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**TRANSMISSION AGENCY OF NORTHERN CALIFORNIA**

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February 14, 2008

West-Wide Energy Corridor DEIS  
Argonne National Laboratory  
9700 S. Cass Avenue  
Building 900, Mail Stop 4  
Argonne, IL 60439

**To Whom It May Concern:**

The Transmission Agency of Northern California (TANC) is pleased to submit its comments to the United States Department of Energy (DOE) related to its West-Wide Corridor Draft Programmatic Environmental Impact Study (PEIS). TANC has submitted similar comments during both the scoping process for the PEIS (written comments were submitted by TANC to DOE on November 28, 2005, as part of the scoping process) and after DOE posted its West-wide map of preliminary draft corridors in June 2006. TANC has also participated in various public meetings related to PEIS development, most recently at DOE's public meeting held in Sacramento, California, on January 8, 2008. TANC appreciates the opportunity to comment on this important process and looks forward to working with DOE in the future to enhance the PEIS and its identification of energy corridors throughout the West. If there are any questions with respect to TANC's comments, please do not hesitate to contact me at (916) 852-1673.

Sincerely,

Bryan W. Griess  
Assistant General Manager

Enclosures

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A Public Entity whose Members include:  
Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Modesto Irrigation District,  
Palo Alto, Plumas-Sierra Rural Electric Cooperative, Redding, Roseville,  
Sacramento Municipal Utility District, Santa Clara, Turlock Irrigation District, Ukiah

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COMMENTS OF THE  
TRANSMISSION AGENCY OF NORTHERN CALIFORNIA  
TO THE  
U.S. DEPARTMENT OF ENERGY'S  
WEST-WIDE ENERGY CORRIDOR  
DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STUDY

The Transmission Agency of Northern California (TANC) is pleased to provide the following comments to the United States Department of Energy (DOE) regarding the West-Wide Energy Corridor Draft Programmatic Environmental Impact Study (PEIS), issued by DOE in October 2007. As indicated in the preceding transmittal letter, TANC has submitted similar comments during both the scoping process for the PEIS (written comments were submitted by TANC to DOE on November 28, 2005, as part of the scoping process) and after DOE posted its West-wide map of preliminary draft corridors in June 2006.

TANC is a California joint exercise of powers agency that provides electric transmission facilities and services to its Members: the California Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah; the Sacramento Municipal Utility District; the Modesto Irrigation District; and the Turlock Irrigation District. The Plumas-Sierra Rural Electric Cooperative is an associate member of TANC. TANC is the largest Participant in, and the Project Manager of, the California-Oregon Transmission Project (COTP), a \$430 million, 339 mile, 500-kV transmission project extending from just north of the California-Oregon border to central California.

In addition, TANC also has an allocation of 300 MW of firm bi-directional service from the Pacific Gas and Electric Company (PG&E) pursuant to the Principles for Tesla-Midway Transmission Service reflected in PG&E FERC Rate Schedule No. 143 (SOTP). TANC receives 300 MW of transmission service across California's Path 15 under the SOTP. TANC has previously explored additional transmission projects, including a Path 15 upgrade project. The Western Area Power Administration (Western), in developing and constructing its Path 15 Upgrade Project, utilized environmental activities previously undertaken by TANC for Path 15.

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TANC is strongly encouraged that Congress included Section 368 in the Energy Policy Act of 2005. TANC agrees that there is a need to designate corridors for electric transmission facilities across federal lands. We believe that the designation of key corridors is a critical step required to begin seriously addressing the improvement of system-wide electric reliability, reduction of transmission congestion, enhancement of the capabilities of the national electric grid, and providing for the further development of a western North American competitive wholesale market.

The western United States and California energy crisis of 2000 and 2001 can be attributed to various causes, but a major component of that crisis was insufficient energy infrastructure. Over the past five years, many of TANC's members and other public power agencies have embarked on ambitious generation resource additions. Unfortunately, California and the west are not "out of the woods" and additional energy infrastructure including generation, transmission and gas pipelines are required to ensure future reliable delivery of electricity to the energy consumers in the west.

Several of the better locations for major new power plants are not located near the West Coast's growing load centers. Wind and geothermal resources must be developed at the location of the energy source, and the opportunity for further development of resources in the Rocky Mountains, and potentially western Canada, requires significant transmission infrastructure to move both renewable and fossil fuel generation to load. Therefore, it is critical that transmission and gas pipeline corridors be established and, more importantly, preserved.

Energy corridors (and eventual transmission lines) in the west will prove critical for the successful development of new abundant energy supplies; however, the energy corridors are only the first step. The actual development of the transmission facilities will require years of planning, engineering, and construction as well as hundreds of millions of dollars to build. Transmission lines will not be built if generation is not also developed to be delivered along the transmission facilities, and the generation facilities will not be developed without transmission facilities to deliver the electricity and customers to purchase the output from the generation plant. Energy infrastructure

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development of this magnitude will require the investment of billions of dollars. Parties will not make this level of investment without assurance of recovery of its costs and the rights to utilize its investment for its own use.

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(cont.)

Utilities responsible for serving load need to have firm, physical rights to justify investments in large projects; TANC believes that this should be a cornerstone of any projects across federal land. *Transmission project participants for projects on federal land and/or sponsored by DOE will need to have the ability and authority for firm, physical transmission rights.*

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Any other proposed treatment of investment will surely leave only speculators to invest in transmission facilities and may result in needed infrastructure not being built. While TANC recognizes that this issue may be outside the current scope of this PEIS, we strongly believe that it is important that DOE establish this principle immediately and that such principle will lead to significantly more participation in the development of needed transmission facilities, which we believe is the intent of Congress.

TANC also believes that in establishing potential corridors DOE should strive to seek corridors that maximize the opportunity for interregional participation and also maximize the opportunity for multiple party participation. When TANC began the development and planning work for the COTP, nearly all of the electric utilities in California, as well as other parties, were invited to participate in the planning, development, and ownership of the COTP. Likewise when the parties that built and own the Mead-Phoenix and Mead-Adelanto Transmission Projects were in the development phases, all interested utilities in the southwestern United States were afforded the opportunity to participate. This approach has led to the joint development of the last two major inter-state transmission projects in the West. Therefore, we believe it important for DOE to solicit input from the electric utilities in the West and other interested parties to define those projects that will be required and where the opportunities for joint collaboration exist.

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In contemplating the criteria for the selection of corridors, TANC recommends that DOE carefully consider and emphasize reliability, fuel and resource diversity, and interregional significance as three potential criteria. Reliability considerations should include the importance of the transmission facilities and the corridor to the power system stability in the Western United States. Fuel and resource diversity considerations should include the ability of the corridor and transmission facilities to increase the utilization of additional renewable resources that could reduce or displace the reliance on natural gas. Interregional importance should be weighed by examining the power transfer capability of a particular corridor and transmission facilities and should also account for those corridors that will promote significant interregional power exchanges.

