

WEC_00090

February 14, 2008

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

Fax: (866) 542-5904

Dear West-Wide Energy Corridor DEIS friends:

I am a Navajo, a World War II Veteran Code-talker, and a longtime member of the New Mexico State Senate. I represent constituents in District 3 of McKinley and San Juan Counties. I hold M.A. and B.S. degrees from the University of New Mexico. The map showing corridors around the Navajo Nation fails to show that one goes directly through my district and over the lands (largely allotments) of my constituents.

I have reviewed the comments of Dooda Desert Rock. I approve and endorse them.

I ask for environmental justice for my constituents by respecting their lives and culture.

Sincerely,


Senator John Pinto

90-001

WEC_00091

JIM GIBBONS
Governor

STATE OF NEVADA

ANDREW K. CLINGER
Director



DEPARTMENT OF ADMINISTRATION

209 E. Musser Street, Room 200

Carson City, Nevada 89701-4298

(775) 684-0222

Fax (775) 684-0260

<http://www.budget.state.nv.us/>

February 6, 2008

Kyriss LaVerne
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

Re: SAI NV # **E2008-280**

Reference:

Project: **West-wide Energy Corridor Programmatic EIS**

Dear Kyriss LaVerne:

The following agencies support the above referenced document as written:

State Historic Preservation Office

This constitutes the State Clearinghouse review of this proposal as per Executive Order 12372. If you have questions, please contact me at (775) 684-0209.

Sincerely,

A handwritten signature in cursive script, appearing to read "Krista Coulter".

Krista Coulter
Nevada State Clearinghouse

WEC_00091

1/21

Rebecca Palmer

From: Nevada State Clearinghouse [Clearinghouse@budget.state.nv.us]
Sent: Tuesday, December 18, 2007 10:58 AM
To: Rebecca Palmer
Subject: E2008-280 West-wide Energy Corridor Programmatic EIS -

<http://budget.state.nv.us/images/state_seal.jpg> NEVADA STATE CLEARINGHOUSE
Department of Administration, Budget and Planning Division
209 East Musser Street, Room 200, Carson City, Nevada 89701-4298
(775) 684-0209 Fax (775) 684-0260

RECEIVED

JAN 17 2008

DEPARTMENT OF ADMINISTRATION
OFFICE OF THE DIRECTOR
BUDGET AND PLANNING DIVISION

TRANSMISSION DATE: 12/18/2007

State Historic Preservation Office

Nevada SAI # E2008-280

Project: West-wide Energy Corridor Programmatic EIS

Follow the link below to download an Adobe PDF document concerning the above-mentioned project for your review and comment.
E2008-280 <<http://www.corridoreis.anl.gov/>>

Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than Monday, February 4, 2008.

Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference.
Questions? Krista Coulter, (775) 684-0209 or clearinghouse@state.nv.us
<<mailto:clearinghouse@budget.state.nv.us>>

Public meeting on 1/17 in Las Vegas.

No comment on this project Proposal supported as written

91-001

AGENCY COMMENTS:

Signature: *Rebecca Palmer*

Date: *1/16/08*

Distribution: Wayne Howle, Attorney General Gary McQuin, Department of Agriculture Phillip Lehr, Colorado River Commission Sandy Quilici, Department of Conservation & Natural Resources Stephanie Martensen, Division of Emergency Management Jeff Hardcastle, State Demographer Alan Di Stefano, Economic Development Kathy Agee, Economic Development Chad Hastings, Fire Marshal Jodi Stephens, Governor's Office Stan Marshall, State Health Division Karen Beckley, State Health Division Cathy Barcomb, Commission for the Preservation of Wild Horses Sherry Rupert, Indian Commission Skip Canfield, AICP, Division of State Lands Michael J. Stewart, Legislative Counsel Bureau Alan Coyner, Commission on Minerals D. Driesner, Commission on Minerals Christy Morris, Commission on Minerals Sandi

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JIM GIBBONS
Governor

STATE OF NEVADA

ANDREW K. CLINGER
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DEPARTMENT OF ADMINISTRATION

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February 11, 2008

Kyriss LaVerne
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

Re: SAI NV # **E2008-280**

Reference:

Project: **West-wide Energy Corridor Programmatic EIS**

Dear Kyriss LaVerne:

Enclosed are additional comments from the following agencies regarding the above referenced document:

Division of Water Resources

These comments were received after our previous letter to you. Please incorporate these comments into your decision making process. If you have questions, please contact me at (775) 684-0209.

Sincerely,

A handwritten signature in cursive script, appearing to read "Krista Coulter".

Krista Coulter
Nevada State Clearinghouse

Enclosure

WEC_00091

From: Nevada State Clearinghouse
Sent: Tuesday, December 18, 2007 10:59 AM
To: Robert K. Martinez
Subject: E2008-280 West-wide Energy Corridor Programmatic EIS -



NEVADA STATE CLEARINGHOUSE
Department of Administration, Budget and Planning Division
209 East Musser Street, Room 200, Carson City, Nevada 89701-4298
(775) 684-0209 Fax (775) 684-0260

TRANSMISSION DATE: 12/18/2007

Division of Water Resources

Nevada SAI # E2008-280
Project: West-wide Energy Corridor Programmatic EIS

Follow the link below to download an Adobe PDF document concerning the above-mentioned project for your review and comment.

[E2008-280](#)

Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than Monday, February 4, 2008.

Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference.

Questions? Krista Coulter, (775) 684-0209 or clearinghouse@state.nv.us

Public meeting on 1/17 in Las Vegas.

No comment on this project Proposal supported as written

AGENCY COMMENTS:

91-002

WEC_00091

The proposed utility corridors have the potential to affect existing water resources. It is likely that these right of way areas may negatively impact important and established water resources such as springs and seeps for wild life or "claims of vested right". The specific impact may be identified during project specific analysis within particular corridors. It is suggested that these proposed right of way areas should be expanded to provide additional flexibility. This would ensure that the impact on these resources be minimized as well as allowing alternate sites in the case of undetermined engineering considerations.

91-003

All records of the State Engineer / Nevada Division of Water Resources are available on the Division's web site, <http://water.nv.gov>, which will allow the applicant the ability to research whether or not the proposed project area will impact existing water rights. During the construction phase, any water used on the described lands for this project shall be provided by an established utility or under permit / waiver issued by the State Engineer's Office.

