
From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 4:55 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50375

Attachments: Draft_PEIS_Written_Comments_2-13-08_WVEC50375.pdf



Draft_PEIS_Written_Comments_2...

Thank you for your comment, Tom Wray.

The comment tracking number that has been assigned to your comment is WVEC50375. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 04:54:46PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50375

First Name: Tom
Middle Initial: C
Last Name: Wray
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Attachment: H:\Draft PEIS Written Comments 2-13-08.pdf

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

**US Department of Energy
Draft Programmatic Environmental Impact Statement
Designation of Energy Corridors on Federal Land
In the 11 Western States
February 13, 2008
Phoenix, AZ**

Introduction.

SunZia Southwest, LLC appreciates the opportunity to offer comments to the US Department of Energy, the US Department of the Interior and the US Bureau of Land Management (collectively, the “departments”), on the Draft Programmatic Environmental Impact Statement for the Designation of Energy Corridors on Federal Land in the 11 Western States (the “Draft PEIS”).

These comments are offered on behalf of the SunZia Southwest Transmission Project, as represented by the project development company, SunZia Southwest, LLC. The project’s development efforts are currently being guided by Southwestern Power Group, LLC (“SWPG”) of Phoenix, Arizona.

The SunZia Southwest Transmission Project (the “project” or “SunZia”) presented oral and written comments on the Draft PEIS at a public meeting held in Phoenix, Arizona, on January 15, 2008. SunZia hereby expands on those comments for the Draft PEIS record.

Project Description.

SunZia is conceived as a nominal 500 kilovolt alternating current extra high voltage transmission project that will interconnect metropolitan Phoenix with key interconnection points in south-central and central New Mexico. The project will be developed to allow the construction of up to two such 500 kV transmission facilities, complete with termini and intermediate interconnections with existing regional EHV transmission systems. The project has identified a “preliminary study corridor” that, depending on finalization of preferred and alternative routings, would range between 350 and 450 miles in length. A preliminary right-of-way application has been filed with the Bureau of Land Management, who will be acting as the federal lead agency in the project’s environmental impact statement.

Purpose of SunZia.

SunZia is the result of several years of collaborative study by regional transmission planning groups, notably the Southwest Area Transmission Study Sub-regional Planning Group, or SWAT. The project was conceived as a major EHV transmission facility for transferring primarily renewable power generation,

particularly wind and solar, from their remote locations to liquid trading hubs and markets in the Western Interconnect. It is the collective view of the regional planning community, particularly participants in the SWAT Group, that these renewable generation resources will only see marginal development without the addition of strategic new EHV transmission to provide access to markets.

Preliminary Routing for SunZia.

The project will generally follow linear surface features including existing high voltage transmission lines, high pressure natural gas pipelines, Interstate 10, linear energy corridors designated in federal agency management plans and other similar features and corridors. In addition the department has designated three energy corridors, the use of which, will be thoroughly evaluated and considered by SunZia: (1) corridor number **81-213**, which runs east-west in the southwestern portion of New Mexico (counties of Hidalgo, Grant, Luna and Dona Ana) and the southeastern portion of Arizona (county of Cochise); (2) corridor number **81-83**, which runs through a portion of extreme southeastern Dona Ana county in New Mexico, east of the Rio Grande River; and, (3) corridor number **81-272**, which runs from the south to the north along the Rio Grande River through portions of Dona Ana, Sierra and Socorro counties in New Mexico. Final preferred route determinations for the project have not yet been made and will be the subject of further evaluation during the course of the EIS.

General Comments on the Draft PEIS.

SunZia believes that major interstate electric transmission projects should be the product of comprehensive and open regional planning efforts involving numerous stakeholders. Such a product of collective collaboration will result in a superior product that is much more likely to maximize the public interest while achieving sound objectives of the project itself. We believe SunZia was a product of such a regional planning approach.

Public policy should discourage uncoordinated and ineffective planning that result in unwisely duplicating facilities and wasting environmental resources. Alternatively, such public policy should:

- 1. Utilize existing linear energy and transportation corridors;*
- 2. Inventory duly-sited, but not necessarily yet constructed, EHV transmission facilities that resulted from state or federal siting actions; and,*
- 3. Integrate with and encourage the use of resource management plan designations for such linear energy and transportation corridors.*

50375-001

Additionally, SunZia notes that the designation in the Draft PEIS of a proposed default corridor width of 3,500 feet is wholly inadequate as a base case assumption to allow safe construction and operation separation of linear energy facilities co-located in such a corridor. We recommend a minimum width of such a designation be no less than one-mile in flat-to-rolling terrain, and wider in areas of abrupt changes in elevation.

50375-002

Interested members of the public and the department can find additional information on the SunZia Southwest Transmission Project by visiting our website: www.sunzia.net

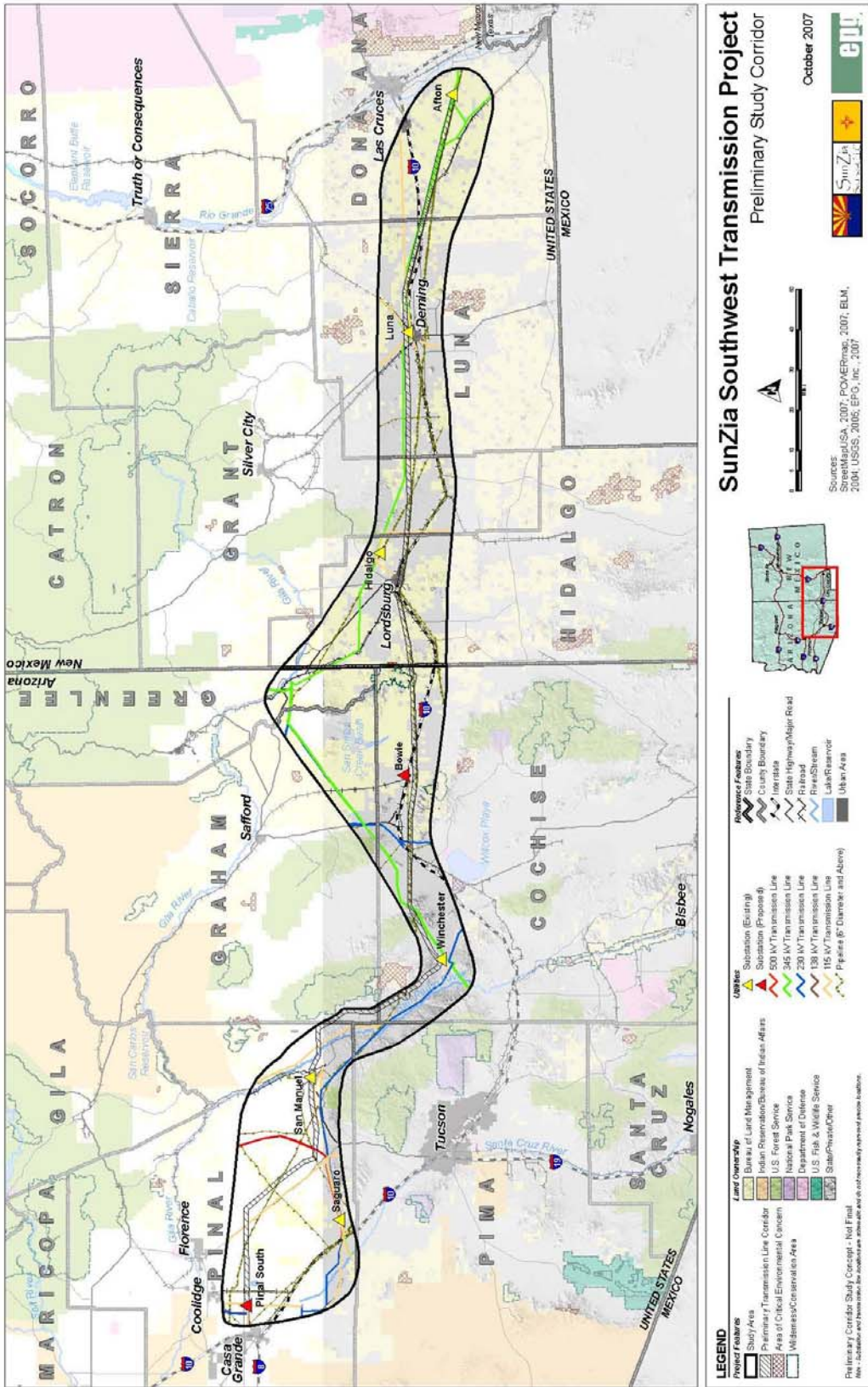
Attachments (3)

- (1) State Base Maps for (i) Arizona and (ii) New Mexico
- (2) Preliminary Study Corridor map for the SunZia Southwest Transmission Project (October 2007)

Submitted by:

Tom C. Wray
Manager, Transmission & Generation Project Development
Southwestern Power Group, LLC
Phoenix, AZ
February 13, 2008

On behalf of [SunZia Southwest Transmission Project](#).



SunZia Southwest Transmission Project
Preliminary Study Corridor

October 2007



Sources:
StreetMapUSA, 2007; POWERmap, 2007; BLM,
2004; USGS, 2005; EPCOR, Inc., 2007



LEGEND

Project Features

- Study Area
- Preliminary Transmission Line Corridor
- Area of Critical Environmental Concern
- Wilderness/Conservation Area

Land Ownership

- Bureau of Land Management
- Indian Reservation/Bureau of Indian Affairs
- U.S. Forest Service
- National Park Service
- Department of Defense
- U.S. Fish & Wildlife Service
- State/Private/Other

Utilities

- Substation (Existing)
- Substation (Proposed)
- 500 kV Transmission Line
- 345 kV Transmission Line
- 230 kV Transmission Line
- 138 kV Transmission Line
- 115 kV Transmission Line
- Proposed 6" Diameter and Above)

Reference Features

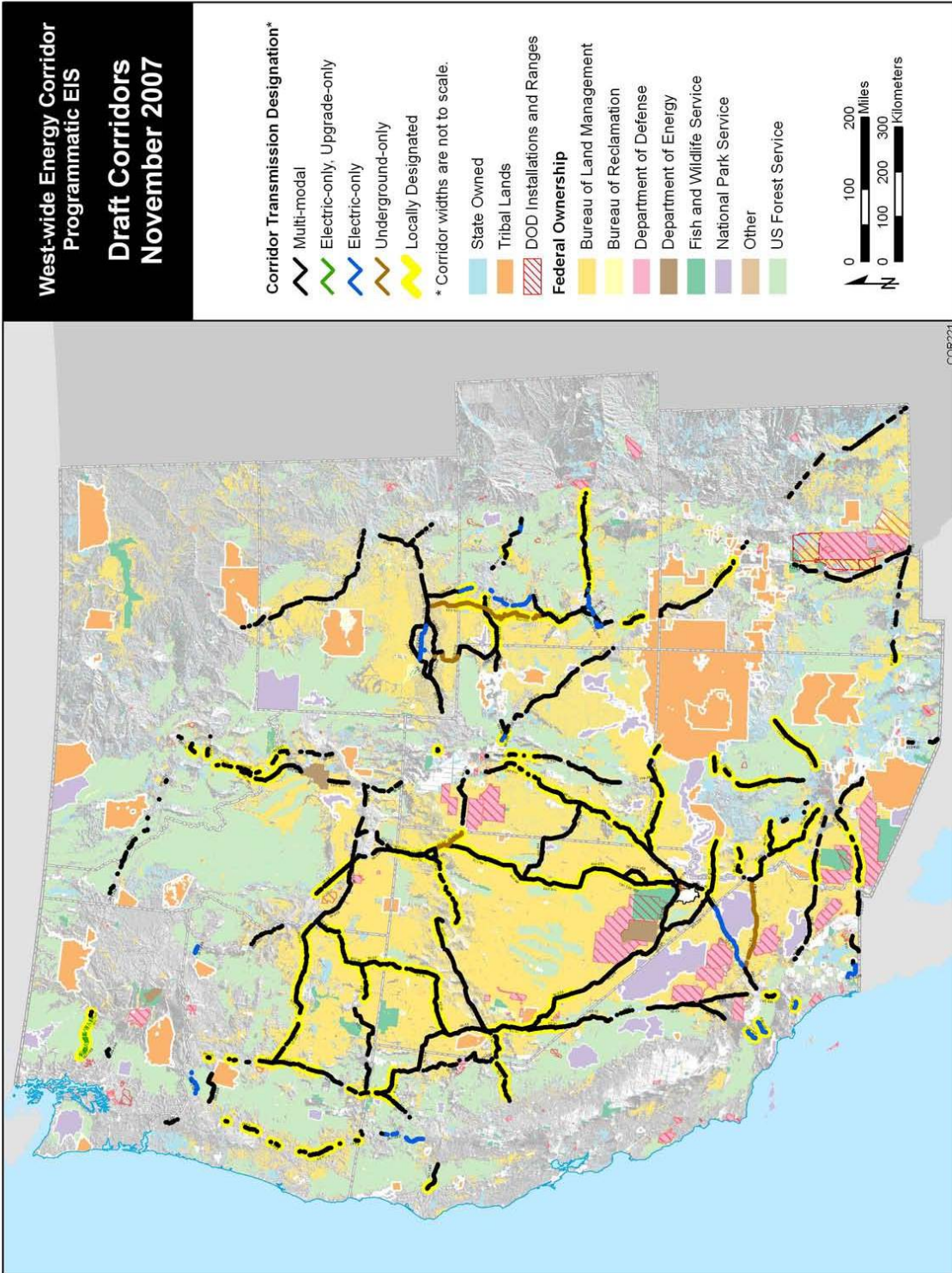
- State Boundary
- County Boundary
- Interstate
- State Highway/Major Road
- Road
- Railroad
- Powerline
- Lake/Reservoir
- Urban Area