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As DOE considers land use decisions, it is important that principles be established which will accommodate the conjunctive use of the designated corridors in order to promote the efficient use of federal lands, and ensure that one use for the corridor does not necessarily come at the detriment of other uses. Furthermore, it is particularly important to protect and preserve the existing high voltage transmission corridors that provide the backbone of the transmission system in the Western United States.

TANC has been performing preliminary economic analyses and evaluating routing options for its proposed transmission program, which we believe DOE should consider in identifying right-of-way corridors (to assist in the development of this program). One key element of TANC's transmission program entails the development of a new high-voltage transmission line from northeastern California to northwestern California (near Round Mountain) and continuing to the Sacramento Valley. More specifically, the proposed route begins in the area of Ravendale in Lassen County and proceeds in a westerly direction, connecting with the Round Mountain substation in Shasta County before heading south into the Sacramento Valley. The proposed southern terminus for this program element is near Tracy. This program study area is displayed for DOE's consideration in the attached map, "Proposed TANC Transmission Program Study Area," including proposed "spurs" at the project's southern terminus. Existing Draft Corridors identified by DOE in November 2007 do not include such a route, which

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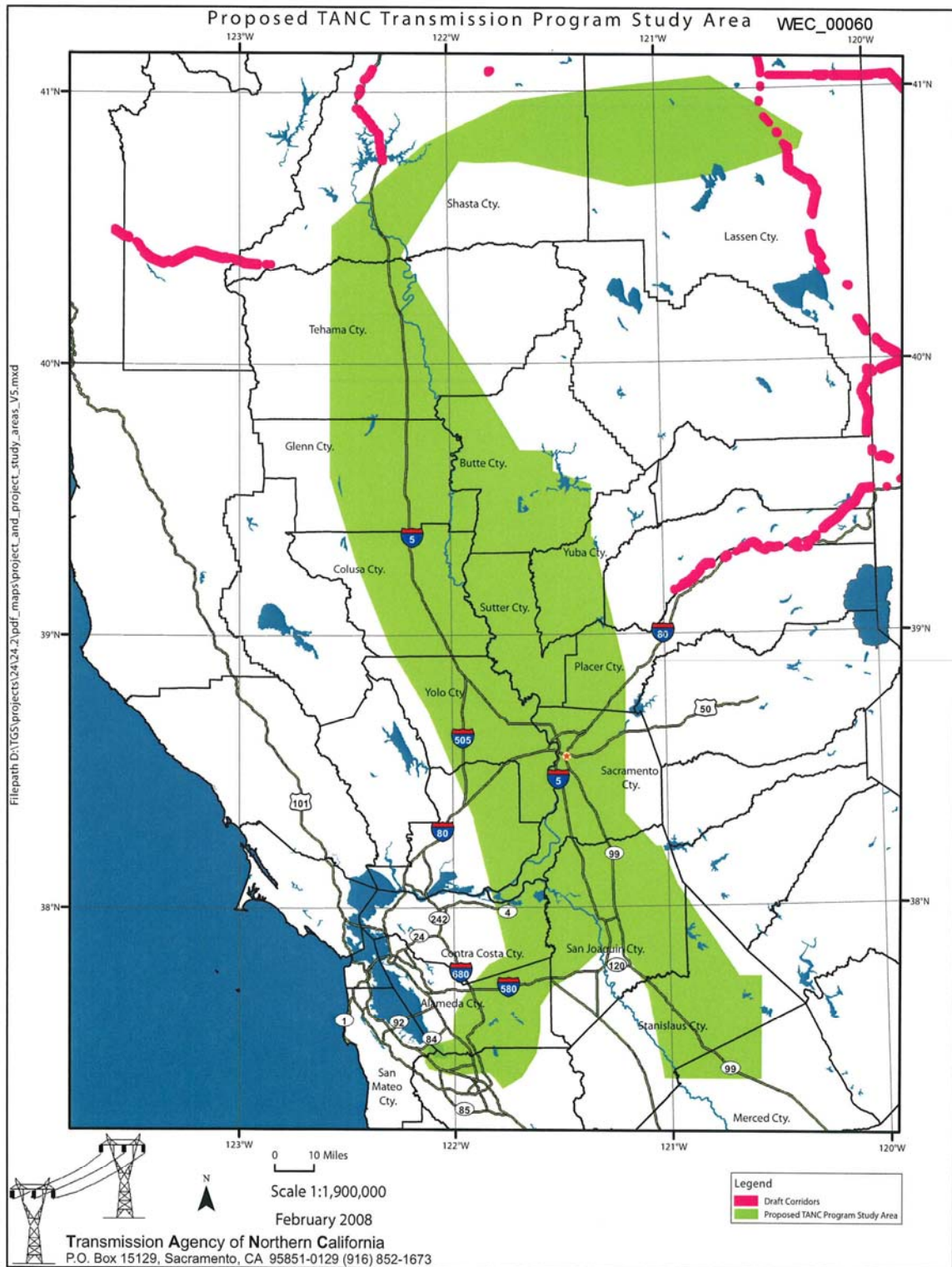
TANC believes to be important in connecting renewable resources in northern California and Nevada to load centers in California.

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TANC is encouraged by the Congress' direction and the efforts to date by DOE to address corridor issues in the West. We believe that much of the past work undertaken by DOE, specifically the Western Regional Corridor Study in 1986, still contains several very important corridor designations in northern California, northern Nevada, the Pacific Northwest, and desert southwest. These corridors, even today, represent critical paths that can serve to interconnect developing generation resources to areas of significant load growth. In addition to these corridors, we believe that other corridors between northern California and northern Nevada, as well as central California and the Greater Bay area, should also be explored to provide valuable access to renewable generating resources and to help relieve congestion.

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Finally, TANC believes that coordinated participation by the federal government is critical to successful development of transmission projects in the West (Western is a participant in the COTP, Mead-Phoenix, and Mead-Adelanto projects). TANC is willing and able to meet with DOE staff and management to discuss our proposed projects and how we may be able to assist DOE in your current efforts. As the Project Manager for the planning, development, land acquisition, construction, and operation and maintenance of the COTP, TANC has developed significant experience in working with multiple agencies and stakeholders to not only plan transmission projects but also to see them built and become part of the solution to a reliable electric grid in the West.



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February 14, 2008

West-wide Energy Corridor PEIS  
Argonne National Laboratory  
9700 S. Cass Avenue  
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~~Via fax: 866-542-5904 (9 pages total)~~ Your web site was not truthful about sending via fax. It won't go through because your machine wouldn't answer.

Re: Comments on Draft PEIS

THE NAME AND ADDRESS OF THE AUTHOR SHALL BE KEPT CONFIDENTIAL

Many changes are required in the PEIS.

I. Perhaps the first and most important change is to clearly and accurately represent the intended scope of the PEIS in its title and in the Executive Summary.

The PEIS is Not An Evaluation of Environmental Impacts of Implementing an Arrangement of Energy Corridors--It is Limited To Evaluating the Environmental Impacts of the "Administrative Action of Drawing Lines on a Map"

The title of the PEIS must be changed as follows to denote its intended scope:

**PROGRAM ENVIRONMENTAL IMPACT STATEMENT  
OF THE ADMINISTRATIVE PROPOSED ACTION  
OF DRAWING LINES ON A MAP**

so that all readers of the PEIS will know the intended scope of the PEIS. Otherwise, readers may be deluded into thinking that the EIS is intended to relate to the effect of actually implementing the Proposed Action on the ground.

