
From: coridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:14 PM
To: mail_coridoreisarchives; coridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50425

Attachments: Comments_on_the_Draft_PEIS_by_Ashton_B_WVEC50425.doc



Comments_on_the_Draft_PEIS_by_...

Thank you for your comment, Ashton Collins, Jr..

The comment tracking number that has been assigned to your comment is WVEC50425. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:14:12PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50425

First Name: Ashton
Middle Initial: B
Last Name: Collins, Jr.
Address: 14 Los Lobos Road
City: Placitas
State: NM
Zip: 87043
Country: USA
Email: abcii@earthlink.net
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Ash Collins\My Documents\Comments on the Draft PEIS by Ashton B.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 by Ashton B. Collins, Jr.:

13 February 2008.

1.0 Deficiencies in the PEIS *process*

1.1 Failure to disclose, timely, materially important planning data to the affected public: That portion of the "corridor" most directly affecting the Placitas, NM, area was disclosed late in the process, and then, only as the result of a FOIA request. This clearly illustrates that information was being withheld from the public.

50425-001

1.2 Failure to provide a process that allows for flexibility of decision options.

The only two options are "Acceptance" and "No Action". This clearly is a Procrustean Bed, and its rigidity is a further barrier to constructive public input, as well as severely limiting optimum planning, and compromising the ultimate result.

50425-002

2.0 Deficiencies in the PEIS, *per se*

2.1 The planning process was limited to defining routes on available public lands, apparently without regard to the extraordinary implications of inevitable impact on private lands. The present and potential impact on private property is absent from the process. The present threat to private property is clearly manifest.

50425-003

2.2 With specific regard to the proposed Section 368 route depicted in the state base map series as 80-273 and 89-271:

2.2.1 The "draft" or "proposed" corridor in the Placitas, NM area cuts directly through the Placitas Open Space. The Placitas Open Space, under the Recreation and Public Purposes Act is reserved for "for reservation type park and recreation purposes only". In addition, the Master Plan, 2002, of the Placitas Open Space clearly delineates numerous sensitive historical, anthropological, and cultural values that would be adversely affected by an energy corridor. The Placitas Open Space is considered a Major Public Open Space (MPOS) as defined in the Albuquerque/Bernalillo County Comprehensive Plan. The 2002 Master Plan was prepared for the City of Albuquerque's Environmental Planning Commission (EPC), and the Sandoval County Commission. The Placitas Open Space covers Township 13N, Range 4E, S 1/2 of Section 24, N 1/2 of the NW 1/4 and NE 1/4 of Section 25 as shown on the U. S. Geological Survey Placitas Quadrangle, New Mexico.

50425-004

2.2.3 Similarly, the path of the abovementioned corridor would proceed directly over, or through the Placitas Elementary School, and the Placitas Community and Senior Center.

50425-005

2.3 The route, in large part, parallels but fails to align with the existing, complete, and long-established 345kV electric transmission corridor, owned by Public Service Company of New Mexico, (PNM). PNM states that it has already applied for Section 368 status for this transmission corridor, and, in fact, for all its 345kV transmission corridors in New Mexico. This corridor avoids the Placitas Open Space and much of the sensitive areas of Placitas. The failure to make use of the obvious economic efficiency, and reduction of adverse impact on private and Tribal

50425-006

lands is astonishing. Why was the PEIS "draft route" permitted to diverge from a well-established transmission corridor, and aim directly at the heart of Placitas?

50425-006
(cont.)

3.0 Recommendations

3.1 Remand the planning process to address the above deficiencies.

50425-007

3.2 In all planning, give full effect to the Placitas Open Space, and the Placitas Open Space Master Plan, 2002, and to all federal, state, county and city land use requirements and restrictions applicable thereto.

50425-008

3.2 With regard to the corridor depicted as 80-273 and 89-271, plan to 1) accept the PNM 345kV corridor as 368 status, and/or 2) align any section 368 corridor with the PNM corridor to the fullest possible extent. In this context, please note that that this recommendation will resolve the issues raised in 2.2, above.

50425-009

Further note: The long-established PNM transmission corridor, referenced above, passes well to the north of the principal population and Open Space areas of Placitas, NM. However, recent residential development has spread northward, toward the PNM corridor. Thus, the argument has been made that a yet more northerly corridor should be considered. Such a corridor, *unless it would occupy other now-existing corridors*, would imply a proliferation of corridors. Thus, my recommendation is that any energy corridor (section 368) in the Placitas area follow, to the fullest extent feasible, existing electric power transmission line routes.

50425-010

Ashton B. Collins, Jr.
14 Los Lobos Road
Placitas, NM 87043
14 February 2008

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:18 PM
To: [mail_corridoreisarchives](mailto:mail_corridoreisarchives@anl.gov); corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50426

Attachments: petitions_WVECD50426.doc



petitions_WVECD50426.doc (2 MB...)

Thank you for your comment, Charles Johnson.

The comment tracking number that has been assigned to your comment is WVECD50426. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:17:39PM CDT

Energy Corridor Draft Programmatic EIS
 Draft Comment: WVECD50426

First Name: Charles
 Middle Initial: V
 Last Name: Johnson
 Address: 3 Katherine Court
 City: Placitas
 State: NM
 Zip: 87043
 Country: USA
 Email: cvjohnson@comcast.net
 Privacy Preference: Don't withhold name or address from public record
 Attachment: C:\Users\Sandy\Documents\Personal\petitions.doc

Comment Submitted:

Attached please find the signatures of 22 of my neighbors who are opposed to the piece-meal approach of the west-wide energy corridor taken by this EIS. We all urge you to create a comprehensive plan that takes into account crucial non-federal lands to make the proposed energy corridor one that actually can deliver energy.

50426-001

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.

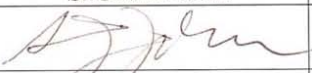

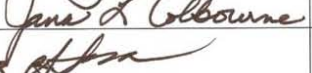
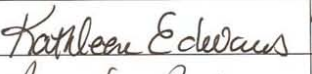
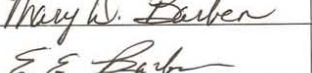


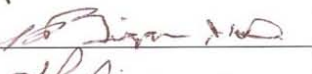
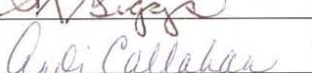
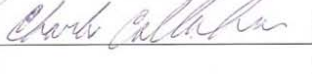
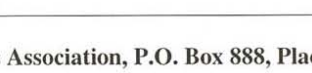



PETITION

We, the undersigned, hereby declare our opposition to the West-wide energy corridor project as proposed in the Programmatic Environmental Impact Statement DOE/EIS-0386, on the grounds that it is unlawful in that it fails to fulfill essential requirements of the National Environmental Policy Act, including full disclosure and notice to affected parties.

NAME	ADDRESS	SIGNATURE	DATE
1. Susan Lashbrook	35 Cedar Creek Placitas, NM 87043	<i>Susan Lashbrook</i>	1-24-08
2. Rick Kossow	35 CEDAR Cr. Placitas, NM 87043	<i>Rick Kossow</i>	1-25-08
3. CHUCK JOHNSON	3 KATHERINE PLACITAS, NM 87043	<i>Chuck Johnson</i>	2-5-08
4. ALAN + TINA MERTENS	1 KATHERINE CT PLACITAS, NM 87043	<i>Alan Mertens</i>	2-13-08
5. PATRICIA JOHNSON	6 KATHERINE CT PLACITAS, NM 87043	<i>Patricia Johnson</i>	2-13-08
6. ROBERT JOHNSON	6 KATHERINE COURT PLACITAS, NM 87043	<i>Robert Johnson</i>	2-13-08
7. Kitty Bemis	5 Katherine Ct. Placitas, NM 87043	<i>Kitty Bemis</i>	2-13-08
8. Bill Bemis	5 Katherine Ct Placitas 5174 87043	<i>Bill Bemis</i>	2-13-08
9. John BAKER	7 KATHERINE CT PLACITAS, NM	<i>John Baker</i>	2-13-08
10.			
11.			
12.			
13.			
14.			
15.			

Please complete and return to Las Placitas Association, P.O. Box 888, Placitas, NM 87043.

PETITION

We, the undersigned, hereby declare our opposition to the West-wide energy corridor project as proposed in the Programmatic Environmental Impact Statement DOE/EIS-0386, on the grounds that it is unlawful in that it fails to fulfill essential requirements of the National Environmental Policy Act, including full disclosure and notice to affected parties.			
NAME	ADDRESS	SIGNATURE	DATE
1. SANDRA JOHNSON	3 KATHERINE CT PLACITAS, NM 87043		1/21/08
2. CHUCK JOHNSON	3 KATHERINE PLACITAS, NM 87043		1/22/08
3. Jana Colbourne	19 Calle Crenga Placitas, NM 87043		1/29/08
4. Adeline SOSA	63 CALLE COBRE PLACITAS, NM 87043		1/29/08
5. Kathleen Edwards	18 Cason del Agua Placitas		2/1/08
6. Mary Barber	P.O. Box 32 Placitas, NM		2/1/08
7. EDWARD BARBER	P.O. Box 32 PLACITAS, NM		2/1/08
8. Nikki MAIN	15 CALLE COBRE PLACITAS, NM 87043		2/1/08
9. K. MAIN	15 CALLE COBRE		2/1/08
10. Pat Funder	3021 Matgale		2-1-08
11. Silmeri Biggs	63 Calle Cobre Placitas 87043		2-13-08
12. Sandra Biggs	63 Calle Cobre Placitas NM 87043		2-13-08
13. Andi CALLAHAN	4 CALLE ROSA PLACITAS, NM 87043		2-13-08
14. CHUCK CALLAHAN	4 CALLE ROSA PLACITAS, NM 87043		2-13-08
15.			

Please complete and return to Las Placitas Association, P.O. Box 888, Placitas, NM 87043.

From: coridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:21 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50427

Thank you for your comment, Jeffrey Wells.

The comment tracking number that has been assigned to your comment is WWECD50427. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:20:46PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50427

First Name: Jeffrey
Middle Initial: B
Last Name: Wells
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:

Hello

I do not agree with the proposed designated corridors in the West-wide Energy Corridor (WWEC) Draft Programmatic Environmental Impact Statement (Draft-PEIS), as these corridors will have significant impacts on wildlife habitat, cultural resources, recreation opportunities, and many other resources on federal lands across the West.	50427-001
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I do not agree with the compromising of our national security due to further proliferation of the centralized energy grid that is embodied in the West-wide Energy Corridor (WWEC) Draft Programmatic Environmental Impact Statement (Draft-PEIS).	50427-002
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I strongly support a national energy policy that promotes technologically assisted energy conservation through incentives, tax credits and low interest loans before developing more remote generation and long distance transmission.	50427-003
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I am opposed to the stated notion of the mayor of Los Angeles and the LADWP that the Mojave Desert is Los Angeles's backyard, and I am opposed to the mayor's and LADWP's resultant omnipotent attitude that allows them to think they can destroy another geographic portion of California as they did in the Owens Valley.	50427-004
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Thank you,
Jeffrey Wells

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: Thursday, February 14, 2008 12:29 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50428

Thank you for your comment, Amy Shahayda.