91-004

All waters of the State belong to the public and may be appropriated for beneficial use pursuant to the provisions of Chapters 533 and 534 of the Nevada Revised Statutes (NRS), and not otherwise.

Very Respectfully,
Mark Sivazlian

Signature: Mark Sivazlian

Date: 4 February, 2008

WEC_00092

Dixie Power-Water-Light & Telephone, Inc.

Box #07675
Washington, Ut 84780
(801) 634-2343

WEST SIDE ENERGY CORRIDOR DEIS

2-14-08

ARGONNE NATL LABS

ARGONNE, ILLINOIS 6259

I HAVE NOT RECEIVED A DRAFT EIS HARD COPY OF THE PROPOSED DEIS FOR WEST SIDE ENERGY CORRIDOR, THUS MY STATEMENTS MAY BE INCOMPLETE. CAN YOU SEND ME A HARD COPY.

OUR FIRM HAS BEEN DOING LONG RANGE RESEARCH IN WATER & POWER THAT INCLUDES WORK ON PARSONS ENGINEERS HAWAII PROJECT.

THERE SHOULD BE PROVISIONS MADE IN THE WEST SIDE PLAN FOR MAG LEV TRAINS, SUPERCONDUCTOR POWER CABLES, WATER PIPELINES AND FIBER OPTIC LINES THAT MAY HAVE AN IMPACT ON YOUR CORRIDORS PROPOSAL FOR TRANSMISSION LINES, PARTICULARLY IN THE UTAH, NEVADA AND CALIFORNIA AREAS, AS WELL AS IDAHO, OREGON & WASHINGTON, AS WELL AS ALASKA.

TECHNOLOGY CAN CHANGE THINGS.

PLEASE SEND ME THE HARD COPY TO

DARRELL G. ROFF
2538 RAMBLING ROAD
VIENNA, VIRGINIA
22181

P.S. I HAVE BEEN BACK EAST & THIS THE LACK OF KNOWLEDGE OF THE DEIS

92-001

WEC_00092

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Box 607675
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WEST SIDE ENERGY CORRIDOR DEIS
ARAGONNE NATL LABS
ARAGONNE, ILLINOIS 6259

9-14-08

I HAVE NOT RECEIVED A DRAFT EIS HARD
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22181

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THUS THE LACK OF KNOWLEDGE OF THE DEIS

WEC_00093

DOODA DESERT ROCK
 A Navajo Unincorporated Association
 P.O. Box 7838
 Newcomb, Navajo Nation
 (New Mexico) 87455

(505) 947-6159

**COMMENTS ON THE WEST-WIDE ENERGY CORRIDOR
 PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT**

February 14, 2008

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

Interest of Commentator

Dooda Desert Rock is an unincorporated Navajo association of grassroots Navajos who live on the land and practice their traditions, and individual and organizational supporters. The association was initially formed to oppose the proposed Desert Rock Power Plant that we are going to stop from being located on our lands near Shiprock in the Four Corners area of northwest New Mexico. "Dooda" can be translated from Navajo as "no way!"

I'm the Association's President and I attended the hearing held in Window Rock, Navajo Nation (Arizona) and in Albuquerque, New Mexico. I heard the assertion that this PEIS and the corridors proposed by it have nothing to do with the Navajo Nation or the interests of Navajos. That is nonsense. A map circulated with the PEIS, "draft Corridors November 2007," shows corridor routes entering the Navajo Nation on the northwest, from the southwest and on the northeast. The map inaccurately does not reflect that the corridor runs through Navajo allotted lands in the Checkerboard Area of New Mexico, outside the "reservation proper." Many Navajos live in that area. Another corridor is shown approaching the Navajo Nation from the south, and of course that might be extended.

We know that the Dine Power Authority seeks to run power lines through the Navajo Nation to run from the proposed Desert Rock Power Plant to sites in Nevada. Apparently there is or was a separate EIS process for that line.

93-001

WEC_00093

Navajos are not fooled. We know that there is an intent for the Dine Power Authority lines and the corridor they will follow to link with the line shown on the map in the northwest of the Navajo Nation.

These comments are largely based on two documents. The first is Executive Order No. 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (February 11, 1994), 59(32) Federal Register (Wednesday, February 16, 1994). The second is United Nations General Assembly Resolution No. A/61/L/ 67 (7 September 2007), the "United Nations Declaration on the Rights of Indigenous Peoples."

93-001
(cont.)

The thrust of our commentary is that this corridor plan must take into account the right of the Navajo People along its routes to live their lives and culture as they wish, without the disruption that will be caused by linking the proposed Dine Power Authority routes with the proposed corridors. The definition of what will run in a "corridor" is broad, and we see the disruption of our lives to follow.

E.O. 12898

Individuals within the Environmental Protection Agency who are familiar with environmental justice and Indian Country issues assure us that our concerns about the preservation of our life and culture do indeed fall within the National Environmental Policy Act. They point to the discussions of environmental justice in Council on Environmental Quality, Environmental Justice: Guidance Under the National Environmental Policy Act (December 10, 1997), and say that if there is a disproportionate impact upon American Indian culture from a proposed action, then that is an aspect of "environment" worthy of protection.

93-002

The discussion of environmental justice at pages 3-295 through 3-301 of the Programmatic Environmental Impact Statement is wholly inadequate. It identifies Minority and Low-Income Populations at pages 3-297—3-298 and shows the "American Indian or Alaska Native" populations of eleven western states. However it does not discuss the important facts that most of the American Indian population of the United States is concentrated in those states, and there is a significant Indian population in the area in and around the Navajo Nation that is addressed by the proposed actions here.

The Declaration

There are several provisions of the Declaration on the Rights of Indigenous Peoples that apply to this situation, including maintaining and strengthening our social and cultural institutions (Article 5), a prohibition against depriving us of our integrity as distinct peoples (Article 8.2(a)), and the right to maintain our spiritual relationship with our lands (Article 25). We have the right to the conservation and protection of the environment, and "the productive capacity" of our lands (Article 29.1). We cannot be forcibly removed from our lands, as with being dislocated by a power corridor (Article 10). We cannot be dispossessed of our lands or resources (Article 8(b)).