The reason that congress and the public may be deluded otherwise is that the PEIS purports to compare the effects of the "no action" alternative and the Proposed Alternative at one location, but at others it says it is only studying the effect of drawing lines on maps.

The Section entitled "What is the Scope of the PEIS" on page ES-9 states in its opening sentence:

"The scope of the analysis in the PEIS includes an assessment of any positive and negative environmental, social, and economic impacts of the alternatives."

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No it doesn't. The "positive and negative environmental, social, and economic impacts of the alternatives" of the "administrative action of drawing lines on a map" are not discussed anywhere. There is no evaluation of these aspects of "drawing lines on a map" for the "no action" alternative.

Inasmuch as the effects of each alternative are nothing more than "drawing lines on a map", it is difficult to see how a comparison can be made. No comparison of the effect of "drawing lines of a map" for the two alternatives is ever reported, because the effect will be only to draw more or fewer or different lines on a map. I'm sure you can see how a person reading the report could be fooled as to the scope, unless you clarify it in the title.

The entire exercise of this PEIS document is, of course, meaningless, by its own self-imposed limitations, and that's what I'm trying to point out. There are many, many examples, but the admissions in the Executive Summary effectively illustrate the point.

A statement on page ES-7 demonstrates that this entire attempt at an EIS is a sham, unless the title of the report is changed to reflect its actual intended scope. Here is what the PEIS states bridging pages ES-6 to ES-7, in justifying its conclusion of "no effects".

"The action agencies reach their 'no effect' determination not because listed species and critical habitat are unlikely to be present in the corridors described in the alternatives. Table 3.8-5 identifies numerous listed species that occur in the 11 western states where energy corridors could be designated. Portions of the corridors would likely include areas occupied by the listed species or within critical habitat.

The action agencies considered preparing a biological assessment and initiating consultation with USFWS [US Fish and Wildlife Service] and NMFS [National Marine Fisheries Service] under Section 7(a)(2). After discussing various approaches, the action agencies determined, however, that the administrative action of drawing lines on a map to designate energy corridors would have no effect on listed species or critical habitat. Preparing a biological assessment before a site-specific project had been proposed to the agencies would be based largely on conjecture or speculation." [emphasis added]

In the middle of the second column on page ES-7, we learn:

"Officials at NMFS do not agree with the action agencies 'no effect' determination. In a written communication received in June 2007, NMFS states that the designation of energy corridors in areas that contain salmonids and their critical habitat 'may affect' listed species."

And how does the PEIS take NMFS's objections into account? Reading at the

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bottom of the second column on page ES-7 and continuing to page ES-8:

“Having carefully considered NMFS’s position, the action agencies maintain that the Proposed Action would have no effect on a listed species or critical habitat. For the reasons stated above, the action agencies found no causal connection, whether direct or indirect, between the mere designation of energy corridors (by land use plan amendment) and any effect on the listed species or critical habitat.”

So the Proposed Action and the scope of the EIS on this issue is expressly limited to “the administrative action of drawing lines on a map”. Drawing lines on a map doesn’t affect any animals on the ground, so one gets a conclusion of “no effect”.

If this logic is true for salmonids and their critical habitat, it must be true for the rest of the PEIS as it is now written. The entire assessment presented in the PEIS is of the environmental effect of “the administrative action of drawing lines on a map”. Wildlife, trees, people, historic sites, fossils, health, socioeconomic issues--none of these are affected in any way by the “administrative action of drawing lines on a map”. Why in the world are hundreds of pages needed to report that “the administrative action of drawing lines on a map”, has “no effect” on anything in the 11 Western States, particularly if the drawing is done in Argonne, Illinois?

I could have saved you all a lot of time and money if you had written me at the start of this PEIS project and told me up front that the PEIS was limited to an evaluation of the environmental effect of “the administrative action of drawing lines on a map”. Heck, the environmental effect is maybe to use up a little paper and pay the salaries of the writers of the report. Since they are in Argonne, Illinois, no effect on us out West.

This bureaucratic doubletalk in ducking the issues of the PEIS is truly frightening in its implications for government and American citizens. Someday when the “action agencies” report to congress, they will represent that they performed an Environmental Impact Statement. They will report to congress that they spent millions of dollars on the Environmental Impact Statement, and they will publicize their having performed the Environmental Impact Statement and worked closely with the various interested parties and stakeholders. That is a major thrust of the PEIS as it is now written.

I went to the trouble of reading the PEIS. What will citizens believe who simply read the Q&As on the public website:

“Why are the agencies preparing a Programmatic Environmental Impact Statement?

“The agencies also chose to prepare a PEIS because it is a well-established vehicle for examining environmental concerns and a familiar mechanism for public participation in important resource management

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actions. Council on Environmental Quality (CEQ) regulations direct agencies to prepare EISs at points in the planning and decisionmaking process that are meaningful. Preparing a PEIS now is consistent with this regulation, even though the analyses reported in the Draft PEIS conclude that designating corridors would have no on-the-ground environmental effects."

I can't understand why you didn't clearly state here, or, even better, on the first page of the public website, that the scope of the PEIS is expressly limited to "the administrative action of drawing lines on a map" and that the physical act of drawing lines on a map never has an environmental impact, except maybe on a few trees and to generate salaries for the drawers of the lines and the authors of the report.

Will the "action agencies" straightforwardly report to congress and the American people that they spent the millions of dollars for the Environmental Impact Statement to evaluate "the administrative action of drawing lines on a map"?

At the very least, they must have an accurate title for the document, as set forth above.

II. The Public Was Denied Any Effective Participation in the Process

A. Choice of administration and process

This exercise is administered by Argonne National Laboratory, located half way across the country from our area in Nevada. Based on the process described in the PEIS, apparently what happened is that employees of Argonne National Laboratory and possibly some other federal employees were instrumental in the major initial decisions of "drawing lines on a map", based on essentially no personal knowledge, and then federal land managers and representatives of hostile foreign governments were allowed to tinker with the plan to their advantage.

There was essentially no input from the affected citizens of the United States of America at the early stage. They are given the opportunity to "comment" on what has already been decided against their interests.

B. Effective Exclusion of Participation of Affected American Citizens Prior to and During the Process of the PEIS

Meetings were held, but the public of affected American citizens was effectively denied participation in nearly all cases. For example, there were meetings held in Las Vegas, Nevada, that were supposed to cover the entire state of Nevada, in the early stages, and in the later stages we were thrown a bone of an additional meeting in Elko, Nevada. Our area, where several of the proposed lines on the map are drawn, is located over 400 miles from Las Vegas and over 300 miles from Elko.

The strategy to exclude public participation was centered around providing public participation to representatives of large companies from this area who were financially able

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to travel to Las Vegas, and those such as hostile foreign governments invited to sit at the table. The hundred million or so affected American citizens were effectively denied participation by this same process.

