



Soda Mountain Wilderness Council

WVEC_00080

P.O. Box 512 • Ashland, Oregon 97520

February 12, 2008

West-wide Energy Corridor EIS
Argonne National Laboratory
9700 S. Cass Avenue – Building 900, Mail Stop 4
Argonne, IL 60439 Fax 1.866.542-5904

COMMENTS ON WEST-WIDE ENERGY CORRIDOR DEIS

To Whom It May Concern:

Please accept these comments on behalf of the board and membership of the Soda Mountain Wilderness Council, based in Ashland, Oregon. DEIS "Corridor #4-247" is currently mapped for our area. That's a real bad idea for many reasons, some of which are listed and/or referenced below. Please communicate our more than fed-up outrage to this Administration and the Congress that recklessly passed the Energy Policy Act of 2005 that you should be tasked with such an unimaginative backward boondoggle powered by the addictive avarice of industrial energy pushers. Shame on them. Our sympathies go out to you as you suffer through this unenviable and thankless dead-end project.

80-001

The "No Action" alternative is currently your only legal alternative, given that your DEIS lacks a "reasonable range" of alternatives. Given that your politically appointed overseers will ignore this basic "NEPA 101" game's-over project-stopper, continuing to waste millions of public and private funds and months/years-of-life in this painfully unnecessary process...

80-002

Please incorporate into our comments on your DEIS by reference:

- Oral invited panel testimony and written submissions by Dave Willis at/for the June 27, 2006, hearing in Washington, DC before the House Resources Subcommittees on Water & Power and Forests & Forest Health regarding "Meeting Electricity Demand in the West Through Responsible Development of Energy Rights-Of-Way on Federal Lands."
• Written comments by Dave Willis and the Soda Mountain Wilderness Council on your previous DPEIS for your West-wide Energy Corridor proposal.
• Oral testimony by Dave Willis on behalf of the Soda Mountain Wilderness Council, second public speaker at your January 8, 2008, afternoon public hearing at the Doubletree Hotel in Portland, OR.
• Written comments on this DEIS by The Wilderness Society, et. al., Nancy Ames Cole of the Siskiyou Pass area south of Ashland, OR, and Lisa Buttrey of the Colestin area south of Ashland, OR.

Further:

- That the DEIS does not factor energy conservation into estimates of future national energy need inexcusably skews projections of future energy need reflected by the DEIS.
• The maps on the DEIS website are difficult to access, confusing, and inconsistent. The California and Oregon maps show proposed Corridor #4-247 crossing the OR/CA border

80-003

80-004



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COMMENTS ON WEST-WIDE ENERGY CORRIDOR PROJECT DEIS
February 12, 2008

in entirely different locations – preventing the public from having consistently accurate information upon which to confidently base meaningful public comment.

80-004
(cont.)

- The DEIS apparently moves Corridor #4-247 out of the Cascade-Siskiyou National Monument, where your June 9, 2006, maps had previously sited it. Thank you. This is prudent. But the proposed corridor’s apparently revised location still unacceptably impacts the Monument area, including the Cascade-Siskiyou (Soda Mountain area) biological connectivity corridor the Monument was established to protect (cf. Northwest Forest Plan ROD, April 2004, pp. 29, 30), the critical deer winter range of the California Department of Fish and Game/Redding BLM Horseshoe Wildlife Area, and Redding BLM’s Jenny Creek Area of Critical Environmental Concern.
- Planning to site a 3,500’ wide energy corridor through both the politically active Ashland, OR area *and* the private property rights hot-bed of Siskiyou County, CA is politically naïve in the extreme.
- Keying a proposed corridor route to connection with a Klamath River dam substation associated with four dams that very well may be removed by court order soon is not wise long term planning.

80-005

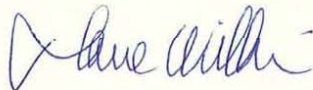
80-006

80-007

Generally, please cease and desist from further action on this entire ill-advised project. As a response to our national addiction to the myth and present reality of limitless energy consumption, this project can only be characterized as a massive mega-octopus of needles designed to keep pushing endless intravenous energy fixes. The irreplaceable American West, the American people, and our ailing planet deserve better vision and leadership. The West-wide Energy Corridor proposal reflects less than neither. Make this whole disastrous project proposal the Waterloo of America’s energy addiction. Can it. Scrap it. Kill this project dead.

80-008

Sincerely,



Dave Willis, Coordinator
Soda Mountain Wilderness Council
P.O. Box 512
Ashland, OR 97520

WEC_00081



BIG PINE PAIUTE TRIBE OF THE OWENS VALLEY
Big Pine Indian Reservation

February 6, 2008

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

RE: West-wide Energy Corridor DEIS

Dear Sir/Madam:

The Big Pine Paiute Tribe of the Owens Valley (Tribe) is located in the Owens Valley on the eastern slopes of the Sierra Nevada Mountains in the State of California. The Tribe has a responsibility to protect the cultural and archeological resources located on and around the Big Pine Indian Reservation.

The draft Programmatic Environmental Impact Statement (PEIS) proposing designation of energy transport corridors on Federal lands throughout 11 Western States was released on November 16, 2007 for a 90-day public comment period. The draft PEIS has been written to: (1) designate corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on federal land in the 11 contiguous Western States; (2) incorporate the designated corridors into the relevant agency land use and resource management or equivalent plans; and (3) ensure that additional corridors are promptly identified and designated.

The draft PEIS contains a map of California with segment 18-23 of the proposed energy transport corridor. According to the map, segment 18-23 does not cross onto the Big Pine Indian Reservation, but is located very close the Big Pine Indian Cemetery. The cemetery is not located on federal lands; therefore, no corridor designation is indicated within the cemetery, but it is within the sphere of influence. If a future project is proposed along segment 18-23 near the Big Pine Indian Reservation, the Tribe must be consulted in the pre-planning stages before any construction activities take place.

81-001

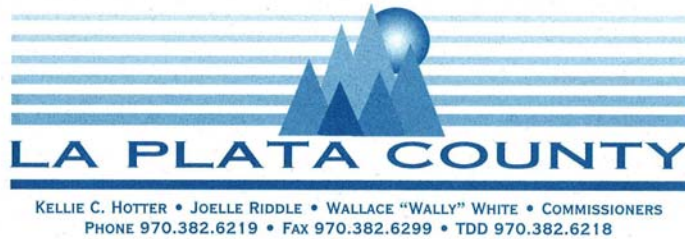
The Tribe also believes that the designation of energy transport corridors shall not eliminate the need for conducting actions to comply with all applicable federal laws including the National Environmental Protection Act, the National Historical Preservation Act, the Native American Grave and Repatriation Act and the Endangered Species Act when projects are initiated within energy transport corridors.

81-002

Sincerely,

Virgil Moose
Chairperson

WEC_00082



February 12, 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

Re: West-wide Energy Corridor Draft PEIS
 Written Comments - La Plata County Colorado

To whom it may concern:

As the Board of County Commissioners we are charged with the oversight of the welfare of the citizens of La Plata County. As such we appreciate the opportunity to submit written comments to the to the various federal agencies associated with the West-wide Energy Corridor DEIS. The proposed energy corridor is noticeable in its absence in La Plata County Colorado as the corridors terminate abruptly at our south County line in the vicinity of State Highway 140, also the State line, and at our west County line by State Highway 160. It is our understanding that the intent of the West-wide Energy Corridor draft PEIS is to foster interagency corporation at the federal level and to determine where energy corridors would be appropriate and also where they would not be appropriate on federal lands.

We realize that the various utility companies that may complete the energy corridors if and when their transmission needs arise will at that time be required to comply with the National Environmental Policy Act (NEPA) and complete an environmental impact statement (EIS) for their specific corridor. If the utility corridor does cross La Plata County it would most likely traverse the southwest corner of the County and the majority of the corridor would be on Federal and Tribal lands (Southern Ute Tribe and the Ute Mountain Ute Tribe). It is inevitable that said energy corridor would also traverse private lands as well as County maintained roads. Therefore we respectfully request that any future requests to complete an energy corridor across La Plata County be required to comply with NEPA and complete an environmental impact statement.

82-001

Sincerely,

LA PLATA COUNTY
 BOARD OF COUNTY COMMISSIONERS




 Joelle Riddle
 Chair
 Kellie C. Hotter
 Vice Chair
 Wallace "Wally" White
 Commissioner



Janet Napolitano
Governor

State Parks Board Members

Chair
William C. Cordasco
Flagstaff

Arlan Colton
Tucson

William C. Scalzo
Phoenix

Reese Woodling
Tucson

Tracey Westerhausen
Phoenix

William C. Porter
Kingman

Mark Winkleman
State Land Commissioner

Kenneth E. Travous
Executive Director

Arizona State Parks
1300 W. Washington
Phoenix, AZ 85007

Tel & TTY: 602.542.4174
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800.285.3703 from
(520 & 928) area codes

General Fax:
602.542.4180

Director's Office Fax:
602.542.4188

WEC_00083

"Managing and conserving natural, cultural, and recreational resources"

FAKED
02-14-08

February 12, 2008

La Verne Kyriss, Federal Energy Corridors Project Manager
West-wide Energy Corridor PEIS
Argonne National Laboratory
9700 S. Cass Ave., Bldg. 900
Mail Stop 4
Argonne, IL 60439

RE: Draft Programmatic EIS, Designation of Energy Corridors on
Federal Land; SHPO-2007-1830

Dear Ms. Kyriss:

Thank you for providing a copy of the draft Programmatic Environmental Impact Statement (PEIS) for our review and comment. Given the size and scope of this project, our office appreciates the level of effort that the Department of Energy and the Bureau of Land Management put into this document and, in particular, your attention to cultural resources. Our office has the following comments relating to the sections on cultural resources:

1. We agree that the proposed action alternative of designating energy corridors has the potential to impact cultural resources. The extent of impacts to resources within the designated corridor is still not identified and does not satisfy Section 106 requirements under the National Historic Preservation Act (NHPA) because of the limited identification effort conducted for this PEIS. We understand that intensive identification efforts will occur at the time of right-of-way applications. We support the use of existing transportation and utility corridors unless those corridors are in an area where the cumulative effects of utility co-location would adversely affect a cultural resource. This may become an issue when historic districts, cultural landscapes, historic trails, National Historic Landmarks, and Traditional Cultural Places are within or near projects.