93-003

WEC_00093

There is a principle that is now part of international law in decisions of the Inter-American Commission on Human Rights and the Inter-American Human Rights Court, namely the provision in Article 27 of the Declaration that recognizes and protects our customary land tenure systems. That is important, because Navajos who were relocated from areas declared to go to the Hopi Tribe, and Navajos who remained, were not paid for their property rights under customary land tenure. They were told that a customary use right was not "property" for purposes of compensation. We now know that customary use rights to land are indeed "property." Our land cannot be taken from us without consent or without adequate compensation.

It is clear that our traditional law applies. The proposed actions violate our obligations to Mother Earth, to the land, and to the animals under The Fundamental Laws of the Dine. They are recognized in the Declaration and in international customary law as binding law.

We have rights to our land, culture and ways under international law. The proposed corridors will obviously impact Navajos, and we caution that our lives must not be disrupted.

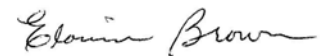
In addition, these international law considerations squarely fall within the scope and intent of Executive Order No. 12898 because they are relevant to us as indigenous people and have to do with our environmental justice.

Recommendation

There should be additional hearings on this PEIS, and the time for public comment should be extended. There should be oral announcements and explanations in Navajo on area radio and television. There should be recordings of explanations made in Navajo sent to each community chapter house.

The PEIS is wholly inadequate because it violates the intent of Executive Order 12898, and it violates customary international law as restated in the Declaration on the Rights of Indigenous Peoples.

Respectfully submitted,



Elouise Brown, President

93-003
(cont.)

93-004

93-005



TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

1100 W. 116TH AVENUE • P.O. BOX 33695 • DENVER, COLORADO 80233 • 303-452-6111

WEC_00094

February 14, 2008

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

RE: Tri-State Generation and Transmission Association, Inc. Comments to the Draft Programmatic Environmental Impact Statement (PEIS) for the Designation of Energy Corridors on Federal Land in 11 Western States (DOE/EIS-0386)

Tri-State Generation and Transmission Association, Inc. (Tri-State) appreciates the opportunity to comment on the Draft PEIS for the Designation of Energy Corridors on Federal Land. Tri-State is a wholesale electric power producer/supplier that serves 44 rural electric cooperatives and public power districts in Colorado, Nebraska, New Mexico and Wyoming. Tri-State's member distribution systems serve nearly 561,000 metered customers (translating to a population of more than 1.2 million people). Tri-State's 250,000-square-mile member service territory includes all or parts of 56 of Colorado's 64 counties, all or parts of 27 counties throughout New Mexico, all or parts of 20 counties in western Nebraska, and all or parts of 14 counties in central and northern Wyoming. Tri-State's transmission system includes approximately 5,096 miles of high-voltage transmission line and 135 substations and switching stations.

Tri-State applauds the efforts of the lead federal agencies, the Department of Energy (DOE) and the Bureau of Land Management (BLM), as well as the cooperating federal agencies, the U.S. Forest Service (USFS), the Department of Defense (DOD), and the Fish and Wildlife Service (FWS), to designate corridors on federal land in the 11 Western states for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities (energy corridors), as required by Section 368 of the Energy Policy Act of 2005 (EPA Act Section 368). Tri-State appreciates the careful analysis of the environmental impacts; attempt to designate federal energy corridors on federal land in 11 western states, and incorporation of the designations into land use and resource management plans. Tri-State understands that a joint determination was made in an effort to address and designate priority corridors to help streamline the process for the permitting and construction of energy transmission facilities. This action was developed to assist in the efficient and cost-effective transmission of energy resources being generated in the western United States while minimizing environmental impacts.

94-001

Given the aforementioned acknowledgement and appreciation of efforts, Tri-State is concerned that the practical effect of the Draft PEIS, if finalized without further changes, will not decrease but dramatically increase National Environmental Policy Act (NEPA) and engineering requirements, and delay critical infrastructure projects needed for safe, continuous, reliable delivery of energy resources to the public. Tri-State believes the Draft PEIS should be revised in several critical respects to properly align the proposed PEIS approach with the real purpose behind EPA Act Section 368, namely expediting the processing and construction of actual energy

94-002

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A Touchstone Energy Cooperative

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ESCALANTE STATION
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PREWITT, NM 87045
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NUCLA STATION
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970-864-7316

WEC_00094



West-wide Energy Corridor PEIS
February 14, 2008
Page 2

project rights-of-way (ROW) within the designated energy corridors. Tri-State respectfully requests that the federal land management agencies consider the following factors and suggestions for improving the Draft PEIS prior to preparation of the Final PEIS.

I. Siting and Permitting

The siting and permit application process is costly and time-intensive. Most utility transmission routes run through a mixture of private, state, Tribal, and federal lands that are managed by different land management agencies, each with its own set of rules and procedures for granting ROWs. Each agency has its own land use restrictions, and energy corridors may not address each agency's issues. Permitting requirements are subject to regional or site-specific agency procedures.

Draft PEIS, Chapter 1, Section 1.3, Page 1-11: Proposed Action to Address the Purpose and Need.

States, "The proposed corridor designations would not approve any site-specific activities or projects or prejudice the environmental impacts of individual projects.", and, "Similarly, if the Agencies decide to amend related land use plans, this also would not authorize any site-specific activities."

The proposed energy corridor designations would not approve any site-specific activities or projects or prejudice the environmental impacts of individual projects. Each year, the federal government processes thousands of use and occupancy applications for transmission and distribution facilities, administers thousands of ROW authorizations, and processes thousands of new and renewal applications. The new PEIS would analyze more than 330 million acres of federal land in the 11 Western states affecting hundreds of forests, rangelands, mountains, wetlands, and floodplains.

It is the federal intent that developing energy corridors would force a more proactive Agency approach by having set options for moving energy across federal lands through the use of corridors. The Agencies are expected to streamline federal permitting and siting practices using a multi-agency mechanism and designating energy corridors while adhering to a comprehensive NEPA document that can be used and relied upon by all Agency field-level staffs.

The Agencies will also be required to implement corridor planning and expedite applications to construct or modify facilities within new corridors and incorporate the designated corridors into the relevant agency land use and resource management plans two years after the designation. The Agencies will be tasked with administering permits for upgraded and new infrastructure needed to meet the expanding needs for energy transportation throughout the Western states.

94-002
(cont.)

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A Touchstone Energy Cooperative 

WEC_00094



West-wide Energy Corridor PEIS
February 14, 2008
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Tri-State is concerned that projects would still be evaluated on a case-by-case basis with NEPA and engineering reviews, and would still be costly, time-consuming and restrained by already resource-constrained local agencies.