Scale: 0 10 20 Miles

North Arrow

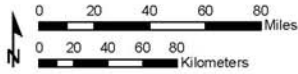
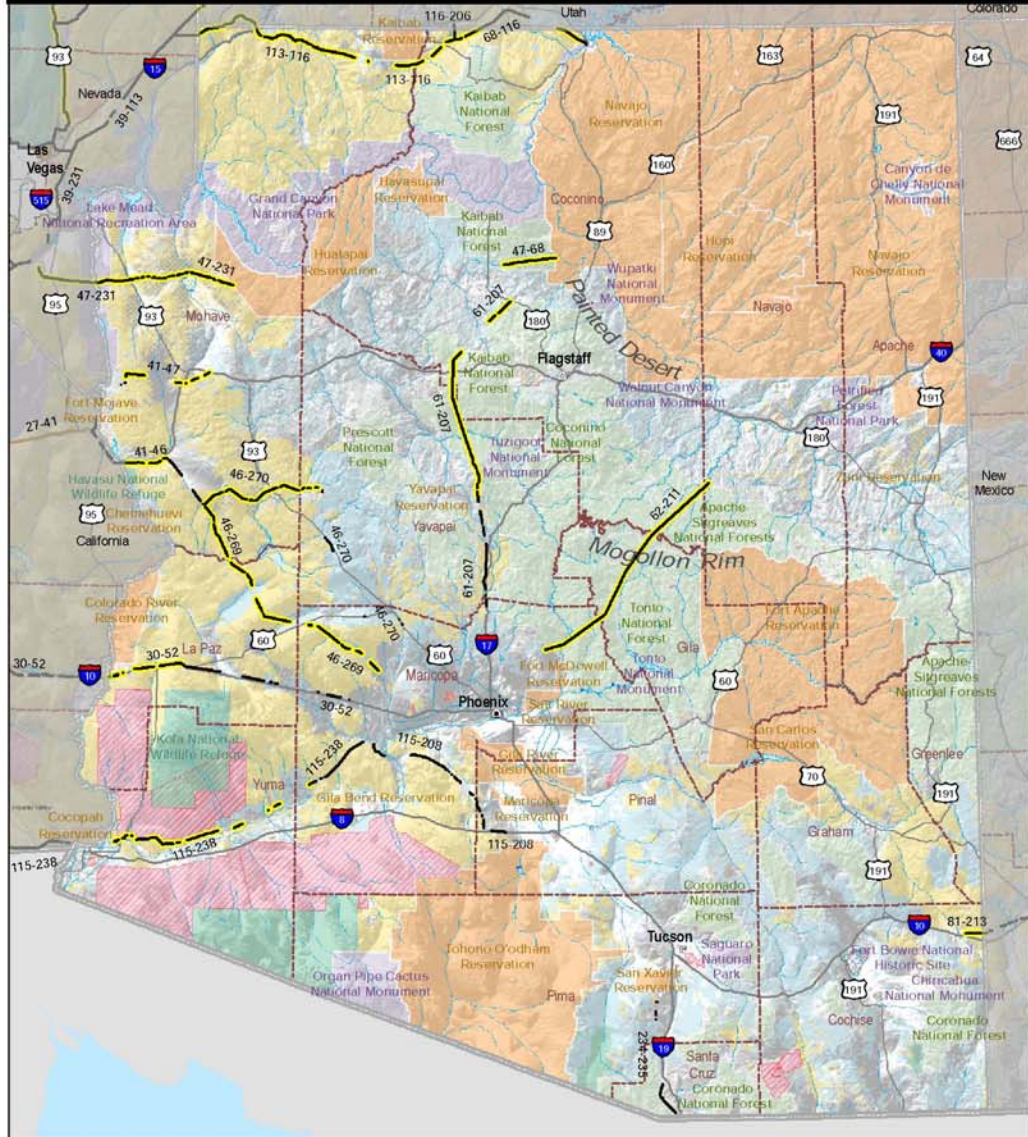
Inset Map: Shows the location of the study area within the state of Arizona.

Project file: g:\arcgis\peis\mxd\atca_2.mxd



PART 2: STATE BASE MAP SERIES

Proposed Section 368 Energy Corridors - ARIZONA -



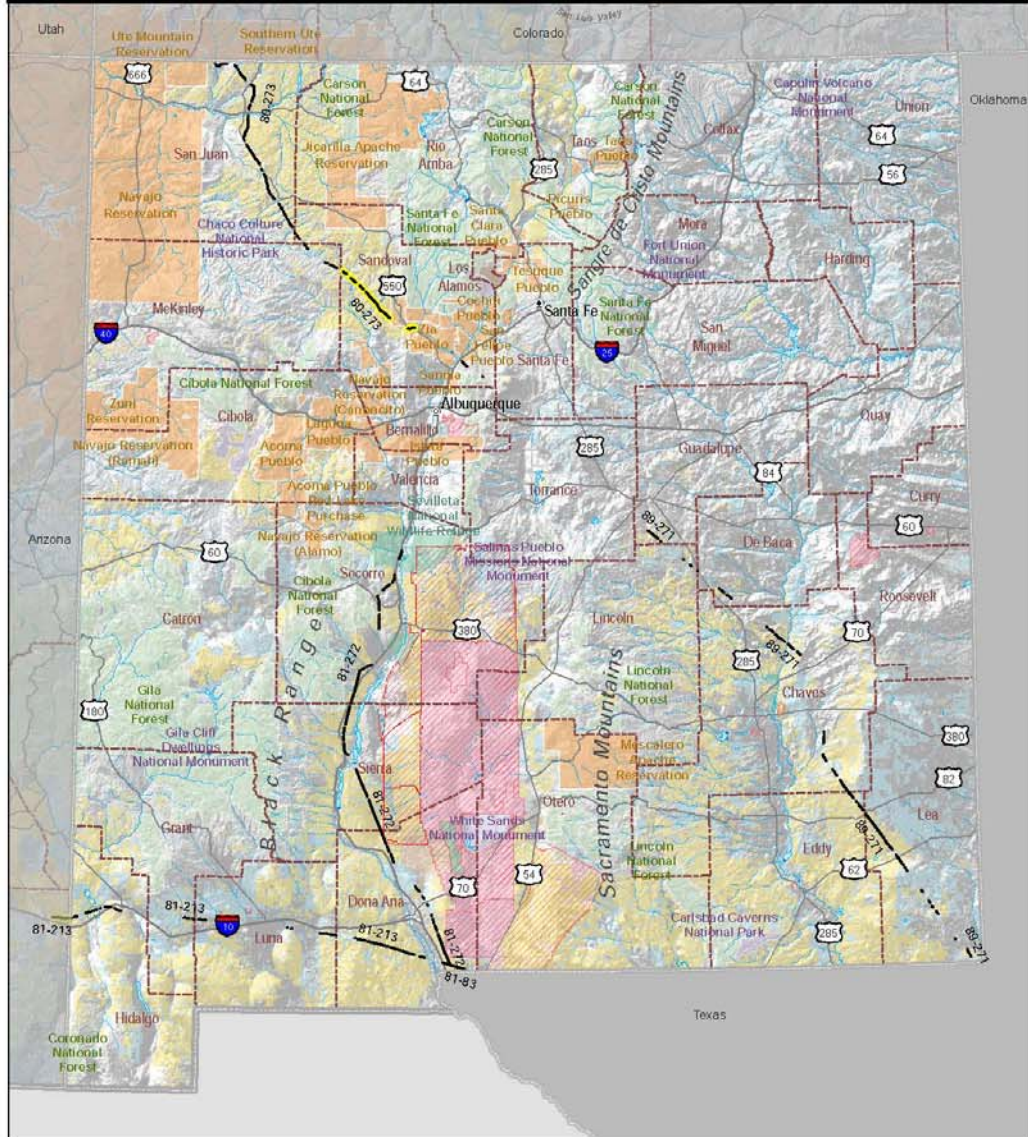
Transmission Designation	
	Multi-modal
	Electric-only, Upgrade-only
	Electric-only
	Underground-only
	Locally Designated

	County Boundary
	State Boundary
	International Boundary

	State Owned
	Tribal Lands
	DOD Installations and Ranges
Federal Ownership	
	Bureau of Land Management
	Bureau of Reclamation
	Department of Defense
	Department of Energy
	Fish and Wildlife Service
	National Park Service
	Other
	US Forest Service

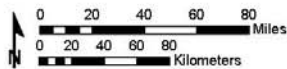
PART 2: STATE BASE MAP SERIES

Proposed Section 368 Energy Corridors - NEW MEXICO -



Transmission Designation	
	Multi-modal
	Electric-only, Upgrade-only
	Electric-only
	Underground-only
	Locally Designated

	State Owned
	Tribal Lands
	DOD Installations and Ranges
Federal Ownership	
	Bureau of Land Management
	Bureau of Reclamation
	Department of Defense
	Department of Energy
	Fish and Wildlife Service
	National Park Service
	Other
	US Forest Service



	County Boundary
	State Boundary
	International Boundary

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:02 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50376

Thank you for your comment, Andrea Laue.

The comment tracking number that has been assigned to your comment is WVEC50376. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:01:36PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50376

First Name: Andrea
Last Name: Laue
State: CA
Zip: 94611
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I'm concerned about several aspects of the energy corridors proposal. First, proposed corridors, e.g. the one in Nevada, would split critical habitat of the desert bighorn and desert tortoise. Also, the plans do little to develop alternative energy sources, the future of energy for the planet. Finally, details of the proposed plan, including detailed maps and alternative plans considered, should be made available to the public. The process should be more transparent!

50376-001
50376-002
50376-003

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:02 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50377
Attachments: ENERGY_CORRIDOR_COMMENTS.doc_2(2)_WVECD50377.doc



ENERGY_CORRIDOR_COMMENTS.doc_2

Thank you for your comment, Dan Dennison.

The comment tracking number that has been assigned to your comment is WVECD50377. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:01:45PM CDT

Energy Corridor Draft Programmatic EIS
 Draft Comment: WVECD50377

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 Last Name: Dennison
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 State: NM
 Zip: 87043
 Country: USA
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 Privacy Preference: Don't withhold name or address from public record
 Attachment: /Users/dandennison/Desktop/ENERGY CORRIDOR COMMENTS.doc 2(2).doc

Comment Submitted:

It is only reasonable and fair that the complete routing of the corridors be determined through thorough consultation with affected parties and complete evaluation as in the PEIS to evaluate all of the impacts.

As a private land owner I am severely jeopardized with the uncertainty of what might, or might not happen in the uncertain future when I know that my community and neighborhood could be impacted in a very negative way.

The County, or the State needs to be engaged to identify reasonable routing on Private lands that will not so adversely affect so many people. This needs to be done before the Corridors on Public lands are committed so that they can be modified, if necessary to match up with more reasonable crossings on Private or Tribal lands.

