

WEC_00114

**LS Power Development, LLC**

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January 25, 2008

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

RE: Comments on West-Wide Energy Corridor Draft PEIS

Dear Sir or Madam:

Upon review of the Draft Programmatic Environmental Impact Statement for the Designation of Energy Corridors on Federal Land in 11 Western States (DOE/EIS-0386), LS Power is pleased to submit the following comments:

Background: LS Power is a privately held company focused on the development, investment and management of reliable and environmentally responsible power generation assets in the United States. LS Power currently has assets and development projects within the western states analyzed in the Draft Programmatic EIS.

In 1994 the Bureau of Land Management granted a right-of-way for the Southwest Intertie Project (SWIP). The BLM's Record of Decision for the SWIP approved a 200 ft wide right-of-way for an above ground 500 kV transmission line and designated a half mile wide energy corridor along this right-of-way. The SWIP right-of-way stretches nearly 500 miles from near Twin Falls, Idaho, south through eastern Nevada to a location just north of Las Vegas, Nevada. Although the transmission line has not yet been constructed, the right-of-way remains valid and LS Power currently holds rights to the project. LS Power is actively completing design and permitting requirements in preparation for construction of the transmission line. The BLM case files associated with the SWIP right-of-way are NVN 049781 and ID 026446. For reference, a project location map displaying the SWIP alignment has been attached.

The Draft Programmatic EIS (PDEIS) proposes to designate the SWIP corridor as a Section 368 Energy Corridor. The SWIP is composed of the following corridor segments as assigned within this document: 37-232, 232-233(W), 110-233, 44-110, 43-44, 43-111, and 111-226 in Nevada; and 112-226 in Idaho.

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Item #1: Corridor segment 43-44 in Nevada as displayed on map D5 and described in Appendix F designates this corridor segment as "Underground Only" with a corridor width of 15,840 ft.

Comment #1: The designation of segment 43-44 as "Underground Only" would contradict with the existing above ground SWIP right-of-way and its associated energy corridor. This "Underground Only" designation would also contradict with the planning and designated corridors identified in the current Wells Resource Management Plan. The Wells RMP is the current land use plan that encompasses the northeastern portion of Nevada, and more specifically corridor segment 43-44. In order to remain consistent with the existing transmission right-of-way, the locally designated energy corridor, and the corridors identified in the Wells Resource Management Plan, the "Underground Only" designation of corridor segment 43-44 should be removed and all applicable areas of the PDEIS be updated.

114-001

Item #2: Corridor segment 44-239 in Nevada as displayed on map D5 and described in Appendix F designates this corridor segment as "Underground Only."

Comment #2: It appears this segment has been identified as "Underground Only" to be consistent with the Wells RMP to minimize visual impacts. However, there is a corridor designated in the Wells RMP which parallels the proposed corridor without such limitations. Furthermore, mitigation of visual impacts, such as undergrounding of a particular line, is more appropriately addressed in the NEPA review of any specific project proposed within the corridor, along with any other impacts. We suggest the "Underground Only" designation of the corridor should be removed from the corridor designation. For reference, the designated and planning corridors map from the Wells RMP Record of Decision has been attached.

114-002

Item #3: The map within Volume III entitled "Part 4: RIGHT OF WAY STATE BASE MAP SERIES, PROPOSED SECTION 368 ENERGY CORRIDORS – NEVADA - " displays the existing utility/transportation rights-of-way in Nevada. This map currently indicates only intermittent sections of right-of-way exist along the corridor segments that follow the existing SWIP right-of-way. This same condition is present on the map displaying the existing utility/transportation rights-of-way in Idaho. That map is also located in Volume III and is entitled: "Part 4: RIGHT OF WAY STATE BASE MAP SERIES, PROPOSED SECTION 368 ENERGY CORRIDORS – IDAHO -."

Comment #3: All maps displaying existing utility/transportation rights-of-way in Nevada and Idaho should be updated to indicate that a utility right-of-way exists along the entire portion of all corridor segments that follow the SWIP right-of-way. Also, any tables within the DPEIS that provide the total miles of existing rights-of-way within Nevada or Idaho should be updated using mileage calculations that incorporate these correct representations.

114-003

Item #4: The PDEIS designates a corridor segment numbered 110-114 in east central Nevada and western Utah (maps D6 and E6). The current alignment of this segment takes an abrupt turn south as the corridor travels east out of Nevada and enters Utah.

114-004

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Comment #4: The PDEIS should consider adding an alternative corridor segment to 110-114 that continues east along US Highway 6 as the corridor enters Utah. This alternative segment's eastern terminus would be near the town of Delta, Utah. There are currently transmission rights-of-way that exist along this alternative alignment. Designating this alignment as a Section 368 Corridor would encourage future transmission projects to locate in this consolidated corridor and lessen the potential for environmental impacts by utilizing existing access roads.