94-002
(cont.)

2. Renewable Energy Delivery Will Be Limited

Draft PEIS, Chapter 2, Section 2.2.1, Steps 1, 2 and 3, Pages 2-13 to 2-25. – Siting Energy Corridor Locations.

States, "Energy corridors were located to provide for the West-wide transport and distribution of energy (electricity, oil, natural gas, and hydrogen) between supply and demand areas in the 11 western states while avoiding sensitive resources and land use and regulatory constraints to the fullest extent possible. If developed with energy transport projects, the corridors would also aid in alleviating congestion problems associated with electricity transmission in the West."

ROW grants for electric transmission lines must have the ability to be issued outside of designated corridors. Energy supply needs regularly surface that do not follow specific corridors. New renewable energy resources such as geothermal, wind and solar power, and utility supply portfolio mandates in various Western states are in the planning stages and may be coming on line in the near and foreseeable future, for instance. Western utilities need to make sure that the transmission line routing and permitting process is not encumbered or complicated more than it already is at the present time.

94-003

Energy development is becoming more prevalent as a result of increasing energy costs and interest in wind resource development. Large portions of resource areas are deemed unsuitable for wind energy development. Changes in visual resource management designations across federal lands, and more restrictions on development activities may effect wind development which serves as counterproductive in today's political climate. Also, by closing large blocks of federal land to wind development, the burden for development will shift to private land. Corridors closed to wind energy development have not been scientifically assessed for high quality wind and development potential. Areas suitable for wind development are not believed to exceed current demand for wind energy. Demand for wind development research is expected to increase across the Western states. To preclude corridors for wind development would be detrimental to the development of renewable energy resources.

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West-wide Energy Corridor PEIS
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Draft PEIS, Chapter 2, Section 2.5, Pages 2-34 to 2-38. – Other Alternatives Considered for Detailed Study, and ES-14.

States, "A number of alternatives for energy corridor designation were suggested during scoping. These alternatives are:

- *Designating all existing energy corridors and ROWs in the 11 western states as federal energy corridors;*
- *Upgrading existing energy transport facilities within existing energy corridors and ROWs for greater transport capacity or efficiency, before new federal energy corridors are designated;*
- *Locating designated energy corridors only in areas adjacent to federal highways and major state and municipal roads;*
- *Designating energy corridors on national park lands and DOD facilities;*
- *Designating as energy corridors existing, under way, or planned energy transport project ROWs (as identified by energy providers), including individual inter- and intrastate corridors connecting very specific supply and demand area locations throughout the West;*
- *Environmentally friendly alternatives that called for increasing energy efficiency or conservation by energy users instead of designating corridors; and*
- *Preliminary corridors identified in the corridor siting process.*

94-004

These alternatives, which were considered but eliminated from further study, were each examined with regard to how well they would meet the purpose and need of Section 368, how well they would support designation of federal energy corridors, and how they would address the energy transmission issues of the electricity transmission grid in the West."

Tri-State believes that although not all alternatives can be applied, the alternatives that were eliminated are vital to the continued, safe operation and delivery of power. Tri-State and utility groups requested as part of the scoping period, that all existing utility corridors be incorporated into the PEIS energy corridors. The existing corridors were not, however, incorporated into the Draft PEIS.

In some cases, existing utility corridors in current resource management plans are essential for siting energy facilities currently under consideration, as well as, future projects designed to transport energy to load centers in the Rocky Mountain West. Care must be taken to ensure significant supply by including wind energy development in large resource areas. It should be noted that some specific provisions and/or management prescriptions will adversely affect the use of existing corridors for transmission of energy and generation of wind power.

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West-wide Energy Corridor PEIS
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Developing new corridors which would allow routing of energy facilities across resource areas would avoid incremental impacts to historic trails, but could prove detrimental to a number of other resources, such as wildlife, that would otherwise be avoided by use of existing corridors.

Additional alternative corridors should be identified and evaluated designed with management prescriptions that truly reflect principles of multiple uses. Such corridors should be allowed to be utilized by future energy facilities and without mitigation measures, such as height restrictions that may preclude the use of existing corridors.

94-004
(cont.)

3. Viewshed and Visual Resources Issues

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-50, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives—Resource: Visual Resources.

States, "There would be no direct impacts to visual resources on federal and nonfederal lands from designating Section 368 energy corridors on federal land and amending land use plans."

There are gaps in some of the proposed energy corridors where existing facilities are now occupying those corridors. Tri-State understands that one explanation for this decision is the view held by local field officials that too many lines in a corridor presented an unsightly viewshed. Viewshed was reportedly stated as a reason that wind development was precluded from uses in corridors. It is understood that viewshed analysis would be part of the site-specific analysis at the time of ROW application. To preclude certain corridors from multiple uses, including wind energy, due to viewshed issues is something that would be required to be reviewed again under NEPA.

94-005

The following experience serves to illustrate the shortcomings Tri-State sees from the approach taken in the Draft PEIS. In Volume 1, Executive Summary and Main Text, Page 2-24, the Preliminary Energy Corridors show a potential 368 Corridor exiting Western Wyoming and directly entering Southeastern Idaho. This corridor contains existing transmission lines transmitting necessary power from Wyoming to Idaho and further into the Pacific Northwest. In the final PEIS mapping, Volume III, Part 2, State Base Map Series, the preliminary corridor referenced above is not shown. Per Step 3 in the Energy Corridor siting, the local Field Offices reviewed and submitted environmental reasons as to why the corridors should or should not be shown. In the particular corridor in the Kemmerer Field Office, a higher class of visual impact outlined in their respective RMP was a given reason as to why the corridor was eliminated, even though existing transmission lines occupied the corridor. In the RMP, there was no reason given as to why the visual impact classification was raised to an exorbitant, unrealistic classification.

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4. Undergrounding of Transmission Lines and Structures

The Colorado Draft Map of Proposed Section 368 Energy Corridors and Rights of Way on Federal Lands State Base Map Part 2 corridor (132-133 and 73-133) designates this particular area as underground only.

In some instances, the original corridor designation does not state an underground requirement in the land use plan of the BLM. The state corridor is part of the original corridor which does not have any underground restrictions. Also, there is a disconnected gap in corridor 132-133 in Garfield County, CO of which the connection points are not identified. This would seemingly present siting and permitting issues in that a connection point would have to be identified and pursued with either private landowners, the affected federal land manager, or alternative routes. If an alternative route was forced, then the designated corridor would not be utilized, thus making the corridor.