Questions about submitting comments over the Web? Contact us at: corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

50377-001

Dan Dennison
 13 Cedar Creek Rd
 Placitas, NM 87043
dan.dennison@usa.net

ENERGY CORRIDOR COMMENTS
 Jan 24,2008

- | | |
|---|-----------|
| ◆ Understand need for adequate Corridors for expanding Energy Needs | 50377-002 |
| ◆ Provide map acquired showing "planned" connecting corridor through Placitas through private lands. | 50377-003 |
| ◆ Designating Corridors on Federal land is not a solution to address expanding Energy needs. This is like buying just tires to solve a transportation problem. Until it is determined how the Corridors on Federal land are connected through Private properties not one watt or one drop of oil to the nation's energy supply | 50377-004 |
| ◆ Common senses tells us that isolated pieces of corridors must be connected to function. The segments identified in the EIS fail to consider how they should be connected. How do we know that the corridor on Federal Land is optimally located if we don't know whether, or even if the segments can be connected? | 50377-005 |
| ◆ These connections can create undisclosed and unevaluated negative impacts on private lands including <ul style="list-style-type: none"> ○ Disturbance of areas of Historical and Cultural significance ○ Aesthetic damages, especially from overhead utilities ○ Disruption of existing and practiced land use patterns ○ Disturbance to vital community Open Space | 50377-006 |

- | | | |
|---|--|----------------------|
| <ul style="list-style-type: none"> ○ Potential health impacts from overhead power lines and underground utilities with the risk of leaks. ○ Socioeconomic Impacts on property values which will occur even with the uncertainty of if and when ROW takings might occur ○ Disruption of the cohesion of established master planned communities and other existing residential communities | | 50377-006
(cont.) |
| <ul style="list-style-type: none"> ◆ It is my opinion that this process has been reaching decisions that are flawed when considering the requirements of our National Environmental Policy Act (NEPA). The entire thesis behind NEPA is the idea that decisions should be thought through, both as to the impacts of the actual project and the reasonably foreseeable future impacts. While the Federal Energy Act requires corridors to be designated on Federal land I am not aware of any guidance that the policies of NEPA do not apply. | | 50377-007 |
| <ul style="list-style-type: none"> ◆ This Process as summarized in the Executive Summary , Part ES-1, requires Consultation with the Federal Energy Regulatory Commission, States, Tribal or local units of governments, as appropriate, affected utility industries, and other interested parties. To our knowledge this consultation, not just notice has been minimal or virtually non existent with several of these parties. The reality is that many of us really did not understand the impact of these Energy Corridors until the EIS was published only a couple months ago and we are not aware of any comprehensive evaluation with local government or other interested individuals. | | 50377-008 |
| <ul style="list-style-type: none"> ◆ To do an EIS and to declare that there are not any unfavorable impacts totally ignores the necessity of performing a thorough and reasonable analysis of <u>ALL</u> land areas that will be impacted. | | 50377-009 |
| <ul style="list-style-type: none"> ◆ Since we happen to have a map of a connecting Corridor on Private land that was created during this EIS process it is a clear to me that those doing the EIS understood that connecting segments through Private lands are foreseeable. If the intentions of NEPA were being followed the studies | | 50377-010 |

should have evaluated and disclosed the impacts on these identified Private Lands.	50377-010 (cont.)
<ul style="list-style-type: none"> ◆ While the EIS does not specifically address impacts on Non-Federal, Private lands it does acknowledge, for example in section 2.6 "Corridor designation could result in effects to land use on nonfederal lands adjacent to or between corridor segments. The type and magnitude of effect would depend on the current and anticipated future land use in these areas." With this being understood it seems totally disingenuous to claim validity for an EIS performed only for <u>segments</u> of the potential future full Corridors. 	50377-011
<ul style="list-style-type: none"> ◆ With this selective, partial official designation of future Corridors it is highly probable that future utility infrastructure providers would naturally assume that these segments would be connected in essentially straight lines <u>Unless</u> connecting portions that would avoid negative impacts on Private lands are also selected in this process. 	50377-012
<ul style="list-style-type: none"> ◆ With this partial disclosure of Corridors in the EIS it can reasonably be assumed that foreseeable action of future Energy providers will result in massive eminent domain likely without the benefit of the Environmental Analysis. The predictable argument would be that an EIS was already done for the Federal Lands and the corridors have been pre-approved and therefore impact analysis on the connecting portions is not necessary. 	50377-013
<ul style="list-style-type: none"> ◆ If these Federal Corridors are pre-selected as proposed the Federal Government could effectively be encouraging eminent domain or taking of private lands when the time comes for the "Normal Process" of acquiring Rights of Way is needed by the Utility companies. 	50377-014
<ul style="list-style-type: none"> ◆ If these Corridors are approved without identification of the specific connecting segments through non-Federal land then all land owners will be confronted with the absolute unknown of potential future impacts on their communities as well as property values. 	50377-015

- ◆ It is understandable that Utility companies would not want future ROW's identified in advance because this could initiate speculative land speculation by individuals anticipating an economic gain if they can sell their property for Rights of Way. However, this concern of future Energy suppliers is not sufficient reason to leave future specific routes unidentified. 50377-016
- ◆ The structure of the process of offering only two choices of Action or No Action is flawed and unrealistic. Common sense and prudent management would provide in the process an alternative for the evaluation of alternatives including designation of connecting segments between the Federal Lands. 50377-017
- ◆ An interesting note to residents of Placitas is that the initial "Scoping" located potential Corridors along Highways and the virtually straight line route through Placitas was received after the Scoping- See Figure 2.1-1. 50377-018
- ◆ Comments provided during the Scoping Hearing from PNM (November 28, 2005) noted that they were going to provide GIS data providing centerline information for its (PNM) proposed Energy Corridors. PNM also attached a map to their comments of same date. Those of us in Placitas would like to know if this map and the coordinates provided by PNM are the basis for the "Planning" map that we acquired. 50377-019
- ◆ If these Federal Corridors are approved then it likely would be highly unlikely that Energy Providers would want to change routes even if National needs determined the need for different distribution and delivery points in the Energy network 50377-020
- ◆ For Placitas parts of the identified "Planning" corridor through private land follows the Las Huertas Creek Arroyo which has recently encountered 50377-021

massive erosion damage from sever storm events. This clearly presents a highly volatile environment for utility corridors, especially for Pipelines.

50377-021
(cont.)

- ◆ As difficult as it may be this whole process requires a pause. The purpose of NEPA is to make better decisions- not necessarily lower impact decisions. The underlying concept , as I understand it, is for agencies to think through decisions before taking actions. The consequences of actions need to be understood before committing to a decision while there still are opportunities to modify them. These corridors fly in the face of these concepts. Instead, these corridors cause us to incur sunk costs into fragmented segments without thinking through the steps required to make the final decision functional.

50377-022

- ◆ As difficult as it will be we strongly encourage a more forthcoming and thorough evaluation of how to completely identify these Corridors while providing utility providers a reasonable assurance that their provision of energy commodities can proceed as required by the needs of consumers.

50377-023

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:17 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50378

Thank you for your comment, Julia Denison.

The comment tracking number that has been assigned to your comment is WVEC50378. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:16:25PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50378

First Name: Julia
Middle Initial: c
Last Name: Denison
Address: P.O. Box 823
City: Placitas
State: NM
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Country: USA
Email: julieplac@aol.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Placitas is a very populated area and there are too many homes on the proposed route for the energy corridor to be here. We only have 1 way in and 1 way out for traffic and if there was a leak in the underground pipe and people had to evacuate they could not do it safely. With so much vacant land around this should be going somewhere else. Along the state line? State road 22 from Santa Domingo pueblo? Lots of alternative routes. With the corridor proposed to be 3/4 mile wide there will be lots of home that will have to be destroyed to do it here.

50378-001

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

From: coridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:20 PM
To: mail_coridoreisarchives; coridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50379

Attachments: Western_Utility_Group_Comments_WVECD50379.doc



Western_Utility_Group_Comments...

Thank you for your comment, Mark Murray.

The comment tracking number that has been assigned to your comment is WVECD50379. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:19:32PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50379

First Name: Mark
Last Name: Murray
Organization: Tri-State Generation and Transmission Association, Inc.
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State: CO
Zip: 80234
Country: USA
Email: mmurray@tristategt.org
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\jannor\Desktop\Western Utility Group Comments.doc

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

February 14, 2008

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

RE: Western Utility Group (WUG) 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)

The Western Utility Group (WUG) appreciates the opportunity to comment on behalf of its 28 member utilities, all of which will be impacted by the Draft PEIS for the Designation of Energy Corridors on Federal Land. WUG is an ad hoc organization composed of electric, gas, and communication utilities (primarily investor owned) from the 11 Western states. WUG functions as a forum for enhancing coordination among utilities and with federal agencies on common environmental and land use issues associated with the management of utility facilities on public lands, particularly linear features such as rights-of-ways and corridors, and other issues as agreed upon by its members.

WUG applauds the well-intentioned efforts of the lead federal agencies, the Department of Energy 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 (EPAct Section 368). WUG appreciates the careful manner in which the Draft PEIS analyzes the environmental impacts of designating federal energy corridors on federal land in 11 western states and incorporates the designations into land use and resource management plans. WUG also 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.

The above reactions notwithstanding, WUG 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. WUG believes the Draft PEIS should be revised in several critical respects to properly align the proposed PEIS approach with the real purpose behind EPAct Section 368, namely expediting the processing and construction of actual energy project rights-of-way (ROW) within the designated energy corridors. WUG respectfully requests that the aforementioned federal land management agencies consider the following factors and WUG suggestions for improving the Draft PEIS prior to preparation of the Final PEIS.

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.

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.

50379-001

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.

WUG 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.

Renewable Energy Delivery Will Be Limited:

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.

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.

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.

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, evaluated and designed with management prescriptions that truly reflect principles of multiple use. 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.

Viewshed and Visual Resources Issues

There are gaps in some of the proposed energy corridors where existing facilities are now occupying those corridors. WUG 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

50379-001
(cont.)

50379-002

50379-003

viewshed analysis would be part of the site-specific analysis at the time of ROW application. To preclude certain corridors from multiple use, including wind energy, due to viewshed issues is something that would be required to be reviewed again under NEPA.

The following experience serves to illustrate the shortcomings WUG 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.

50379-003
(cont.)

Undergrounding of Transmission Lines and Structures

As note, the Nevada Draft Map of Proposed Section 368 Energy Corridors and Rights of Way on Federal Lands State Base Map corridor (43-44 and 44-239), Volume III – Part 2, designates this particular area as underground only. The state corridor is part of the original corridor which does not have any underground restrictions. The original designation does not state an underground requirement in the land use plan of the BLM.

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.

50379-004

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 (NESC) 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.

Expediting the Application Process

WUG 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. However, the WUG membership is concerned that this will not expedite the land use authorization. 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

50379-005

should clearly outline to their staff that while the 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 critical infrastructure.

50379-005
(cont.)

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. 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.

50379-006

Proposed Action Alternative

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 of 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.

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. WUG'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.

WUG 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 above. 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. WUG 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 WUG and endorsed by the then Chief of the U.S. Forest Service and the Director of the Bureau of Land Management.

50379-007

Equally important, WUG is concerned that many of the corridors previously requested by WUG members during the PEIS scoping process and incorporated into the Draft PEIS will nonetheless be inadequate to

50379-008

meet the expanding needs for energy transportation throughout the Western states. WUG encourages the federal agencies preparing the Final PEIS to include additional corridors and modifications to proposed corridors as identified by WUG members and other utilities that rely on these corridors. Those utilities know where additional energy facilities are most likely to 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.

50379-008
(cont.)

Land Use Plan Amendments and Interagency Permitting Coordination

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.

WUG is concerned that new transmission facilities proposed outside of the designated corridors may be rejected in the early 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.

50379-009

WUG is concerned that there will be cases where adjoining states identified proposed corridors that do not meet each of the needs of other utilities across state boundaries, thereby making the permitting process more time-consuming and restrictive, if not impossible, due to environmental and permitting constraints.

WUG appreciates the opportunity to comment and urges that serious consideration be given to our recommendations in preparing the Final PEIS.

Sincerely,



Mark Murray
Permitting and Land Rights Manager
Tri-State Generation and Transmission Association, Inc.

Cc:

From: coridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:23 PM
To: mail_coridoreisarchives; coridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50380

Attachments: Comments_on_the_draft_peis_WVECD50380.doc



Comments_on_the_
draft_peis_WVE...