If participation via written comments carries the same weight as by personal appearance and sitting at the decision-making table, then everyone should have been limited to the same participation.

To put this in perspective, how about a committee of the residents of Lyon County, Nevada mapping new energy corridors down the residential streets of Argonne, Illinois? We will do that with essentially no knowledge of your area. But you will be allowed to participate by traveling to public meetings in Des Moines, Iowa, or Columbus, Ohio, or Lexington, Kentucky to give your two-cents worth after we have already decided where to run the corridors down your streets. Those cities are about as far away from Argonne, Illinois as Las Vegas, Nevada is from us.

The public was allowed to submit comments. Appendix B of Volume II summarizes those comments. Significantly, there is no statement as to how the authors of the PEIS responded to those comments by altering the plan.

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III. The Public Was Denied Any Informed Participation in the Process

Intelligent participation, and an opportunity to effectively participate, were denied to American citizens and made available to hostile foreign governments.

The public of American citizens were excluded by not providing proper and sufficient data for informed and intelligent participation. Maps were presented of the proposed energy corridors. Those maps were of too coarse a scale to determine exactly where the proposed energy corridors were to run. I drove out to one of the general areas with a copy of the map, and I certainly could not tell where the proposed energy corridor was to run. It was not marked by survey stakes or anything of the sort that I could find.

If American citizens had been allowed to participate, say by properly noticed public meetings held in the county seat of each affected county, detailed maps and corridor descriptions would have been presented at each meeting. Then the American citizens could have traveled the route of the proposed energy corridors to gather information to make informed comments. As it is, the process of defining 6000 miles of proposed corridors in this one report is simply at too coarse a scale for effective participation by American citizens.

On the other hand, others were given a place at the stakeholders' table. Representatives of Indian governments--which are hostile foreign powers relative to American citizens--were given a place but American citizens were excluded by the process. And guess what--the hostile foreign governments didn't want the energy corridor lines drawn on a map of their lands, and that's exactly what they got.

Nevada and Lyon County Nevada, and thence their citizens, were not represented at the stakeholders' table. The state of Wyoming and some of its counties were.

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IV. The PEIS Is a Sales Document for a Predetermined Result, Not a Fair Evaluation of Competing Alternatives

The PEIS claims to evaluate two competing alternatives, a "no action" plan and the "proposed plan". The "no action" plan is given very little space beyond the 1-1/4 pages of evaluation at pages 2.1 and 2.2 of the PEIS, and a little lip service elsewhere. The "no action" plan is essentially discarded because it allegedly won't have any section 368 impacts. Wait a moment--if the "no action" alternative has no section 368 impacts, why are you talking about it at all? Certainly if a utility company wanted to built power lines across federal land, the impacts would have to be evaluated. Instead, the "proposed plan" is given hundreds and hundreds of pages of evaluation, enthusiastically prepared by people half a continent away who have no knowledge of our local areas. Is there any question as to how the competitive evaluation will turn out?

I could not even find a map of the "no action" plan in the PEIS. Perhaps it is there, but I couldn't find it. Absent a map and a concrete understanding of what the "no action" plan entails, how can you even talk about it? You certainly can't evaluate and compare it.

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The PEIS treats the "Proposed Action" as an all-or-nothing proposition, and it is not. There must be a "no action" plan considered for every utility objective of the proposed energy corridor system. For example, if the utility needs a right of way from Reno to Las Vegas, there must be an evaluation of the "no action" plan and the proposed plan for that utility objective. There is absolutely no reason why each proposed segment should not be individually considered, and that is what happens under a proper "no action" plan.

If a utility company wants to build a power line through some part of Lyon County, Nevada, it makes a proposal that is presented to the public in Lyon County, Nevada, not in Las Vegas, Nevada over 400 miles away or Elko Nevada, over 300 miles away. The utility company could never get away with proposing hearings 300 or 400 miles away concerning a local stretch of utility line. In a local hearing, the public would know exactly where the utility line is to run, and can provide comments so that local variations can be taken into account.

Further, the proposing utility company has to make a complete proposal. The present PEIS apparently covers only corridors that run on federal land. But it is obvious that such cannot be the case. The corridors must cross some state, county, municipal, and/or private land. At the very least, the corridors must cross state highways. State approval must be obtained for such crossings. No provision is made for gaining such approvals in the PEIS. But that is what would have to happen in a conventional "no action" plan. A utility will propose a right of way, it will be considered by local residents, and action may or may not be taken as the utility proposed.

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As it is now and would be the case under the "no action" plan, when there is a proposal to run a utility line, there are public hearings at the location where the utility line is to be run. Local concerns can be raised by the affected American citizens, not limited to a few special interests and hostile foreign governments designated by the Action

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Agencies.

The evaluation of the "no action" plan omits any mention of the most important virtue of the "no action" plan. That virtue is local input to the planning process.

In short, the "no action" alternative is nothing but a straw man set up with rules that guarantee that it will be easily knocked down.

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(cont.)

V. The PEIS does not take into account other federal and other governmental priorities and laws

Although there is a listing of federal laws that are said to be considered, this listing is incomplete. Had the authors consulted with local governments and American citizens familiar with their individual areas, they would have learned that and been able to include all of the relevant federal laws.

There is no showing that applicable state, county, and municipal laws and ordinances, and private property rights, were taken into account. It might be thought that these are not relevant if the energy corridor is to run only on federal land, but of course that is not possible.

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VI. The PEIS is based upon an approach that is not viable, where state and local interests are not taken into account

As noted, most states, counties, and American citizens were excluded from the planning process. The document purports to deal only with energy corridors on federal land, as though American citizens have nothing to say about how their federal lands are used.

Further, the energy corridors cannot be sustained on federal land only. They must traverse state, county, municipal, and private lands at some points. These points cannot be determined from the coarse-scale information given in the PEIS, but it is necessarily the case that the energy corridors must cross state and county highways. By effectively excluding the public from the process, the energy corridor plan is doomed to failure because there is no reason to believe that the public will allow its state, county, municipal, and private land to be crossed when necessary. If, for example, a County Commission in Lyon County, Nevada, says 5 years from now that the power company may run a utility line across a county road, but at a location 10 miles laterally away from the "energy corridor", the energy corridor becomes useless as a planning device.

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VII. The Commenting Process is Set Up to Discriminate Against American Citizens

On the web site, it is emphasized that comments of American Citizens may not be anonymous.

Yet a major part of the input to the PEIS by the federal government and

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representatives of hostile governments is anonymous. The identities of federal land managers, hostile governmental officials, and others who provided input is not provided, nor is the specific input provided by each such person identified with that person by name.

VIII. The PEIS Does Not Consider Important Aspects of American Culture

The PEIS emphasizes indian culture, but does not address important aspects of our American culture. For example, the proposed route of Corridor 18-23 appears to overlap important American cultural features without any regard for them, and the features are not listed in the appropriate Appendix . (Although with the coarseness of the scale, the exact route cannot be determined with certainty.) Our cultural resources are just as important to us as are those of the hostile foreign governments to them. If the approach for developing the proposed corridors had included local meetings so that American citizens could participate, rather than being limited to federal employees and hostile governments in this area, these important aspects of our culture could have been taken into account.