The comment tracking number that has been assigned to your comment is WVEC50428. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:28:56PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50428

First Name: Amy
Last Name: Shahayda
Address: 654 thornhill #5
City: Palm Springs
State: CA
Zip: 92264
Country: USA
Email: ashahayda@dc.rr.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.

50428-001

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:31 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50429

Thank you for your comment, Christine Keller.

The comment tracking number that has been assigned to your comment is WVECD50429. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:30:33PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50429

First Name: Christine
Middle Initial: A
Last Name: Keller
Organization: View Point West
Address: P.O. Box 1152
City: Montrose
State: CO
Zip: 81402
Country: USA
Email: vpwest@montrose.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Please add us to the list of public commenters to be notified and updated as the EIS process and documents proceed. Thank you. | 50429-001

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: Thursday, February 14, 2008 12:32 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50430

Thank you for your comment, Cathy Wilson.

The comment tracking number that has been assigned to your comment is WVEC50430. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:32:10PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50430

First Name: Cathy
Middle Initial: D
Last Name: Wilson
Address:
City:
State: NV
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:

Please don't mess up the land and the habitat for the animals any more than it already is. Putting an energy corridor right through wildlife areas will make it even harder for animals like the big horn sheep and tortoises to survive. They already have to deal with harsh summers, not enough water because we're using it up, and our continued development of their land. Besides that, coal isn't the way to go. It's dirty and pollutes the air. Don't mess up the land for an energy method that will mess up the air!

50430-001

50430-002

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: Thursday, February 14, 2008 12:33 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50431

Thank you for your comment, Trent Clark.

The comment tracking number that has been assigned to your comment is WVEC50431. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:33:14PM CDT

Energy Corridor Draft Programmatic EIS
 Draft Comment: WVEC50431

First Name: Trent
 Last Name: Clark
 Organization: Caltrans Environmental Division
 Address: 4050 Taylor Street MS242
 City: San Diego
 State: CA
 Zip: 92110
 Country: USA
 Email: trent_clark@dot.ca.gov
 Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

On February 1, 2008, the California Department of Transportation (Caltrans) received a Draft Programmatic Environmental Impact Statement (PEIS) for environmental review from the United States Department of Energy and the United States Department of the Interior, Bureau of Land Management (BLM). Cooperating agencies in preparation of the PEIS include, the United States Department of Agriculture, Forest Service; the United States Department of Defense; and the United States Department of Interior, Fish and Wildlife Service (USFWS). The purpose of the PEIS is to:

- Designate corridors for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities on federal land in eleven contiguous western states, including California. Corridor designation could result in effects to land use on nonfederal lands adjacent to or between corridor segments.
- Perform any environmental reviews that may be required to complete the designation of such corridors.
- Incorporate the designated corridors into the relevant agency land use and resource management plans or equivalent plans.

Caltrans District 11 Environmental (incorporating San Diego and Imperial Counties) has reviewed the project areas that cross Caltrans' District 11 right-of-way (ROW) for biological impacts. Approximate areas in San Diego and Imperial Counties where the West-Wide Energy Corridors could be designated occur along or near the right of way of Interstate 8 (I-8) between post mile (PM) 50 and PM 52 in San Diego County, PM 75 in San Diego County and PM 24 in Imperial County, and PM 67 and PM 97 in Imperial County. Habitat in these areas include chaparral, coast live oak woodland, southern coast live oak riparian forest, sagebush scrub, desert scrub, Jeffrey pine forest, desert wash, barren habitat, disturbed habitat, and developed habitat (either urbanized or converted to agriculture).

Federally listed species that could potentially occur in these areas include the federally endangered arroyo toad (*Bufo californicus*), San Diego button celery (*Eryngium aristulatum* var. *parishii*), Peninsular bighorn sheep (*Ovis canadensis*), and Yuma clapper rail (*Rallus longirostris yumanensis*); the federally threatened Pierson's milk-vetch (*Astragalus*

50431-001

magdalenae var. piersonii); and the federal candidate for listing western yellow-billed cuckoo (Coccyzus americanus). The PEIS has included these species in their list of species protected under the Endangered Species Act (ESA) that could potentially occur within the designated West-Wide Energy Corridor. The PEIS states that project-specific assessments and consultations with the USFWS and National Marine Fisheries Service will be conducted to comply with Section 7 of the ESA prior to approval of ground disturbing activities and project development for any federally listed species that has the potential to occur within the project areas.

The PEIS states that the BLM has established a policy not only to conserve federally listed species but also to conserve special status species which include species listed by a state in a category such as endangered or threatened and those designated by each BLM state director as sensitive. State listed species that could potentially occur within areas at designated corridors in Caltrans ROW include the state endangered Algodone's Dunes sunflower (Helianthus niveus ssp. tephrodes), state threatened California black rail (Laterallus jamaicensis coturniculus) and barefoot banded gecko (Coleonyx switaki), and the BLM sensitive flat-tailed horned lizard (Phrynosoma mcallii) and burrowing owl (Athene cucularia). The PEIS states that impacts to these and other special status species will have to be considered in project-specific assessments developed prior to project development.

50431-001
(cont.)

The main biological concerns within Caltrans' ROW include adverse effects on federal and state listed species; riparian, chaparral, sage scrub, and desert scrub habitat; federally protected wetlands; and wildlife corridors.

Any impacts to wetland or riparian habitat for each project occurring under the West-Wide Energy Project Corridor within Caltrans' ROW will require a Section 1602 Lake and Streambed Alteration Agreement from the California Department of Fish and Game (CDFG) and a Section 404 Nationwide or Individual Permit from the U.S. Army Corps of Engineers. Any impacts to federally listed species or critical habitat within Caltrans' ROW will require coordination with USFWS. Any impacts to state listed species within Caltrans' ROW will require coordination with CDFG.

50431-002

If you have comments or questions, please call 619-688-3140.

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: Thursday, February 14, 2008 12:44 PM
To: [mail_corridoreisarchives](mailto:mail_corridoreisarchives@anl.gov); corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50432

Attachments: Goshute_-_Comment_Letter_WVECD50432.doc



Goshute_-_Comme
nt_Letter_WVECD...

Thank you for your comment, Paul Tsosie.

The comment tracking number that has been assigned to your comment is WVECD50432. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:43:31PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50432

First Name: Paul
Last Name: Tsosie
Organization: Tsosie & Hatch LLP
Address: 7864 S. Redwood Road
City: West Jordan
State: UT
Zip: 84088
Country: USA
Email: beth@thlawfirm.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\parker.wells\Desktop\Goshute - Comment Letter.doc

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

VIA ELECTRONIC TRANSMISSION

West-wide Energy Corridor PEIS
Argonne National Laboratory
9700 S. Cass Ave., Bldg. 900, Mail Stop 4,
Argonne, IL 60439
Fax: 1-866-542-5904

Re: Draft Programmatic Environmental Impact Statement
Designation of Energy Corridors on Federal Lands in the 11 Western States
DOE/EIS-0386

Dear Project Manager:

Pursuant to notice published by the Department of Energy ("DOE"), Department of the Interior, Bureau of Land Management ("BLM") and the Environmental Protection Agency, The Confederated Tribes of the Goshute Reservation ("*Goshute Tribe*"), submits the following comments addressing the captioned Draft Programmatic Environmental Impact Statement ("*DPEIS*").

Background

The Confederated Tribes of the Goshute Reservation straddles the Utah-Nevada border and is located in White Pine County, Nevada, and in Juab and Tooele Counties in West Central Utah approximately 60 miles southeast of Wendover. The Reservation sits on a small portion of the ancestral lands of the Goshute Tribe, which tribal members have inhabited from time immemorial. The Reservation was officially established under Executive Order No.1539 approved May 20, 1912 and Executive Order No.1903, approved March 23,1914 and under the authority of the June 18, 1934 Indian Reorganization Act. Further land purchases were made from the year of 1937 to 1990 to equal a total acreage of 122,085.

The governing body of the Goshute Tribe is the Tribal Council is made up of five council members who serve for three consecutive years. The council governs the reservation and manages the tribal government. The Tribal Council approves any type of economic activity occurring within the exterior boundaries of the reservation, including any energy or other utility line or any type of development that requires access through the reservation.

The location of the Goshute Reservation makes it a prime target for energy corridors and other utility lines. Currently, and in the very near future there will be, water pipelines, energy lines, coal plants and other utility lines within the exterior boundaries of the reservation and surrounding the reservation.

RMP Comments
February 11, 2008
Page 2

Comments

1. *Cultural Resources* General Comment

1.1 Cultural and tribal resources are the Goshute Tribes precious and valuable resources. These tribal resources, including the Goshute Tribe's ancestral homeland, represent the foundation of the Goshute Tribe's, ancestry, history and culture. Pow-wows, hunting of traditional game, plant gathering and tribal and religious ceremonies all take place upon the Goshute Tribe's reservation and ancestral lands. The preservation of these cultural practices is essential to the preservation of the Goshute Tribe's historical and ancestral way of life. We ask that the DOE and the BLM complete a cultural resource inventory as required under Section 106 of the National Historic Preservation Act.

50432-001

2. *DEIS Does Not Consider Impacts of Potential Corridors on Tribal Lands* General Comment

2.1 The DPEIS fails to consider impacts of energy corridors on private and tribal lands. The energy corridors set forth in the DPEIS are incomplete and only show segments located on federal lands. The PDEIS maps show a series of disconnected lines located on federal lands. Gaps in the corridors will require the use of private and tribal lands to connect and effectuate the establishment of true energy corridors. The PDEIS should consider the portions of private and tribal land that are likely to be impacted in connecting the series of corridors established under the PDEIS on federal lands.

50432-002

3. *Tribal Governments to Establish Prices* General Comment

3.1 Indian nations are sovereign nations. As sovereign nations, Indian nations should be able to determine and establish the prices for all utilities crossing tribal lands. Energy companies interested in placing transmission lines, pipelines or any other form of utility crossing tribal lands are required to contact tribal governments concerning the proposed crossing of tribal lands.

50432-003

3.2 The prices set by the federal government relating to various energy corridors that run across federal land should not be regarded as fair market value for energy corridors running across tribal-owned lands and private lands. Such prices may be arbitrary or below true fair market value and should not be permitted to affect rates set by Indian tribes and private landowners for energy corridors running across tribal and private lands. Therefore, the BLM should allow Indian tribes to set rates at fair market value rather than the rates set by the federal government for federally-owned lands.