The cost of undergrounding extra high voltage transmission lines is significant. The significant increase in cost is due to underground cable costs and supporting infrastructure requirements, such as underground concrete systems and ductbanks. Underground cable can cost twenty-six times more than overhead cable and beyond. Concrete ductbanks can cost more than four times that of overhead support structures. An overhead line can be repaired relatively quickly with standard line materials. An underground line repair would have to be done by specialized contractors who may or may not be readily available when an outage occurs. The repair of a failed underground splice or termination would take a significantly greater amount of time during which the circuit would not be available to support loads. This would result in transmission line outages which would have a direct impact on safe, continuous, and reliable electric service to all effected end users.

Some utilities require a minimum 40 to 50-foot wide easement for installation of an underground transmission line. This width of easement is necessary to accommodate underground construction activities, heat dissipation and construction of the line during operations, and any necessary repair and maintenance activities.

In siting multiple facilities in a mutual corridor, the utility must maintain proper clearances between natural gas and water lines per National Electric Safety Code standards to avoid induced corrosion and incompatibility (i.e., water and electricity). Also, maintenance performed on water or gas lines could affect underground electric transmission systems.

94-006

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WEC_00094



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5. Expediting the Application Process

Draft PEIS, Chapter 1, Section 1-2, Pg 1-8: Existing Administrative Challenges to Federal Rights-of-Way Authorization.

States, "At present, some of the barriers to infrastructure development in the western states include inconsistent agency procedures for granting ROWs; inconsistent agency views on whether proposed energy infrastructure projects would address near- or long-term energy needs; a lack of coordination among agencies that administer contiguous tracts of land when responding to applications for a ROW across their respective jurisdictions; and the lack of coordination within agency offices regarding the appropriate geographic locations of corridors or ROWs."

Tri-State appreciates that the Agencies would include uniform interagency operating procedures for reviewing applications for energy ROWs within designated energy corridors. It is stated that the Agency will designate a federal point-of-contact (POC) who will represent the Agencies in matters regarding ROW applications in a designated energy corridor. This POC would be a liaison between the applicant and Agency.

Draft PEIS, Chapter 1, Section 1.4, Page 1-12 and 1-13.


States, "The Proposed Action of designating Section 368 corridors does not:

- 1. Guarantee that a specific project would be approved in a designated energy corridor. The Agencies must review each project-specific application and conduct an appropriate environmental review for each project;*
- 2. Limit an Agency's discretion to deny a ROW or other permit within the designated energy corridor or elsewhere;*
- 3. Alter an Agency's internal procedures for review and approval of site-specific projects as facilitated through an appropriate interagency POC;*
- 4. Establish energy corridors on nonfederal lands;*
- 5. Preclude any proposal for a project outside of a Section 368 designated corridor.*
- 6. Limit proponents to applying for permits solely within designated corridors."*

Although well-intentioned, Tri-State is concerned that the expediting process will not streamline the land use authorization precisely for the non-guarantees listed given above. Permittees are still subject to site-by-site review, the Agency still has discretionary authorization in each regional office, and the Agency's internal procedures are not nullified just because a corridor will be utilized. As the NEPA process is required regardless of corridor designation on a project-by-project basis, potential exists for permitting agencies to view energy corridor designation as a pre-requisite for permitting. This effectively creates another step in the permitting process, potentially elongating, not streamlining the permitting of needed transmission infrastructure. Federal agencies should clearly outline to their staff that, while the

94-007

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energy corridor designation process (and associated PEIS) may ultimately assist efficient permitting of facilities, NEPA processes are stand-alone processes that are the ultimate decision-making tool to consider environmental and other impacts. Until a tie between energy corridors and the NEPA process is explicitly defined and implemented, projects currently in the NEPA permitting process should be given the support and consideration they need to timely construct needed infrastructure.

94-007
(cont.)

6. ROD and Next Federal Actions

Upon signing Records-of-Decision (RODs), the BLM, FS, FWS, and, if applicable, the DOD would amend their respective affected land use plans to incorporate the corridor designation. Corridor designation on these federal lands would be defined by a centerline and width to accommodate future proposed energy transport projects.

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-53, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives--Resource: Socioeconomic Resources.

States, "There would be no direct socioeconomic impacts on federal lands from designating Section 368 energy corridors on federal land and amending land use plans. Corridor designation could have effects on property values and future land use on nonfederal lands adjacent to or between the designated corridors on federal lands. The nature of the effects would depend on the current and future land use of the nonfederal lands."

Tri-State disagrees. These energy corridors would be designated only on federal lands, not private lands. Applicants would be required to identify preferred project-specific routes across federal land and prepare for gaining authorization across private lands. Project applicants would secure authorizations across private lands in the same manner that they currently do, independent of the application process for corridors on federal lands. Acquiring easements across private lands may be more difficult if set corridors must be followed. Some private landowners simply do not want utilities to travel across their parcels and this is a major siting constraint. This may disallow flexible options to move preferred routes off certain private lands, which is inevitable due to designated federal corridors.

94-008

7. Proposed Action Alternative

Draft PEIS, Chapter 2, Section 2.2, Page 2-2:

States, "A corridor width of 3,500 feet was selected by the Agencies for the Section 368 energy corridors (Text Box 2.2-2). This width would provide sufficient room to support multiple

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energy transport systems.”, and, “For example, assuming an operational ROW width of 400 feet, about 9 individual 500-kV transmission lines could be supported within a 3,500-footwide corridor. Alternately, as many as 35 liquid petroleum pipelines (each consisting of a 32-inch-diameter pipe and a 100-foot construction ROW) or 29 natural gas pipelines (42-inch-diameter pipe and 120-foot construction ROW) could be supported within a 3,500-foot-wide corridor.”

Tri-State appreciates the acknowledgement that such developments are unrealistic, but is also concerned with the hypothetical nature of planning multiple use corridors and widths, of which planning is not based on factual research of specific requirements associated with specific industries. There would be approximately 6,055 miles of energy corridors designated in the West for multimodal energy transport. The corridor widths could be as wide as 3,500 feet, unless specified otherwise because of environmental or management constraints or local designations. Energy corridor widths proposed during scoping ranged from as narrow as 60 feet to more than 5 miles. The smaller suggested widths would be able to support little more than a single energy project, while the larger widths would be difficult if not impossible to apply throughout the West because of regional environmental, physical, and/or regulatory constraints.