83-001

2. The document does not address the affects of the designation of corridors on tribal, state, county, municipal, and private lands. The utilities will not stop at the boundaries of federal lands. They will continue across other land jurisdictions and the path of the utilities across these other jurisdictions will be determined in part by the location of the corridors defined in this document. This document does not provide a discussion of the resources that may be impacted on other land jurisdictions. Isn't this a "connected action" as defined in 40 CFR 1500, Section 1508.25?

83-002

WEC_00083

L. Kyriess
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Page 2

3. Chapter 2, section 2.4.1 (3) states that the appropriate agency, assisted by the project applicant, must comply with all aspects of Section 106 of the NHPA on a project-by-project basis. It appears from the remaining discussions in Chapter 2 on Interagency Operating Procedures (IOPs) and discussions in Chapter 3 that it is the Department of Energy’s intention to complete Section 106 as part of the NEPA process. In some cases, it may be more efficient to just complete Section 106 under the NHPA. Will that be an option? There does need to be a formal notification from your agency notifying consulting parties and the public of your intent to substitute the NEPA process for Section 106, if that is your intention.

83-002
(cont.)

4. Chapter 2, section 2.4.1 (30 and 35) discusses the development of cultural resource management plans (CRMPs). The document states that the project proponent should develop the CRMP to provide guidance for compliance with cultural resource laws and include the definition of the Area of Potential Effect, appropriate procedures for inventory, evaluation and mitigation, evaluations of eligibility, etc. It appears that the CRMP is being used to complete Section 106. If this is the case the PEIS needs to be more specific about the role of the federal agency in the CRMP. The federal agency in consultation with the SHPO and any THPOs/Tribes needs to be responsible for defining the APE, defining the level of identification efforts, making determinations of eligibility, determinations of effect, and appropriate mitigation. Where and how does this happen in the development of the CRMP? How will disagreements among consulting parties be handled? How is the federal agency going to insure the completion of the Section 106 process? A plan is not a legally binding document. Where will agreement documents be completed to ensure completion of Section 106? The use of Programmatic Agreements (PAs) or Memorandum of Agreements (MOAs) should be addressed. The role of the Advisory Council also needs to be discussed. Chapter 2 needs to be expanded to provide more detail on how the requirements of Section 106 will be met and the role of the federal agency official within that process.

83-003

5. We support and would encourage the use of assigned Cultural Resource/Tribal Coordinators to assist applicants. In our experience with other programs, where the applicant completes much of the Section 106 requirements, the SHPO staff have had to take on additional responsibilities in training and mentoring applicants through the process. Having assigned Cultural Resource Coordinators would help relieve this pressure on SHPO staff.

83-004

6. In Chapter 3, 3.10.1.1, second paragraph, the document states that, "As a land use planning action, this PEIS represents the first phase of the Section 106 process." By "first phase," is the document referring to "initiating the process" or "identification of historic properties" under 800.4? If this statement does refer to identification, the PEIS does not meet the identification efforts required under Section 106, and the language should be

83-005

WEC_00083

L. Kyriss
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revised to clarify that the PEIS is a preliminary identification effort that will be completed in later phases on a project-specific basis [36CFR Part 800.4(2)]. | 83-005
(cont.)


7. In Chapter 3, section 3.10.2.2, the next to-the-last sentence should say "property types" not "site types." Properties may be site, buildings, structures, objects, or districts. | 83-006

8. In Table 3.10.6, under Mitigation for structures, we would prefer "move structures to a new location" rather than "reconstruct structure in a new location." Reconstruction is a Secretary of Interior treatments, but one that is not applicable in a 106 action. | 83-007

9. Chapter 3 should be expanded to include the use of PAs and MOAs as legal documents that enforce the CRMP. Has the agency considered the use of a National PA or State-specific PAs for this project and subsequent specific ROW projects? | 83-008

10. Our office was not able to make any additional comments, beyond the property information provided last year, on the cultural sensitivity of proposed alignments using the maps provided. | 83-009

Thank you again for considering our concerns and suggestions. We look forward to continued consultation on this project. If you have any questions, please contact me at 602-542-7141 or by e-mail at cgriffith@azstateparks.gov.

Sincerely,

Carol Gill Griffith
Deputy State Historic Preservation Officer
Arizona State Historic Preservation Office

cc. Advisory Council on Historic Preservation

WEC_00084

ROTHSTEIN, DONATELLI, HUGHES, DAHLSTROM, SCHOENBURG & BIENVENU, LLP

ATTORNEYS AT LAW

RICHARD W. HUGHES

505.988.8004
FAX: 505.982.0307
rwhughes@rothsteinlaw.com

February 14, 2007

VIA FAX (866)542-5904 and U.S. Mail

Westwide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Ave., Bldg. 900, Mailstop 4
Argonne, Illinois 60439

Re: *Comments on Energy Corridor DEIS by the Pueblo of Santa Ana*

To Whom It May Concern:

The Pueblo of Santa Ana hereby submits the following written comments, to be considered in conjunction with the oral comments delivered on behalf of the Pueblo by Richard W. Hughes at the public hearing at Albuquerque, New Mexico on January 24, 2008.

The Pueblo of Santa Ana, a federally recognized Indian tribe situated in Sandoval County, New Mexico, is directly impacted by the energy corridors proposed by the Department of Energy and the Department of the Interior through New Mexico. A major corridor that crosses New Mexico diagonally from the northwest to the southeast brackets the lands of Santa Ana and its neighboring pueblo, Zia Pueblo. Several interstate hydrocarbon pipelines (and one carbon dioxide pipeline) currently cross Santa Ana lands, more or less on the course of the "projected" line of the corridor as it would cross the lands of Zia and Santa Ana. Santa Ana is thus deeply concerned by this process, and by the approach taken by DOE and DOI in their assessment of environmental impacts, or more specifically, their failure to make any such assessment.

84-001

In general, Santa Ana does not oppose the concept of creating corridors within which pipelines and power lines would be clustered, so as to avoid further disfigurement of the landscape by the ever increasing spider web of energy rights-of-way. But there is no question that this "clustering" of rights-of-way in predesignated corridors will intensify the impacts on the natural environment within each corridor. Contrary to the repeated assurances throughout the DEIS that the mere designation of corridors will have no environmental effect since there is no implied approval of any actual new pipeline or power line, the very designation of the corridors will undoubtedly, as is it clearly intended to, influence the future location of these facilities, and make virtually certain that those facilities will be located inside the corridors that have been designated. It is mere sophistry, thus, to claim that the designation of the corridors has no impact: it has a definite and probably measurable future impact, that should be assessed now, before the designation becomes final. This is the mandate of NEPA.

84-002

WEC_00084

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The departments have essentially conceded this, in that, as the DEIS explains, they engaged in a fairly elaborate consultation process with various federal agencies to resolve potential conflicts between the corridors and wilderness areas, wildlife refuges, national parks and monuments and similar sensitive federal areas. If, as the DEIS claims, the designation of corridors will have no impacts, why worry about laying them squarely across national parks and wilderness areas? The reason is obvious: the designation itself will in fact have a direct impact on the location of future facilities, and thus the future impact on the natural environment within the designated corridors is a certainty.

Given that, it requires no extraordinary intuition to see that, similarly, the fact that no official designations of corridors have been made across private or Indian lands to link the segments of the corridors on federal lands certainly does not mean that the corridors will not directly cause environmental impacts on those private and Indian lands. First, there is the simple and painfully obvious necessity that power lines and pipelines must be continuous facilities, and cannot be merely segments, matching the federal land segments of the energy corridors. Second, there is the fact that, as noted above, the designation of the corridors will virtually assure the clustering of facilities within the corridors, intensifying their impacts. Those effects will be matched on the intervening stretches of private and Indian lands.

In short, the designation of energy corridors across federal lands will unquestionably have not only direct, certain and probably largely measurable environmental impacts on those lands, but will also have comparable impacts on the Indian and private lands that will have to be crossed in order to link up the segments on the federal lands. It will not do for the departments to crouch behind their sophistic arguments that the designation of the corridors is merely a technical formality, with no impacts. The likely impacts from the clustering of the energy rights-of-way within these corridors will be palpable, severe, intense, and effectively permanent, and they should be properly evaluated in this document before the decision to formally designate these corridors is made final.

84-003

Moreover, the necessity that the segments on federal lands must be joined by a de facto extension of the corridors across private and Indian lands necessitates that the department should do two things: first, engage in meaningful consultation with local governmental entities, including Indian tribes, through whose lands the clustered facilities must extend, in the same manner as it engaged in consultations with the Fish and Wildlife Service, the National Park Service and the Forest Service with respect to the sensitive federal lands that were potentially impacted by the designation of corridors, so as to assure that the corridor segments on federal lands are located so as to minimize adverse impacts on the intervening tracts of private and Indian lands. Second, the departments must necessarily evaluate the environmental impacts of the portions of the corridors that will, in effect, cross private and Indian lands, to the same extent

84-004

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that it considers impacts on the formally designated federal segment lands.

84-004
(cont.)

NEPA requires no less than the foregoing. NEPA requires a candid disclosure of the potential impacts of federal action. The departments have failed utterly to comply with that requirement in their claim that the designation of these corridors will have no impacts.

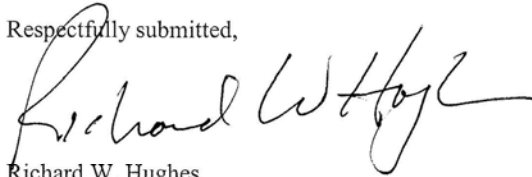
84-005

Santa Ana will be more than happy to engage in meaningful discussions with the departments as to how impacts to Santa Ana lands could be minimized by the alignment of the corridor segments on adjacent federal lands, but merely inviting representatives of the pueblo to attend a meeting, or to express comments with no meaningful one-on-one exchange, does not constitute the kind of consultation that is clearly demanded of the agencies in this instance.