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(cont.)

IX. The PEIS is Woefully Inadequate in its Assessment of Corridors 18-23 and 18-224.

I have carefully reviewed Appendices G, L, M, P, and Q of Volume II, as I am very familiar with portions of this area along which proposed Corridors 18-23 and 18-224 run (to the best I can tell from the coarse-scale maps provided).

There are important sensitive resource areas not listed in Appendix G.

There are important fossil formations that are not listed in Appendix L.

There are important water resources that are not listed in Appendix M. You should check with other federal agencies if you think your "none" identification is correct for Nevada.

There are important visual areas not listed in Appendix P.

There are important archeological, historical, and ethnographic elements not listed in Appendix Q.

"The administrative action of drawing lines on a map" won't affect any of these, so perhaps that is why they are omitted. On the other hand, other entries in these appendices are similarly unaffected by "the administrative action of drawing lines on a map", so I don't know why they are listed.

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X. Changes that Shall be Made to Make the Energy Corridor Approach Viable

1. The existing energy-corridor plan shall be scrapped as having been made without effective public input.

2. The planning process shall be restarted with proper public participation from the beginning.

3. The planning process shall be managed by a local entity with knowledge of the issues in each community, not someone in Argonne Illinois who has no familiarity with our American West.

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4. There shall be state and local governmental participation at all stages.

5. There shall be multiple public meetings in the county seat of every county that the proposed energy corridor is to traverse. In the first meeting, the public shall be given the precise location of the proposed energy corridor, and where it is to traverse state, county, municipal, or private land. In subsequent meetings, after the public has had the opportunity to evaluate the proposed approach, the public shall have a full opportunity to provide necessary changes that must be made to the proposed energy corridor, on an equal footing with federal agencies and hostile foreign governments. A "no action" alternative shall be considered in each case for each county.

6. The PEIS shall be directed to what should be evaluated, the actual environmental impacts of the proposed action. If it is limited as it is now, it shall be titled: "PROGRAM ENVIRONMENTAL IMPACT STATEMENT OF THE ADMINISTRATIVE PROPOSED ACTION OF DRAWING LINES ON A MAP". There shall be a clear statement up front in the PEIS, perhaps on the cover sheet itself, and on page 1 of the website, that "The administrative action of drawing lines on a map' by definition has no environmental impact, other than perhaps in using up paper and providing salaries to those who draw the lines, so we don't know why we spent all of this time and money writing the PEIS".

7. The action agencies shall report to congress and the American people as to how much money was spent to evaluate the environmental impact of drawing lines on a map.

Sincerely,



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February 14, 2008

West-wide Energy Corridor PEIS  
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Argonne, IL 60439

Re: More Comments on Draft PEIS

THE NAME AND ADDRESS OF THE AUTHOR SHALL BE KEPT CONFIDENTIAL

I write further to Point I of my letter of earlier today.

I have pondered upon the consequences of your attempt to limit your responsibility to the "administrative action of drawing lines on a map".

At first, my reaction was that this self-defined limitation by the Action Agencies, which is not supported by law, was just a typical government dodge to avoid responsibility for doing the right thing, to push the problem off into the future, and to deceive the Congress, the President and the public in a manner whereby ANL and the Action Agencies can avoid accountability for their actions. There are certainly lots of weasel words in the PEIS supporting this concept by ANL and the Action Agencies. After all, how could this kind of playing with words and phrases hurt anyone?

Then I realized that the attempted self-defined limitation to the "administrative action of drawing lines on a map" by the Action Agencies is an enormous detriment to the West and a disservice to its citizens, and a subversion of the intent of Congress and the President in passing Section 368. Congress and the President, the representatives of the American people, clearly intended there to be some substance to this effort, and the Action Agencies have subverted that intent by attempting to limit the consequences of their actions to "the administrative action of drawing lines on a map".

I realized why this subversion of the intent of Congress, the President, and the public is wrong. There are at least seven reasons.

First, your PEIS contains false statements made with the intent to deceive Congress, the President, and the public. To positively conclude "no effect" when a federal agency such as NMFS, within its legal scope of responsibility, has indicated that the Proposed Action "may affect" listed species", is a knowingly false statement made with the intent to deceive. Its that simple.

Second, the essence of the argument of the PEIS that NMFS' position may be ignored with impunity is that NMFS had a misunderstanding of the objective of the work: NMFS read Section 368 to understand, as would most people, that the PEIS was serious about evaluating environmental impacts, whereas the position of the PEIS is that it is not

WVEC\_00061

-3-

excuse that "the administrative action of drawing lines on a map" has no real on-the-ground effects in the world. Consequently, all of the conclusions of the PEIS are suspect.

Fifth, as I pointed out in my letter of yesterday, the Action Agencies and ANL need to scrap what has been done to date in respect to environmental issues, and to start over with a proper concept of their mission. You must revise your thinking to view your environmental mission as an initial screen to remove potential corridors with known or probable adverse environmental consequences. The PEIS is correct that it cannot ensure environmental approval in the future, but it must screen out any proposed corridors that have currently known or likely adverse environmental consequences, not sweep those adverse environmental consequences under the rug in an attempt to mislead the Congress, the President, the public, and the utilities. All you have done so far is to select potential corridors that make certain governmental agencies and hostile powers such as the indians happy. What makes these governmental agencies and the hostile powers happy does not necessarily result in acceptable consequences under the environmental laws. What the PEIS in its present form does is to lure utilities down the wrong path in many instances.

Sixth, you have done a great disservice to future federal employees who will be tasked with making decisions about whether to allow the utilities to run their lines through sensitive areas. Once the utility company has spent a great deal of time and money planning its utility line through the pre-designated corridor of "lines drawn on a map", and pointed out that the EIS done in the corridor study in 2007-2008 found "no effect", the future federal employees will be pressured to ignore those salmonids and critical habitat identified by NMFS, as well as other legitimate environmental concerns raised in the PEIS and that were similarly falsified.

Seventh, your actions will lead to extensive lawsuits as a result of the confusion over the meaning of the Section 368 study, that will further delay and increase the cost of utility projects.

There is an old saying--"what a tangled web we weave, when first we practice to deceive". The PEIS seeks to deceive the Congress, the President, the public, and the utilities by presenting itself as an Environmental Impact Statement of the Section 368 mandate. Upon digging we find that it erroneously limits itself to "the administrative action of drawing lines on a map" and "mere designation of energy corridors".

I urge you to change your mind-set and do your job right.

Sincerely,

WEC\_00062

Roland W. Wright  
P.O. BOX 515  
PIONEERTOWN CA 92268

February 13, 2008

West-wide Energy Corridor DEIS  
Argonne National Laboratory  
9700 S. Cass Avenue  
Building 900, Mail Stop 4  
Argonne, IL 60439

I am writing you today to protest the Los Angeles Department of Water and Power's proposed Green Path North Project. Not only is it using old technology, but it duplicates electric paths already in existence.