50432-004

3.3 Many tribes, including the Goshute Tribe, have deeply rooted historical, cultural and religious ties to their aboriginal and reservation lands. The Goshute Tribe feels that its lands are a part of its identity and culture and views its natural surroundings as "Mother Earth."

50432-005

RMP Comments
February 11, 2008
Page 3

Therefore, it is imperative that the Goshute Tribe is the only party permitted to approve or deny energy corridors on its land and the only party permitted to set the rates for such a right of way across its ancestral lands, which lands play an integral role in tribal culture, religion, history and society.

50432-005
(cont.)

3.4 The Bureau of Indian Affairs and other government agencies should not be permitted to set the rates for energy and other utility corridors running across tribal lands. Because of tribal sovereignty, tribes should be able to set the rates for corridors running across their tribal lands. The rates should not be set or affected by any other agency or entity.

50432-006

The Goshute Tribe appreciates the opportunity to respond to the DPEIS and would like to continue to be included in further discussions regarding the DPEIS. If the BLM has any questions relating to the Goshute Tribe's comments and concerns, please contact the Goshute Tribe through the contact information provided below.

Very truly yours,

Paul Tsosie

Paul Tsosie
Legal Counsel for Confederated Tribes
of the Goshute Nation
TSOSIE & HATCH LLP
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Company Contact:

Ed Naranjo
Confederated Tribes of the Goshute Nation
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Phone: 435-234-1138
Fax: 435-234-1162

cc: Ed Naranjo

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:50 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50433

Thank you for your comment, Nick Dobric.

The comment tracking number that has been assigned to your comment is WVECD50433. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:49:41PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50433

First Name: Nick
Last Name: Dobric
Address:
Address 2:
City:
State: NV
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:

Agencies need to make this process more transparent to the public - with detailed maps and various alternatives. Without alternatives, we can only comment on what we don't like about the proposed plan. | 50433-001

Special or sensitive public lands need to be avoided altogether. Specific to our region - the 223-224 and 37-232 lines that are in the Desert National Wildlife Refuge and the 232-233 line that impacts the Delamar Mountains and Meadow Valley Range Wilderness Areas. | 50433-002

The corridors will fragment the habitat of the threatened desert tortoise and the desert bighorn sheep. Scientists say that wildlife habitat suffers from roads and powerlines. The wildlife refuge is a wildlife refuge, not a power corridor. | 50433-003

The cumulative impact of these energy corridors need to be analyzed for federal, state, private, and tribal lands that will be impacted when the corridors are connected. There is no such analysis currently. | 50433-004

An alternative needs to be developed that links up the corridors to Nevada's high quality geothermal, solar, and wind sources. Public lands should not be supporting new coal plants and last century's energy policy. America needs a forward thinking energy policy that moves the country toward the use of renewable energy sources and away from fossil fuels. | 50433-005

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: Thursday, February 14, 2008 1:03 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50434

Attachments: WBRT_DOE_368_corridors_PEIS_02-08_FILED_WVEC50434.pdf



WBRT_DOE_368_c
orridors_PEIS_02...

Thank you for your comment, Holly Propst.

The comment tracking number that has been assigned to your comment is WVEC50434. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:02:44PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50434

First Name: Holly
Last Name: Propst
Organization: Western Business Roundtable
Address: 350 Indiana Street, #640
City: Golden
State: CO
Zip: 80401
Country: USA
Email: hpropst@westernroundtable.com
Privacy Preference: Don't withhold name or address from public record
Attachment: I:\WBRT\Committees\Energy\Electricity\Electricity Transmission\Comments
\WBRT_DOE_368_corridors_PEIS_02-08_FILED.pdf

Comment Submitted:

Thanks for the opportunity to submit input. The Western Business Roundtable's comments are contained in the attached document.

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 14, 2008

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

RE: Draft PEIS for the Designation of Energy Corridors on Federal Lands in 11 Western States (DOE/EIS-0386)

Dear Sir/Madam:

On behalf of the multi-sector membership of the Western Business Roundtable, I am writing regarding the Department of Energy, the Department of Interior's Bureau of Land Management and Fish and Wildlife Service, the Department of Agriculture's U.S. Forest Service and the Department of Defense ("the Agencies") efforts to designate energy corridors in the Western U.S. pursuant to Section 368 of the Energy Policy Act of 2005 ("EPAct05").

This is a Herculean undertaking. We appreciate the efforts, thus far, to seek means of rationalizing the process for designation of corridors on federal lands in 11 Western States for electricity transmission and distribution facilities and for oil, gas and hydrogen pipelines. Those efforts have culminated in a draft Programmatic Environmental Impacts Statement ("PEIS") which, when approved, will be integrated in the various Agencies' management plans.

THE ROUNDTABLE'S INTEREST IN THIS ISSUE:

The Western Business Roundtable is a non-profit business trade association comprised of CEOs and senior executives of organizations doing business in the Western United States. Our member companies are involved in a broad range of industries, including agricultural products, accounting, chemicals, coal, construction and construction materials, conventional and renewable energy production, energy services, engineering, manufacturing, mining, oil and gas, pipelines, telecommunications, and rural electric cooperatives, public and investor-owned utilities. We work for a common sense, balanced approach to economic development and environmental conservation, and we support public policies that encourage economic growth, opportunity and freedom of enterprise.

The Western energy corridor designations are of keen interest to our member organizations, all of which are involved in economic activities in the West. Our region has experienced explosive growth in recent decades. Forecasts show that this trend line will continue unabated into the future. This is

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info@westernroundtable.com | www.westernroundtable.com

The opinions expressed in this letter represent the views of a majority of Roundtable Members, but not necessarily all of our members.

putting tremendous pressure on already challenged Western energy infrastructure. In particular, electricity transmission upgrades and expansions are essential to ensure that:

- Consumers in the West continue to enjoy reliable and cost-effective electricity supplies;
- Energy-intensive industries stay competitive in world markets;
- Economic growth and jobs continue to be created throughout our region; and
- Fuel diversity is maintained and strengthened in the West and across the nation.

Without such transmission system improvements and other energy infrastructure development, it is unlikely that we will see diversity in new generation in the West. Reliance on a broad portfolio of fuel sources -- including natural gas, coal, hydropower, wind and other renewable resources -- helps to protect consumers against price spikes and increases our energy alternatives and our national security.

In their Executive Summary (Section ES.2), the Agencies note that the purpose of the PEIS is to address “the need for upgrade and new infrastructure and to take actions to improve reliability, relieve congestion and enhance the capability of the national grid to deliver electricity.” The Roundtable could not agree with this objective more firmly. The key, though, is whether the PEIS will deliver on its promise to provide more certainty and efficiency in siting processes than have existed in the past. If the Agencies can achieve that, it will go far to increase the regulatory certainty upon which energy infrastructure investment depends. This energy infrastructure is necessary to develop, deliver and utilize the wide diversity of resources located in the American West.

ROUNDTABLE CONCERNS AND RECOMMENDATIONS:

Though we fully acknowledge the efforts extended, to date, on this process, we are concerned that the resulting draft PEIS has strayed from the intent of EPAct05 generally and Section 368 specifically. If approved without revision, the PEIS will fail to meet the goal of expediting the siting and construction of critical infrastructure in the West. We respectfully request that the Agencies make the following changes to the PEIS to comport it to the objectives of Section 368:

1. PEIS-designated routes need to be consistent with Western energy reliability and infrastructure planning processes.

The West has ongoing regional and sub-regional infrastructure planning processes in place. Chief among those is the Western Electric Coordinating Council (WECC), which evaluates the need for new electricity transmission to ensure reliability and meet load demand within the Western grid. We are concerned that the PEIS designations lack consistency with, and have not given proper consideration to, the plans and transmission needs identified by WECC and the participating energy providers in that process and other regional and sub-regional planning efforts.

50434-001

2. Existing corridors must be encompassed within the PEIS-designated corridors.

We are concerned that the preliminary maps issued by the Agencies, and included in the draft PEIS, do not include already existing corridors as corridors to be carried forward under the designation process. This is very troubling. Existing corridors, already in current federal management plans, are critically important for siting energy facilities currently under consideration, as well as future projects designed to transport energy to load centers.

50434-002

We strongly urge the Agencies to clearly incorporate all previously designated, existing energy infrastructure corridors on federal lands as designated corridors under the Section 368 process.

3. ROW grants must be made available outside designated corridors.

While the Roundtable is an ardent supporter of designated corridors, we do not believe that all energy infrastructure activities on federal lands can, or should, be limited exclusively to such corridors. There are circumstances where the resource location, technical efficiencies, economics and location of energy markets will dictate energy infrastructure development outside Section 368-designated corridors.

50434-003

The PEIS's focus on the designated corridors as the "preferred" routes gives pause to many of our members. For this process to be viable over time, Agencies must allow ROW grants for energy infrastructure outside of designated corridors. It is critically important that this process not morph into a situation that makes Western regional energy infrastructure routing and permitting more inflexible, encumbered or complicated than it already is. That clearly would be at odds with the intent of EPAAct05.

4. Administrative processes streamlining must be real.

We applaud the Agencies for suggesting inclusion of uniform interagency operating procedures for reviewing applications for ROWs within the designated corridors. Likewise, we believe the naming of a federal point-of-contact to represent the Agencies on these matters is helpful.

Having said that, the Agencies make clear in the PEIS that the proposed energy corridor designations would not approve any site-specific activities or projects or prejudice the environmental impacts of individual projects. We are concerned that projects will still be evaluated on a case-by-case basis with NEPA and engineering reviews. Thus, the process will remain costly, time-consuming and constrained by already over-extended local agencies.

50434-004

At a minimum, the PEIS needs to address broad issues like connected action, EMF and visual impacts at the designation level. The designation of specific corridors for future energy infrastructure should create a presumption that such issues were addressed with the designation level. Though applicants seeking use of the corridor would obviously have to address mitigation issues, they should not be required to reassess whether the project is acceptable to begin with.

5. Corridors widths must be sized to ensure infrastructure reliability and encourage multiple use.

The Agencies have proposed a default corridor width of 3,500 feet, claiming this is sufficient to allow for multiple infrastructure uses within the corridor. Many of our members have significant concerns with this assertion, particularly regarding its potential impact on reliability of their infrastructure systems. Further, we have efficiency concerns. If this effort is going to have any lasting benefit, the corridors need to be large enough to be functional, not just for already identified needs, but also future ones.

50434-005

Corridors should be of sufficient width to accommodate multiple energy infrastructure facilities in adjoining rights-of-way without impeding or encroaching on each other for technical or logistical reasons. This will require corridors to be greater than 3,500 feet in width in many places. For these reasons, we believe the default corridor width needs to be at least one mile.