84-006

We hope that the foregoing comments are helpful and will be given serious consideration as this process goes forward. Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted,



Richard W. Hughes
Attorney at Law

RWH/zyl

cc: Hon. Ulysses Leon, Governor

WEC_00085



TransCanada PipeLines Limited
 Gas Transmission Northwest
 System
 1400 SW Fifth Avenue, Suite 900
 Portland, Oregon 97201
 USA

Tel: 503.833.4000
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February 14, 2008

West-Wide Energy Corridor DEIS
 Argonne National Laboratory
 9700 South Cass Avenue
 Building 900, Mail Stop 4
 Argonne, IL 60439
 Fax (866) 542-5904

Subject: West-wide Energy Corridor Draft Programmatic EIS

TransCanada's Gas Transmission Northwest (GTN) and Northwest Natural are partners in the development of Palomar Gas Transmission (Palomar), an interstate natural gas pipeline company located in Portland, Oregon. We would like to submit herewith our comments on the subject draft Programmatic Environmental Impact Statement (EIS). Palomar is sponsoring the Palomar Gas Transmission Project, a 220-mile pipeline project that would bring gas from GTN's pipeline in central Oregon to the Willamette Valley in western Oregon. Palomar will also provide a path for natural gas from a proposed LNG terminal in Oregon to access the interstate gas transmission system. Palomar initiated the NEPA Pre-Filing process with the Federal Energy Regulatory Commission in 2007, and expects to file an application this year. The route of the proposed project would cross approximately fifty miles of U.S. Forest Service and Bureau of Land Management lands, mainly in the Cascade Range.

Route planning for the project, in consultation with the aforementioned federal land management agencies, began over two years ago. The route envisioned at the time was conveyed to the West-wide Energy Corridor team during scoping for the subject EIS. With the support of the Bureau of Land Management and Forest Service, that route was incorporated into a corridor that appears in the EIS as Corridor No. 230-248.

Since that time, continued consultation with the land management agencies and more detailed studies have resulted in significant route changes to reduce environmental impacts. The EIS's east-west corridor shown across the Mt. Hood National Forest should be revised to reflect these improvements. Palomar is providing under separate cover an electronic GIS file showing the revised Palomar route across Federal lands.

Secondly, although the scale of the maps in the EIS makes reading them somewhat difficult, it appears that no east-west corridor has been identified to cross the narrow band of Federal (BLM) land adjacent to the lower Deschutes River between the Warm Springs Reservation and the mouth of the Deschutes, a distance of over 45 miles.

85-001

85-002

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Because of the steep terrain and its Wild and Scenic River status, there are very few opportunities for east-west utility corridors across the lower Deschutes. However, 1) utility lines currently cross the River, and 2) the need for corridors across the River to accommodate future utility projects is great, given that the area lies directly between the Portland metropolitan area to the west and major gas and electric transmission systems to the east. Moreover, an east-west corridor crossing the lower Deschutes is necessary as a continuation of Corridor 230-248, the east-west corridor crossing the Mt. Hood National Forest. Failure to designate an east-west crossing of the Deschutes River at a location that aligns with Corridor 230-248 would render that corridor unusable, precisely the type of situation the West-wide Energy Corridor initiative was designed to prevent.

85-002
(cont.)

We have conducted detailed routing studies in the vicinity of the existing Bonneville Power Administration electric transmission line crossing, which lies on the outskirts and to the north of the town of Maupin, Oregon (Section 32, T.4S, R.14E). We urge the DOE to identify a multi-modal corridor at this location. The specific location of the corridor is of importance, because the challenging terrain would preclude pipeline construction at most locations, and it makes no sense to identify a multimodal corridor unless a constructable location lies somewhere within it. Our detailed routing studies conclude that a feasible corridor at this location would be 2500 feet wide, measured north from the existing electric transmission crossing (if the corridor were centered over the existing transmission line, the southern half of the corridor would conflict with urban land uses in and immediately adjacent to the town of Maupin, and would be effectively useless for transmission utilities). This corridor location would encompass the relatively flat terrace at the bottom of the Deschutes canyon necessary to stage construction of a pipeline crossing of the River.

85-003

We acknowledge that the EIS must of necessity employ a relatively broad-brush approach to cover the geographic sweep mandated by the EPAAct; however, it must also be able to address some of these more site-specific concerns if it is to produce a result that can actually be of practical value in facilitating sound energy infrastructure development.

Finally, we request that the Final EIS clarify whether designation of a utility corridor through this process would result in automatic incorporation of such corridors into individual Federal land management agency management plans or whether separate actions need to be taken by land managers to amend such resource plans accordingly. The logical interpretation would be that it was the intent of the Energy Policy Act to streamline corridor designation by having the resource plans automatically amended. Clarity on this issue is important to provide process certainty to prospective energy projects, the land managing agencies, and the public.

85-004

Thank you for considering our comments.

Sincerely,



Michael B. Burke
Project Development Manager
TransCanada's GTN & NBP Systems
1400 SW Fifth Ave., Suite 900
Portland, OR 97201
(503) 833-4509
(503) 833-4954 fax
michael_burke@transcanada.com

1 of 6 PAGES WVEC_00086

Sunrise Powerlink.

- | | |
|--|--------|
| 1. Will create decades of visual pollution affecting most Ca. Residents living in and traveling around the areas they are built or proposed. | 86-001 |
| 2. Can be alleviated through effective conservation measures sponsored by the electrical utility. | 86-002 |
| 3. There has to be or will be better technological forms of transmitting electricity from point A to B instead of using the massive T towers used (too) frequently in rural, pristine areas. | 86-003 |
| 4. If areas of S. Ca. are found to need additional electricity, those areas should be subjected to the impacts these projects include. | 86-004 |

Alternative powerlink thoughts to consider:

- | | |
|---|--------|
| 1. Wind turbines now have a 14:1 turning reduction and take only a slight breeze to become operational. | |
| 2. We have onshore/offshore breezes from the ocean almost daily coupled with miles of ocean where wind farms could be developed, far enough off shore to not create visual impacts on our beaches. | |
| 3. Also, there is a potential for customer electrical generation that would feed electricity back into the grid, with rebates or installation offered from the electrical supplier. | 86-005 |
| 4. The electrical company can place wind farms/solar on top of commercial buildings in densely populated areas, most of which have flat roofs, set for installation. Wind/solar could be incorporated into the newly designed airport, Lindberg Field . San Diego/Los Angeles would be an example for the rest of the nation. | |

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Pristine areas would be preserved, green energy would be produced and there would be no overland power transmission lines effecting generations of citizens, some yet unborn.

86-005
(cont.)

Conservation: Aggressive action needed.

A. Building codes requiring minimum of **R-52 insulation** in attics.

B. Hot **water heaters** with a minimum of **2” of insulation** between the tank and outer cover. Highly insulated ovens, dishwashers.

C. **Sunshades** that cut cooling costs dramatically on all exterior windows or triple pane tinted glass. **Smaller heat/cooling windows.**

D. **Less overhead streetlight operation.** Automobiles have halogen lights now high in candlepower.

E. **Recreation** requiring athletic field lighting operational only in the **daytime** hours. (Schools)

86-006

F. Mandating **commercial stores/warehouses** not to have bay doors continually open when temps outside are over 100 degrees and interior temps are at a tolerable level of comfort. **A/C blows through the open doors outside into the atmosphere.**

G. **Commercial buildings** can turn off **every other row of lights** without effecting customers, employees safety or shopping decisions. No heat from lights that are off will offset air conditioning costs and feed the grid.

H. Possible **building moratorium**, in the event

WEC_00086

electricity becomes scarce. Most feel there are too many people here now.

| 86-006
| (cont.)

In closing, I am not an electrical engineer, planner or affiliated with any manufacturer of green power.

If an ordinary citizen can come to workable thoughts, think what paid professionals, designers, engineers worldwide, can do.

There are workable solutions to the power link.

If I can assist further pls. contact me.

Gary C. Hoyt
Flying Cloud Ranch
Boulevard, Ca.

(619) 766 9010

WEC_00086

Sept. 29, 2006

Billie Blanchard, CPUC
Lynda Kastroll, BLM
c/o Aspen Environmental Group
235 Montgomery St. Suite 935
San Francisco, Ca. 94104-3002

Re: Sunrise Powerlink Project

Dear Ms. Blanchard and Kastroll,

Apparently, you are examining the possibility of running a overland power transmission line through Boulevard.

Boulevard is an area that has unique reasons why the transmission lines should not be of consideration or be installed here. The primary reason is safety to our residents *and* to your power appurtenances.

Boulevard is at approximately 3200-3500 feet in elevation, approximately 5 miles from a 6-8% upgrade downgrade to the low desert which has a run away truck turnout installed for heavy trucks that cannot take the downgrade. I have seen trucks on fire from burning brakes while traveling downhill in the Easterly direction.

Coming up the grade the opposite occurs with automobiles. They occasionally catch fire from overheating while coming up the grade, as evidenced by burned asphalt patches on Interstate 8. Our volunteer fire department extinguished an automobile fire on I-8 westbound, while I was on the Boulevard Fire Dept's Board of Directors. It is very fortunate for our community that we have been spared from a major catastrophe from vehicle fires occurring in each direction.

As you must know, it is obligatory for a utility company to supply an adequate means of electricity to its customers. That obligation could very well be interrupted by vehicle created fires if the lines are run in the vicinity of Interstate 8.

Additionally, we have full time residents that live next to the freeway that would be subjected to the continual 1-300 milligauss that overland transmission lines expose. I will not go into the magnetic field measurement interpretations. If you need more information it can be found at: <http://www.nichs.hih.gov/emfrapid/>

For the responsible protection of our residents and a safe, uninterrupted electrical supply, other sites should be studied with wisdom and lack of prejudice that are more conducive to your needs. The Boulevard I-8 route should be tabled and unapproved.

Reconstruction of overland transmission cable is costly, interrupts users consumption of the product and could possibly be avoided by choosing a more suitable route.

Very truly yours,

Gary C. Hoyt

WVEC_00086

ASPEN ENVIRONMENTAL GROUP
235 Montgomery Street Suite #935
San Francisco, Ca. 94104

May 31, 2007

Attn: Billie Blanchard/Lynda Kastoff

Re: Interstate 8 alternative/500KV overland transmission line.

Ms. Blanchard/Kastoff,

My name is Gary Hoyt and would like to comment on the I-8 alternative. I don't want to sound repetitious and have the same comments as others in our county, so the addressed concerns will be focused only on the I-8 alternative, why the northern route is the right choose. This correspondence is brief to save you time in review. If ANY of my comments need to have a greater detail pls. feel free to e mail: garyhoyt@yahoo.com

AIRPORT PROXIMITY

There is a county airport located in Jacumba near the planned I-8 alternative route. It is a good emergency facility owned by San Diego County that is used when the west side of San Diego is experiencing fog/low visibility flight conditions that VFR (visual flight rule) pilots, the largest majority, use. The 500KV line will interfere with unfamiliar pilots landing @ Jacumba, especially in high wind conditions.

The Border Patrol is very active in the I-8 Jacumba/Boulevard area and frequently fly at low altitude in Bell 501 helicopters aiding in arresting smugglers/illegals. According to the San Diego County Airport Authority, an expansion of the existing airport is considered as Jacumba develops, increasing airport activity.