Rather than create electricity in another state and then transport it to Los Angeles it makes more economic sense to make it in the Los Angeles area and save the millions and millions of dollars that it would cost building the new transmission towers.

Years ago Los Angeles amended their building code to require all tall buildings have a flat roof. Each of those rooftops could easily support a huge array of solar collectors, creating enough electricity to cover LA's additional electric needs for a long time. Indeed, to be a green city, as the mayor has stated, would require all the citizens of the city to find ways to save and create more energy. Unfortunately, all they have proposed so far is to build a long transmission line and bring in power from Nevada and Arizona.

We have a home in the Pipes Canyon area of Pioneertown, a beautiful unspoiled corner of the Mojave Desert. The view from our porch looks down the canyon and is breathtaking. The proposed Transmission lines would come within a stone's throw of our home and our view would be spoiled with huge towers and wires. The value of our property would certainly drop by a huge amount, as would all our neighbors.

We are able to walk on BLM land and within a quarter of a mile of our house we can see where centuries ago Native Americans camped and carved

62-001

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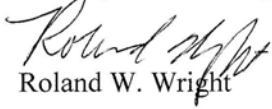
petroglyphs in the huge rock formations. All this is threatened because the proposed path of the transmission lines will be routed through that area. The beautiful flat-topped mesas would be spoiled for all future generations with ugly transmission towers crossing them. Please do not let this happen

The Route 10 Corridor already has transmission lines and would be a ready made solution if LA really needs the power. There are no legal procedures necessary to condemn the land and this would save the City a tremendous amount of time and money.

I know that a lot of this has already been said, but this little corner of the Mojave Desert means so much to me, my neighbors in Pioneertown and the millions of people who come here each year from all over the world to marvel at the beauty of this area. It would be terrible to have to tell future generations "you should have seen how it used to be".

Please don't let this happen.

Thank you for reading this,

  
Roland W. Wright

62-001  
(cont.)

WEC\_00063

JAMES W. ZION  
Attorney at Law  
3808 Ladera Drive N.W.  
Albuquerque, NM 87120

(505) 839-9549  
JZion@aol.com

February 14, 2008

West-wide Energy Corridor DEIS  
Argonne National Laboratory  
9700 S. Cass Avenue  
Building 900, Mail Stop 4  
Argonne, IL 60439

Fax: (866) 542-5904

Via fax and first class mail

Dear West-Wide Energy Corridor people:

I represent The Forgotten People. It is an informal organization of survivors of the Navajo-Hopi Land Dispute, including Navajos who were evicted from "District 6" (the exclusive Hopi area), relocatees from the former Joint Use Area, those who were victimized by the forty-year "Bennett Freeze" on development, and those who suffer from relocation.

The group supports the comments of Dooda Desert Rock because individuals of The Forgotten People will be adversely impacted by the western energy corridor. The map on your web site shows one corridor ending on the northwest of the Navajo Nation, another entering at the "bear's tail" near my clients, and you can see the Hopi Reservation within. We will not be fooled—the external corridors are going to link up with ones inside the Navajo Nation, and that means my clients.

We agree that the "environmental justice" considerations that apply under Executive Order 12898 must be read in light of the provisions of the United Nations Declaration on the Rights of Indigenous Peoples. The right of the people to their culture, land and life-ways are precisely what is envisioned in the executive order. Texts on environmental law treat the situation of American Indians as a unique subset of the categories of "minority" and "poverty," and the Declaration correctly states principles of international customary law. We are not fooled when people say that the Declaration isn't "binding." It is not binding as such, but to the extent it states principles of international customary law (which it does), it does state standards that apply to you.

Please make no mistake about our positions. We know that the external corridors are to be linked to the Dine Power Authority internal ones and there are other likely corridors. Effectuating any corridor within the Navajo Nation is going to impact the rights of individual Navajos.

63-001

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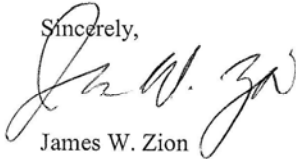
Some Navajos who were to be relocated from "District 6" attempted to get compensation for their customary use rights. A federal court told them that Indian customary use title is not "property" for purposes of compensation. The Declaration on the Rights of Indigenous Peoples, adopted by the United Nations General Assembly on September 7, 2007, clearly states that customary land tenure is valid, and the Inter-American Court of Human Rights ruled that lands held by Indian customary use are compensable "property" under the international law right to property. *The Case of the Mayagna (Sumo) Awas Tingni Community v. Nicaragua* (Inter-American Court of Human Rights, August 31, 2001).

We are also talking about the "right to be Indian" under the Declaration, and its right to self-determination is a right to be exercised by The Forgotten People as a distinct subset of the Navajo People. *Indian Country Today* recently called upon all Indian nations to observe the Declaration, so it should establish rights for individuals as against the Government of the Navajo Nation.

Whoever wrote the environmental justice portion of the PEIS did not understand the concept of environmental justice, and there was no meaningful consideration of the place of Navajos in the plan. If, as some say, the PEIS does not affect or cover Navajos, then why was a hearing held in the Navajo Nation capitol at Window Rock?

Given obvious defects in the PEIS it should be redone. Alternatively the comment period should be extended. We agree with Dooda Descrt Rock that there should be more hearings within the Navajo Nation, and there should be educational outreach on the contents of the PEIS orally and in Navajo. That should be done by radio, television, and in audio materials for the chapters.

Sincerely,



James W. Zion

63-001  
(cont.)

WVEC\_00064

February 14. 08

To Whom It May Concern:

As a concerned citizen I would like to comment on the PEIS. I strongly oppose it! Every day we Americans are losing our freedoms. The very idea of a 11/2 mile corridor crossing across North America is repulsive!

Citizen's rights and Property rights are being totally obliterated in favor of banks and corporate interests. The rights of the people are not being heard and are being totally ignored. I keep hearing how other people in other countries want to destroy "our way of life". when right under our noses things like this. and ideas like this are accomplishing it.

If Congress has approved this idea then they are wrong. I believe in Democracy and the United States! The "No Action" Alternative is the only way I vote on this issue. I strongly oppose the "One World" idea" this wipes out what our forefathers and every soldier has ever faught for.

I do support wildlife corridors. Right now wildlfe are prevent<sup>ed</sup> from migrating by the wall being built between the U.S. and Mexico- this is shameful. Are we no better than the Communists? I do believe in legal immigration.

For your information I am a Retired Teacher, and a lifetime Educator I hope you will take my comments to heart!

I believe that most Americans would rather be "less secure" than lose any more of their freedoms!

P.S.

I am presently  
a Docent at the  
Albuquerque Museum  
of Nat + History  
& the Hb of America  
Haven since 2000.