6. Undergrounding requirements at the corridor designation stage are counter-productive and costly to energy consumers.

We are concerned by the inclusion of “undergrounding” requirements on high voltage transmission lines in certain designated corridors contained in the PEIS:

- The cost of undergrounding such high voltage lines, especially over long-distances, is exorbitantly expensive. Underground cable costs 26 times more than overhead cable. Support structures can cost four times that of overhead support structures. Obviously, energy consumers will be left with the bill for any such requirements.
- Undergrounding poses real reliability issues. Repairs are vastly more complicated to achieve, impacting system reliability.
- Undergrounded high voltage lines require a much larger easement to safely operate within than overhead lines. Their use will eat up valuable space in the corridor that could otherwise potentially be used for other vital infrastructure.

50434-006

All of these factors argue against Agencies’ inclusion of undergrounding requirements as predicates to access to designated corridors.

7. Renewable energy delivery must not be limited through the designation process.

We are extremely concerned that the PEIS designation process may have negative impacts on the West’s ability to make use of its large renewable energy resource. Viewshed has been reported as the reason that wind development is precluded from PEIS-designated corridors. This policy represents a disconnect from the reality on the ground in the West and a straying from the intent of EPAct05. Our region is aggressively pursuing development of our vast renewable energy resources. This is occurring both because market forces support their

50434-007

development and because federal and state energy policies encourage, and in many cases, mandate their use. Denying a specific energy resource from inclusion in the federal corridors is inequitable and impractical.

50434-007
(cont.)

8. The PEIS needs to acknowledge the need to plan for the future.

As noted above, designated energy corridors under this PEIS should not be considered by the Agencies as the exclusive energy corridors to be sited on federal lands in the West. It is impossible to successfully predict, today, the precise energy infrastructure needs of the Western region 15 to 20 years down the road. We already can anticipate the need for expansion of existing and already planned infrastructure. Beyond that, new infrastructure needs are on the horizon -- oil shale development infrastructure, new renewable energy resource development and CO2 transport systems, to name just several examples.

50434-008

Thus, it is critical that part of the exercise here be devoted to developing a process for designation of future corridors. This process should allow for an integrated, multi-jurisdictional evaluation and decision-making process. Further, because of the long-term aspects of energy corridor designations, we strongly urge the Agencies to have in place a review process that could update the list of corridors, or revise the initial studies underlying the designations, in order to take into account changed circumstances or new developments.

CONCLUSION:

We again thank the Agencies for the hard work that has gone into the Western Corridors process to date and urge you to strengthen the viability of the PEIS through the inclusion of these common sense recommendations.

Best regards.

Sincerely,



Jim Sims
President and CEO
The Western Business Roundtable

cc: Vice President Dick Cheney
CEQ Chairman Jim Connaughton
DOE Secretary Samuel Bodman
House Natural Resource Committee Members
House Energy and Commerce Committee Members

Senate Energy and Natural Resources Committee Members
Western Governors
Western Governors Association
American Legislative Exchange Council
Council of State Governments-West

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 1:08 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50435

Thank you for your comment, Laura Dennison.

The comment tracking number that has been assigned to your comment is WVEC50435. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:07:58PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50435

First Name: Laura
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Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

In the western part of Placitas is a very large expanse of ELM land that presently is open space. It is our understanding that the BLM will be updating the Resource Management Plan for these properties in the not too distant future.

It is the very strong desire of the residents of the Placitas area to participate in this process and strongly encourage that most, if not all of these BLM lands stay in permanent open space for the benefit of both us and future generations of New Mexicans.

When looking at the proposed Federal Corridors it clearly appears that the most efficient and least costly routing for connections could take them right through these BLM parcels.

It is strongly encouraged that alternative routes be identified and designated to leave the future of these open spaces undisturbed. Thank you for your consideration.

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.

50435-001

From: coridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 1:09 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50436

Thank you for your comment, Hilary White.

The comment tracking number that has been assigned to your comment is WVECD50436. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:09:14PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50436

First Name: Hilary
Last Name: White
Organization: Sheep Mountain Alliance
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Email: hilary@sheepmountainalliance.org
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Thank you for the opportunity to comment on the West Wide Energy Corridors Draft Programmatic Impact Statement (PEIS). We recognize the importance of evaluating future energy corridor to meet growing demands. However, as proposed these corridors will cover 6,000 miles and effects almost 3 million acres of public lands. It is not possible to do a comprehensive review of the impacts of this proposal at that scale. It is therefore incumbent on the federal government to do site specific analysis on individual projects in appropriate detail with proper public input. This PEIS analysis should not be deemed adequate to shortcut this process in the future.

50436-001

Although pipelines and power lines may be needed, we are disappointed by the lack of analysis of other alternatives including energy conservation, distributed generation, and upgrading existing systems with new technology to maximize efficiency before creating new corridors and additional impact on our public lands.

50436-002

It does not seem possible at this scale to adequately meet the requirements of NEPA in evaluating cumulative effects. This is particularly true as large segments of the corridor that pass through private land are not even identified, much less subjected to any type of analysis to consider the cumulative effects in conjunction with the federal lands being designated. All future project need to incorporate best management practices and minimize damage to other resources, recreation, and visual character. The projects implemented in the corridors should avoid totally special or sensitive public lands, areas subject to pending legislation (such as Wilderness designation) and critical wildlife habitat. All projects should also include detailed reclamation and restoration plans incorporating site specific native species and noxious weed control plans.

50436-003

The proposal does not analyze a range of alternative as required by NEPA. In particular there should be discussion of corridors to connect wind, geothermal, and solar resources rather than just traditional energy sources. It appears that a reduction in uses of fossil fuel resources is eminent and the proposal needs to evaluate how the West can be a contributor to development of sustainable renewable energy resources.

50436-004

We were unable to develop a meaningful analysis of the impacts to San Miguel County based on the limited information provided on the corridor alignment on the PEIS maps. The corridor appears to be 3,500 feet wide as it is shown crossing the public lands (segment 130-131 N). If the corridor is this wide as it traverses private lands between the indicated public lands portions, this could have dramatic effects on the value of the private lands. Substantial impacts to private lands are inevitable as the public lands segments are connected. A corridor 2/3 of a mile wide could cover entire private parcels rendering them unsuitable for development due to future uncertainty. Again, it does not seem possible for an the NEPA process to be adequate with regard to evaluating human impacts when entire segments of private lands inevitably impacted are not even identified much less analyzed.

50436-005

In the southern portion of the county when the public land portions shown are connected, the corridor bisects occupied Gunnison Sage Grouse habitat. This is of concern given the ongoing debate regarding listing of the Gunnison Sage Grouse under the Endangered Species Act. It also flies in the face of substantial conservation efforts on behalf of the Gunnison Sage Grouse undertaken by County government and private partnerships.

50436-006

The comments given by the San Juan Office of the BLM when evaluating consistency with their Resource Management Plan (RMP), suggest they evaluated it only as an above ground use corridor in finding it consistent with their RMP. Another map in the PEIS identifies the corridor in San Miguel County as multimodal including underground uses. This apparent conflict needs to be clarified. Was the corridor also evaluated for consistency with the new San Juan BLM RMP currently in the final stages of the NEPA process?

50436-007

The PEIS indicates the portion of the corridor in San Miguel County does not follow an existing transportation/utility corridor. However, it appears to be near an existing corridor for the Trans Colorado natural gas pipeline. If the corridors are near each other it is unclear why the proposed corridor does not follow the existing gas line corridor for at least some portion of the route.

50436-008

We hope the PEIS will be amended to be able to gain a better understanding of what is being proposed for concerned local jurisdictions. We also request there be a commitment by the federal government to a process that fully identifies and addresses project specific concerns as any proposals are implemented in these designated corridors.

50436-009

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: Thursday, February 14, 2008 1:10 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50437

Thank you for your comment, Thomas Cade.

The comment tracking number that has been assigned to your comment is WVEC50437. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:09:38PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50437

First Name: Thomas
Middle Initial: J
Last Name: Cade
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City: Boise
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Zip: 83709
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Email: tcade@peregrinefund.org
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I am a professional biologist (Ph.D. from University of California, Los Angeles) and hunter who has 25 years of field experience in the Birch Creek, Crooked Creek, and Medicine Lodge Creek watersheds in Clark County, Idaho, through which one of the proposed energy corridors (50-260) would run. I am quite familiar with the existing powerline structures and rights-of-way existing in this region and the problems they cause wildlife. My concern is that these watersheds are prime, and to a large extent undisturbed, wildlife habitats for elk, deer, antelope, sage grouse, and their associated predators. It is one of the best regions remaining in Idaho for sage grouse, a species that is increasingly threatened with extinction. This is one reason why The Nature Conservancy owns a sizeable property with FWS and BLM allotments in Crooked Creek.

Any programmatic EIS needs to consider potential deleterious impacts of proposed energy corridors on wildlife before actual rights-of-way are permitted. This EIS has been developed under the spurious assumption that a programmatic EIS has no direct impact on wildlife and landscape values because it is only a plan and has no authority to grant a right-of-way; therefore, no detailed, on-the-ground consideration of future impacts need be developed prior to permitting a right-of-way. This is the highest level of sophistry I have yet encountered in the history of EIS preparations.

50437-001

At the very least, a programmatic EIS should give serious consideration to alternative routes that pass through already domesticated landscapes rather than through wilderness or other sensitive wildlife areas. Where passage of corridors through lands with high natural values cannot be avoided, the EIS should provide some general stipulations about how to minimize deleterious impacts on landscape and wildlife. In some areas, such as Crooked Creek and Medicine Lodge Creek, powerlines and pipelines should be buried underground. Existing high powerlines in the area are well known to cause collision fatalities among flocks of sage grouse, to function as unnaturally high hunting perches for eagles and other birds of prey that eat sage grouse, and to cause sage grouse to move their leks and nests away from the vicinity of these tall structures, which function to fragment the natural habitat.

50437-002

50437-003

The bottom line is: once a programmatic EIS has been approved with corridors laid out on a map, it will be the template guiding permits for rights-of-way. It is important to know what the biological consequences of delineating these corridors will be before the the programmatic EIS is approved. The current draft does not provide such an analysis.

50437-004

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: Thursday, February 14, 2008 1:12 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50438

Thank you for your comment, Larry Fagot.