AUTOMOBILE/HEAVY TRUCK FIRES ON I-8

Enclosed for your review is a letter dated Sept. 29, 2007 that addresses that issue.

AREA OF HIGH WINDS

Enclosed is an example of a high wind warning from Yahoo! Weather. Winds in east county San Diego are very strong especially in Spring and Fall. This warning calls for wind gusts of 75 MPH, dated 3/27/07.

Fire coupled with high winds such as this could be disastrous and interrupt overland electrical transmission reliability.

High winds affect aircraft/helicopter Border Patrol traffic. The 500 KV lines would be a hazard, possibly death for a pilot/crew blown into the lines.

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SAN ADREAS FAULT LINE

Boulevard is located in this earthquake zone although I have not seen maps to prove it. If there is a large scale earthquake a 500 KV line next to I-8 could prove disastrous, interrupting standard traffic flow for an extended period of time and prevent emergency helicopters offering aid to injured or dead motorists, from landing at the site.

QUESTIONABLE CLEVELAND FOREST ROUTE

It is my understanding that guidelines have been issued by the Fed. Gov. under "Forest-wide Standard and Guidelines that in paragraph 1 states: "Consider new special use permit or easement only when suitable private land is not available and such use does not conflict with the management objectives" Therefore, if true, the project must be rejected through the Cleveland National Forest.

NORHTERN ROUTE/SANTA ISABEL

IF the desert route is used as originally proposed by SDGE;

1. Less vegetation to feed a fire, lowering the threat of a power interruption.
2. The visual impact will affect less property owners.
3. The chance of a natural/human catastrophe affecting power distribution, less.
4. Transitory citizens using some of the northern route, mostly weekends, would be subjected to 1-300 milliguass 500KV lines exhibit but not on a daily basis.
If the I-8 alternative is built, it could create health hazards for *many* more full time residents adjacent to the alternative more so than the northern/Santa Isabel route.
5. The construction and long term maintenance cost to SDGE would be a cost savings to rate payers and an easier route to build, impacting far less property owners.

Very truly yours,

Gary C. Hoyt
2052 Flying Cloud/Boulevard



WVEC_00087

Utah Office, 444 East 800 North, Logan, UT 84321
 ph. (435) 752-2111 fax (435) 753-7447
 e-mail: bpendery@pcu.net

February 14, 2008

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

Re: Comments on the West-wide Energy Corridor Draft Environmental Impact Statement

To whom it may concern:

Please accept these comments of the Wyoming Outdoor Council on the above-referenced document (hereinafter, DEIS).

General Comments.

It is our view that the best energy corridor is the one that is not needed or used. In many cases, this could be a far cheaper, and thus economically preferable, approach to meeting energy transmission needs, and it would have far fewer environmental impacts than what is presented in the DEIS. Thus, the first priority of the DEIS should be to identify ways to avoid constructing new energy corridors, not providing for their construction. The need for many corridors could be avoided altogether with increased emphasis on and use of energy use efficiency, for example. The use of existing corridors could be maximized and if needed expanded prior to designating and constructing new corridors. The existing energy transmission network should be maximized and upgraded to the degree possible prior to pursuing new corridors. These are entirely reasonable options that would help ensure the nation's energy needs are met, and thus under the regulations and case law interpreting the National Environmental Policy Act (NEPA), these options should be considered as an alternative, or at least as mitigation for reducing environmental impacts in the DEIS.

87-001

It is also crucial that designated energy corridors avoid environmentally sensitive areas. These include "flagship" areas like National Parks, Wilderness Areas, National Monuments, and National Wildlife Refuges, of course, but also include many other sensitive landscapes, including: Bureau of Land Management (BLM) areas of critical environmental concern, BLM or Forest Service designated wildlife management or

87-002

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recreation management areas, BLM wilderness study areas and citizens' proposed wilderness areas on BLM lands, Forest Service roadless areas, National Recreation Areas, and other like lands. In addition, sensitive wildlife habitats, especially those of the sage grouse, must be avoided even if they have no formal designation. Issues related to protecting the sage grouse will be discussed in more detail below. Allowing energy corridors to intrude on areas such as these is entirely contrary to multiple use management which remains the overarching framework for management of BLM and Forest Service lands (see definition of multiple use at 43 U.S.C. § 1702(c), for example), and also violates the policy and ends established by NEPA (see 42 U.S.C. § 4331(a) and (b)). Thus, the DEIS must ensure areas such as these are avoided.

87-002
(cont.)

Finally, a dominant need that the DEIS should seek to promote and facilitate is increased use of renewable energy. Renewable energy (and increased energy use efficiency) is where our energy future lies by nearly unanimous agreement, not business as usual reliance on fossil fuels. We simply must move toward greatly reducing our dependence on fossil fuels (if for no other reason than the climate change problems created by fossil fuels, which will be discussed in more detail below) and increasing our use of renewable energy, and the DEIS must seek to promote that future, not a business as usual fossil fuels future that often entails maximum environmental impacts, and which has many other negative economic and social implications. In Wyoming, this means that a principal goal of the DEIS should be to facilitate access to the transmission grid for wind energy development.

87-003

Related to the need to facilitate development of renewable energy and not promoting increased use of fossil fuels, are issues related to coal-fired power plants and the potential location of energy corridors. This possibility is presented in Figure 2.2-5 in the DEIS, where a potential "unrestricted" energy transport network is presented. These corridors include a corridor in eastern Wyoming that would clearly primarily benefit proposed coal fired power plants. In northeastern Wyoming, the Wygen III, Two Elk, and Dry Fork power plants have been proposed and are at one level of permitting or another. The DEIS should not seek to provide energy transmission corridors that promote these fossil fuel-based-energy options (especially ones based on coal due to its extreme impacts on environmental quality). Again, the emphasis should be on providing transmission corridors for renewable sources of energy, such as wind. At a minimum, if the DEIS is going to make any provisions whatsoever that might facilitate or relate to these power plants, it must fully consider the environmental impacts of these power plants in conjunction with the impacts of the energy corridors. These coal-fired-power plants would clearly be connected actions, similar actions, or cumulative actions, and thus under NEPA, their impacts must be fully considered, too. 40 C.F.R. § 1508.25. We would note that much the same situation applies throughout the west: these likely continuations of the energy corridors are very often associated with various proposed coal-fired power plants. Thus, this is a west-wide issue and not local.

87-004

The DEIS has failed to consider a reasonable range of alternatives. It has only considered one alternative, its proposed action alternative, since the no action alternative is probably statutorily precluded from being adopted. The no action alternative is a point

87-005

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of reference, but nothing more. We will not belabor this issue in these comments, we know the agencies receive lots of legal guidance and advice, but considering only one alternative does not meet the requirements of NEPA, and thus the DEIS is legally deficient and subject to being overturned by a court. NEPA at 42 U.S.C. § 4332(2)(C)(iii) demands consideration of “alternatives to the proposed action” and the Council on Environmental Quality regulations at 40 C.F.R. § 1502.14 are replete with language as to the importance of considering alternatives to a course of action. We would note that in all cases “alternatives” plural is used in these laws. Limiting an environmental impact statement (EIS) to consideration of only one alternative that can actually be implemented totally defeats the purposes of NEPA. This should be corrected prior to the final EIS being released. At a minimum the option of increasing energy use efficiency so as to eliminate or reduce the need for energy corridors should be considered (agencies are not limited to considering options solely within their jurisdiction in an EIS¹).

87-006

The proposed general corridor width of 3,500 feet is far too wide and would greatly and unnecessarily increase environmental impacts. This width must be reduced so as to avoid converting vast swaths of our multiple use public lands into industrial corridors suitable for little more than transporting electrons and BTUs. If existing infrastructure were used to the maximum extent possible, if existing infrastructure were upgraded to the maximum extent possible, and if it were insisted that infrastructure be jointly used by numerous energy producers to the maximum extent possible, this remarkable width could be greatly reduced in most if not all instances, and our public lands preserved for other, often more valuable, uses.

87-007

Climate Change.

It is critical that the DEIS provide a full discussion of the climate change or global warming implications of the energy corridors that are adopted, particularly that it consider the climate change implications of the use of these corridors for fossil-fuel-based energy generation relative to renewable-energy-based energy generation. The tradeoffs between fossil fuel energies and renewable energies in this regard need to be fully illuminated and analyzed.

87-008

The courts are increasingly demanding that this issue be considered. See Massachusetts v. Environmental Protection Agency, 127 S.Ct. 1438 (2007) (U.S. Supreme Court determines the harms associated with climate change are serious and well recognized and greenhouse gases fit well within the Clean Air Act’s capacious definition of an air pollutant). We would note that the BLM is under direction from the Secretary of the Interior to “consider and analyze potential climate change impacts” when making decisions regarding the potential utilization of resources on BLM lands. Exhibit 1 (letter

¹ See, e.g., Muckleshoot Indian Tribe v. U.S. Forest Service, 177 F.3d 800 (9th Cir. 1999); National Wildlife Federation v. National Marine Fisheries Service, 235 F.Supp.2d 1143 (D. Wash. 2002); Natural Resources Defense Council v. Morton, 458 F.2d 827, 834 (D.C. Cir. 1972) (all finding fault in agency NEPA analyses where the agency refused to consider a range of alternatives beyond its specific authority). See also 40 C.F.R. § 1502.14(c) (agencies are to “[i]nclude reasonable alternatives not within the jurisdiction of the lead agency.”).

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from the Secretary of the Interior regarding need to consider climate change issues). And of course, NEPA requires that BLM consider all environmentally significant issues in an EIS, and there is no doubt that global warming is such an issue.

Not only will the carbon dioxide (CO₂) emissions associated with activities related to the transmission corridors contribute to global warming, the impacts of global warming are likely to affect management actions and options related to siting and mitigating impacts from these corridors. A generally drying climate with less winter snow may have profound implications for the environment throughout the west, and thus for energy corridor locations and impacts. We believe the agencies should consider likely climate impacts that will occur and how that might affect or be affected by these energy transmission corridors. How will climate change effect reclamation potential in areas disturbed by corridors, for example?

87-008
(cont.)