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WVECD50380. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:22:23PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50380

First Name:
Last Name:
Address:
City:
State: OR
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Country: USA
Email:
Privacy Preference: Withhold name and address from public record
Attachment: C:\My Documents\Comments on the draft peis.doc

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

Comments on the draft peis:

<p>The draft government designation of more than 6,000 miles of energy transportation corridors has found little public support and almost no media attention.</p>	<p>50380-001</p>
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<p>With the travesty of having little or no notification of the proposal or when & how to respond to this draft it is no wonder that it has received little or no public input. The options presented have no consideration for access to renewable energy resources and are not based on studies of future needs.</p>	<p>50380-002</p>
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<p>There are no options provided for in the draft. What are the cumulative effects of these immense corridors? what are the threats to private lands? how will the corridors connect to & through private land?</p>	<p>50380-003</p>
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<p>Why are there overlapping corridors as in the case of the palomar corridor and what is the impact of the siting of these projects?</p>	<p>50380-004</p>
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<p>Why are there overlapping corridors as in the case of the palomar corridor and what is the impact of the siting of these projects?</p>	<p>50380-005</p>
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<p>There is no discussion of avoiding old growth areas & the intention and need for environmental studies and the protection of sensitive environmental areas are not even considered.</p>	<p>50380-006</p>
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<p>Where will this energy come from? Why aren't we considering also investing in small renewable energy projects to offset the need for more vast energy transmission systems that are vulnerable to not only terrorist attacks but degrade the environment & put sensitive species at risk?</p>	<p>50380-007</p>
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<p>The energy department needs to seriously evaluate alternatives to minimize the number of corridors and maximize use of renewable energy and it should include requirements to presumptively limit all projects to designated corridors.</p>	<p>50380-008</p>
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<p>There is no mention of a push to conserve energy and to plan for developing additional technologies for demand response use for electrical output. Appliances equipped with circuitry that detects the electrical grid's stress level could eliminate up to 20% of peak demand according to one study done by a federally funded research laboratory.</p>	<p>50380-009</p>
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<p>The department of energy should designate energy technology funds to be used for the expansion of renewable energy projects & to push for additional technology & use of demand response to best utilize & allocate our present & future resources.</p>	<p>50380-010</p>
--	------------------

Thank you,

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:27 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50381

Attachments: 368ltr_WVECD50381.pdf



368ltr_WVECD50381.pdf (386 KB)...

Thank you for your comment, Christopher Terzich.

The comment tracking number that has been assigned to your comment is WVECD50381. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:27:04PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50381

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Comment Submitted:
Please see the attached letter.

Questions about submitting comments over the Web? Contact us at:
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at (630)252-6182.



February 13, 2008

Ms. LaVerne Kyriss, Federal Energy Corridors Project Manager
Office of Electricity Delivery and Energy Reliability
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U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585
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Subject: Draft Programmatic Environmental Impact Statement (PEIS) for the Designation of Energy Corridors on Federal Lands in 11 Western States, Docket No. EA-331

Dear Ms. Kyriss:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the Draft Programmatic Environmental Impact Statement (PEIS) for the Designation of Energy Corridors on Federal Lands in 11 Western States under Section 368 of the 2005 Energy Policy Act. SDG&E understands the complexity of this process and recognizes that the Department of Energy (DOE) and the Bureau of Land Management (BLM) is seeking specific comments and suggested changes for incorporation in the Final PEIS.

Most fundamentally, the PEIS and final federal corridor designations, along with associated land use plan amendments, must take into greater account existing rights-of-way, projects currently being evaluated at the state and federal levels, corridor planning on a state and local level, and land use constraints and encroachments on existing and proposed energy corridors. A consistent and coordinated comprehensive approach is critically important in determining the final federal corridor designations and is necessary to fully realize the associated benefits of any designation.

50381-001

SDG&E requests that DOE and BLM consider the following three issues, which are vital to California's energy future and are consistent with our State-mandated planning efforts. Each of these issues is discussed in further detail in the attached document.	50381-001 (cont.)
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<p>Issue 1: Include the designation of the following three transmission corridors located on federal lands or otherwise within federal jurisdiction (see attached map):</p> <p>Northern East to West Corridor Southern East to West Corridor Existing Southwest Powerlink Corridor</p>	50381-002
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<p>Issue 2: Include specific language that clearly states that the federally designated energy corridors will not be used as a vehicle to prejudice, contest or dispute applications for rights-of-way in non-designated federal corridors.</p>	50381-003
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<p>Issue 3: Include information regarding future updates to the federal energy corridor designations.</p>	50381-004
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<p>Notwithstanding the recognized critical congestion situation in southern California generally and in San Diego County specifically, the draft PEIS proposes a relatively limited designation for the area. For instance, in San Diego County and neighboring Imperial County, less than 20 miles (.03%) are proposed for designation, out of more than 6,000 total miles proposed in the eleven western states. While SDG&E supports these initial proposals, SDG&E believes that additional designations should be included in the final PEIS to be commensurate with the severe congestion circumstances in the San Diego County area, which is one of only two DOE identified Critical Congestion Areas in the country.</p>	50381-005
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SDG&E is very supportive of the comprehensive efforts of DOE, the BLM, and each of the Cooperating Agencies to alleviate transmission congestion and plan for future transmission facilities. We welcome the opportunity to provide additional detail or answer any questions regarding our comments. Thank you in advance for your consideration of SDG&E's recommendations.

Sincerely,



Christopher P. Terzich, REA
Principal Environmental Specialist
San Diego Gas and Electric Company
8315 Century Park Court, CP21E
San Diego, CA 92123-1548
(858) 637-3701

Attachments

**San Diego Gas & Electric (SDG&E)
Comments on the Draft Programmatic Environmental Impact Statement (PEIS)
for the Designation of Energy Corridors on Federal Lands in 11 Western States,
Docket No. EA-331**

Issue 1: Include the designation of three transmission corridors located on federal lands or otherwise within federal jurisdiction

Introduction

Fulfilling the objectives of Section 368 is particularly important in southern California, where the U.S. Department of Energy (DOE) has recently recognized the critical transmission congestion situation and designated the area as a National Interest Electric Transmission Corridor (NIETC). To help alleviate transmission congestion issues, SDG&E has been working with the California Energy Commission (CEC) on the state's energy corridor planning process (SB 1059)¹, guidelines for which were adopted in December 2007, as well as on the existing Integrated Energy Policy Report (IEPR) update process.² Similarly, SDG&E has been working with the CPUC and BLM on the Sunrise Powerlink, a proposed 500/230 kV transmission project that would provide access to about 1,000 megawatts of renewable energy in the Imperial Valley and assist SDG&E in meeting State Renewable Portfolio Standard requirements.

The Section 368 federal corridor designation process should take into account these ongoing processes and consider designating additional corridors, particularly in locations where there are existing transmission facilities with the greatest possibility for future expansion. Doing so would maximize the effectiveness of the corridor designation program through a coordinated approach envisioned by Congress in enacting Section 368 and reduce the potential for duplication of effort of environmental review as required by the National Environmental Policy Act (NEPA). Thus, SDG&E specifically recommends the designation of the following three corridors in the PEIS:

1. Northern East to West Corridor

In 2006, SDG&E proposed the Sunrise Powerlink to improve reliability, gain access to renewable energy resources in the desert and reduce energy costs. The location, configuration and objectives of the Sunrise Project directly address and implement the very directives that Section 368 seeks to achieve, namely improving reliability, relieving congestion, and enhancing the capability of the national grid to deliver electricity. As recognized by the draft Section 368 PEIS, San Diego is an energy demand area with the potential to tap into significant energy supply areas with renewable resources. *See, e.g.*, ES-15. The Sunrise Powerlink directly addresses San Diego's increasing energy supply needs and its congestion and reliability issues. *See* CEC Report, Strategic Transmission Investment Plan 2005, at 6.³ As a result, the PEIS

¹ SB 1059 was enacted to develop an integrated, statewide approach to electric transmission planning and permitting to address California's critical energy and environmental policy goals, including corridors to be designated on state and private lands.

² The IEPR is an assessment and forecast of existing energy industry supply, production, transportation, delivery and distribution, and prices. The information in the IEPR is used by the CEC to develop future energy policies. The CEC adopts an IEPR every two years and an update every other year.

³ Available at <http://www.energy.ca.gov/2005publications/CEC-100-2005-006/CEC-100-2005-006-CMF.PDF>.

50381-006

should include existing and proposed corridors in the area, which could be used for projects such as the Sunrise Powerlink, as outlined below and illustrated on the enclosed map. It should be noted that corridors to be designated under the Section 368 process must allow a continuous and logical connection between federal lands and state and private lands to be useful for future transmission line planning and routing. To illustrate this, the enclosed map shows routing corridors on both federal and non-federal lands. To further aid the DOE and BLM in the consideration of these corridors, electronic GIS shape files of these routes have been included.

a. **Imperial Irrigation District North-South Corridor**

BLM's California Desert Conservation Area Plan designated a Contingent Utility Corridor just west of the Salton Sea, generally following Highway 86. Within this corridor there is currently located a 161 kV transmission line belonging to the Imperial Irrigation District (IID), which begins in the El Centro area and continues northwest into the Coachella Valley area. Both the IID transmission line and the contingent corridor correspond to a portion of the proposed Sunrise Powerlink route. As an existing transmission line, a currently identified BLM contingent corridor, and a proposed electric transmission route, this contingent corridor should also be designated as part of the proposed federal corridor system.

Moreover, designating this contingent corridor would provide a link between the existing Southwest Powerlink transmission line corridor and the I-10 Palo Verde-Devers (PVD) corridor, which contains an existing 230kV and 500kV transmission line paralleling I-10 from Arizona through Riverside County in California. Providing a connection between PVD and the Southwest Powerlink would provide a generation transmission tie line for the numerous renewable energy projects currently pending in that area. Given the fact that any other potential north-south corridor connection between the Southwest Powerlink and PVD with existing energy transmission facilities is constrained by land use encroachments and constraints, topography, or potentially significant environmental constraints, designating this route located on federal lands as an energy corridor is prudent for future energy corridor planning, particularly given the south-north orientation of the DOE's Critical Congestion Area, which corresponds with coastal southern California.

b. **Existing BLM Jurisdictional Corridor**

One of the proposed route sections for SDG&E's preferred alignment of the Sunrise Powerlink is an existing right-of-way through Anza Borrego Desert State Park (ABDSP or Park), substantial portions of which are under the jurisdiction of the BLM. There is an existing 69/92kV transmission line currently located within this 100 foot corridor that was originally built in the 1920s, and which predates the establishment of the Park over a decade later. The federal interests in the transmission corridor were reserved by federal legislation and patent, and have existed for over 80 years. The BLM recently confirmed its continuing jurisdiction within ABDSP in July 2007. See Attachment A, CPUC Data Request 1, GEN 2 and Attachment B, CPUC Data Request 8, ALT 74. This long existing federal transmission line corridor should be included in the federal designation.

50381-006
(cont.)

The route for the Sunrise Powerlink through ABDSP was chosen for a number of reasons, including SDG&E's interest in utilizing an existing right-of-way to minimize environmental impacts and selecting a route separate in physical location from the existing Southwest Powerlink for reliability purposes. The existing Southwest Powerlink is the only 500kV transmission line in San Diego and Imperial counties and is already approaching maximum capacity with a limited ability for expansion given land use and other constraints along its route, particularly around its terminus in the Miguel Substation in southern San Diego County.

Separate and apart from issues that are specific to the Sunrise Powerlink project, BLM's existing right-of-way through ABDSP should be considered for federal designation because this route is the most direct connection between the Imperial Valley, with its rich potential for renewable resources, and the San Diego area. Regardless of whether Sunrise is ultimately located through ABDSP, it is certain that in the future some improvement to the existing 69kV line will be required, and its importance to the energy supply system of the San Diego area should be recognized.

2. Southern East to West Corridor

In addition to SDG&E's proposed route for the Sunrise Powerlink, the CPUC/BLM have identified additional potential transmission corridors in San Diego and Imperial Counties that are being considered for the Sunrise Powerlink and are likely to be considered for any future transmission line in this area. These alternative potential routes have been identified in the joint CPUC/BLM draft environmental impact report/environmental impact statement (DEIR/EIS) issued on January 3, 2008. However, it appears from the map contained in the draft PEIS that only a portion of federal lands identified as needed for the CPUC proposed potential southern corridor was included in the proposed Section 368 corridor designation. Similarly, the Section 368 designation does not include other corridor options identified by the CPUC/BLM. While SDG&E believes that its preferred northern route is the best option for the Sunrise Project, if the CPUC and BLM were to approve an alternative route in southern San Diego county, as contemplated in the Draft EIR/EIS, only a portion of the corridor located on federal lands would be included within a Section 368 federally designated corridor, while the remaining contiguous federal lands would not. This is exactly the situation Congress sought to *avoid* in enacting Section 368 and seeking to streamline the transmission corridor process. Each of these corridors on federal land should be therefore designated as federal energy corridors as outlined below and illustrated on the enclosed map:

a. BCD Route

The BCD Corridor begins by diverging north from Interstate 8 just west of the Carrizo Gorge Wilderness and east of the town of Boulevard. The route traverses north adjacent to Carrizo Gorge Wilderness before heading west into Cleveland National Forest. The corridor also crossed BLM lands.⁴

⁴ See CPUC/BLM Draft EIR/EIS, Sunrise Powerlink Project at Figure ES-17 and Section E.2.1, available at <http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/toc-deir.htm>.