The comment tracking number that has been assigned to your comment is WVEC50438. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:11:37PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50438

First Name: Larry
Middle Initial: F
Last Name: Fagot
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Zip: 92110
Country: USA
Email: larry.fagot@dot.ca.gov
Privacy Preference: Don't withhold name or address from public record

- Comment Submitted:
Visual analysis of features visible from the Caltrans highway right of way should conform to the Standard Environmental Reference (SER). See <http://www.dot.ca.gov/ser/voll/sec3/community/ch27via/chap27via.htm>. | 50438-001
- Caltrans scenic highway designation and eligibility should be fully addressed. See http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm | 50438-002
- Key views with simulation of towers and lines from the Caltrans highway should be developed after consultation with Caltrans Landscape Architecture using FHWA visual analysis methodology. See Visual Impact Assessment for Highway Projects, Publication Number FHWA-HI-88-054 | 50438-003
- Alterative route visual impact assessment should be performed. | 50438-004
- Impacts to existing vegetation and potential highway planting should be addressed. | 50438-005
- Please provide postmiles where Caltrans encroachment permit(s) would be required. | 50438-006

Sincerely,
Larry F. Fagot

California Landscape Architect No. 2477
International Society of Arboriculture Certified Arborist No. WE-7652A
State of California,
Department of Transportation
District 11 Landscape Architecture
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Building 2, Floor 3, Cubicle 86
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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: Thursday, February 14, 2008 1:29 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50439

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WVEC50439. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:29:04PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50439

First Name:
Middle Initial:
Last Name:
Address:
City:
State: NV
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Privacy Preference: Withhold name and address from public record

Comment Submitted:

Special or sensitive public lands need to be avoided altogether. Specific to our region - the 223-224 and 37-232 lines that are in the Desert National Wildlife Refuge and the 232-233 line that impacts the Delamar Mountains and Meadow Valley Range Wilderness Areas.

50439-001

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: Thursday, February 14, 2008 1:45 PM
To: [mail_corridoreisarchives](mailto:mail_corridoreisarchives@anl.gov); corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50440

Attachments: [Comments_on_Section_368_Draft_PEIS_\(2-14-08\)_WVEC50440.pdf](#)



Comments_on_Sect
ion_368_Draft_...

Thank you for your comment, Karilee Ramaley.

The comment tracking number that has been assigned to your comment is WVEC50440. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:44:57PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50440

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Privacy Preference: Don't withhold name or address from public record
Attachment: S:\L&W\KSR\Comments_on_Section_368_Draft_PEIS_(2-14-08).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.

**The United States Department of Energy
Draft Programmatic Environmental Impact Statement for the
Designation of Energy Corridors on Federal Land
in the 11 Western States**

**Comments by Salt River Project
Submitted February 14, 2008**

I. INTRODUCTION

The Salt River Project Agricultural Improvement and Power District (“SRP”) appreciates the opportunity to provide comments to the U.S. Department of Energy and U.S. Department of the Interior, 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 (“PEIS”).

SRP, a political subdivision of the State of Arizona, owns and operates generation, transmission and distribution systems, as well as irrigation and water supply systems. SRP provides retail electric services to more than 920,000 residential, commercial, agricultural and mining customers in Arizona. SRP owns and operates a diverse portfolio of generation resources to meet the demands of customers. To meet the future demands of our customers, in one of the fastest growing areas in the United States, SRP will need to rely on a variety of resources, many of which will by necessity be located remotely from the area we serve. This need becomes even greater when SRP and other utilities seek renewable resources, many of which are located remotely from demand. Because a significant portion of the state and the west constitutes federal lands, it will be critical for SRP and other western utilities to site future transmission lines in corridors on those federal lands.

Although SRP is encouraged by the efforts undertaken by the Departments to prepare the draft PEIS, SRP is disappointed that the Departments do not appear to have heard the electric industry’s needs for *viable* expanded and new corridors. It is clear that the Departments have compiled and reviewed a large amount of information, data and input in preparing the draft. SRP is concerned, however, that the Departments have not given sufficient consideration to several issues raised in prior comments by SRP, the Southwest Area Transmission (“SWAT”) Sub-Regional Planning Group, and other western utilities. Although SRP will not repeat all of the prior comments here, SRP encourages the Departments to review those comments and give serious consideration to incorporating them in the final PEIS.

50440-001

In its Executive Summary, at section ES.2, the Departments note that the purpose of the PEIS is to address “the need for upgraded and new infrastructure and to take actions to *improve reliability, relieve congestion, and enhance the capability of the national grid to deliver electricity.*” To accomplish those goals will require new

SRP Comments
Submitted February 14, 2008

corridors that are (i) located to allow growing areas access to increasingly remote renewable and other resources; (ii) coordinated with the tribes or provide alternatives for bypassing tribal lands; (iii) wide enough to allow utilities to comply with mandatory reliability requirements and avoid sensitive environmental areas; and (iv) designed to facilitate and streamline the siting process. Although SRP believes that the draft PEIS makes some progress toward those goals, SRP believes that the Departments could have, and should have, done much more to accomplish those goals. The following comments will highlight those issues that SRP believes need particular focus as the Departments finalize the PEIS.

II. GENERAL COMMENTS

A. The Departments should address the process issues raised in prior comments submitted by SWAT.

As SWAT indicated in written comments submitted throughout the PEIS process, the electric utilities in the western states have implemented a robust regional and sub-regional planning process through the Western Electric Coordinating Council (“WECC”). The planning process is in compliance with regulations implemented by the Federal Energy Regulatory Commission (“FERC”). That process evaluates the need for new transmission and includes numerous opportunities for broad participation by interested parties in identifying needed transmission. This effort has been undertaken to minimize the impact and maximize the value of new transmission projects. SRP strongly urges the Departments to ensure that the final PEIS is consistent with and has given consideration to the plans and transmission needs identified through the WECC and sub-regional processes.

50440-002

B. The Departments should expand the proposed default corridor width to a minimum of one mile.

The Departments have proposed a default corridor width of 3,500 feet, asserting that such a width would allow the siting of multiple facilities within a single corridor. SRP recommends that the Departments revisit that determination and widen the corridors, to accommodate more appropriate separation distances between pipelines and transmission lines in any energy corridor. Many utilities provided examples in their previously submitted written comments demonstrating why corridor widths of 3,500 feet or less can create a significantly increased risk of power outages or rolling blackouts. The draft PEIS appears to ignore those examples.

50440-003

This is an issue of both safety and reliability. SRP understands that the Departments could have a concern about public reaction to utility corridors that might be perceived by some as “over designation.” It is critical, however, 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 sufficient separation between lines to reduce the risk of simultaneous outages. Although the Departments acknowledge in the draft PEIS that mandatory industry requirements

SRP Comments
Submitted February 14, 2008

and standards (including those to be enforced by NERC and WECC) very well may prohibit the placement of transmission lines in such close proximity, and thereby require widening the corridor or creating additional corridors, the Departments apparently have decided to push the need for wider and new corridors to another day. The deferral of that analysis and decision undermines the goal of the PEIS to streamline the process for obtaining the required authorizations to site on federal lands. The Departments should mitigate the adverse impact of that deferral by widening the default corridor width to *at least one mile* and using narrower widths only where specifically dictated by terrain or other similar restrictions.

50440-003
(cont.)

C. The Departments should address in the final PEIS the broad issues of connected action, EMF and visual impact.

SRP requests that the Departments address in the final PEIS the issues of connected actions and electromagnetic fields (“EMF”). With respect to connected actions, SRP urges the Departments to clarify that an application to site an energy facility within a designated corridor will not be required to undergo a detailed connection action evaluation. The entire western interconnection is a connected grid and every project relies upon other parts of the system to function properly. An applicant requesting use of a designated corridor should not be required to analyze potential future projects that may use part or all of the transmission line to be sited in that corridor.

50440-004

With respect to EMF and visual impact, SRP proposes that the Departments clarify that projects to be sited in designated corridors will not be required to readdress the underlying issues of EMF and visual impact. The designation of specific corridors for future transmission lines should create a presumption that those issues were considered in designating the corridor. Although an applicant for use of a designated corridor might be required to address in an application methods to mitigate the visual impact of a line through appropriate use of structure types, finish, height and placement, the applicant should not be required to reassess whether the visual impacts of the project are acceptable to begin with.

D. The Departments should include a new corridor between the Arizona-New Mexico border and the Phoenix metropolitan area.

SWAT requested that the Departments include in the PEIS a new corridor between the Arizona-New Mexico border and the Phoenix metropolitan area. That request was consistent with the studies performed through the regional planning process. Unfortunately, the only corridor the Departments included in the draft PEIS is the existing corridor from the Cholla Power Plant to the Pinnacle Peak Substation. That corridor alone will not be sufficient to ensure reliability or to allow SRP to access the anticipated renewable resources in New Mexico. Forest fires over the past five years have demonstrated that even a two mile wide corridor is insufficient to meet reliability needs. SRP again urges the Departments to designate an additional corridor.

50440-005

SRP Comments
Submitted February 14, 2008

III. SPECIFIC COMMENTS

In addition to the general comments discussed above, SRP offers the following specific comments on the draft PEIS:

A. Figure 1.1-1

Figure 1.1-1, at page 1-4 of the draft PEIS, contains what appears to be incorrect information that could result in an underestimate of the needs for a new corridor. The map indicates that the Navajo Generating Station, Cholla Power Plant, Springerville Generating Station, and Palo Verde Nuclear Generating Station (“PVNGS”) are all less than 1,000 MW of generation. Each of those facilities should be shown as greater than 1,000 MW. With respect to PVNGS, it appears that the Departments did not include the significant (6,000 MW) gas-fired generation located in the area. Such low assumptions easily could result in an underestimate of the need for additional corridors.

50440-006

B. References

SRP encourages the Departments to provide additional detail with respect to the references upon which they relied. Although the Departments include a long list of references, it would assist future applicants if the Departments provided more specific citations within the referenced documents.

50440-007

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 1:47 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50441

Thank you for your comment, Caroline Conway.

The comment tracking number that has been assigned to your comment is WVEC50441. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:46:18PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50441

First Name: Caroline
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Comment Submitted:

I am an environmental educator in the Mojave Desert. I lead outdoor ecology programs for school children and adults. I also teach Natural Resources at a local community college. Our school programs utilize volunteers from the surrounding community to help us with the programs that take place in local nature preserves.

I am very concerned about the number of energy projects proposed for the Mojave Desert. I want to see California reduce greenhouse gases and use alternative energy, but I don't want to risk some of the last wild land in Southern California needlessly. The Mojave Desert may seem the perfect place for massive energy production and transmission, but it is also a unique and fragile ecosystem.

My understanding of the West Wide Energy Corridor designation is that it would allow projects to be fast-tracked, which will result in fewer environmental controls and less time planning. Some of the projects being considered are very large and/or include long transmission lines that bisect wild lands and private property.

50441-001

Californians are willing to make sacrifices to advance renewable energy and cut greenhouse gases, but I want to make sure that we explore conservation and energy efficiency before considering huge projects that transmit energy over great distances. The Mojave Desert is also a precious resource.