114-004
(cont.)

Item #5: Figure 3.6-5 in the PDEIS shows a portion of Steptoe Valley in east central Nevada to be a non-attainment area for the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO₂).

Comment #5: Although this portion of Steptoe Valley was once a non-attainment area for SO₂, in 2002 the Environmental Protection Agency redesignated this area as attainment for SO₂. Notice of this action was posted in Federal Register Volume 67, Number 71, pages 17939-17944 (Doc. 02-8289). Please update Figure 3.6-5 and applicable sections of the PDEIS text that represent this area as non-attainment for SO₂.

114-005

Comment #6: LS Power would like to commend the efforts of those who were involved with the designation of these energy corridors within this Programmatic EIS. The designation of energy corridors is very important for America's energy future. These corridors help establish a balance between the public's need for improved energy infrastructure and the protection of this nation's precious natural resources.

114-006

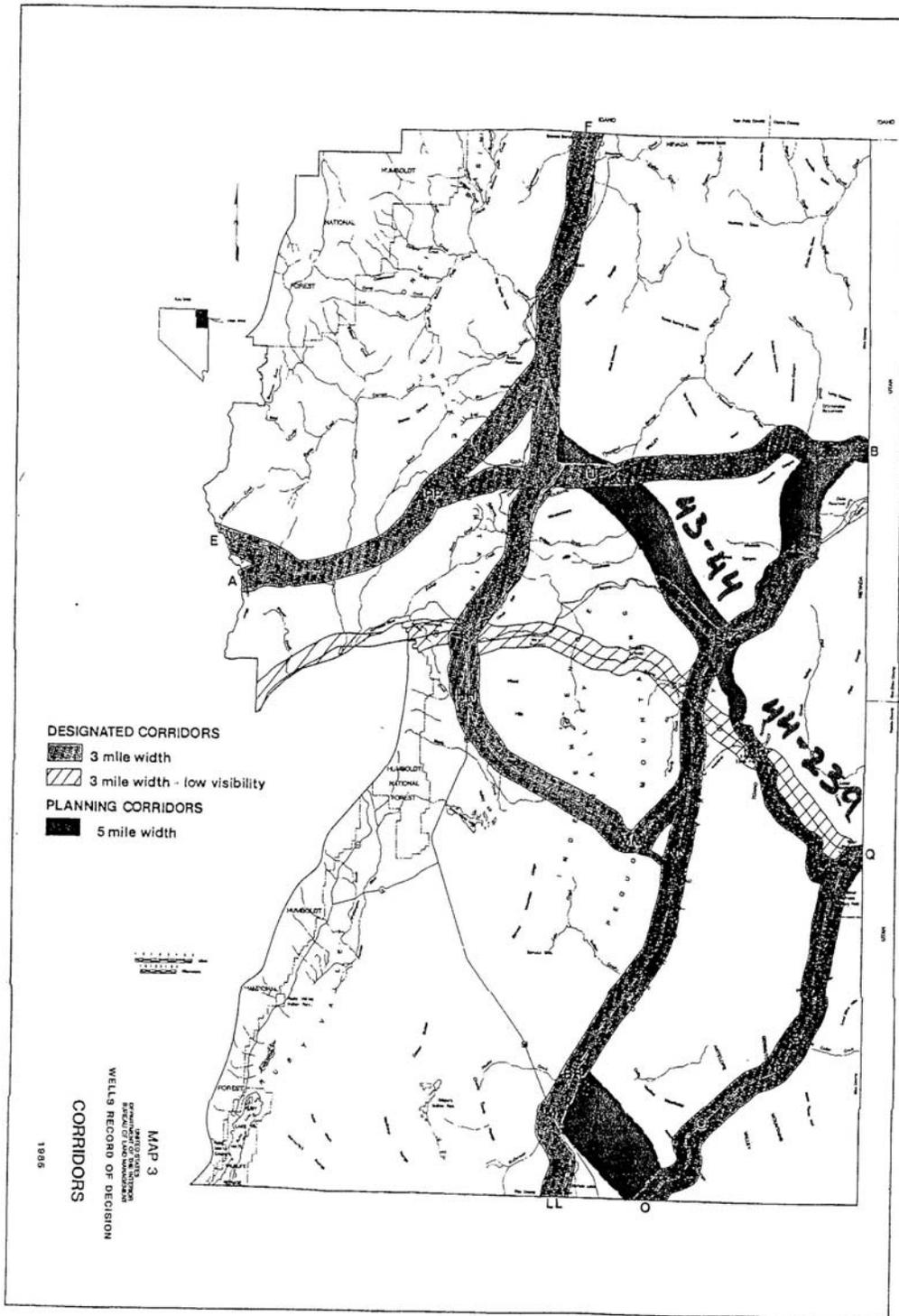
Thank you for your consideration of these comments. Should you have any questions or wish to obtain further clarification of these comments, please feel free to contact me.