Furthermore, at a minimum the agencies should provide an estimate of the quantity of CO₂ emissions that will be generated by activities associated with these corridors and identify means to reduce those emissions. At least as importantly and perhaps more importantly, the agencies should identify the quantity of methane (CH₄) that will be emitted as a result of oil and gas development associated with these transmission corridors and identify means to reduce those emissions. Methane of course is a far more "powerful" greenhouse gas than is carbon dioxide. A failure to provide at least this level of analysis of climate change issues would make the energy corridor EIS legally deficient. That these gases are not regulated pollutants under the Clean Air Act (yet) is irrelevant, this is clearly a significant environmental issue, and consequently under NEPA the agencies must consider it.

Sage Grouse.

The sage grouse of course is a species of increasing concern. It is recognized by the BLM as a sensitive species and is subject to the provisions of the BLM Special Status Species Manual. The bird may well be listed under the Endangered Species Act (ESA) in the relatively near future due to the decision by the U.S. District Court in Idaho remanding a decision to not list the bird to the U.S. Fish and Wildlife Service for reconsideration. A number of policies and guidance documents related to the sage grouse apply.

There can be little doubt the energy corridors planned in Wyoming will traverse a great deal of sage grouse habitat. Wyoming is widely recognized as probably the primary stronghold for this species where many of the largest populations remain. Given this, protection of the bird and assurance that it will not be further compromised must be provided in the DEIS. Provision should be made in the DEIS that corridors will not be allowed to traverse sage grouse leks (this would likely physically destroy the lek in almost all cases, especially below-ground corridors which would involve excavation) and assurance must be made that power lines cannot serve as convenient perch sites for sage grouse predators, a widely recognized problem associated with power lines. At a minimum, the DEIS should provide that prior to development of a corridor, surveys will

87-009

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be conducted to identify sage grouse leks, potential nesting habitat, and winter concentration areas, and provision made to avoid those areas or at a minimum mitigate potential impacts.

87-010

Attached as Exhibit 2 is a recent analysis from the Wyoming Game and Fish Department regarding sage grouse conservation needs. We ask the agencies to fully consider this report and to incorporate its recommendations for sage grouse conservation into the DEIS. While the focus of this report relates to oil and natural gas development activities, we believe many of the recommendations are still highly relevant and applicable, and of course, a major likely use of the corridors under consideration here is the transport of natural gas and oil, so again this report is clearly relevant.

The report recognizes the three-fold nature of the problem of conserving sage grouse in the face of energy development: 1) the best available science shows that full field development has severe negative impacts on sage grouse populations under current lease stipulations; 2) most of the greater sage grouse habitat has already been leased; and 3) these leases contain stipulations that have been shown to be inadequate for protecting sage grouse populations. *Id.* at 2. The report outlines six key areas that need to be considered: core areas, no surface occupancy stipulations (“NSOs”), phased development, timing stipulations, well pad densities and restoration. *Id.* With respect to core or crucial areas, which are areas that the biologists authoring the report suggested should include leks, male display areas, sagebrush patch size, seasonal habitats, seasonal linkages or appropriate buffers, the conclusion was simple: “Because breeding, summer and winter habitats are essential to populations, development within these areas should be avoided. If development cannot be avoided within core areas, infrastructure should be minimized and the area should be managed in a manner that effectively conserves sagebrush habitats within that area.” *Id.* The report recommends “identifying and implementing greater protection within core areas from impacts of oil and gas development...[as] a high priority.” *Id.* The report also suggests that due to the current scale at which NSOs and timing stipulations are established, they alone will not conserve sage grouse populations without being used in combination with core areas.” *Id.* at 3, 6. On the other hand, phased development is a tool that depending on the design “may help maintain large, functional blocks of sage grouse habitat.” *Id.* at 6. Timing stipulations to protect nesting habitat should be in place March through June and where nesting habitat has not been mapped they should apply within four miles of active lek sites. *Id.* at 7.

87-011

These and many other recommendations made in the report should guide mitigation provisions for the sage grouse in the DEIS. In addition, we believe the agencies should consider the reports and documents developed by the Avian Powerlines Interaction Committee. See <http://www.aplic.org>. This group is composed of approximately a dozen utilities as well as the U.S. Fish and Wildlife Service, and it has developed standards for bird friendly powerlines, and perhaps most importantly when it comes to protecting the sage grouse, methods to discourage bird perching on powerlines. The agencies should fully consider this information. Given the possible listing of the sage grouse under the ESA and its recognition as a special status species by the BLM, special provisions must be taken to ensure the conservation of this species.

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Comments on Specific Energy Corridors Proposed in Wyoming.

In general, but with some exceptions or concerns that will be discussed below, we are supportive of the energy corridor designations proposed for Wyoming. In particular, we feel that it is appropriate for energy corridors to track along the Interstate Highway 80 corridor across southern Wyoming, which is largely the case. This area is not only the most appropriate for energy corridors from an environmental impact and social perspective (this is the dominant corridor across Wyoming for not only energy, but also people and commerce as well), it would also allow access to much of the highest potential wind energy areas in the Wyoming (and indeed in the west). So we generally support this facet of the DEIS.

87-012

We are also generally supportive of the corridors that would track along U.S. Highway 20 going west from Casper, and the corridors that would track along the Big Horn River basin in north-central Wyoming. Although we have specific concerns with a portion of this corridor that will be discussed below.

87-013

But we do have concerns regarding some of the proposed corridors, and we would like to highlight those concerns here:

Shirley Basin Corridor (No. 78-255).

Portrayed in the maps is a corridor that would run north from approximately Medicine Bow into the Shirley Basin. We have several concerns with this corridor. First, this area is a black-footed ferret recovery area. The black-footed ferret may be the most endangered mammal in North America. It enjoys protection under the ESA. Consequently, the agencies should ensure this corridor does not pass near the recovery area. This multi-modal corridor might physically disrupt prairie dog colonies (which ferrets depend on) if underground corridors were dug, and above ground transmission lines might provide predator perches. This must be avoided, and not only should the current recovery area be protected, provision should be made to protect ferrets that might inhabit new areas because this would be fully consistent with the agencies' conservation responsibilities relative to this species. Additionally, the Shirley Basin area is important sage grouse habitat, so the considerations discussed above should apply. It appears to us the primary reason for designating this dead-end corridor is likely to allow for wind energy development, which we are generally supportive of. But it would seem appropriate to ensure that any corridor in this area tracks closely along the two existing highways in the Shirley Basin, Wyoming Routes 487 and 77. The corridor should not deviate from close proximity to these roads.

87-014

Adobe Town Area (No. 73-133).

This corridor appears to track just east of the highly sensitive and very popular Adobe Town Area, an extensive wild land area just to the west of this corridor. The Adobe Town Area was just designated a Very Rare or Uncommon Area under Wyoming state law, which emphasizes its importance and special values. Consequently, the utmost

87-015

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must be done to ensure this corridor does not create environmental impacts that affect the Adobe Town Area. For one, it is not clear to us why this corridor could not be moved slightly to the east and merged with the corridor (No. 138-143) that runs along Wyoming Route 789. That would appear to us be a far more environmentally preferable option that would not hamper the creation of a corridor. In any event, if this corridor is left in place, it is crucial that it remain "underground only" and that any disturbance on this corridor be carefully regulated so as to protect the Adobe Town Area.

87-015
(cont.)

Flaming Gorge National Recreation Area (No. 126-218).

It is unclear to us why this corridor needs to diverge so far from U.S. Highway 191 and intrude on the Flaming Gorge National Recreation Area. In addition to the importance of this area for human recreation, the area where this corridor would traverse is in the midst of a wide expanse of very remote and wild BLM lands. These values should not be lost by designating a corridor in this area; if the corridor is needed it should closely track U.S. Highway 191. Certainly this corridor should remain "underground only" if it is retained. It is very likely this area of expansive sagebrush habitat is important for sage grouse, and thus the concerns discussed above apply and should become components of the DEIS.

87-016

Rock Springs Area Corridors (Nos. 121-221, 121-240, 129-218, and 218-240).

In the vicinity of Rock Springs, the corridor that tracks along I-80 bifurcates to the north and the south. The corridors in this approximately 60-80 miles east-west stretch run approximately 10-18 miles north and south of the highway. While it is our understanding that this is possibly being done to accommodate wind energy development, we still have concerns. Our primary concern is that the northern segment of this corridor (primarily No. 121-221) appears to track very closely to the southern end of the BLM's Jack Morrow Hills special management area.

87-017

The Jack Morrow Hills area is recognized for its special values by the BLM and the BLM has in place a number of strong provisions to protect this area. See http://www.blm.gov/wy/st/en/field_offices/Rock_Springs/jmhcap.html (presenting Jack Morrow Hills Coordinated Activity Plan Record of Decision). This vast undeveloped expanse of sagebrush habitat in the northern Red Desert is home to five areas of critical environmental concern, six wilderness study areas, some of the most intact segments of the Oregon, California, Mormon and Pony Express pioneer trails, and numerous significant historical, archeological, paleontological, and native traditional cultural places. It is tremendously important habitat for large herds of mule deer, pronghorn and elk, and thus is a popular hunting area, and it is a stronghold for the sage grouse.

87-018

Given these values, we believe it is extremely important to ensure that energy corridors do not intrude on this area. It is our view that even visual intrusion on this area is unacceptable. That is, power lines should not be visible from this area, even if they are located outside of it. As it stands now, we do not believe there is assurance that an electric transmission line constructed along route No. 121-221 would not be visible from

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within the Jack Morrow Hills area. Since this would be totally contrary to the BLM's management direction for this area, the DEIS should ensure this is not a problem. The corridor could easily be moved south a few miles to ensure there is no potential intrusion on the Jack Morrow Hills area.

Similarly, with all of these routes we believe it is important to ensure they deviate from the I-80 corridor the minimum amount possible. Doing this could greatly reduce environmental impacts, so it should be ensured. In some respects what is proposed now is essentially a 30 mile wide corridor which is clearly not appropriate or needed. We would further note that No. 121-240 appears to intersect the Pony Express, Mormon, California, and Oregon National Historic Trails. These trails must be protected from visual impacts created by overhead corridors, and direct physical impacts from underground corridors must also be prevented.

87-018
(cont.)

Bridger/Bighorn Mountains Area (No. 79-216).

West of Casper along U.S. Highway 20 this route diverges from the highway at approximately the town of Powder River. It appears to track along the Burlington Railroad Line for a number of miles and then turn north to cross the Bridger Mountains in the vicinity of Lysite, although it may be north of the railroad line for a considerable distance. It then runs north through northeastern Fremont County and eastern Hot Springs County and eventually rejoins the U.S. Highway 20 corridor in the general vicinity of Worland in Big Horn County.