Very sincerely-

Betty J. Pritchard  
Betty J. Pritchard

64-001

WEC\_00065

# UINTAH COUNTY



STATE OF UTAH

*Our past is the nation's future*

COMMISSIONERS:  
 David J. Haslem  
 Jim Abegglen  
 Michael J. McKee  
 ASSESSOR - Gayla Casper  
 ATTORNEY - JoAnn Stringham  
 CLERK/AUDITOR - Michael W. Wilkins  
 RECORDER - Randy J. Simmons  
 TREASURER - Donna Richens  
 SHERIFF - Rick Hawkins  
 SURVEYOR - Robert Kay

February 14, 2008

West-side Energy Corridor PEIS  
 Argonne National Laboratory  
 9700 South Cass., Ave., Bldg. 900, Mail Stop 4  
 Argonne, IL 60439

RE: PEIS of Energy Corridors on Federal Lands

To whom it may concern:

Thank you for the opportunity to comment on the Programmatic Environmental Impact Statement for the Designation of Energy Corridors on Federal Lands in the 11 Western States.

We are in full support on the proposed actions of preserving energy corridors throughout the West.

Uintah County, Utah would like to see additional corridor preservation in our area. We have vast natural resources of natural gas, oil, oil shale and tar sands. Transportation of energy is an important issue as we seek to secure ample energy for our area and throughout the country.


We have no further comments at this time but reserve the right to comment at a later date if warranted.

Sincerely,

UINTAH COUNTY COMMISSION

  
 Michael J. McKee, Chairman

  
 David J. Haslem

  
 Darlene R. Burns

65-001



WEC\_00066



P.O. BOX 435 → HUSON, MONTANA, 59846 → (406) 626-5675

February 13, 2008

West-wide Energy Corridor DEIS  
 Argonne National Laboratory  
 9700 S. Cass Avenue  
 Building 900, Mail Stop 4  
 Argonne, IL 60439

**Re: Designation of Energy Corridors on Federal Land in the 11 Western States**

---

As an all-volunteer citizens' group working for over two years to protect the movement of wildlife through the regionally-critical Ninemile Wildlife Corridor, the Ninemile Wildlife Workgroup has serious concerns with this federal proposal. It is vague in its implications, top-down mandated on behalf of private industry, lends itself to increased national energy consumption at a time when the need to cut consumption has become blatantly obvious, and has the potential to wreak havoc with Montana's natural resources, of which the wildlife resource concerns us most specifically.

66-001

The Ninemile Wildlife Corridor is recognized by federal and state agency biologists as one of only a handful of movement areas between Missoula and the Montana-Idaho state line still available to wide-ranging species. It connects the Northern Continental Divide Ecosystem (Crown of the Continent) with the Selway-Bitterroot (Selkirk-Selway) and Cabinet-Yaak Ecosystems—core biological “preserves,” if you will, for many species of concern. Movement is already constricted by onrushing development in the wildland-urban interface. An energy corridor of the magnitude envisioned in this PEIS has the potential to be devastating to remaining wildlife movement zones, in particular in narrow intermontane valleys, as is common in western Montana. We are already dealing with a reluctant federal highway administration in trying to address the enormous toll taken on migrating wildlife (and many humans) by a highway system built in the very same drainages.

66-002

Therefore, serious consideration must be given UP FRONT—not as a “mitigation” addendum—to the very real consequences on the ground of ramming a two-thirds-mile-wide energy transport corridor through very sensitive AND VERY ECONOMICALLY VALUABLE wildlife habitat.

Thank you for your consideration of above comments, and the opportunity to input them.

Sincerely,

Eleanor Danesh, Coordinator

cc- Peter Gaulke, Lolo National Forest

“Maintain wildlife movement areas so that wildlife populations can live and move freely and securely through the mixture of public lands, private lands, and transportation corridors.”

WEC\_00067



West-wide Energy Corridor DEIS  
 Argonne National Laboratory  
 9700 S. Cass Avenue  
 Building 900, Mail Stop 4  
 Argonne, IL 60439

February 13, 2008

**Re: Scoping Comments for the West-wide Energy Corridor Programmatic Environmental Impact Statement**

Thank you for the opportunity to comment on this programmatic DEIS. Friends of Nevada Wilderness has been actively involved with the conservation of Nevada's wild places for over two decades. Many of our 1,300 members recreate on public lands throughout the state including areas affected by this proposal. They enjoy hiking, camping, wildlife viewing and the observing the wealth of archaeological and botanical resources in these areas.

We are concerned that there seems to be no mechanism for alternatives in this document. While this is a West-wide document, there are some very specific concerns in Nevada. With the expansive growth in the Las Vegas valley the document fails to adequately address the issue of "choke points" those areas where there isn't physical space for a 3500 foot wide corridor.

67-001

The document does not consider other alternatives or the impacts to the wildlife and wilderness values of the Desert National Wildlife Range or to the north and west sides of the Spring Mountains which currently are only impacted by small power lines. We are concerned that there are other proposals from other companies that do not seem to be in sync with this one. The Kern River pipeline proposal is one of those.

The DEIS does not address the impact of new and expanded corridors on sage grouse populations in habitat traversed by these new or greatly expanded corridors. Sage grouse populations have seen dramatic over much of its range within Nevada. Power lines have been identified as a significant cause of population declines within a couple of miles of the power line. The north-south corridor in Eastern Nevada traverses over two hundred miles of good sage grouse habitat.

67-002

Friends of Nevada Wilderness also has concerns with the necessity of the Reno to Las Vegas corridor. Even with full development of all the proposed geothermal projects in Western Nevada that corridor is not critical. It appears to cross some areas such as the Agai Pah Hills along Walker Lake that should not be disturbed. Why would this corridor not follow US Highway 95?

67-003

WEC\_00067

We are hopeful that when specific EISs are prepared for individual segments in the future that workable and sensible alternatives are prepared and analyzed with full participation from knowledgeable local land managers and the public.

Sincerely,

A handwritten signature in black ink, appearing to read "Shaaron Netherton". The signature is written in a cursive style with a large initial "S".

Shaaron Netherton  
Executive Director  
Friends of Nevada Wilderness



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4610

Web site: <http://gf.state.wy.us>

WEC\_00068

GOVERNOR  
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BILL WILLIAMS, DVM – President  
JERRY GALLES – Vice President  
CLARK ALLAN  
CLIFFORD KIRK  
FRED LINDZEY  
RON LOVERCHECK  
ED MIGNERY

February 12, 2008

WER 11270  
U.S. Department of Energy  
Draft Programmatic Environmental  
Impact Statement for the Designation of  
Energy Corridors in Eleven Western States

West-wide Energy Corridor Draft PEIS  
Argonne National Laboratory  
9700 S. Cass Avenue, Bldg. 900  
Mailstop 4  
Argonne, IL 60439

Ladies/Gentlemen:

The staff of the Wyoming Game and Fish Department has reviewed the Draft Programmatic Environmental Impact Statement for the Designation of Energy Corridors in Eleven Western States and Notice of Public Hearings. We offer the following comments.

At this time, because we do not know the specific locations of future projects, we cannot give comprehensive input on issues and concerns regarding terrestrial wildlife and aquatic resources from designating corridors on Federal lands for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities.