94-009

Permittees face topographic, environmental, and regulatory constraints for ROW widths of just 75 to 100 feet. The statement that a 3,500-foot width could be placed on most federal lands while avoiding many sensitive resources and areas is not a realistic assumption. Each project application will be scrutinized by project-specific analyses within the corridors and by regional staff. Regional stipulations and requirements are not currently uniform or consistent and are not expected to become consistent after the mandate corridors are in place. Tri-State’s members are concerned with the blanket assumption that an operational ROW width of 400 feet would support about 9 individual 500-kV transmission lines which could be supported within a 3,500-foot-wide corridor. Most projects are subject to independent issues and constraints.

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-55, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives—Resource: Health and Safety.

States, “There would be no direct health and safety impacts on federal and nonfederal lands from designating Section 368 energy corridors on federal land and amending land use plans.”

94-010

Tri-State disagrees. It is crucial that appropriate separation distances between the different pipelines and electric transmission lines in proposed energy corridors be considered before designating multiple uses within one corridor. The basis for the separation distance should include the safety and reliability impact of each facility upon the other facilities, not just historical or previously used separation distances. The National Electric Safety Code (NESC)

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and separation distances for electric transmission lines should be incorporated into corridor restrictions. A rational evaluation based on the types of events that may cause a loss of multiple facilities in a common corridor, and the impact of the loss and its consequences should be conducted. The loss of multiple transmission lines in a common corridor can expose major metropolitan areas to a significant risk of rolling black-outs due to lack of diversity and corridor separation.

94-010
(cont.)

Draft PEIS, Chapter 2, Section 2.2.2, Page 2-25.

States, "In some cases, the corridor adjustments proposed by managers and staff from adjacent federal land management units resulted in discontinuities in corridor alignments between adjacent federal lands."

Tri-State members have long expressed concern that a maximum corridor width of less than one mile would be suboptimal from a reliability perspective, and not wide enough to accommodate multiple facilities in general and transmission lines in particular. It is vital that utility corridors be wide enough to provide the flexibility needed to avoid environmentally sensitive areas, address engineering, technical and vegetation management constraints, and allow lines to be built with sufficient separation to reduce the risk of simultaneous outages of multiple lines. The 3,500 foot width would be narrower than many previously designated corridors, and would not meet the aforementioned criteria. The proposed 3,500 foot maximum width, in many cases, will be insufficient to enable future location of facilities and rights-of-way in a manner that is most efficient, most compatible with local topography, and minimizes environmental effects. Tri-State again proposes a one-mile standard width and the option for utilities to request a wider corridor as necessary to address these concerns. Further justification for such a width was included in the BLM 1980 management plan for the California desert Conservation Area and mentioned in the 1993 *Western Regional Corridor Study* prepared by Tri-State and endorsed by the then Chief of the U.S. Forest Service and the Director of the Bureau of Land Management.

94-011

Equally important, Tri-State is concerned that many of the corridors previously requested by Tri-State members during the PEIS scoping process and incorporated into the Draft PEIS will nonetheless be inadequate to meet the expanding needs for energy transportation throughout the Western states. Tri-State encourages the federal agencies preparing the Final PEIS to include additional corridors and modifications to proposed corridors as identified by Tri-State members and other utilities that rely on these corridors. Those utilities know where additional energy facilities most likely have to be located to meet future energy supply transportation requirements. It is vital that the energy corridors recognize both regional and local needs as well as broader Western needs.

Tri-State suggests that the DOE incorporate all previously designated, existing electric transmission line corridors, and man-made linear features on federal lands as energy corridors.

94-012

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This should also include all transmission elements identified and referenced in the November 7, 2005 "Report to Congress: Corridors and Rights-of-Way on Federal Lands," by the U.S. Department of Agriculture, U.S. Department of the Interior, U.S. Department of Energy, and Council on Environmental Quality. The preliminary maps issued by the federal agencies and included in the Draft PEIS do not include already existing corridors as corridors to be carried forward. Corridors that are currently permitted by the federal land management agencies, BLM, and USFS, should be included (see Attachment A.).

94-012
(cont.)

8. Land Use Plan Amendments and Interagency Permitting Coordination

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-43, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives—Resource: Land Use.

States, "The proposed corridor designations would not approve any site-specific activities or projects or prejudice the environmental impacts of individual projects.", and, "Similarly, if the Agencies decide to amend related land use plans, this also would not authorize any site-specific activities."


Designation of energy corridors under the Proposed Action would require the amendment of Agency-specific land use plans to incorporate the designated corridors. The plan amendments for the Proposed Action would include the identification of specific energy corridors by centerline, width, and compatible energy uses, and restrictions (such as, electricity transmission with a restricted tower height). Tower height is determined on a case-by-case basis and restrictions on height would be inappropriate for most electric transmission projects.

94-013

Tri-State is concerned that new transmission facilities proposed outside of the designated corridors may be rejected in the early permitting stages due to location outside a designated corridor. It should be noted that utility transmission will not always follow previously identified corridors, as delivery is dependant on load centers and delivery needs. It is understood that new transmission facilities would be highly scrutinized by federal agencies, and in some cases may require approval or review at the national level before a ROW use is granted outside of the designated corridors. Tri-State also understands that existing corridors that could be designated and used for multiple purposes, may encumber, restrict, or introduce safety concerns for continuous operations, maintenance, and delivery of reliable energy.

Tri-State is concerned that there will be cases where adjoining service territory states of Colorado, New Mexico, and Wyoming have identified proposed corridors that do not meet each of the needs of Tri-State and other utilities that share state boundaries, thereby making the

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permitting process more time-consuming and restrictive, if not impossible, due to environmental and permitting constraints.

94-013
(cont.)

Tri-State appreciates the opportunity to comment and urges that serious consideration be given to our recommendations in preparing the Final PEIS. Intense scrutiny is needed in order to continuously provide energy, through conventional generation or renewable resources, which is vital to the health and safety of its vast spectrum of consumers.