50381-006
(cont.)

b. **Modified BCD-South Route**

For the purposes of this corridor designation process, SDG&E proposes the BCD-South route with modifications to avoid areas designated as Backcountry Non-Motorized zone in the Cleveland National Forest Land Use Management Plan adopted in 2005 and to address freeway crossing issues to avoid placement of a structure in the middle of the freeway right-of-way potentially contrary to Caltrans policies.⁵

c. **Modified D Route**

The Modified Route D Corridor begins at the western edge of the La Posta Reservation, traverses west adjacent to the southern border of the Cleveland National Forest, and then heads north through the forest. This route crosses both Forest Service and BLM lands.⁶ This route also includes the Star Valley Road Option to avoid sensitive resource areas, as identified by the CPUC, across Forest Service lands.⁷

3. **Southwest Powerlink Corridor**

It appears from the existing proposed corridor designation map in the draft Section 368 PEIS that only a very small portion of the existing Southwest Powerlink transmission line is within the proposed designated corridor. Specifically, the current proposed designation falls short of the full length of the Southwest Powerlink into the Miguel Substation. In this area, the Southwest Powerlink traverses BLM lands in the Otay Mountain area, and SDG&E recommends that the full length of the Southwest Powerlink be included in the corridor designation.

The Southwest Powerlink is a vital interstate transmission facility that brings power from Arizona to San Diego and can be used as a generation transmission tie line for numerous wind energy projects on the near horizon in eastern San Diego County. The transmission line is currently under tremendous pressure as the only 500 kV line into San Diego County⁸ and its location in a quickly developing area. The Southwest Powerlink is becoming increasingly subject to encroachment and restrictions from federal and state conservation programs, including the San Diego National Wildlife Refuge Planning Area. Designating the full route of the Southwest Powerlink in this area will ensure that the route is recognized as a crucially important energy facility in the years to come.

Issue 2: Future Unidentified Corridors

The PEIS contains language that the designated system of energy corridors would not preclude an applicant from applying for a right-of-way outside of the designated Section 368 energy corridors. However, the PEIS also refers to Section 368 energy corridors as “preferred” locations (page ES-4, second column, first paragraph). The PEIS should be clarified and revised

⁵ *Id.*

⁶ See CPUC/BLM Draft EIR/EIS, Sunrise Powerlink Project at Figure ES-17 and Section E.4.1, available at <http://www.cpuc.ca.gov/Environment/info/asp/sunrise/toc-deir.htm>.

⁷ *Id.*

⁸ The Southwest Powerlink is the only 500 kV transmission line in San Diego County, compared to the state’s 47 other 500 kV transmission lines.

50381-006
(cont.)

50381-007

to include specific language that clearly states that the designation of this system of corridors shall not be used as a vehicle to prejudice, contest or dispute applications for rights-of-way on federal lands in non-designated Section 368 energy corridors.

50381-007
(cont.)

Issue 3: Future Updates to the Designation of Energy Corridors

The PEIS states that Section 368 calls for the designation of additional corridors to address future energy transport and distribution needs (page 2-26, second column, first paragraph). The PEIS does not specify whether there are established deadlines for updates to the Section 368 energy corridors plan. If such deadlines exist, the PEIS should include details about any mandated deadlines or timeframes to keep the public informed about how the energy corridor planning and designation process will move forward in the future.

50381-008

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:32 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50382

Attachments: Modified_Northern_&_ES_Southern_Routes_021208_WVEC50382.pdf



Modified_Northern_
&_ES_Souther...

Thank you for your comment, Christopher Terzich.

The comment tracking number that has been assigned to your comment is WVEC50382. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:31:43PM CDT

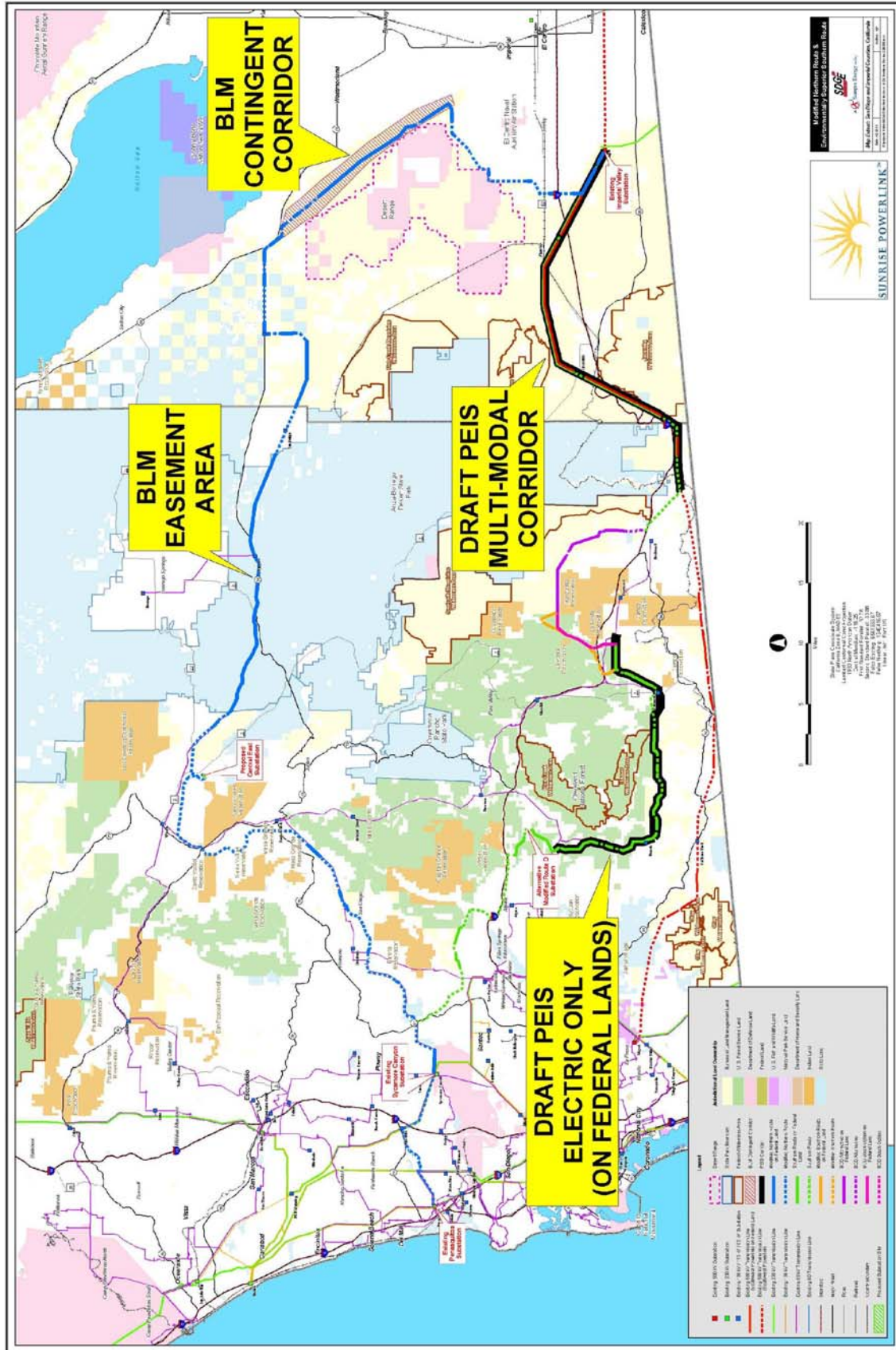
Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50382

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Comment Submitted:

Please see the attached Map from San Diego Gas & Electric which goes with Energy Corridor Draft Programmatic EIS Comment WVEC50381. Thank you. | 50382-001

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.



From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 5:54 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50383

Attachments: PC-Ww-Energy-Cor-PDEIS-Comment-ltr-tmd-080114_WVEC50383.pdf



PC-Ww-Energy-Cor
-PDEIS-Comment...

Thank you for your comment, Timothy Dyhr.

The comment tracking number that has been assigned to your comment is WVEC50383. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 05:54:02PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50383

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Email: tmdyhr@minesgroup.com
Privacy Preference: Don't withhold name or address from public record
Attachment: D:\Tim Business Documents\A1-Pumpkin Copper\WWE-West-wide Energy Corridor\PC-Ww-Energy-Cor-PDEIS-Comment-ltr-tmd-080114.pdf

Comment Submitted:
Comments submitted on behalf of Nevada Copper Corp

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.



February 13, 2008

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

Via Internet at <http://corridoreis.anl.gov/involve/comments/index.cfm>

Dear Sir or Madam:

We have reviewed the Draft PEIS for the West-wide Energy Corridor in detail and determined the proposed corridor potentially affects a known mineral resource that is currently the subject of a feasibility study. The project, Pumpkin Hollow Copper, is on 21,000 acres of both patented and unpatented mining claims southeast of the city of Yerington in Lyon County, Nevada (Townships 12 and 13N, Range 26 E, MDB&M). The deposits are well defined, have been explored since the 1960s, and at present have high potential for expansion and development into a major copper, iron, gold and silver mine.

On the eastern boundary of these deposits is an existing high voltage power line also currently designated as a proposed corridor, up to 3500' wide, in the Draft PEIS. The Draft PEIS states that energy transport projects developed within the corridor will be given preference over mineral development. Expansion of the existing right-of-way up to 3500 feet adjacent to the mineral properties could adversely affect mineral development in Pumpkin Hollow and may render a mining operation economically infeasible. Reducing the potential for mining in Pumpkin Hollow could also adversely impact economic development directly generated by the project for Lyon County and the city of Yerington.

The West-wide Energy Corridor PEIS states mineral development is the highest value land use per acre. The PEIS also states the width of the Energy Corridor is adjustable. Unless there are compelling factors affecting the configuration of the Corridor, any specific alignment and configuration ought to be adjusted to avoid conflict with the mineral developments in Pumpkin Hollow.

We request that the final PEIS include language specifying that all efforts be taken to ensure a mechanism that eliminates or reduces the impacts to mine development. This will also assure that the compatible development of energy distribution, strategically important mineral resources, and economic growth for the local community is maximized.

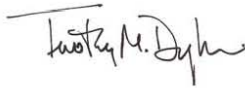
50383-001

■ 1325 Airmotive Way ■ Suite 175 U ■ Reno ■ Nevada ■ 89502 ■
Telephone: (775)322-7622 ■ Facsimile: (775)322-2660
Tim Dyhr (Cell): (775) 843-0764 ■ E-mail: tmdyhr@minesgroup.com ■ Facsimile: (520)-529-5074

Draft PEIS for the West-wide Energy Corridor PDEIS Comment Letter
February 13, 2008
Page 2

Should you have any questions, please do not hesitate to call me at 775-843-0764.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy M. Dyhr". The signature is written in a cursive style with a horizontal line above the first few letters.

Timothy M. Dyhr, Principal
The MINES Group, Inc.
On behalf of Nevada Copper Corp.

CC: Joe Kircher, COO Nevada Copper Corp.
Dennis Stark, Lyon County
Rob Loveberg, Lyon County
Dan Newell, City of Yerington

File: PC-Ww-Energy-Cor-PDEIS-Comment-ltr-tmd-080114

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 6:06 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50384

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WVEC50384. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 06:06:20PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50384

First Name:
Last Name:
Address:
City:
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:
The proposed energy corridor is a travesty all around. The project is not green, will destroy sensitive natural areas and degrade the quality of life for the citizens of the Morongo basin with no benefit to their community. All Californians should understand that the desert they live in or come to visit for inspiration and renewal is under a grave threat. This project must NOT be allowed to proceed.

50384-001

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

From: coridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 6:11 PM
To: mail_coridoreisarchives; coridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50385

Attachments: Planning_Letterhead-BLM_Energy_Corridors_WVEC50385.doc



Planning_Letterhead-BLM_Energy...

Thank you for your comment, Pat Cecil.

The comment tracking number that has been assigned to your comment is WVEC50385. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 06:10:44PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50385

First Name: Pat
Last Name: Cecil
Organization: Inyo County Planning Department
Address: 168 N. Edwards St.
City: Independence
State: CA
Zip: 93526
Country: USA
Email: pcecil@inyocounty.us
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\mgaffney\My Documents\Planning Letterhead-BLM Energy Corridors.doc

Comment Submitted:

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.