Our concern here is with the traverse of public lands this route makes in its central portion, especially as it crosses over the Bridger Mountains. While we feel that it is appropriate for the corridor to track along the railroad route as much as possible, and to regain the U.S. Highway 20 corridor in the Bighorn Basin as soon as possible, the 60 or so miles between Lysite and Worland is of real concern to us.² This is a very remote and wild section of public lands. Thus, it is crucial that these lands receive as much protection as possible. Perhaps only underground corridors should be allowed in this area. In an ideal world the corridor would not diverge from U.S. Highway 20 and would track through the Wind River Canyon, but we realize that is probably impossible given its narrowness, and that route too would raise a number of significant environmental issues. So if this route must cross the Bridger Mountains in this extensive wild area, every effort should be made to protect the resources in this area, and more importantly perhaps, its underlying wildness and remote feel. Thus, any existing corridors should be used and tracked as closely as possible, and any special areas (such as important wildlife habitats and citizens proposed wilderness areas) should be avoided. To the extent this route diverges from highway and railroad corridors, it should be required to track those existing corridors to the maximum extent possible.

87-019

² To the extent the corridor does not faithfully track along the railroad line but instead runs north of it, we would object to that siting as well. The corridor should faithfully track along the railroad line as much as possible so as to reduce impacts.

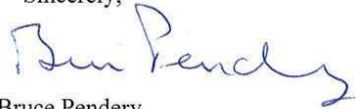
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Conclusion.

Comments have been submitted regarding the DEIS by The Wilderness Society and Western Resource Advocates. The Wyoming Outdoor Council "signed on" to both of those sets of comments. Consequently, we incorporate those comments fully into these comments and ask that they be considered as part of these comments.

Thank you for considering these comments and we look forward to remaining involved in this process.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Pendery". The signature is written in a cursive style with a large initial "B".

Bruce Pendery,
Program Director

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United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, D.C. 20240

ORDER NO. 3226

SIGNATURE DATE: January 19, 2001

Subject: Evaluating Climate Change Impacts in Management Planning

Sec. 1 Purpose. There is a consensus in the international community that global climate change is occurring and that it should be addressed in governmental decision making. The National Assessment of the Potential Consequences of Climate Variability and Change, an interagency effort initiated by Congress under the Global Change Research Act of 1990, Public Law 101-606, has confirmed that climate change is impacting natural resources that the Department of the Interior (Department) has the responsibility to manage and protect. This Order ensures that climate change impacts are taken into account in connection with Departmental planning and decision making.


Sec. 2 Authority. This Order is issued in accordance with the authorities contained in: Reorganization Plan No. 3 of 1950, as amended, 5 U.S.C. App.; 5 U.S.C. § 301; 43 U.S.C. § 1451; and 43 U.S.C. § 1453.

Sec. 3 Bureau and Office Responsibilities. Each bureau and office of the Department will consider and analyze potential climate change impacts when undertaking long-range planning exercises, when setting priorities for scientific research and investigations, when developing multi-year management plans, and/or when making major decisions regarding the potential utilization of resources under the Department's purview. Departmental activities covered by this Order include, but are not limited to, programmatic and long-term environmental reviews undertaken by the Department, management plans and activities developed for public lands, planning and management activities associated with oil, gas and mineral development on public lands, and planning and management activities for water projects and water resources.

Sec. 4 Effective Date. This Order is effective immediately and will remain in effect until its provisions are converted to the Departmental Manual or until it is amended, superseded or revoked, whichever comes first.

/s/ Bruce Babbitt

Secretary of the Interior


- Exhibit 1 -

WEC_00087



WYOMING GAME AND FISH DEPARTMENT

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FRED LINZEY
RON LOVERCHECK
ED MIGNERY

January 29, 2008

MEMORANDUM

TO: Terry Cleveland and John Emmerich
FROM: Tom Christiansen and Joe Bohne
COPY TO: Jay Lawton, Bill Rudd, Reg Rothwell, Bob Oakleaf
SUBJECT: Multi-State Sage-Grouse Coordination and Research-based Recommendations

As assigned by Assistant Director Emmerich, we have been working with other state fish and wildlife agencies in WAFWA Sage-Grouse Management Zones 1 and 2 (MT, CO, UT, SD, ND, WY) in order to coordinate interpretation of recent sage-grouse research related to oil and gas development.

Attached for your review, please find the latest and final document capturing the multi-state interpretation of the recent science related to sage-grouse conservation and oil and gas development. It has been well scrutinized by staff from MT, WY, CO, ND and UT and there is consensus on the content by the participants. South Dakota was unable to attend the initial meeting in Salt Lake City on January 8-9, but they have been provided with meeting notes and the resulting document.

It is our recommendation that WGF acknowledge this document as the correct interpretation of the recently published sage-grouse research and use this information to update and augment department documents and policies. It should be used in the forthcoming discussions with the BLM regarding their update to their sage-grouse Instruction Memorandum. In addition, we suggest that in order for this document to serve the broadest purpose for sage-grouse conservation four additional actions are needed. First, the document should be shared with Governor Freudenthal's staff. Second, we recommend that the Director's Office enter into discussions with MT FWP Director Jeff Hagener to ensure consistency in the application of these recommendations between our border states, and especially with the WY and MT BLM State Field Offices. Third, we recommend the document be submitted to WAFWA's Sage-Grouse Technical Committee as well as the WAFWA Executive Committee for their consideration and use. Finally, we recommend this document be included with other materials sent to the USFWS for consideration in their review of the status of sage-grouse and measures in place to conserve those populations.

We look forward to your direction on how to proceed.

"Conserving Wildlife - Serving People"

Exhibit 2

WEC_00087

**Using the Best Available Science to Coordinate Conservation Actions that
Benefit Greater Sage-Grouse Across States Affected by Oil & Gas Development in
Management Zones I-II (Colorado, Montana, North Dakota, South Dakota, Utah,
and Wyoming)**

Background

Greater Sage-grouse are widely considered in scientific and public policy arenas to be a species of significant conservation concern. Loss, degradation and fragmentation of important sagebrush grassland habitats have negatively impacted sage-grouse populations. Much of this loss of habitat function is occurring in Sage-grouse Management Zones (MZ) 1 and 2 (Stiver et al. 2006) in Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming as a result of oil and gas development (Connelly et al. 2004). Oil and gas development is rapidly increasing within these areas. In response to those concerns, states and provinces are in various stages of completing or updating management plans in order to provide for long-term sage-grouse conservation. Special emphasis is being placed on oil and gas development as it rapidly spreads across much of the eastern range of sage-grouse.

The recent decision by B. Lynn Winmill, Chief U.S. District Judge (2007), which remands the original 2005 not warranted decision back to the USFWS for reconsideration, has highlighted the need for States to coordinate their application of best available science. Representatives from the state agencies with authority for managing fish and wildlife from the major sage-grouse and energy producing states comprising MZ 1 and 2 and sage-grouse researchers who have published new findings, met on January 8 and 9, 2008 in Salt Lake City. The objectives of the meeting were to better understand the application of most recent peer-reviewed science within the context of oil and gas development and coordinate and compare implementation of conservation actions utilizing that information.

Review Process

The participants at this meeting represented technical science and management advisors from each of the states. Researchers having the most recently peer reviewed and published articles concerning sage grouse and oil and gas development were invited to present their findings and answer questions. State agency participants agreed that the goal was not to establish state or regional policy or to determine the management actions that will be implemented in any or all states within MZ 1 or 2. Rather, the goal was to reach agreement on the conservation concepts and strategies related to oil and gas development that are supported by current published peer-reviewed and unpublished literature. If implemented, these concepts and strategies likely will not eliminate impacts to sage-grouse populations that result from energy development. However, when used in combination with other conservation measures, these actions may enhance the likelihood that sage-grouse populations will persist at levels that allow historical uses such as grazing and agriculture and maintain their current distribution and abundance, thereby avoiding the need to list sage-grouse under the federal Endangered Species Act.

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Each researcher was invited to present their findings and to answer questions posed by the states. Following this, each state provided an overview of their review of the science and their resulting management actions and recommendations. The group then collectively reviewed, debated and agreed on the concepts and strategies supported by that science. The focus of the meeting was on five key issues: core areas, no-surface-occupancy zones, phased development, timing stipulations, well-pad densities, and restoration. Scientific data are available to inform many other issues related to sage-grouse management and conservation that were not reviewed (e.g., BMPs).

Core Areas

Identification and protection of core areas, sometimes also referred to as crucial areas, will help maintain or achieve target goals for populations including distribution and abundance.

Full field energy development appears to have severe negative impacts on sage-grouse populations under current lease stipulations (Lyon and Anderson 2003, Holloran 2005, Kaiser 2006, Holloran et al. 2007, Aldridge and Boyce 2007, Walker et al 2007, Doherty et al. 2008). Much of greater sage-grouse habitat in MZ 1 and 2 has already been leased for oil and gas development. These leases carry stipulations that have been shown to be inadequate for protecting breeding and wintering sage-grouse populations during full field development. (Holloran 2005, Walker et. al. 2007, Doherty et al. 2008) New leases continue to be issued utilizing these same stipulations. To ensure long-term persistence of populations and meet goals set by the states for sage-grouse, identifying and implementing greater protection within core areas from impacts of oil and gas development is a high priority.

In order to conserve core areas it is essential that they be identified and delineated. Sage-grouse populations occur over large landscapes comprising a series of leks and lek complexes with associated seasonal habitats. Therefore, core areas should capture the range required by a defined population to maintain itself. This concept is consistent with Crucial Wildlife Habitats recently endorsed by the Western Governor's Association (2007). Criteria that could be used to identify and map core areas include, but are not limited to: (1) lek densities, (2) displaying male densities, (3) sagebrush patch sizes, (4) seasonal habitats (breeding, summering, wintering areas), (5) seasonal linkages, or (6) appropriate buffers around important seasonal habitats.

Research indicates that oil or gas development exceeding approximately 1 well pad per square mile with the associated infrastructure, results in calculable impacts on breeding populations, as measured by the number of male sage-grouse attending leks (Holloran 2005, Naugle et al. 2006). Because breeding, summer, and winter habitats are essential to populations, development within these areas should be avoided. If development cannot be avoided within core areas, infrastructure should be minimized and the area should be managed in a manner that effectively conserves sagebrush habitats within that area.

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No Surface Occupancy (NSO)

At the scale that NSOs are established, they alone will not conserve sage-grouse populations without being used in combination with core areas. The intent of NSOs is to maintain sage-grouse distribution and a semblance of habitat integrity as an area is developed.