Sincerely,



for
Barbara A. Walz
Vice President
Environmental

cc: Mac McLennan
Jon Beyer
Mark Murray

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A Touchstone Energy Cooperative 

WEC_00095

E. Craig Smay, P.C.

174 E. South Temple
Salt Lake City, UT 84111-1102
ph: (801) 539-8515
fx: (801) 539-8544

FACSIMILE TRANSMISSION

To: West-wide Energy Corridor DEIS (866) 492-5704

Fr: William & Shannon Davis
williamadavisjr@gmail.com

Date: 2/11/08

Re:

Total Pages: 1

cc: The EIS should clarify the effect of designating Federal corridors on the use of eminent domain owned by utilities, and on the need for individual EISs for projects within corridors. The authorizing Act grants private companies Federal eminent domain powers, even where States and localities would deny it. Because designated Federal corridors will be discontinuous, the result must be that projects which will bridge gaps in corridors will resort to eminent domain. This may also occur where resort to eminent domain would permit a shortcut between sections of a Federal corridor even though not discontinuous. Would such use of eminent domain require a separate project EIS? Would a private contractor be able to show "necessity", where the purpose is merely to provide a shortcut?

95-001

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FAX NO. 541

P. 01
WVEC_00096

February 10, 2008

Dear West-wide Energy Corridor Planners,

We would like to comment on the recent Draft DEIS. The proposed "Corridor #4-247" seems to be mapped directly through the Colestin Valley in the Siskiyou Mountain crest area. We oppose placing the corridor through this route for several reasons.

As a life-long professional firefighter, I am very concerned that routing electrical transmission lines, and gas and hydrogen pipelines lines through this area poses an unacceptable risk not only to the residents living here but also potentially to the massive numbers of people who drive the I-5 highway daily. This stretch of I-5 and the adjacent Colestin Valley to the west are geographically narrow - any accident occurring along the energy corridor may have far-reaching adverse affects on both local residents and upon both I-5 travelers and traffic flow. It may appear on paper that having I-5 adjacent to the proposed route would enhance access, but quite the opposite is true due to the rugged terrain involved - ground-truthing will show this to be true. In any case, the volunteer emergency responders in this area are not equipped to handle hazmat incidents and are few in number. Furthermore, the Valley is bottle-necked at both ends and throughout the winter season, travel is treacherous and often impossible, making emergency response often slow at best.

We have lived here our entire lives, and our parents before us. Truly, we hold this land dear. This area is a precious ecological gem, as can be understood by the creation of the Cascade Siskiyou National Monument to the immediate east of the proposed route for Corridor #4-237. It seems obvious to us that it is contrary to the spirit of establishing the Monument to place a 3500' energy corridor cutting right through some of the best habitat in Oregon for elk, bear, cougar, bobcat, fox, turkey and many more species. For myself, I hunt every season, as I have done since I was a boy, and I believe this corridor will have a disastrous effect on the elk herd, deer and other animals I have hunted and enjoyed for 50 years. Also, the Cottonwood Creek runs the length of this narrow valley. Establishing an energy corridor would inescapably degrade this riparian habitat that features native trout.

We believe it makes sense to select a route that presents fewer obstacles. Such a route would offer 1) flatter terrain instead of passing through narrow & steep mountains 2) multiple, reliable access points instead of a road with single access point on both the north and south ends and which is subject to closures in extreme winter weather, 3) reduced negative environmental impact instead of cutting through nationally recognized habitat and migration routes for wild animals 4) reduced costs both in construction and maintenance instead of predictably high costs associated with building in this geographically and geologically challenging landscape.

Please take our comments into careful consideration during this process. We strongly believe the proposed route is deeply flawed and have presented a few of our misgivings here. We will continue to follow the process closely.

Sincerely,

John A. Marin
Debbie Marin
John & Debbie Marin
1300 SS Bar Ranch Rd
Hornbrook, CA 96044

96-001

I am writing in reference to the proposed energy transmission corridors on public lands in the 11 western United States. Pursuant to the 2005 Energy Policy Act, the agencies are designating the corridors for the transport of electricity, natural gas, oil, and hydrogen, though electricity transmission is the main driver. Extending over **6,000 miles in length** and encompassing **3 million acres of public lands**, these corridors will have significant impacts on land and wildlife in the region.

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I feel that the corridors must avoid our most sensitive landscapes and wildlife habitats, be limited in number and scope, and facilitate the connection of renewable energy sources to the power grid. Please consider:

- **Analyzing more than one alternative**, including alternatives with energy efficiency and renewable energy scenarios and those that maximize the use of existing power lines through upgrades.
- **Analyzing the environmental impacts now** instead of waiting until right-of-way applications are filed. **Considering more cumulative impacts** of the corridors, including impacts on air quality and climate change (especially if the corridors are targeted for more coal plants in the region) and impacts to private, state, and tribal lands where a corridor "ends."
- **Considering conditioning future right-of-way approvals** within corridors such that each new connecting power source does not exceed the carbon dioxide and other emissions of a combined-cycle natural gas plant (roughly 1,100 lbs. of CO2 per megawatt-hour of produced energy).
- **Ensuring that future transmission projects are required to be within designated corridors** "to the maximum extent practicable" to maximize the full benefit of the corridors, while still allowing appropriate flexibility.

97-001

97-002

97-003

97-004

97-005

Sincerely,

Tracy Daniels
555 Rivergate Ln B2-249
Durango, CO 81301

FEB-12-2008 20:46 FROM: SAXONEX

4683170

TO: 18665425904

P. 1 of 1
WEC_00098

Terence Palmer
20595 Sycamore Springs Rd.
Jamul, CA 91935

February 13, 2008

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

To Whom It May Concern:

This is to comment on the proposed energy corridor through the Cleveland National Forest and surrounding residential areas in Jamul (Deerhorn Valley).

How does this affect the nature preserve of the national forest which is not supposed to be built on? Why is okay to do something so devastating to so many? What about the knatcatcher and the flycatcher birds and the endangered butterflies and grasses and toads which the county protects?

It's my understanding that this is to supply energy to Mexico at least to some extent. Doesn't Mexico cause us enough problems with what we have to pay for their medical coverage, loss of jobs to American citizens, drugs, sewage, etc. Now, potentially, my family and neighbors might be subjected to major health risks to supply an unnecessary and unsafe power source to them thru my front yard? I don't agree. I protest most vehemently.