Planning Department
168 North Edwards Street
Post Office Drawer L
Independence, California 93526

Phone: (760) 878-0263
 (760) 872-2706
 FAX: (760) 878-0382
 E-Mail: inyoplanning@inyocounty.us

March 11, 2008

Re: West-Wide Energy Corridor Draft Programmatic Environmental Impact Statement

To whom it may concern,

The Inyo County Board of Supervisors is highly concerned about potential impacts to the Owens Valley from the West-Wide Energy Corridor Draft Programmatic Environmental Impact Statement (EIS). These concerns include:

- Visual/aesthetic impacts from expanding existing energy corridors in the Owens Valley | 50385-001
- Economic impacts to recreation from expanded energy corridors in the Owens Valley | 50385-002
- Reduced access to public lands from expanding existing energy corridors in the Owens Valley | 50385-003
- Taking of private property through eminent domain to accommodate expanded energy corridors, or devaluation of property values from expanded energy corridors | 50385-004
- Limiting expansion to existing energy corridors in the Owens Valley | 50385-005
- Impacts to plants and wildlife from expanded energy corridors in the Owens Valley | 50385-006

The Board of Supervisors and the Planning Department have specific questions that it recommends be addressed and incorporated into the Final EIS:

1. Table A in Volume Two lists new proposed corridors in the Owens Valley containing electric transmission lines only, yet Table F in Volume Two lists multimodal (oil, gas and hydrogen pipelines and electric power lines) as the proposed use. What use or uses are planned for new energy corridors in the Owens Valley? | 50385-007
2. North of and through the City of Bishop, there is one active energy corridor, utilized by the City of Los Angeles Department of Water and Power (DWP). South of Bishop, two energy corridors exist, one for DWP and the other for Southern California Edison. It is unclear from the map (Part 2: State Base Map Series) if new energy corridors are being proposed in the Owens Valley. Will the proposed action add more energy corridors on federal public lands, DWP lands, or private property in the Owens Valley? If new energy corridors are being proposed, where will they be located? | 50385-008
3. Under the U.S. Bureau of Land Management's (BLM) current Resource Management Plan (RMP) for the Owens Valley, energy corridors are one half mile wide in the Owens Valley. The proposal seeks an energy corridor of 1,320 feet wide (about a quarter of a mile). What impact will the proposed action have on the current width of energy corridors in the Owens Valley? | 50385-009

- | | |
|--|-----------|
| 4. The BLM's current RMP for land located in the Owens Valley does not designate specific types of energy corridors (i.e. oil, gas, hydrogen, electric). Will the RMP have to be revised to accommodate the proposed action? | 50385-010 |
| 5. What impacts will the proposed action have on private property, plants and wildlife, and access/recreation on BLM land in the Owens Valley? | 50385-011 |

Thank you for the opportunity to comment. If you have any questions, please contact Matt Gaffney, Inyo County Planning Department, at (760)-873-7423.

Sincerely,

Pat Cecil, Director
Inyo County Planning Department

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 6:11 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50386

Thank you for your comment, John Strong.

The comment tracking number that has been assigned to your comment is WVECD50386. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 06:11:17PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50386

First Name: John
Last Name: Strong
State: CA
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

The proposal to extend a power link thru the wilderness areas of Anza Borrego State Park is a betrayal of trust. Such a proposal is anathema to the interests of the residents of the area.

50386-001

To do an end around by designating the area as an energy corridor is perfidious. I think both proposals should be denied. There are alternative options that are much better.

50386-002

John Strong

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 6:20 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50387

Thank you for your comment, Jody Rich-Ramirez.

The comment tracking number that has been assigned to your comment is WVEC50387. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 06:19:49PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50387

First Name: Jody
Last Name: Rich-Ramirez
Organization: Century 21 Mirage
Address: 57370 29 Palms Highway, Suite 101
City: Yucca Valley
State: CA
Zip: 92284
Country: USA
Email: jr Ramirez@century21.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Energy for the Twentyfirst Century must evolve into truly renewable resources and the old methodology of building bigger grids and devastating our land by scraping and putting up huge power towers is of the past. The San Diego region is poised on the brink of a new energy future, and the path it charted determined in large part the success of its people, its economy and its ability to provide a cleaner, more secure energy supply for generations to come.

San Diego Smart Energy 2020 paves the way for a shift from reliance on fossil fuels and imported power to an array of local solutions that include energy efficiency measures with emphasis on high efficiency air conditioning systems; common-sense weatherization and conservation; the proven technology of solar photovoltaic (PV) panels, for large commercial use as well as on homes; small, highly efficient natural gas-fired power plants that generate both power and heating/cooling; adoption of smart grid procedures that improve the efficiency of the grid by monitoring and controlling the flow of electricity on a continuous basis; and the widespread institution of green building design principles. San Diego Smart Energy 2020, the strategic energy plan for San Diego County provides a working blueprint of realistic methods to reduce greenhouse gases from power generation by 50 percent over current levels by 2020 while increasing the total electricity supply from renewable energy resources and maximizing locally generated power. The plan is economically feasible for residents and businesses alike. If Mayor of Los Angeles truly wants to impact the Los Angeles Region in a positive way, he needs to look south to San Diego for the answer. Not devastating our Natural Resources and Preserves to power broker energy while using double speak of "Green" "Renewable" and "Alternative" and pushing the corporate welfare agenda. And, in closing... I am opposed to the mayor of Los Angeles and the LADWP's stated notion that the Mojave Desert is somehow Los Angeles' back yard and their resultant omnipotent attitude that allows them to think they can destroy another geographic portion of California as they did in the Owens Valley is not only narcissistic but criminal. We the people need your leadership to develop and maintain rational energy policy that is based on conservation and local generation of energy and STOP GREEN PATH NORTH. Thank you for the opportunity to comment.

50387-001

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 6:24 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50388

Attachments: Western_Energy_Corridor_PEIS_WVECD50388.pdf



Western_Energy_C
orridor_PEIS_W...

Thank you for your comment, Greg Wolff.

The comment tracking number that has been assigned to your comment is WVECD50388. Once the comment response document has been published, please refer to the comment tracking number to locate the response.


Comment Date: February 13, 2008 06:24:05PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50388

First Name: Greg
Last Name: Wolff
Organization: Office of Archaeology and Historic Preservation
Address: Colorado Historical Society
Address 2: 1300 Broadway
City: Denver
State: CO
Zip: 80203
Country: USA
Email: greg.wolff@chs.state.co.us
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\greg wolff\Desktop\Western Energy Corridor PEIS.pdf

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.



 OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

February 13, 2008

LaVerne Kyriss
Federal Energy Corridors Project Manager
c/o West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

Re: Comments on Draft Programmatic Environmental Impact Statement (PEIS) for the Designation of Energy Corridors on Federal Land in the 11 Western States (CHS# 48353)

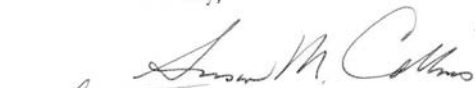
Dear Ms. Kyriss:

Thank you for the opportunity to comment on the draft PEIS:

- 1. We caution that "avoidance" of historic properties should consider not only direct effects, but also indirect, cumulative, and reasonably foreseeable effects. This is an important consideration because upon designation these energy corridors will subsequently see multiple undertakings with the potential to adversely affect historic properties. 50388-001
- 2. The potential effect to historic districts and historic landscapes is not adequately addressed. 50388-002
- 3. The suggestion that "When cumulative and indirect effects are identified as issues in the CRMP, project proponents may contribute to a cumulative and indirect effects fund to mitigate these effects" is interesting but provides more questions than answers. Will proponents be required to contribute to such a fund? What if they choose not to contribute? What if the contributions are not adequate for the appropriate mitigation measures? 50388-003
- 4. Finally, we echo the issues raised in the Advisory Council on Historic Preservation's letter dated February 12, 2008 regarding the use of the NEPA process to comply with Section 106 of the National Historic Preservation Act (NHPA) and appropriate consideration of the concerns of tribes and other consulting parties. 50388-004

We look forward to further consultation with the various agencies regarding this project.

Sincerely,


Georgianna Contiguglia
State Historic Preservation Officer
GC/GAW

CC: Kate Winthrop, BLM Project Manager for WEC-PEIS

From: coridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 7:41 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50389

Thank you for your comment, Darby Dettloff.

The comment tracking number that has been assigned to your comment is WVECD50389. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 07:40:55PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50389

First Name: Darby
Middle Initial: P
Last Name: Dettloff
Address: 9
City:
State: CO
Zip:
Country: USA
Privacy Preference: Withhold address only from public record

Comment Submitted:

There are many reasons why my neighbors and I would choose to purchase land at Lone Cone Ranches 30 miles away from the nearest town; a 3500 foot energy corridor is not one of them. People who own land at Lone Cone are the type of people who are not afraid to get snowed in for a winter, drive 30 miles to stock up on groceries, or haul water. Power lines, much less a 3500 foot swath of treeless "corridor" seems to me to be out of place in such a pristine area. It would be a shame to climb a ridge on my own property with a commanding view of Lone Cone mountain, and instead of turning around and enjoying the beautiful sunset down Disappointment Valley, Fuming at the cretins who raped another chunk of land. It starts with power lines, then comes an "energy corridor", what's next?

50389-001

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

From: corridoriswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 7:48 PM
To: mail_corridorisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50390

Thank you for your comment, Mark Novkov.

The comment tracking number that has been assigned to your comment is WVECD50390. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 07:47:53PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50390

First Name: Mark
Last Name: Novkov
Address: 3351 E. Eva St.
City: Phoenix
State: AZ
Zip: 85028
Country: USA
Email: springsource1@yahoo.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

As a citizen I am appalled that full and fair disclosure has been disregarded by the several agencies involved in the "nearly two year" study that determined that it was okay to design energy transport corridors through the Disappointment Valley, west of Lone Cone Mt, CO. There was apparently no thought given to the displacement of people living there nor the general destruction of a pristine and fragile ecosystem that weighs in the balance. These types of projects should be channeled much more carefully than the proposed Draft PEIS would indicate. I join with those not in favor of the current proposal until a much more thorough plan can identify specifically where and how the corridor would be constructed through the Disappointment Valley. Further I intend to seek Congressional review of this process. Thank you.

50390-001

Questions about submitting comments over the Web? Contact us at:
corridoriswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 8:11 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50391

Thank you for your comment, Keith Jones.

The comment tracking number that has been assigned to your comment is WVECD50391. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 08:11:04PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50391

First Name: Keith
Middle Initial: F
Last Name: Jones
Organization: Lone Cone Ranches HOA, SW Colorado
Address: 1006 Club Lake Rd.
City: Nocona
State: TX
Zip: 76255
Country: USA
Email: keith@wf.quik.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Dear Sirs,

The Proposed SW Colorado corridor 130-274 may traverse the Beautiful and Remote Lone Cone Ranches Subdivision where I and many others have invested much to escape from such things as the proposed corridor(s).

I just recently found out about this proposal. Why were not private land owners between the proposed federal land corridors notified? How is it possible that federal corridors be evaluated without also evaluating the state and private lands inbetween? How will this corridor affect erosion, wildlife and visual beauty that presently exists in the proposed corridor areas (Federal, state and private)? Will there be noisy pump stations, additional maintenance roads and nighttime light pollution along the corridors? If this corridor passes thru my property will the government purchase at existing market rate? If this corridor passes close to my property it will decrease significantly the monetary and personal value of my property! How will it be possible for such a wide corridor to traverse the steep upper disappointment valley walls/mountains? Will the 2/3 mile corridor be completely clear cut (there are magnificent ponderosa pines and other trees in many of the federal areas proposed, including private lands in Upper Disappointment Valley)?

50391-001

Have other alternatives for energy transportation been studied/investigated thoroughly?

Thank you.

Best regards,
Keith Jones
LCR Board Member, Lot 54
home ph 940 825-7037
work ph 940 397-7126

From: coridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 8:38 PM
To: mail_coridoreisarchives; coridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50392

Attachments: WestWidecomm01_WVECD50392.doc



WestWidecomm01_
WVECD50392.doc,,

Thank you for your comment, James Lockhart.

The comment tracking number that has been assigned to your comment is WVECD50392. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 08:37:43PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50392

First Name: James
Middle Initial: E
Last Name: Lockhart
Organization: Pikes Peak Sierra Club Group
Address: 1718 Lorraine St., Apt. B4
City: Colorado Springs
State: CO
Zip: 80906
Country: USA
Email: jlock@datawest.net
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Owner\My Documents\Mydocuments\SierraCons
\WestWidecomm01.doc

Comment Submitted:
The attached comments are submitted on behalf of the Pikes Peak Sierra Club Group and the Central Colorado Wilderness Coalition.

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

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

To Whom It May Concern:

We am writing on behalf of the Pikes Peak Sierra Club Group and the Central Colorado Wilderness Coalition with regard to the West Wide Energy Corridors Draft Programmatic Environmental Impact Statement.

We are concerned about certain general aspects of the proposal.