50441-002

Caroline Conway

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: Thursday, February 14, 2008 1:52 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50442

Attachments: West-wide_Energy_Corridor_Draft_Prog_EIS_Comments_(02-14-2008)_WVEC50442.doc



West-wide_Energy
_Corridor_Draf...

Thank you for your comment, Joan May.

The comment tracking number that has been assigned to your comment is WVEC50442. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:51:25PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50442

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Privacy Preference: Don't withhold name or address from public record
Attachment: Z:\mydocs\Planning\West-wide Energy Corridor Draft Prog EIS Comments
(02-14-2008).doc

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.

SAN MIGUEL COUNTY

BOARD OF COMMISSIONERS

JOAN MAY ELAINE FISCHER ART GOODTIMES

February 14, 2008

Delivered via electronic mail

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

RE: West-wide Energy Corridor Draft Programmatic Environmental Impact Statement; Comments of San Miguel County, Colorado

Thank you for the opportunity to comment on the West-wide Energy Corridor Draft Programmatic Impact Statement (PEIS). These comments are being made in addition to those submitted from The Wilderness Society that the San Miguel County Board of Commissioners has also adopted. As a preliminary matter, it should be noted that, contrary to the requirement in Section 368 of the Energy Policy Act of 2005, the federal agencies involved in the development of the PEIS have not consulted with the County, a local unit of government, within whose boundaries a corridor designation has been proposed.

50442-001

We recognize the importance of evaluating future energy corridor to meet growing demands. However, as proposed these corridors will cover 6,000 miles and affects almost 3 million acres of public lands. It is not possible to do a comprehensive review of the impacts of this proposal at that scale. It is therefore incumbent on the federal government to do site specific analysis on individual projects in appropriate detail with proper public input. This PEIS analysis should not be deemed adequate for NEPA purposes to shortcut this process in the future.

50442-002

Although pipelines and power lines may be needed, we are disappointed by the lack of analysis of other alternatives including energy conservation, distributed generation, and upgrading existing systems with new technology to maximize efficiency before creating new corridors and additional impact on our public lands.

50442-003

It does not seem possible at this scale to adequately meet the requirements of NEPA in evaluating cumulative effects. This is particularly true as large segments of the corridor that pass through private land are not even identified, much less subjected to any type of analysis to consider the cumulative effects in conjunction with the federal lands being designated. All future energy corridor projects need to incorporate best management practices and minimize damage to other resources, recreation, and visual character. The projects implemented in the corridors should avoid totally special or sensitive public lands, areas subject to pending legislation (such as Wilderness designation) and critical wildlife habitat. All projects should also include detailed reclamation and restoration plans incorporating site-specific native species and noxious weed control plans.

50442-004

Comment Letter Sent To
West-wide Energy Corridor DEIS
February 14, 2008
Page Two

The proposal does not analyze a range of alternative as required by NEPA. In particular, there should be discussion of corridors to connect wind, geothermal, and solar resources rather than just traditional energy sources. It appears that a reduction in uses of fossil fuel resources is imminent and the proposal needs to evaluate how the West can be a contributor to development of sustainable renewable energy resources. 50442-005

We have been unable to develop a meaningful analysis of the impacts to San Miguel County associated with the proposed corridor designation based on the limited information provided on the corridor alignment on the PEIS maps and the accompanying texts. The corridor section located in San Miguel County, segment 130-274) appears to be 3,500 feet wide as it is shown crossing the public lands. If the corridor is this wide as it traverses private lands between the indicated public lands portions, this could have dramatic effects on the value of the private lands. Substantial impacts to private lands are inevitable as the public lands segments are connected. A corridor 2/3 of a mile wide could cover entire private parcels rendering them unsuitable for development due to future uncertainty. Again, it does not seem possible for the NEPA process to be adequate with regard to evaluating human impacts when entire segments of private lands inevitably impacted are not even identified much less analyzed. 50442-006

In the southern portion of the County when the public land portions shown are connected, the corridor bisects occupied Gunnison Sage Grouse habitat, as mapped by the Colorado Division of Wildlife. This is of concern given the ongoing federal court litigation regarding the listing status of the Gunnison Sage Grouse under the Endangered Species Act. It also flies in the face of substantial conservation efforts on behalf of the Gunnison Sage Grouse undertaken by County government and private partnerships. 50442-007

The PEIS map and text, Tables A and F, identifies the corridor in San Miguel County as multimodal including underground uses. This apparent conflict needs to be clarified. Was the corridor also evaluated for consistency with the new San Juan BLM RMP currently in the final stages of the NEPA process? 50442-008

The PEIS indicates the portion of the corridor in San Miguel County does not follow an existing transportation/utility corridor. However, it appears to be near an existing corridor for the Trans Colorado natural gas pipeline. If the corridors are near each other, it is unclear why the proposed corridor does not follow the existing gas line corridor for at least some portion of the route. 50442-009

The PEIS must be amended in order to gain a better understanding of what is being proposed for concerned local jurisdictions. We also request there be a commitment by the federal government to a process that fully identifies and addresses project specific concerns as any proposals are implemented in these designated corridors. In view of the lack of consultation with San Miguel County, and the clearly inadequate NEPA process, the County is compelled to request that the "No Action" alternative be adopted and that the various federal public land management agencies continue to rely on the applicable resource management planning process. 50442-010

Respectfully submitted,

/s/Joan May

Joan May, Chair
Board of County Commissioners
San Miguel County, Colorado

From: coridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 2:01 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50443

Thank you for your comment, Karolyn snow.

The comment tracking number that has been assigned to your comment is WVEC50443. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 02:01:13PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50443

First Name: Karolyn
Middle Initial: a
Last Name: snow
Organization: Great Old Broads for Wilderness
Address:
City:
State: CO
Zip:
Country: USA
Privacy Preference: Withhold address only from public record

Comment Submitted:

Along with coal and oil, please consider the use of the energy corridor infrastructure for local, clean and renewable energy. This should be the focus for the future. Government has a role to play in the future of power generation and dissemination.

50443-001

Please designate corridors with the DeGette Wilderness Act in mind and avoid sensitive areas including the Yampa River, Roan Plateau and Curicanti Area in Colorado.

50443-002

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: coridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 2:17 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50444

Thank you for your comment, Keri McParland.

The comment tracking number that has been assigned to your comment is WVECD50444. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 02:16:27PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50444

First Name: Keri
Last Name: McParland
Address:
City:
State: CA
Zip:
Country: USA
Privacy Preference: Withhold address only from public record

Comment Submitted:

I do not agree with the proposed designated corridors in the West-wide Energy Corridor (WVEC) Draft Programmatic Environmental Impact Statement (Draft-PEIS), as these corridors will average 3500 feet wide and range up to 5 miles in width and will scar 6,000 miles and almost 3 million acres of public lands.
I strongly support a national energy policy that promotes local generation of power through incentives, tax credits and low interest loans before developing more remote generation and long distance transmission.

50444-001

50444-002

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: Thursday, February 14, 2008 2:19 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50445

Attachments: WEST_WIDE_ENERGY_CORRIDOR_COMMENTS_2.14.2008_WVEC50445.doc



WEST_WIDE_ENER
_CORRIDOR_COMM

Thank you for your comment, Bruce Parker.

The comment tracking number that has been assigned to your comment is WVEC50445. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 02:18:38PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50445

First Name: Bruce
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Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Bruce Parker\My Documents\MILLARD COUNTY\WEST WIDE ENERGY CORRIDOR COMMENTS 2.14.2008.doc

Comment Submitted:
Comments provided by Millard County, Utah and supplementing comments provided earlier
(Tracking #WVEC50147)

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.

**COMMENTS RELATED TO THE
“WEST-WIDE ENERGY CORRIDOR DRAFT
PROGRAMMATIC ENVIRONMENTAL
IMPACT STATEMENT”**

DIRECT TO:

**THE U.S. DEPARTMENT OF ENERGY,
THE U.S. DEPARTMENT OF INTERIOR BUREAU OF LAND
MANAGEMENT,
THE U.S. DEPARTMENT OF AGRICULTURE FOREST SERVICE,
THE U.S. DEPARTMENT OF DEFENSE**

**PROVIDED BY:
MILLARD COUNTY, UTAH
SUPPLEMENTING MILLARD COUNTY COMMENTS
TRACKING #WVECD50147
FEBRUARY 14, 2008**

As supplementary materials to comments previously provided (Comment Tracking Number WVECD50147), Millard County, Utah (hereinafter “Millard County”) provides the following input directed to the West-wide Energy Corridor Draft Programmatic Environmental Impact Statement (PEIS) (hereinafter “West-wide Energy Corridor”). These comments are provided by Millard County through its Board of County Commissioners (Commissioner John Cooper - Chair, Commissioner Kathy Walker, and Commissioner Daron Smith).

As already identified (Comment Tracking Number WVECD50147) the proposed alignment for the West-wide Energy Corridor in Millard County creates a number of severe negative impacts. In addition to those impacts previously identified those impacts also include the following:

- Real potential exists for the degradation of both culinary water and secondary water (irrigation water) systems. To maintain the vitality and viability of one of the most important agricultural producing areas in the United States the protection of both surface and ground water resources is imperative. The proposed alignment of the West-wide Energy Corridor traverses areas immediately adjacent to significant surface water resources, and crosses a critically important ground water aquifer of Millard County. Negative impacts to the culinary and secondary water resources of Millard County, including any reductions in both water quantity and water quality, will create severe impacts to the public health and welfare of County residents and the economic well-being of Millard County.

50445-001

West-wide Energy Corridor Draft Programmatic Environmental Impact Statement
Millard County, Utah –Supplemental Comments
2/14/2008

- The proposed alignment of the West-wide Energy Corridor is in immediate proximity and crosses primary transportation corridors of Millard County. During the construction periods of any energy transmission facilities within the proposed West-wide Energy Corridor and any maintenance activities or event that would close the primary transportation corridor of Millard County creates a true and significant risk to the public safety of County residents and businesses.

50445-002

Based on the concerns expressed by Millard County, including the impacts of the West-wide Energy Corridor to its residents, businesses, visitors, agricultural activities, economy, view amenities and other impacts, Millard County again reiterates and affirms its opposition to the proposed West-wide Energy Corridor alignment in Millard County. Simultaneously, Millard County supports a West-wide Energy Corridor alignment for future study that would parallel and be in immediate proximity to the Intermountain Power Plan transmission alignment located in Millard County.

50445-003

Once again, on behalf of the residents of Millard County, thank you for the opportunity to present our concerns, comments and input to the West-wide Energy Corridor Draft Programmatic Environmental Impact Statement.

Millard County Board of County Commissioners:

Commissioner John Cooper
Commissioner Daron Smith
Commissioner Kathy Walker

cc. File

From: coridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 2:25 PM
To: mail_coridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50446

Thank you for your comment, Karma Bingham.