98-001

What about eco friendly energy options? What about windmills. The health risks of what you are proposing are frightening. The ground water quality for wells would be threatened, the water shed to Barrett Lake which is emergency water for San Diego. Risk of fire. No roads in forest and BLM. Please re-think, re-design, re-plan – for the future. For the future of our planet and our children and their children and the animals who share this planet and depend on us not to make them extinct.

98-002

Are you aware that if you stand in water (natural source) under one of those large electrical towers, that the water will burn your skin? Scary.

Sincerely


Terence Palmer

Feb 15 08 06:38a

Bill Pape

(619) 766-4927

p. 1

WEC_00099

JSB PAGE 1 of 3

WILLIAM PAPE
P. O. BOX 516
JACUMBA, CA 91934

February 13, 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 Transport Network PEIS DOE/EIS-0386

To Whom It May Concern;

The Jacumba Sponsor Group represents the residents of Jacumba, California located in southeastern San Diego County. On behalf of the residents and property owners of Jacumba, the comments herein are transmitted in response to the West Wide Energy Transport Network PEIS DOE/EIS-0386; Draft Programmatic Environmental Impact Statement of the Designation of Energy Corridors in the 11 Western States (October 2007) prepared by the Department of Energy (DOE) and the Department of the Interior, Bureau of Land Management (BLM).

The Jacumba Sponsor Group is dismayed by the failure of the PEIS-0386 to address the real physical impacts of the proposed 3500 foot wide corridor on San Diego County including the town of Jacumba. The proposed corridor location travels south of and parallel to I-8 in the vicinity of the town and bisects the town and the freeway. As such, DOE and BLM are placing a major impediment between the town and its front door, which raises environmental justice concerns and will have negative visual and socio-economic impacts upon the town. Among its other effects, the placement of above and below grade utility lines within the corridor will have impacts on groundwater supply to the town and will impact cultural and historic resources in the area. Further, the location of the corridor will bring to a halt future development of properties in and surrounding the town that create the opportunity for renewal of the community.

99-001

Rather than do the hard work of actually analyzing the impacts to communities and areas affected by the more than 2/3 mile wide corridor, the PEIS improperly postpones the analysis of all impacts to later analysis of individual utility proposals, a clear violation of NEPA requirements. As such, the PEIS, despite its long length, in fact provides no real analysis of any impacts and no real mitigation other than avoidance. However, the PEIS really does not properly address avoidance either, failing to analyze any alternatives to the proposed line along its entire 11 state length other than a no-project alternative. This

99-002

Thursday, February 14, 2008 America Online: Billjacum

JS6

is clearly prohibited by NEPA.

99-002
(cont.)

Finally, the PEIS, by analyzing only the impacts to federal lands, creates a non-linear corridor. However, it is certain that the utilities which will cross this corridor must be linear and cannot start and stop at federal lands. It is equally certain that the creation of the corridor is intended to smooth the way for future utility location and that utilities will be more likely than not to locate within the corridor—that is the clear intent of the legislation establishing the corridors. As such, there will be impacts on non-federal lands and the PEIS must consider those prior to establishing the corridors.

99-003

Jacumba is situated approximately 2 miles from Interstate 8 which provides the primary ingress and egress to the town. Jacumba has fallen on hard times since the opening of I-8. Historically, Jacumba was a destination resort for southern California due to its unique location and geothermal hot springs. The town's re-emergence as a destination resort depends on its climate and attractive physical setting and its ability to attract new development, new residents, new visitors and business. The introduction of an energy corridor with the potential for high tension power lines, underground pipelines and transmission facilities on virtually all of the intervening property between Interstate 8 and the town will undoubtedly affect the perception of the area, property values and the ability of the town to renew itself.

99-004

The local community of Jacumba has a higher than average population existing at income levels below the median. As a representative of the community, the Sponsor Group did not have access to the single statewide scoping session and the lack of local hearings prevents input from the residents.

99-005

The sole source of potable water to the community of Jacumba and surrounding area are groundwater aquifers located directly in the path of the proposed corridor. The aquifer in some instances is within 5 feet of the surface and the potential for contamination from underground pipelines would deny residents potable water. Extremely high voltage overhead power lines are not conducive to groundwater supplies and the operation of wells and pipelines.

99-006

Jacumba strives to maintain a setting that is attractive and encourages the type of development that would bring with it infrastructure improvements and community lifestyle benefits. The energy corridor is both a visual impairment and obstacle to improving the community at large. The potential existence of industrial facilities associated with the energy transmission corridor is not conducive to the residential nature of Jacumba. The town of Jacumba has continually suffered from the lack of infrastructure improvements and the introduction of large overhead high tension electrical lines, reservations for underground pipelines and transformer substations will be very unappealing and make it unlikely that anyone will want to improve the area and attract economic stimulus.

99-007

The facilities associated with the energy corridor will negatively affect the safety of existing residents. Historically, the town of Jacumba is isolated by storm events that generate runoff in excess of 30,000 cfs. This flow is conducted within a natural drainage channel bisecting the entire width of the proposed corridor. Notwithstanding the inherent risk associated with the rupture or toppling of facilities, the access to the facilities will be hampered thereby compounding the dangers to the community.

99-008

The PEIS should analyze alternatives to the proposed corridor location. It is clear from other environmental undertakings by BLM, that it is aware of and currently considering many other alternatives for power locations in San Diego County. For example, BLM is currently processing two other environmental documents that consider such alternatives and that analyze the impacts of the corridors: Draft Environmental Impact Report DES-07-58; San Diego Gas & Electric Company Sunrise Powerlink Project SCH No. 2006091071 and the Eastern San Diego County Draft Resources Management Plan and Draft Environmental Impact Statement DES 07-02. Yet, in this document, the BLM fails to include consideration of any such alternatives. Surely there is an alternative to the north of

99-009

Feb 15 08 06:39a Bill Pape (619) 766-4927 P. 3

WEG-00099
Page 3 of 3

J56

I-8 that could be considered as feasible and would avoid the impacts to Jacumba. NEPA requires consideration of such alternatives.

99-009
(cont.)

The Sponsor Group therefore requests that the DOE and BLM fully analyze alternatives other than the 2 considered in the PEIS and that it fully assess and not defer analysis of the impacts of the corridor on San Diego County and the town of Jacumba prior to approval of this corridor.

Very truly yours, *William L. Pape*

CHAIRMAN - JACUMBA SPONSOR GROUP 619 766 4927