Breeding Habitat - Leks

Research in Montana and Wyoming in coal-bed methane natural gas (CBNG) and deep-well fields suggests that impacts to leks from energy development are discernable out to a minimum of 4 miles, and that some leks within this radius have been extirpated as a direct result of energy development (Holloran 2005, Walker et al. 2007). Walker et al. (2007) indicates that the current 0.25-mile buffer lease stipulation is insufficient to adequately conserve breeding sage-grouse populations in areas having full CBNG development. A 0.25-mi. buffer leaves 98% of the landscape within 2 miles open to full-scale energy development. In a typical landscape in the Powder River Basin, 98% CBNG development within 2 miles of leks is projected to reduce the average probability of lek persistence from 87% to 5% (Walker et al. 2007). Only 38% of 26 leks inside of CBNG development remained active compared to 84% of 250 leks outside of development (Walker et al. 2007). Of leks that persisted, the numbers of attending males were reduced by approximately 50% when compared to those outside of CBNG development (Walker et al. 2007).

The impact analyses provided in Walker et al. (2007) are based on a 7-year dataset where probability of lek persistence is strongly related to extent of sagebrush habitat and the extent of energy development within 4 miles of the lek and the extent of agricultural tillage in the surrounding landscape. The estimated probabilities of lek persistence are only reliable for the length of the dataset, and it is not understood how other stressors (e.g., West Nile virus [Naugle et al. 2004], invasive weeds [Bergquist et al. 2007]) will cumulatively impact sage-grouse over longer time periods. While increased NSO buffers alone are unlikely to conserve sage-grouse populations, results from Walker et al. 2007 suggest they will increase the likelihood of maintaining the distribution and abundance of grouse and should increase the likelihood of successful restoration following energy development.

Additional information provided in Walker et al. (2007) allows managers and policy makers to estimate trade-offs associated with allowing development within a range of different distances from leks (Figures 1a and 1b). These probabilities will also need to be applied over larger landscapes in future analyses to better understand projected region- and state-wide population impacts under current and future development scenarios. Walker et al. (2007) studied lek persistence from 1997-2005 in relation to coal bed natural gas (CBNG) development in the Powder River Basin. These models are based on projected impacts of full-field development within (a) 2 miles and (b) 4 miles of the lek. We present results from these models (rather than models with impacts at smaller scales)

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because development within 2 and 4 miles of leks are known to decrease breeding populations as measured by the number of displaying males (Holloran et al. 2005, Walker et al. 2007), and 52% and 74-80% of hens are known to nest within 2 and 4 miles of leks, respectively (Holloran and Anderson 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008). Sizes of NSO buffers required to protect breeding populations may be underestimated because leks in CBNG fields have fewer males per lek and a time lag occurs (avg. 3-4 years) between development and when leks go inactive. As a result, it is expected that not only will lek persistence decline, the number of males per lek will also decline. In contrast, sizes may be overestimated where high lek densities cause buffers from adjacent leks to overlap. Additional time is required to develop models demonstrating the probabilities of lek persistence at well-pad densities less than full development.

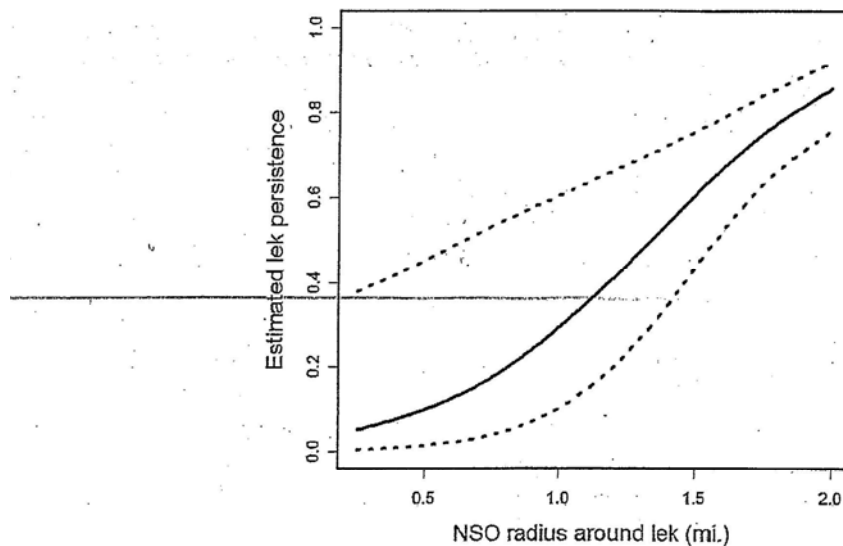


Figure 1a. Estimated probability of lek persistence (dashed lines represent 95% CIs) in fully-developed¹ coal-bed natural gas fields within an average landscape in the Powder River Basin (74% sagebrush habitat, 26% other habitats types) with different sizes of no-surface-occupancy (NSO) buffers around leks, assuming that only CBNG within 2 miles of the lek affects persistence. Buffer sizes of 0.25 mi., 0.5 mi., 0.6 mi., and 1.0 mi. result in estimated lek persistence of 5%, 11%, 14%, and 30%. Lek persistence in the absence of CBNG averages ~85%.

¹ Defined as entire area outside the NSO buffer, but within 2 miles, being within 350 meters of a well.

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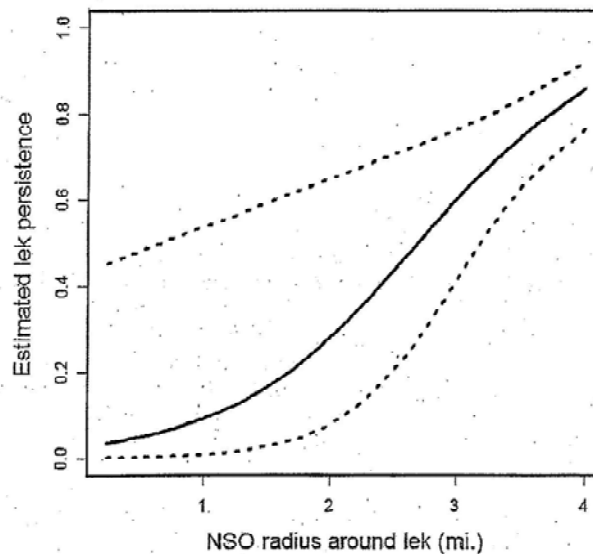


Figure 1b. Estimated probability of lek persistence (dashed lines represent 95% CIs) in fully-developed² coal-bed-natural-gas-fields within an average landscape in the Powder River Basin (74% sagebrush habitat, 26% other habitats types) with different sizes of no-surface-occupancy (NSO) buffers around leks, assuming that only CBNG within 4 miles of the lek affects persistence. Buffer sizes of 0.25 mi., 0.5 mi., 0.6 mi., 1.0 mi., and 2.0 mi. result in estimated lek persistence of 4%, 5%, 6%, 10%, and 28%. Lek persistence in the absence of CBNG averages ~85%.

Figures 1a and 1b provide an illustration of the trade-offs between differing NSO buffers in relation to lek persistence in developing CBNG fields. The group does not offer a specific NSO recommendation but provides these graphs to guide decision-making.

Breeding Habitat - Nesting and Early Brood-rearing

Yearling female greater sage-grouse avoid nesting in areas within 0.6 miles of producing well pads (Holloran et al. 2007), and brood-rearing females avoid areas within 0.6 miles of producing wells (Aldridge and Boyce 2007). This suggests a 0.6-mile NSO around all suitable nesting and brood-rearing habitats is required to minimize impacts to females during these seasonal periods. In areas where nesting habitats have not been delineated, research suggests that greater sage-grouse nests are not randomly distributed. Rather, they are spatially associated with lek location within 3.1 miles in Wyoming (Holloran and Anderson 2005). However, a 4-mile buffer is needed to encompass 74-80% (Moynahan

² Defined as entire area outside the NSO buffer, but within 4 miles, being within 350 meters of a well.

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2004, Holloran and Anderson 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008). These suggest that all areas within at least 4-miles of a lek should be considered nesting and brood-rearing habitats in the absence of mapping.

Winter Habitat

NSO or other protections may also need to be considered for crucial winter range. Survival of juvenile, yearling, and adult females are the three most important vital rates that drive population growth in greater sage-grouse (Holloran 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008). Although overwinter survival in sage-grouse is typically high, severe winter conditions can decrease hen survival (Moynahan et al 2006). Crucial wintering habitats can constitute a small part of the overall landscape (Beck 1977, Hupp and Braun 1989). Doherty et al. (2008) demonstrated that sage-grouse avoided otherwise suitable wintering habitats once they have been developed for energy production, even after timing and lek buffer stipulations had been applied (Doherty et al. 2008). For this reason, increased levels of protection may need to be considered in crucial winter habitats.

Phased Development

Population-level impacts and avoidance associated with energy development have been documented (Braun et al. 2002, Lyon and Anderson 2003, Holloran 2005, Kaiser 2006, Holloran et al. 2007, Aldridge and Boyce 2007, Walker et al 2007, Doherty et al. 2008). Phased development maximizes the amount of area within a landscape that is not being impacted by development at any one time, and can occur at multiple spatial scales (e.g., phased development of separate fields in a landscape, phased development of infrastructure within a single unit or field, or phased development within a single lease). Unitization, clustering, and geographically staggered development are all forms of phased development. As a tool to minimize impacts to sage-grouse, developing oil and gas resources by employing one of these phased methods may help maintain large, functional blocks of sage-grouse habitat.

Timing Stipulations

As with NSOs, at the scale that timing stipulations are established, they alone will not conserve sage-grouse populations without being used in combination with core areas. The intent of timing stipulations is to help maintain sage-grouse distribution and a semblance of habitat integrity as an area is developed. Timing stipulations are of lesser value at the scale of full-field development.

Breeding Habitat - Leks

Traffic during the strutting period when males are on a lek results in declines in male attendance when road-related disturbance is within 0.8 miles (Holloran 2005). The distance traveled by males from the lek during the breeding season has been reported in varying ways but generally averages 0.6 miles from a lek (Colorado Greater Sage-Grouse

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Conservation Plan Steering Committee 2008 - see Appendix B). Additionally, females breeding on leks within 1.9 miles of natural gas development had lower nest initiation rates and nested farther from the lek compared to non-impacted individuals (Lyon and Anderson 2003), suggesting disturbance to leks influence females as well. Local variations may influence the application of specific dates, which are typically within a window of March 1 and May 31.