The comment tracking number that has been assigned to your comment is WVEC50446. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 02:24:57PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50446

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Comment Submitted:

Please keep the energy transmittal lines within the existing corridors which are largely upon Federal lands. I strongly oppose having them run through private grounds (expecially ours! as is being considered by Northwest energy). We live in an agricultural area and do not wish to have our livestock and farm subject to these lines. I also understand that a new cable is available which can carry more power than previous lines. I encourage more study in that direction. Thank you for your consideration. Hal and Karma Bingham

50446-001

50446-002

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: Thursday, February 14, 2008 2:32 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50447

Attachments: 20080214a_DOE_EIS_0368_Final_WVEC50447.pdf



20080214a_DOE_E
IS_0368_Final_W...

Thank you for your comment, R. "Bud" Andersen.

The comment tracking number that has been assigned to your comment is WVEC50447. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 02:31:28PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50447

First Name: R. "Bud"
Middle Initial: L
Last Name: Andersen
Organization: TransCanadaPipeline, Inc. NLT Initiative
Address: TransCanada Pipeline, Inc.
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Address 3: Calgary AB T2P5H1 Canada
City: n/a.
Email: bud_andersen@msn.com
Privacy Preference: Withhold address only from public record
Attachment: C:\Documents and Settings\Bud\My Documents\20080214a DOE EIS 0368 Final.pdf

Comment Submitted:
Thank You for the opportunity.

Please see attachments.

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 14, 2008

Ms. Laverne Kyriss
Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

TransCanada Corporation
450 - 1st Street S.W.
Calgary, Alberta, Canada T2P 5H1

Ken Tate
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fax 403.920.2340
email ken_tate@transcanada.com
web www.transcanada.com

Via email

Dear Ms. Kyriss

**Re: TransCanada's Comments on
(DOE/EIS-0368) dated October 2007**

TransCanada is a major energy infrastructure developer and operator in North America with over 50 years of demonstrated experience. For the last several years, TransCanada has been developing long distance, HVDC transmission lines in the Western US and Canada. These lines comprise our NorthernLights Transmission initiative.

The Inland Project consists of two HVDC transmission lines – one originating in central Montana and terminating south of Las Vegas and a second from the central Wyoming to Las Vegas. These projects will provide the Southwest with access to the plentiful, low-cost and clean resources from Montana, Wyoming and other western states.

The Celilo Project is a bi-directional HVDC transmission line from central Alberta Canada to the lower Columbia region of the Pacific Northwest. This line will join two large markets that do not have a direct trading path, offer mutual reliability support and access to Alberta's plentiful clean resources.

TransCanada appreciates the opportunity to comment on the report titled Programmatic Environmental Impact Statement, Designation of Energy Corridors on Federal land in the 11 Western States (DOE/EIS-0368) dated October 2007. TransCanada spoke at the Public Scoping meeting held in Denver, CO on October 25, 2005 and subsequently filed a submission on July 18, 2006 in response to the "Potential Energy Corridors in the Western States, June 2006".

TransCanada continues to hold the views presented in these submissions and offers further comments in the attachment.

For more information about TransCanada, please refer to www.transcanada.com. For more information about the projects, please contact me directly or Bill Hosie at (403) 920-7338, bill_hosie@transcanada.com.

Sincerely,

Ken Tate,
Vice-President, Power Transmission



**Submission of
TransCanada
to the
United States of America
Department of Energy,
Regarding
DOE/EIS-0368
Programmatic Environmental Impact Statement
Designation Energy Corridors on Federal Land
In the 11 Western States
Dated October 2007**

February 14, 2008



TransCanada – NorthernLights

February 14, 2008

TransCanada Corporation (TransCanada) is one of North America’s leading energy infrastructure companies with more than \$25 billion in assets in pipeline, storage, and power supply infrastructure. Although TransCanada is best known for its natural gas pipeline business, it is also a rapidly emerging player in the field of power generation and electric transmission. TransCanada’s financial strength and experience in linear facilities position it well to pursue opportunities in the pipeline and electric transmission business.

NorthernLights is TransCanada’s initiative to facilitate the development of new low-cost and clean generating resources by providing new electrical high voltage direct current (HVDC) transmission capacity to the West Coast and Southwestern states. Central to the concepts developed by NorthernLights is the use of modern HVDC transmission technology. Some of the benefits of HVDC are lower capital costs, lower line losses and reduced land use. As well HVDC is relatively easy to integrate with existing alternating current (AC) power systems.

The Montana Project, Figure 1, starts in central Montana and terminates in the Eldorado Valley south of Las Vegas, Nevada. The Wyoming Project, Figure 2, starts in the central Wyoming and terminates in the Eldorado Valley.

Figure 1
Montana to Las Vegas



Figure 2
Wyoming to Las Vegas

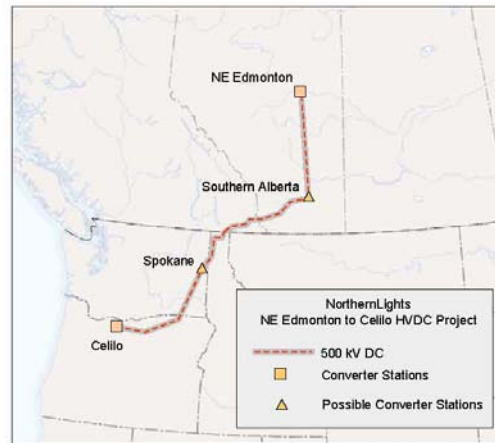


TransCanada – NorthernLights

February 14, 2008

The Celilo Project is a bi-directional HVDC transmission line from central Alberta, Canada to the lower Columbia region of the Pacific Northwest. This line will join two large markets that do not currently have a direct trading path, offer mutual reliability support and access to Alberta's abundant clean resources. With the addition of a converter station in the Spokane, Washington area, generators in Montana, Eastern Washington, Eastern Oregon, Idaho and British Columbia can gain access to markets on the Pacific Northwest coast and Northern California.

Figure 3 NorthernLights Alberta to Celilo Project



The NorthernLights configurations have been arrived at though the exploration of a number of system configurations and corridor options with federal and state officials, regulators, load serving entities and regional planning organizations.

TransCanada – NorthernLights

February 14, 2008

TransCanada's Comments

TransCanada's has the following comment in response to the DOE/EIS-0386 dated October 2007. We respectfully submit our views and recommendations:

1. General

TransCanada is supportive of the 368 process and the results. The Agencies have done a good job of balancing the need for new energy corridors with the need to manage Federal lands. TransCanada is also encouraged to know that energy projects, when there is good reason, can also be permitted outside of the 368 designated corridors.

50447-001

2. Corridors North and South of the Idaho National Laboratory

Reference to corridors designated as 50-260 and 252-253 for Montana and Idaho on map sheets Volume III, Part 2, State Base Map Series.

TransCanada is supportive of these corridors. They contain existing facilities and allow for future interstate project to traverse from Montana to Idaho, with eventual southerly routing into Nevada and other Southwestern states. They will also allow for future connection of generation in the area should it develop.

50447-002

3. Wyoming to Southern Idaho

The Preliminary Draft - Potential Energy Corridor in the Western States dated June 2006 included a corridor from southern Wyoming into southern Idaho traversing the Kemmerer Field District. TransCanada does not believe this corridor should be removed from consideration and requests that it be reinstated in the final decision.

50447-003

The corridor is important to move energy from energy rich Wyoming to the west coast and to the southwest. Without this designation, the permitting process for currently planned electrical transmission lines in this orientation will be more difficult to co-ordinate.

In the absence of such designation, we strongly recommend that an alternate corridor be identified and designated, thus facilitating the transmission of energy from Wyoming into Idaho, the Pacific Northwest and the Southwestern states.

50447-004

TransCanada – NorthernLights

February 14, 2008

4. North East Nevada

Reference to corridors designated as 43-44 on map sheet Nevada in Volume III, Part 2, State Base Map Series.

TransCanada is concerned that corridor 43-44 is now proposed to be designated as underground only. This corridor has been previously permitted for an overhead transmission line for a 200 feet right-of-way and the corridor was later expanded to 3500 feet.

TransCanada’s two NorthernLights Inland Projects are planned to traverse this area. Placing the facilities underground would represent a significant, unwarranted cost without any corresponding benefit. This additional cost would ultimately be borne by electricity customers.

50447-005

TransCanada acknowledges the very substantial and difficult work done by the Agencies and thanks the Agencies in advance for considering these comments and requests.

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 2:36 PM
To: [mail_corridoreisarchives](mailto:mail_corridoreisarchives@anl.gov); corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVECD50448

Attachments: Energycorridorcmnt_WVECD50448.doc



Energycorridorcmnt_WVECD50448...

Thank you for your comment, Cynthia Mann.

The comment tracking number that has been assigned to your comment is WVECD50448. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 02:36:16PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVECD50448

First Name: Cynthia
Middle Initial: M
Last Name: Mann
Address: PO Box 96
City: Carey
State: ID
Zip: 83320
Country: USA

Email: hideawayranch@gmail.com

Privacy Preference: Don't withhold name or address from public record

Attachment: /Users/Cindy/My Documents/Cindy/MSTI/Letters to Editor/Energycorridorcmnt.doc

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.

HIDEAWAY RANCH
PO BOX 96
CAREY, ID 83320

February 14, 2008

West-wide Energy Corridor Programmatic EIS

To whom it may concern:

The route of the proposed energy corridor closest to us appears to be in an appropriate place as it is drawn in a north/south direction crossing the Idaho National Laboratory. The idea of keeping the corridors on federal land is appropriate, but these routes will involve crossing private ground. A 3500' wide swath is a huge area of impact and will often negatively affect private property. The following is a list of questions that my husband and I would like to have answered regarding the proposed energy corridors:

What private property rights will private landowners have in the proposed energy corridors? | 50448-001

How will the Federal Government protect endangered species in the proposed energy corridors? | 5044-002

How will the Federal Government protect animal migratory routes in the proposed energy corridors? | 50448-003

What is the next step in your process after the closure of public comment on the eis? | 50448-004

If these proposed corridors are placed across Idaho, all utility companies should be mandated to stay within the designated corridors. The Department of Energy's efforts to impose these energy corridors across our country have unleashed America's corporate greed. Whatever incentives the DOE is or has proposed to these companies have them in a feeding frenzy to lace the west with 130' steel towers running wherever is the shortest route to deliver power to the grid. My husband and I are dealing with one such proposal from Northwest Energy of Montana. They are proposing a route to cross miles of private property, impact a National Monument, cut off crucial wildlife migratory corridors, and ruin property values. All in the name of profit. | 50448-005

We charge you with the responsibility of treading lightly across our sensitive lands and wildlife and to find routes that do not impact our way of life. | 50448-006

We look forward to a reply.