However, in general, locating additional energy lines would be most efficient and have the least impacts if they were sited along existing corridors. We realize some of the spacing requirements associated with security issues, and thus recognize the width of some of the corridors will increase significantly, but this is still more desirable than establishing an entirely new corridor. New corridors will require a great deal of environmental analysis on public lands and a considerable condemnation process for private lands. If a new corridor were required, it would best be sited along already linearly disturbed areas such as major highways and railroads.

68-001

Likewise, there should obviously be an avoidance of sensitive habitats and areas, such as crucial and sensitive wildlife habitat areas, wildlife concentration areas, major avian migration routes, stream and river crossings, national wildlife refuges, and national monuments that also serve as important wildlife refugia. Timing of construction activities as well as long-term maintenance activities should be sensitive to seasonal needs of wildlife and fish in key habitat areas.

68-002

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February 12, 2008  
Page 2 - WER 11270

Consultation with state wildlife agencies should be part of the established protocol when more detailed planning of routes is undertaken, particularly in states like Wyoming where the wildlife resource is an important part of the state's economic infrastructure and lifestyle.

68-003

Thank you for the opportunity to comment.

Sincerely,



*John Emmerich*  
JOHN EMMERICH  
DEPUTY DIRECTOR

JE:VS:gfb

cc: Steve Furtney, Governor's Planning Office

Feb 14 2008 11:56AM DEPT OF NAT RES AMP DIV 3609021789

P. 2

WEC\_00069



WASHINGTON STATE DEPARTMENT OF  
**Natural Resources**

DOUG SUTHERLAND  
Commissioner of Public Lands

February 8, 2008

West-wide Energy Corridor DEIS  
Argonne National Laboratory  
9700 S Cass Avenue  
Building 900, Mail Stop 4  
Argonne IL 60439

**SUBJECT: Comments on the West-wide Energy Corridor Draft PEIS**

The Washington Natural Heritage Program (WNHP) is responsible for maintaining information on Washington's rare plant species and high-quality or rare native ecosystems, as well as cooperating with the Washington Department of Fish and Wildlife to assist in the maintenance of information on some of the state's animal species of concern.

We have reviewed the proposed energy corridor location and have identified several rare plant species that occur within one-mile of the corridor. I have attached a summary of this information. The WNHP information system is dynamic and should be queried for current information for each proposed project within the energy corridor.

We recommend considering the protection of rare species when evaluating applications for projects within the energy corridor. The biological evaluation should include state-listed as well as federally-listed species. In addition to consultations with the US Fish and Wildlife Service under Section 7 of the ESA, the Washington Natural Heritage Program, Washington Department of Natural Resources, should be consulted for rare plant species, and the Washington Department of Fish and Wildlife should be consulted for animal species of concern.

69-001

Thank you for the opportunity to provide comments on the West-wide Energy Corridor DEIS. Please call me at (360) 902-1697 if you have any questions, or contact me by e-mail at [sandra.moody@dnr.wa.gov](mailto:sandra.moody@dnr.wa.gov).

Sincerely,

Sandy Swope Moody, Environmental Review Coordinator  
Washington Natural Heritage Program

Enclosures

Asset Management & Protection Division, PO Box 47014, Olympia WA 98504-7014



Feb 14 2008 11:56AM DEPT OF NAT RES AMP DIV 3609021789

p.3

WEC\_00069

WASHINGTON NATURAL HERITAGE INFORMATION SYSTEM  
 ENDANGERED, THREATENED AND SENSITIVE PLANT SPECIES  
 IN THE VICINITY OF WEST-WIDE ENERGY CORRIDOR IN WASHINGTON

Data Current as of February 2008  
 Page 1 of 1

<u>TOWNSHIP, RANGE</u>	<u>ELEMENT NAME</u>	<u>STATE STATUS</u>	<u>FEDERAL STATUS</u>
T27N R10E	<i>Lycopodium dendroideum</i> (Treelike clubmoss)	S	
T26N R13E	<i>Carex stylosa</i> (Long-styled sedge)	S	
T26N R17E-R18E	<i>Cypripedium fasciculatum</i> (Clustered Lady's-slipper)	S	SC
T26N R21E	<i>Petrophyton cinerascens</i> (Chelan rockmat)	E	SC
T25N R21E	<i>Iliamna longisepala</i> (Longsepal globemallow)	S	

Feb 14 2008 11:56AM DEPT OF NAT RES AMP DIV 3609021789

p. 4

WEC\_00069

**WASHINGTON NATURAL HERITAGE INFORMATION SYSTEM  
Rare Plant Species**

**FEDERAL STATUS DEFINITIONS- (Note: Federally listed plant species are subject to the US Endangered Species Act.)**

**LE = Listed Endangered:** Any taxon that is in danger of extinction throughout all or a significant portion of its range and that has been formally listed as such in the Federal Register under the Federal Endangered Species Act.

**LT = Listed Threatened:** Any taxon that is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and that has been formally listed as such in the Federal Register under the Federal Endangered Species Act.

**PE = Proposed Endangered:** Any taxon that is in danger of extinction throughout all or a significant portion of its range and that has been proposed for listing as such in the Federal Register under the Federal Endangered Species Act.

**PT = Proposed Threatened:** Any taxon that is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and that has been proposed for listing as such in the Federal Register under the Federal Endangered Species Act.

**C = Candidate species:** Taxa for which current information indicates the probable appropriateness of listing as Endangered or Threatened and that has been published in the Federal Register as a candidate for listing under the Federal Endangered Species Act.

**SC = Species of Concern:** Species whose conservation standing is of concern but for which status information is still needed. Species of concern lists are not published in the Federal Register.

**STATE STATUS DEFINITIONS- (Note: The state ESA does not include provisions to list or protect rare plant species – the state rare plant list is advisory only.)**

**E = Endangered:** Any taxon in danger of becoming extinct or extirpated from Washington within the foreseeable future if factors contributing to its decline continue. Populations of these taxa are at critically low levels or their habitats have been degraded or depleted to a significant degree.

**T = Threatened:** Any taxon likely to become Endangered in Washington within the foreseeable future if factors contributing to its population decline or habitat degradation or loss continue.

**S = Sensitive:** Any taxon that is vulnerable or declining and could become Endangered or Threatened in the state without active management or removal of threats.

**X = Possibly Extinct or Extirpated from Washington:** Based on recent field searches, a number of plant taxa are considered to be possibly extinct or extirpated from Washington. Taxa in this group are all high priorities for field investigations. If found, they will be assigned one of the above status categories.

**R = Review:** Taxa of potential concern, but for which no status has yet been assigned.  
Group 1 = Taxa in need of additional field work before a status can be assigned.  
Group 2 = Taxa with unresolved taxonomic questions.

**W = Watch:** Taxa more abundant and/or less threatened in Washington than previously assumed.

**Non-Vascular Plant:**

**P = Priority:** At this time, there is insufficient information to assign a statewide status to most of the non-vascular taxa. For now, the lichen and macrofungi lists have been divided into two priority groups based on criteria of occurrence pattern, vulnerability, threats, degree of protection, and taxonomy.