Breeding Habitat - Nesting and Early Brood-rearing

Often, timing stipulations (periods where no activity that creates disturbance are allowed) for breeding habitat have been applied using a radius around a lek. However, nesting and brood-rearing habitat is not uniformly distributed around the lek. Mapping of habitat would allow for more accurate application of this stipulation. Research on the distribution of nests relative to leks and on the timing of nesting indicates that timing stipulations to protect nesting hens and their habitat should be in place from March through June in mapped breeding habitat or (when nesting habitat has not been mapped) within 4 miles of active lek sites (Moynahan 2004, Holloran et al. 2005, Colorado Greater Sage-Grouse Conservation Plan Steering Committee 2008).

Winter Habitat

Research suggests that no surface occupancy should also be applied to important wintering habitats (Doherty et al. 2008), but if development occurs, impacts would be reduced if development activities were avoided between December 1 and March 15.

Well-Pad Densities

Leks tend to remain active when well-pad densities within 1.9 miles of leks are less than 1 pad per square mile (Holloran 2005) but leks tend to go inactive at higher pad densities (Holloran 2005, Naugle et al. 2006).

Restoration

The purpose of restoration in sage-grouse habitat should be the removal of infrastructure associated with energy development from the land surface and subsequent re-establishment of native grasses, forbs, and shrubs, including sagebrush, to promote natural ecological function. Restoration should reestablish functionality of seasonal habitats for sage-grouse. Thus a field should not be considered restored until sagebrush-grassland habitats have been reestablished.

Future Needs

Time did not allow for a detailed discussion of specific Best Management Practices for oil and gas development and restoration, seasonal habitat mapping, or future research. These topics are all recognized as needing action in the immediate future.

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Appendix 1.

Participants (Alphabetical)

Dr. Tony Apa, Colorado Division of Wildlife
Mr. Joe Bohne, Wyoming Game and Fish Department
Mr. Tom Christiansen, Wyoming Game and Fish Department
Mr. Jeff Herbert, Montana Department of Fish, Wildlife and Parks
Mr. Bill James, Utah Division of Wildlife Resources
Mr. Rick Northrup, Montana Department of Fish, Wildlife and Parks
Mr. Dave Olsen, Utah Division of Wildlife Resources
Mr. Aaron Robinson, North Dakota Game and Fish
Ms. Pam Schnurr, Colorado Division of Wildlife
Mr. T.O. Smith, Montana Department of Fish, Wildlife and Parks
Mr. Brett Walker, Colorado Division of Wildlife

Invited Guests

Dr. Matt Holloran, Wyoming Wildlife Consultants, LLC
Dr. David Naugle, University of Montana

Feb 12 08 12:54p HINCKLEY TOWN, INC.

435-864-3341

p.1
WEC_00088

February 12, 2008

West Wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail stop 4
Argonne, Illinois 60439
Fax 866 - 542 - 5904

Dear Sirs:

I would like to enter my PROTEST TO THE TRESPASS OF OUR FARM PROPERTY with your Energy Corridor, in the area south of Delta, Utah continuing south past Oasis, Utah at least Two Miles.

At 2000 South my Son Jerry Skeem owns 20+ acres of farm land on the east side of the Railroad tracks continuing almost to 2500 south.

At 2500 south he also owns 80+ acres of prime farm land on the west side of the R. R. Tracks. The Deseret Irrigation Canal runs along the west side of the farm and crosses the R. R. Tracks at about 3000 So. This Canal furnishes Irrigation Water to most all the Oasis Farming area.

Fred and Elva Skeem owns 20+ acres of farm land, 40 Fruit trees and a prime garden Area between the Canal and the River.

About 3300 So. Just south of the Canal and west of the R. R. Tracks Fred and Elva Skeem owns 75 acres of Prime farm ground, with farm buildings and feed yards. We lease to our Son Paul Skeem for farming.

There is also a "Lewis Home" and the "Pauly Home" with farm buildings and a large Feed yards along the river.

At 3500 South on the East side of the R. R. Tracks my Son Sheldon Skeem owns a newer home, farm buildings, corrals, feed yards and 20 acres of farming ground.

South is the Town of Oasis, where there are many homes of friends and relatives along both sides of the R.R. Tracks. Also farming ground belonging to relatives.

At 4500 South there is 160 acres of farm land which has been in the family for five generations. Several homes of relatives. My Son Jerry Skeem has a newer home with farm buildings, corrals, and 35+ acres along the road just east of the R. R. Tracks.

88-001

Feb 12 08 12:55p

HINCKLEY TOWN, INC.

435-864-3341

p.2
WEC_00088

Further south, an Uncle owns a home and a farm.

We have lived here all our lives and worked hard to make a living and upgrade this farm land with lazer leveling, good irrigation ditches and fertile top soil. We feel that this trespass would be detrimental to our farming business. In fact it could put us out of business.

88-001
(cont.)

THE QUESTION I WOULD LIKE TO ASK; Why? When West Millard County has so much desert land, would you want to trespass the fertile irrigated farm land, destroy homes, land and people's lives.

Please follow the recommendations of the County Commissioners and go a few miles West of Delta and then South on the desert..THIS WOULD HURT NO ONE. And Be easier to maintain. Crossing our farm land would bring defistation, not only to the land but to the ditches and canals that are in place.and to our future. We pray that You will consider our recommendations.

88-002

Sincerely: *Elva H. Skeem*

Fred and Elva Skeem
P. O. Box 12
Hinckley, Utah 84635
Tele: 435-864-3164

Paul Skeem
2716 W. 2500 S.
Delta Utah RFD 84624
Tele: 435-864-8989

Sheldon Skeem
2478 W. 3750 S.
Delta Utah RFD 84624
Tele: 435-864-2836

Jerry Skeem
5275 S.2950 W
Oasis, Utah 84650
Tele: 435-864-2696

Feb 12 08 11:48a

HINCKLEY TOWN, INC.

435-864-3341

p.1

WEC_00088

Feb. 12, 2008

West Wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, Illinois 60439
Fax 866-542-5904

Dear Sirs:

I would like to protect the trespass of our farm property, with your Energy Corridor, in the area between Delta Utah and south three basis, Utah and two miles south -

at app. 2000 South my son Jerry Skem owns 20+ acres of farm land on the east side of the Rail road tracks.

at 2500 South; he also owns 80+ acres of prime farm ground along the west side of the R.R. tracks. The Desert Diversion Canal runs along the edge of the farm and crosses the R.R. tracks at app. 3000 South.

Fred + Elva Skem owns 20+ acres, a house, 40 fruit trees and a prime garden area between the canal and the river.

at 3000 South just south of the canal and west of the R.R. tracks. Fred + Elva Skem own 70 acres of prime farm land, farm buildings and Corral. These are leased to our son Paul Skem for farming.

Feb 12 08 11:48a

HINCKLEY TOWN, INC.

435-864-3341

p.2
WVEC_00088

There is also a "Lewis Home" and a "Pauly Home" with farm buildings and a large feeding area along the river.

At 3000 South, on the East side of the R.R. tracks, my son Sheldon Sheem has a new home, farm buildings and feed lot plus 20 acres of farm land.

South is the town of Oasis, Utah where there are many homes of friends and relatives. There is also farm land on both sides of the R.R. tracks owned by relatives.

At 4500 South, there is 160 acres of farm land which has been in the family for five generations. There are several homes of relatives. My son Jerry Sheem owns 35+ acres of farm land here, along the road by the east side of the R.R. tracks. He also has a new home, and feed lot and farm buildings. Further south our uncle owns a home and farm.

We have lived here all our lives. Worked hard to improve and upgrade the farm land with loam leveling, irrigation ditches and fertile top soil. We feel that this trespass would be detrimental to our farming operations.

The Question is: Why? when West Millard County has so much desert land, would you want to trespass on the fertile irrigated farm lands, to destroy the land the homes and families.

Feb 12 08 11:49a

HINCKLEY TOWN, INC.

435-864-3341

p.3

WEC_00088

Please follow the recommendations of the County Commissioners and go a few miles west of Delta, Utah, then south through the desert. This would hurt no one and it would be less expensive and easier to maintain your corridor.

Crossing our farm land, not only the land, but homes, people and their business would be ruined. We pray that you will consider our recommendations.

Sincerely: Elva H. Skeem

Fred + Elva Skeem
P.O. Box 12
Hinckley, Utah 84635
tele: 435-864-3164

Paul Skeem
2716 W. 2500 So.
Delta, Utah RFD
84624
tele: 435-864-8989

Sheldon Skeem
2478 W 3750 So.
Delta Utah, RFD.
84624
tele: 435-864-2836

Gerry Skeem
5275 So 2950 W.
Oasis, Utah 86450
tele: 435-864-2696

WEC_00089

20725 Cinnamon Dr.
Jamul, CA, 91935
February 14, 2008

Gentlemen,

As a homeowner of the home on 5 Acres of land at the above address (parcel number 606 020 22 00), I am contacting you to express my concern over the proposed "Powerlink West-Wide Energy Corridor" through the Honey Springs - Deerhorn Valley region of San Diego County, north and east of State Route Hwy 94.

Many endangered species will certainly be affected, damaged, or eliminated through the destruction of habitat: Checkerspot Butterfly, Southwestern Flycatcher, Least Bell Vireo, Bald Eagles, Red Tailed Hawks and other birds of numerous species.

Environmental damage will be incalculable and long lasting: to the watershed, deep water table, Barrett Lake Watershed and western-flowing streams; to wildlife, grasslands, native chaparral, small mammals, reptiles, & amphibians (Southwest Arroyo Toad), multitudes of wilderness creatures will unquestionably be disturbed and destroyed.

89-001

89-002

WEC_00089

The ruination of pristine and beautiful wilderness areas — (massive amounts of total acreage to be involved) —; the long period of time involved during construction in which noise pollution will be exponentially magnified as will the dust, and dirt and environmental pollution; the loss of quiet, and peace of rural landscapes, the traffic problems that would be caused — all of these issues must be considered. An alternate solution must be found. To build the West-Wide Energy Corridor through the lovely rural eastern part of our county, would be inconceivable — an incomprehensible transgression as severe as another October fire — or the construction of another CASINO in Honey Springs Road and Deerhorn Valley! Don't, Don't ruin our precious few remaining wild lands of San Diego. Find an alternate, desert route or another option entirely.

89-003

89-004

Thank you for your attention,

Sincerely,
Mark White