(1) The proposal analyzes only two alternatives, representing the entire network of corridors and a "no action" alternative. This gives neither federal agencies an opportunity to conduct the type of analysis envisioned by the National Environmental Policy Act, which calls for analysis of a reasonable ranger of alternatives. Nor does it give the public the opportunity to guide public policy by pointing out advantages and weaknesses of various reasonable courses of action. Effectively, the public is asked either to support a pre-selected alternative in full or oppose all expansion of the energy grid and pipeline network.

50392-001

(2) The proposal necessarily considers existing patterns of energy production and consumption and extrapolates them into the future. However, by doing this in conjunction with a single-alternative approach, it unduly focuses on fossil fuels energy production and transportation. We feel that it is important to also consider improving access for alternative energy sources, such as wind and solar power. Planning for distribution of energy from a production area is a significant cost factor, both in terms of time and dollar costs, and NEPA analysis is a significant planning cost, as is recognized by the very fact that the federal government is seeking to pre-identify future energy corridors. If the energy corridor plan does not consider linkages to likely areas of wind and solar production, the very existence of an established and approved corridor may cause energy policy and energy producer planning to favor existing energy production means, giving them an artificial cost advantage and thereby creating a barrier to development of new technologies.

50392-002

(3) We would like to suggest in particular that the analysis of special and sensitive public lands include not only existing Wildernesses, but also areas proposed for protection in pending legislation such as the Colorado Wilderness Act Of 2007, H.R. 3756 sponsored by Rep. Diana Degette of Colorado, which proposes some sixty new wilderness areas, five of which would be impacted by the proposed corridors.

50392-003

We are particularly concerned about possible impacts to the Badger Creek Proposed Wilderness Area by the Arkansas River corridor 87-277.

The Badger Creek Roadless Area is located north of the Arkansas River near the town of Howard, and includes 25,300 acres of roadless land on both sides of Badger Creek. Although much of the roadless area is National Forest land, the portion impacted by the proposed energy corridor is managed by the Bureau of Land Management, and is located along the southern boundary of the roadless area. In addition to outstanding wilderness qualities, the area is recognized for numerous natural values, including elk migration corridors, rare plant communities, and a high winter concentration for mule deer located in the southwest portion of the area in the vicinity of the proposed corridor. Badger Creek forms an important wildlife connecting link between South Park and the Arkansas Canyons area, and is also a recognized cold water fishery. It has been the subject of extensive efforts to control upstream erosion and to improve water quality and we have expressed concern in the past about the possible negative impacts of roads and consequent motorized use, permitted or illegal, in achieving this goal..

50392-004

The proposed energy corridor essentially follows an existing transmission line right of way located at the south end of the Badger Creek roadless area. Indeed, proponents of wilderness designation for the area sited the southern boundary primarily with reference to, or to avoid conflict with, this powerline and its access road. We are therefore concerned that extending the existing powerline corridor to the north would impact acreage within the existing roadless area, effectively disqualifying it for wilderness designation. Therefore we suggest that any expansion of the existing right of way be to the south of the existing powerline corridor in the vicinity of the Badger Creek Proposed Wilderness, rather than to the north.

The proposed energy corridor through the Badger Creek region is 3500 feet in width. We are concerned that a wide energy corridor would adversely affect connectivity between the proposed wilderness and relatively wild lands and important wildlife habitat to the south. In order to preserve sensitive species and general biodiversity, it is not enough to preserve islands of unimpacted land. Rather it is crucial to also consider connections between these areas. We note that it is most likely necessary to analyze powerlines and pipelines differently due to their significantly different impacts upon connectivity. A powerline corridor using existing roads might be relatively less impacting than a pipeline corridor, since it could avoid impacting known wildlife corridors to some degree by proper selection of transmission tower sites, whereas a pipeline would have greater ground disturbance, and would bisect the wildlife corridor to at least the same extent as a road.

50392-005

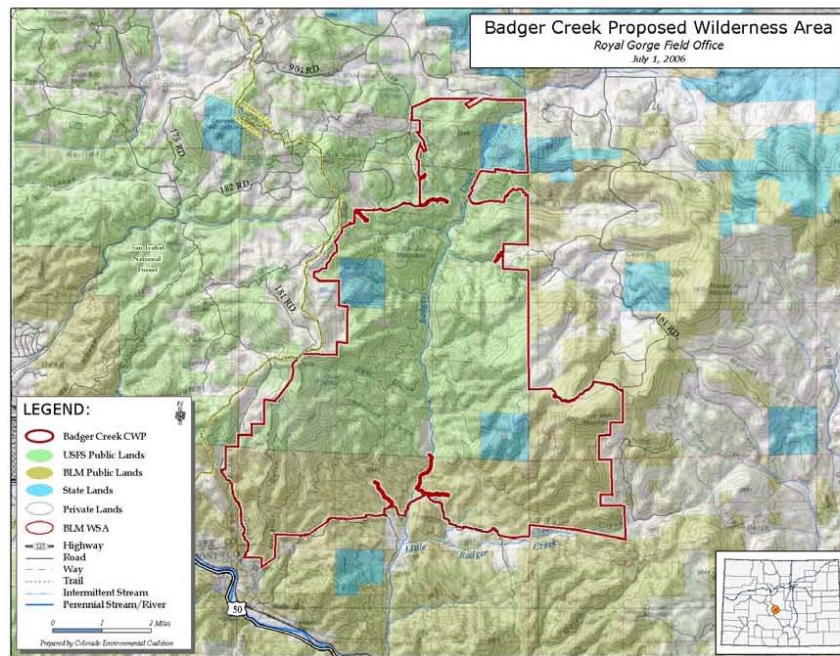
We likewise feel that approval of this corridor for pipelines would have a significantly greater impact because there are no pipelines currently within the corridor, and because the topography of this corridor segment is extremely rugged. Here, and throughout the proposed network, a proper analysis should recognize not only the differential impacts of powerline and pipeline corridors, but also the additional impact of pipelines in an area currently hosting only powerlines, or vice versa.

50392-006

The appended map shows the Badger Creek vicinity. The proposed corridor essentially parallels the southern boundary of the Proposed Wilderness.

James E. Lockhart, Conservation Chair
Pikes Peak Sierra Club Group
1718 Lorraine St., Apt. B4, Colorado Springs, CO 80906 jlock@datawest.net

John Stansfield, Coordinator
Central Colorado Wilderness Coalition
PO Box 588, Monument, CO 80132 303-660-5849; jorstan@juno.com



From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 9:14 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50393

Thank you for your comment, Elise Van Arsdale.

The comment tracking number that has been assigned to your comment is WVEC50393. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 09:13:51PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50393

First Name: Elise
Middle Initial: S
Last Name: Van Arsdale
Organization: Pathways
Address: P.O. Box 607
City: Placitas
State: NM
Zip: 87043
Country: USA
Email: vanarsdalee@aol.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Having attended the public comment presentation at the Holiday Inn at Albuquerque, I would like to add my concerns that public notice , consultation requirements and sketchy ambiguous language with regard to community impact have NOT been adequately addressed. I want to understand what the connections will mean in between the dotted lines. I would like to have DOE address the application process that will be reviewed for potential providers--what participation can the affected communities have on this applicant process? "Imminent domain" and ROWs are terms that ignite individuals and communities. To what extent would these be used? We want a more forthcoming evaluation of what this corridor means to our community!

50393-001

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

From: coridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 9:36 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50394

Thank you for your comment, Rhonda Hayes.

The comment tracking number that has been assigned to your comment is WVECD50394. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 09:36:10PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50394

First Name: Rhonda
Middle Initial: L
Last Name: Hayes
Organization: Environmental Preservation Alliance
Address: 7144 Airway Ave
City: Yucca Valley
State: CA
Zip: 92284
Country: USA
Privacy Preference: Withhold address only from public record

Comment Submitted:

I think that Los Angeles should learn to conserve energy and turn off their lights at night instead of proposing new power lines that will destroy the Mojave Desert and the way of life of the Mojave's residents, human as well as animal. The proposed Green Path has nothing green about it and they might as well call it the "Underhanded, sneaky Black Path!"

50394-001

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster at (630)252-6182.

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 9:43 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50395

Thank you for your comment, Anne Scofield.

The comment tracking number that has been assigned to your comment is WVEC50395. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 09:42:53PM CDT

Energy Corridor Draft Programmatic EIS
 Draft Comment: WVEC50395

First Name: Anne
 Middle Initial: C
 Last Name: Scofield
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 State: CA
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 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Places important to wildlife should not be impacted by the energy corridor. Big Morongo Preserve is important to several types of wildlife because it has water year-round. It is an important migration stopover spot for birds and a corridor for mammals. | 50395-001

Landscape values should be considered. Just because the property may be owned by the BLM or another government agency, does not mean that it has no aesthetic value. Will tearing up the land or erecting electric towers and wires trash a nice view or open space? Are places under consideration for wilderness designation excluded? | 50395-002

I do not understand why the corridor has to be up to five miles wide. This seems like a terrible waste of land and invites unnecessary destruction of the land. The wider the corridor, the more likely it will disrupt the landscape and the ecology. | 50395-003

The corridor outlined for southern California seems to run mostly through desert areas. You should note that desert areas are some of the most fragile we have and the slowest to recover from damage. Several sensitive species, including the Desert tortoise and Peninsular Big Horn sheep use these area. Great care must be taken to protect such species, both flora and fauna. | 50395-004

Overground or underground bypasses will be necessary to allow free movement of animals. Interrupting or preventing movement in such fragile areas could be disastrous for them. Water sources for wildlife must be considered in the plan. | 50395-005

No decision about the corridor should be rushed for the benefit of the Los Angeles Department of Water and Power. The DWP should have no more influence than I do. | 50395-006

Much of the land in question receives very high winds and is usually very dry, increasing the danger of wildfires. | 50395-007

Finally, you are the people working on this plan. You are the ones that can examine the land and get input from experts. Most of us cannot visit every foot of land in the PEIS. | 50395-008

The information on-line has not adequately explained the thought process. Ultimately, it is your public responsibility to do it right.

50395-008
(cont.)

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 9:58 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50396

Thank you for your comment, Carol Shimer.

The comment tracking number that has been assigned to your comment is WVEC50396. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 09:57:57PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50396

First Name: Carol
Middle Initial: A
Last Name: Shimer
Address: 823 San Bruno Ave.
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Zip: 89002-9005
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Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Subject: Energy Corridor.

Federal agencies,

Are we really in need on of another major highway? Can we put progress on the back burner for once? Can we preserve our lands and save something special for future generations?

At risk are the Desert National Wildlife Range, the Delamar Mountains and Meadow Valley Range Wilderness Areas.

These lands are sensitive to Native Americans, several extinct paleontological mega faunas are found in-situ, the desert tortoise, big horn sheep, and the Las Vegas bear poppy and buckwheat. The archaeology of this area spans the last 12,000 years. The Paleo-Archaic fluted point (Clovis) to the Stemmed point (Lake Mojave or Silver Lake) covers roughly from 10,000 BC - 5,500 BC. The Middle Archaic, Pinto point, from 5,500 BC - 3,000 BC and the Late Archaic, Gypsum, period from 3,000 BC - AD 500 are also represented. The introduction of the bow and arrow and the beginning of the Ceramic period spans the time from AD 500 - AD 1540. The Historic period from AD 1540 to present; starting with the migration of the Spanish, Mormons, Mining, Ranching, and the Railroad, these stages are all reflected in Nevada's past in this very location.

50396-001

Can we please save this area from destruction? Can we preserve it?

Please be Nevada's long-term visionaries. Save this area for our grandchildren and their grandchildren.

Thank you,

Carol Shimer
823 San Bruno Ave.
Henderson, Nevada 89002

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 10:15 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50397

Thank you for your comment, Richard Spotts.