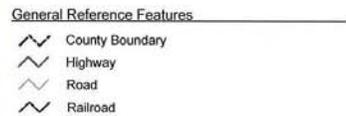
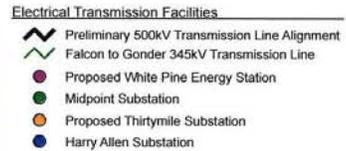
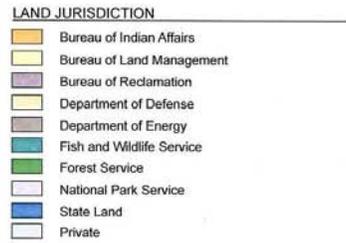
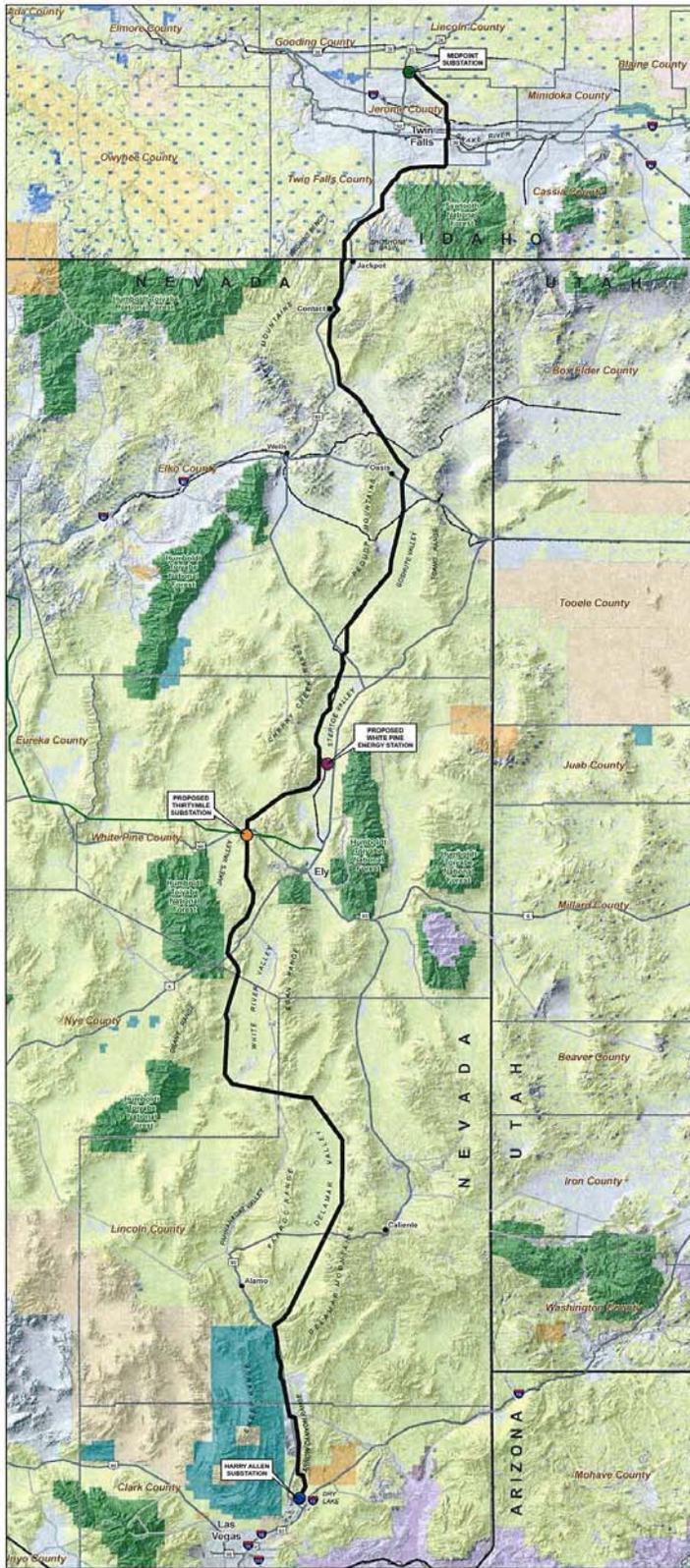
Sincerely,



Luke C Papez
LS Power Development, LLC

Enclosures: Southwest Intertie Project, Project Location Map
Map 3, Corridors, Wells RMP Record of Decision





Sources
 BLM - Nevada State Office, Land Ownership 2006
 USGS, 30 meter Digital Elevation Models



SOUTHWEST INTERTIE PROJECT
 500kV Transmission Line

Great Basin Transmission, LLC

Project Location

January 2008