The comment tracking number that has been assigned to your comment is WVEC50397. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 10:15:00PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50397

First Name: Richard
Middle Initial: A
Last Name: Spotts
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State: UT
Zip: 84770-6026
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Email: spotts@infowest.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I appreciate this opportunity to comment on the West-wide Energy Corridors Programmatic Draft Environmental Impact Statement (DEIS). Overall, I believe that this DEIS is very thorough and informative. However, I have some specific concerns. First, I think that the width of some proposed new energy corridors may be excessive. If multiple power lines or pipelines need to use the same corridor, I want them to be placed as close together as technically possible. The construction of new corridors will obviously destroy or degrade natural habitats over long linear distances, and also increase the potential for habitat fragmentation on the landscape and the colonization and spread of harmful invasive species like cheatgrass. Second, where access roads are used to maintain power lines and pipelines along a corridor, there should be one shared road per corridor. Public access to these corridor roads may need to be prohibited and their use effectively limited for administrative purposes only. Otherwise, given the increased use of off-road vehicles, these corridor roads may become jumping off points for serious unauthorized route proliferation problems and resource impacts. Third, new corridors should avoid environmentally sensitive or designated conservation areas as much as possible. Fourth, I am very concerned by some news reports alleging that the DEIS system of proposed corridors may be heavily skewed toward serving fossil fuel energy sources, while giving short shrift to serving potential alternative energy sources, like solar, wind, geothermal, and biomass. For example, central Nevada reportedly has enormous potential for geothermal energy development, yet there may be no proposed corridor to serve this area. I believe that global warming is a huge and increasingly serious problem, and that aggressive efforts are needed to hasten the transition away from burning fossil fuels and toward implementing a variety of alternative energy sources. This DEIS should fully recognize the severity of this problem, and include proposed corridors that could serve areas with known or likely solar, wind, geothermal, and biomass energy potential. Finally, the DEIS should analyze the potential for locating more energy facilities closer to the energy users to avoid or at least greatly reduce the need for constructing new corridors. For example, many solar and wind facilities could be placed on or near existing structures and developments. This would avoid loss of natural habitats and greatly reduce the energy lost through transmission over long distances. For example, where power lines cross high ridges with good wind data, perhaps some wind turbines could be placed on cross-beams of

50397-001

50397-002

50397-003

50397-004

50397-005

50397-006

the power line towers or nearby. This would avoid or reduce the need for construction of smaller power lines to link with larger power lines to transmit the energy to communities. Thank you very much for considering my comments.

50397-006
(cont.)

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 10:24 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50398

Attachments: DOE-PEIS_comments_draft_021308_WVECD50398.doc



DOE-PEIS_comment
s_draft_021308...

Thank you for your comment, John Robison.

The comment tracking number that has been assigned to your comment is WVECD50398. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 10:23:45PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50398

First Name: John
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Address 3: 710 N 6th Street
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Country: USA
Email: jrobison@wildidaho.org
Privacy Preference: Don't withhold name or address from public record
Attachment: /Users/johnrobison/Desktop/DOE-PEIS comments draft 021308.doc

Comment Submitted:

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

February 13, 2008

Re: Idaho Conservation League comments on the West-wide Energy Corridor Programmatic Environmental Impact Statement

To Whom It May Concern:

Thank you for considering our comments on the Programmatic Environmental Impact Statement (PEIS), Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386). We have also submitted general comments with The Wilderness Society and wish to provide some additional comments. For thirty-five years, the Idaho Conservation League has worked to protect Idaho's clean water, wilderness, and quality of life. As

Idaho's largest state-based conservation organization, we represent over 9,000 members who want to ensure that energy development and infrastructure is consistent with protecting our water, wildlands, and wildlife.

The Idaho Conservation League is fully aware that existing transmission capacity is one of the main limiting factors for energy distribution in the state and region-wide. We support comprehensive planning efforts that combine the needs of utilities, transmission developers, and Idaho communities. Investing in properly sited transmission systems can protect the environment, promote economic development, diversify the power system and keep the region economically competitive. Indeed, Idaho Conservation League is currently working with Idaho utilities on regional planning efforts to address these issues. It is, therefore, increasingly important to create comprehensive planning efforts that are beneficial to utilities and transmission developers, while adequately addressing project related effects to habitat, wildlife, and our local Idaho communities.

50398-001

The Idaho Conservation League is concerned that the current Draft PEIS does not sufficiently describe potentially adverse impacts to Idaho's special-status species such as sage grouse and their habitat. The impact of these transmission systems largely depends on the location of the project and the specific technologies employed in the final development. The PEIS needs to further analyze all potential and cumulative impacts associated with the designation of these corridors and surrounding areas. We are particularly concerned about construction of transmission facilities across sensitive areas such as the Snake River Birds of Prey National Conservation Area and in sage grouse habitat. We recommend that the final PEIS take additional action directing new corridors along previously existing corridors.

There is significant concern regarding the long-term viability of greater sage grouse populations. The US Fish and Wildlife Service is currently conducting a finding of determination whether greater sage grouse deserve protections under the Endangered Species Act. Greater sage grouse suffer from the loss, degradation, and fragmentation of sagebrush steppe habitats throughout the west. It's estimated that only 50-60% of the original extent of this habitat remains in the west (West 2000), and in 2007, the American Bird Conservancy listed sagebrush as the most threatened bird habitat in the continental United States. As such, we cannot stress enough how important it is for agencies to consider impacts to sage grouse and for public land managers to conserve existing habitat and actively restore altered sagebrush steppe habitats.

50398-002

The Conservation Plan for the Greater Sage-grouse in Idaho lists infrastructure such as this as the second greatest threat for sage-grouse. Transmission lines and other infrastructure represent high risk for loss of lek areas, nesting locations, and brood-rearing habitats (Braun 1986, Connelly et al. 2004). Furthermore, we are concerned that the increased level of human activity will increase the chance of a habitat-altering wildfire and subsequent conversion of native vegetation into non-native cheat grass. In addition to decreasing forage and cover, noxious weeds such as cheat grass dramatically increase the risk of recurring fires that reduce adjacent sage grouse habitat.

We believe that properly siting corridors can avoid much of these impacts. We believe that an integral part of conserving and recovering sage grouse will be relying on the guidance from local stakeholder groups. As such, we recommend that the DOE coordinate further efforts more closely with the US Fish and Wildlife Service and local Sage-grouse Local Working Groups.

50398-003

In addition to siting corridors to avoid and minimize impacts, the PEIS should further investigate the benefits of off site mitigation. Specifically, The PEIS should consider the benefits of restoring and reclaiming outdated corridors that are no longer needed to mitigate the environmental effects of new infrastructure. Specifically, dismantling redundant corridors and restoring the habitat in these locations may be an important tool in providing adequate habitat for sensitive species such as sage grouse.

50398-004

Lastly, because of the limited impact analysis, the current PEIS would likely not afford utilities and transmission developers with the opportunity to "tier off" the PEIS to supplement project-specific analysis which is one of the original goals. If the DOE is going to invest in consolidating infrastructure into corridors, there should be additional coordination with local utilities.

50398-005

Thank you for the opportunity to participate in the preparation of this report and for

your consideration of the attached comments.

Please feel free to contact me with any questions or concerns at the address listed above.

Sincerely,

John Robison
Public Lands Director

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Draft Programmatic EIS Webmaster
at (630)252-6182.



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

February 13, 2008

**Re: Idaho Conservation League comments on the West-wide Energy Corridor
Programmatic Environmental Impact Statement**

To Whom It May Concern:

Thank you for considering our comments on the Programmatic Environmental Impact Statement (PEIS), *Designation of Energy Corridors on Federal Land in the 11 Western States* (DOE/EIS-0386). We have also submitted general comments with The Wilderness Society and wish to provide some additional comments. For thirty-five years, the Idaho Conservation League has worked to protect Idaho's clean water, wilderness, and quality of life. As Idaho's largest state-based conservation organization, we represent over 9,000 members who want to ensure that energy development and infrastructure is consistent with protecting our water, wildlands, and wildlife.

The Idaho Conservation League is fully aware that existing transmission capacity is one of the main limiting factors for energy distribution in the state and region-wide. We support comprehensive planning efforts that combine the needs of utilities, transmission developers, and Idaho communities. Investing in properly sited transmission systems can protect the environment, promote economic development, diversify the power system and keep the region economically competitive. Indeed, Idaho Conservation League is currently working with Idaho utilities on regional planning efforts to address these issues. It is, therefore, increasingly important to create comprehensive planning efforts that are beneficial to utilities and transmission developers, while adequately addressing project related effects to habitat, wildlife, and our local Idaho communities.

The Idaho Conservation League is concerned that the current Draft PEIS does not sufficiently describe potentially adverse impacts to Idaho's special-status species such as sage grouse and their habitat. The impact of these transmission systems largely depends

*Idaho Conservation League Comments for the West-wide Energy Corridor Programmatic
Environmental Impact Statement, p. 1 of 3.*

on the location of the project and the specific technologies employed in the final development. The PEIS needs to further analyze all potential and cumulative impacts associated with the designation of these corridors and surrounding areas. We are particularly concerned about construction of transmission facilities across sensitive areas such as the Snake River Birds of Prey National Conservation Area and in sage grouse habitat. We recommend that the final PEIS take additional action directing new corridors along previously existing corridors.

There is significant concern regarding the long-term viability of greater sage grouse populations. The US Fish and Wildlife Service is currently conducting a finding of determination whether greater sage grouse deserve protections under the Endangered Species Act. Greater sage grouse suffer from the loss, degradation, and fragmentation of sagebrush steppe habitats throughout the west. It's estimated that only 50-60% of the original extent of this habitat remains in the west (West 2000), and in 2007, the American Bird Conservancy listed sagebrush as the most threatened bird habitat in the continental United States.¹ As such, we cannot stress enough how important it is for agencies to consider impacts to sage grouse and for public land managers to conserve existing habitat and actively restore altered sagebrush steppe habitats.

The *Conservation Plan for the Greater Sage-grouse in Idaho* lists infrastructure such as this as the second greatest threat for sage-grouse. Transmission lines and other infrastructure represent high risk for loss of lek areas, nesting locations, and brood-rearing habitats (Braun 1986, Connelly et al. 2004).^{2,3} Furthermore, we are concerned that the increased level of human activity will increase the chance of a habitat-altering wildfire and subsequent conversion of native vegetation into non-native cheat grass. In addition to decreasing forage and cover, noxious weeds such as cheat grass dramatically increase the risk of recurring fires that reduce adjacent sage grouse habitat.

We believe that properly siting corridors can avoid much of these impacts. We believe that an integral part of conserving and recovering sage grouse will be relying on the guidance from local stakeholder groups. As such, we recommend that the DOE coordinate further efforts more closely with the US Fish and Wildlife Service and local Sage-grouse Local Working Groups.

In addition to siting corridors to avoid and minimize impacts, the PEIS should further investigate the benefits of off site mitigation. Specifically, The PEIS should consider the benefits of restoring and reclaiming outdated corridors that are no longer needed to

¹ West, N.E. Synecology and disturbance regimes of sagebrush steppe ecosystems, p. 15-26. In P.G. Entwistle, A.M. DeBolt, J.H. Kaltenecker, and K. Steenhoff, Proceedings: sagebrush steppe ecosystems symposium. USDI Bureau of Land Management Publication BLM/ID/PT-001001+1150, Boise, ID.

² Braun, C.E. 1986. Changes in sage-grouse lek counts with advent of surface coal mining. Proceedings, Issues and technology in the management of impacted western wildlife. *Thorne Ecological Institute* 2: 227-231.

³ Connelly, J.W., Knick, S.T., Schroeder, M.A., and S.J. Stiver. 2004. Conservation assessment of greater sage-grouse and sagebrush habitats. Western Association of Fish and Wildlife Agencies. Unpublished Report. Cheyenne, Wyoming.

Idaho Conservation League Comments for the West-wide Energy Corridor Programmatic Environmental Impact Statement, p. 2 of 3.

mitigate the environmental effects of new infrastructure. Specifically, dismantling redundant corridors and restoring the habitat in these locations may be an important tool in providing adequate habitat for sensitive species such as sage grouse.

Lastly, because of the limited impact analysis, the current PEIS would likely not afford utilities and transmission developers with the opportunity to “tier off” the PEIS to supplement project-specific analysis which is one of the original goals. If the DOE is going to invest in consolidating infrastructure into corridors, there should be additional coordination with local utilities.

Thank you for the opportunity to participate in the preparation of this report and for your consideration of the attached comments.

Please feel free to contact me with any questions or concerns at the address listed above.

Sincerely,

John Robison
Public Lands Director

From: coridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 11:02 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50399

Thank you for your comment, Scott Thorne.

The comment tracking number that has been assigned to your comment is WVEC50399. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 11:02:14PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50399

First Name: Scott
Last Name: Thorne
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City: Picabo
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Zip: 83348
Country: USA
Email: sthorne@sunvalley.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Below are my concerns/suggestions regarding the west-wide energy corridors:

- 1)Keep the corridors on Federal land.
- 2)There will be a surge of interest from private companies wanting to build infrastructure to make a quick buck and these private companies should be allowed in the designated corridors only.
- 3)Currently there are new products on the market i.e. cable that will in effect double the carrying capacity of existing 500kv lines. Replacing wire is cheaper and a whole lot easier on the landscape than building new transmission lines.
- 4)Consideration of wildlife migration paths when siting potential corridors.
- 5)Respect what these corridors mean to private property and rural communities.

As the need for power grows and populations increase in metropolitan areas, these people have a right to affordable power. However, those of us that live in rural areas also have the right not to have these delivery corridors across or even near our land. These energy corridors will considerably devalue nearby private land and bring ruin to small communities.

50399-001
50399-002
50399-003
50399-004
50399-005
50399-006

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