Sincerely,

Gregory and Cynthia Mann

PO Box 96

Carey, ID 83320

hideawayranch@gmail.com

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 2:48 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WVEC50449

Attachments: PacifiCorp_PEIS_Comments_-_02-14-08_WVEC50449.pdf



PacifiCorp_PEIS_Co
mments_-_02-...

Thank you for your comment, Shannon McWhinney.

The comment tracking number that has been assigned to your comment is WVEC50449. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 02:47:23PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WVEC50449

First Name: Shannon
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Privacy Preference: Don't withhold name or address from public record
Attachment: U:\LegalDept\McWhinney\BLM\PacifiCorp PEIS Comments - 02-14-08.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.



Pacific Power
Rocky Mountain Power
825 NE Multnomah Street
Portland, Oregon 97232

Please Reply To:

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Direct Dial (503) 813-5585
Fax (503) 813-7252
Email: shannon.mcwhinney@pacificorp.com

February 14, 2008

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

Re: PacifiCorp Comments on the Draft Programmatic Environmental Impact Statement for Energy Transport Corridors in the West

PacifiCorp, a subsidiary of MidAmerican Energy Holdings Company, appreciates the opportunity to comment on the Programmatic Environmental Impact Statement ("PEIS"), *Designation of Energy Corridors on Federal Land in the 11 Western States* (DOE/EIS-0386). PacifiCorp respectfully submits these comments to supplement prior company comments provided to the Department of Energy ("DOE") on November 21, 2005 related to the preparation of the PEIS and to the DOE on July 10, 2006 related to the preliminary draft map of potential energy corridors on federal lands.

PacifiCorp is one of the largest western electric utilities, serving approximately 1.7 million residential, commercial and industrial electric customers throughout its six state service territory (California, Oregon, Washington, Idaho, Wyoming and Utah) and is committed to serving its customers with safe, reliable and economically competitive electricity, including renewable energy. In addition, PacifiCorp provides electric transmission service in nine of the eleven western states covered in the PEIS, owning (1) approximately 15,500 miles of transmission lines that range from 46 kV to 500 kV and (2) approximately 8,300 MW of generation capacity. The ability to transport these resources long distances across federal lands to expanding load centers is critical in meeting PacifiCorp's ever increasing electric load demands.

PacifiCorp strongly supports the development and federal designation of energy corridors on federal lands across the western U.S., consistent with Section 368 of the Energy Policy Act of 2005 ("Act"). The energy corridor designation process, if properly implemented, can play a critical role in assuring that necessary energy infrastructure, particularly electric transmission, is developed and utilized in a timely, efficient and environmentally responsible manner to meet the country's growing energy needs. While PacifiCorp is generally supportive of the Draft PEIS, we believe the practical effect of the document in helping to expedite the processing and

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construction of actual energy project rights-of-way within the designated energy corridors may be diminished unless the specific areas of concern identified below are remedied in the Final PEIS. Accordingly, PacifiCorp offers the following comments intended to show how the Draft PEIS can be improved to benefit not just the proponents of energy projects within future designated corridors, but also to those preparing documents and to reviewers of specific proposals.

General Comments

1. Corridor Width: PacifiCorp remains concerned that the proposed 3,500 foot maximum corridor width is suboptimal from a reliability perspective and not wide enough to accommodate multiple energy facilities in general and transmission lines in particular. As supported by the Western Electric Coordinating Council ("WECC") recommendations, PacifiCorp believes that where multiple high capacity transmission lines are located in the same area, prudence dictates that they should be as widely separated as practical so as to minimize the possibility of simultaneous outages due to a common (or single mode) event such as storms, fires, etc. Where new corridors have been designated as part of the West-wide PEIS as an extension of existing corridors that contain one or more high capacity line, PacifiCorp respectfully requests a corridor of at least one mile in width to provide needed separation. For designated corridors that do not contain existing 230 kV or higher transmission lines in a corridor; PacifiCorp suggests that the 3,500 feet width is adequate to provide separation of at least 1,000 feet between non-interconnected lines.

50449-001

2. Multi-modal Use: Placement of energy facilities adjacent to each other or other facilities within the same corridor may result in safety or incompatibility issues. It is not always possible for multiple electrical lines to be located in the same rights-of-way corridor and still maintain adequate separation from other lines or utilities (such as natural gas pipelines). All utilities must endeavor to meet reliability and safety standards with an eye toward reducing the risk of simultaneous line outages due to a common event (storm, fire, earthquake, gas line rupture, etc.) within a single corridor. Activities generally excluded from transmission (high voltage) utility corridors include mining, materials storage and disposal, habitat improvements involving facility construction, non-linear energy project development, blasting, excavation and high profile (tall) facility development.

50449-002

To avoid conflicts and overlaps, PacifiCorp recommends that the Final PEIS adopt procedures requiring that all existing entities to be notified when there are plans for an applicant to install new facilities within existing rights-of-way or designated utility corridor so uses do not conflict with each other. PacifiCorp also recommends that the Final PEIS include a specific provision stating that rights-of-way facilities will not be placed adjacent to each other if issues with safety, incompatibility or resource conflicts are identified. This approach is consistent with the current WECC regional planning and line rating processes

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3. Coordination of Sections 368 and 1221: Certain large-scale transmission projects will span both federal and non-federal land. It is therefore important that coordination with the implementation of Sections 368 and 1221 of the Act occur with corridor designations on non-federal land to assure needed electric transmission infrastructure is properly planned, developed and sited. The Section 1221 "national interest" corridors will encompass both federal and non-federal lands, and the Section 368 designations should take the Section 1221 designations into account. Further, under Section 1221, DOE is responsible to act as the lead agency for overall federal permitting of electric transmission facilities, in the interest of streamlining the permitting process. The federal PEIS agencies should use this lead agency process to streamline authorizations for use of federal lands, including the Section 368 corridors.

50449-003

Comments on the Draft PEIS Proposed Energy Corridor Maps

PacifiCorp respectfully submits the following comments regarding the maps showing the proposed West-wide energy corridor designations.

1. Volume 1, Executive Summary and Main Text, Page 2-24: The Preliminary Energy Corridors include a potential Section 368 Corridor exiting Western Wyoming and directly entering Southeastern Idaho. This corridor contains existing transmission lines transmitting power from Wyoming to Idaho and into the Pacific Northwest.

In the Draft PEIS mapping, Volume III, Part 2, State Base Map Series, the preliminary corridor referenced above is not shown. Local Field Offices were required to review and submit environmental reasons as to why the preliminary energy corridors should or should not be shown as required in step 3 of the energy corridor siting process. The Bureau of Land Management ("BLM") Kemmerer Field Office designated a higher visual resource class for this existing corridor in its respective Resource Management Plan ("RMP") and the corridor was eliminated even though existing transmission lines occupied the corridor. In the RMP no reason was given as to why the visual impact classification was raised. PacifiCorp believes that the definition of "energy corridor" in Section 368 of the Act as well as the mandate to federal land agencies to enhance the renewable energy generation within and located on federal lands were not considered.

50449-004

PacifiCorp provided similar comments during the public review process of the Kemmerer Area RMP and shares the concern recently expressed by the State of Wyoming's Governor (January 2, 2008 letter to Kemmerer BLM office) that the corridor should continue to exist as originally outlined. PacifiCorp requests that the Record of Decision which amends the respective Land Use Plans also amend the RMP of the Kemmerer Field Office to reinstall a very necessary corridor linking Wyoming energy and renewable resources to load centers in the West.

2. Volume III Section 1 Map F06: Volume III Section 1 Map F06 shows corridor 66-212 through the portion of the U.S. 191 utility corridor that runs through Moab Canyon. This corridor

50449-005

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has reached maximum capacity. In 1999, the Western Regional Corridor Study Committee (Western Utility Group) recommended that utility corridors within the Moab Planning Area continue to be designated alongside the I-70 and U.S. 191 roadway corridors. All corridors identified in previous regional plans remain designated at present. The Western Utility Group ("WUG") is currently working to identify additional corridors throughout the region, and has put forth one additional utility corridor in the Moab Planning Area following the Questar, Williams, et. al. pipeline route through East Canyon (Bureau of Land Management 2001c). To address this capacity constraint, PacifiCorp respectfully requests that the designation of an additional corridor occur running north to south parallel to the existing U.S 191 highway corridor but outside of the restrictive Moab canyon.

50449-005
 (cont.)

3. Volume III Part 5 Map cor196ORadmin: In this reference, there is no designated corridor connecting corridor 4-247/7-11 in central Oregon and 11-103 in the Willamette Valley. PacifiCorp therefore proposes an east to west corridor be designated near the intersection of corridors 4-247 connecting to corridor 11-103. The addition of this corridor provides a possible path for transfer of existing and future resources into the Willamette Valley load center by connecting designated corridors from the east into Idaho and Wyoming and from the north into Washington.

50449-006

4. Volume III Part 5 Map cor196ORadmin: The designated corridor 250-51 does not extend to the Oregon-Washington state border connecting existing renewable energy resource areas in Southwest Washington into the transmission grid. PacifiCorp recommends the extension of the proposed corridor 250-51 west and north through the Wallowa-Whitman and Umatilla national forests to the Oregon-Washington border. The addition of this corridor would provide a possible path for transfer of new resources in southeast Washington and northeast Oregon into the western transmission grid and could enhance the development of new renewable resources.

50449-007

5. Volume III Part 5 Map cor196WYadmin: The proposed corridors do not include an east to west corridor from Southern Wyoming into Southern Idaho. PacifiCorp therefore proposes an additional corridor extending west and north from proposed corridor 121-221 or 121-240 north of the Fossil Butte National Monument into Southern Idaho connecting into proposed corridor 49-112 or 49-202. The addition of this corridor would provide an additional path for resource transfers out of Wyoming connecting into the proposed and existing energy corridors in southern Idaho and west into Oregon and Washington.

50449-008

6. Volume III Part 5 Map cor196WYadmin: The proposed north to south corridors 126-218 between Wyoming and Utah; and 73-133 between Wyoming and Colorado are designated as underground-only. Consideration should be given to change these corridors to multi-modal to provide additional overhead electric transmission options to connect Wyoming resources to load centers in Utah and Colorado.

50449-009

Comments on Environmental Remarks in the Draft PEIS

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The PEIS is by definition programmatic; that is, it does not describe a specific project or identify development proposed to occur. Under this consideration it should not propose or evaluate specific environmental impacts, land use effects or other activities or actions that would result in direct physical or natural environmental consequences. However, PacifiCorp is concerned that the PEIS has attempted to go beyond the programmatic approach and identify specific environmental impacts and recommend appropriate mitigation in Volume I Chapter 3. Designating preferred energy corridors will ultimately result in some consequences and/or constraints to transmission line planning. However, generally these effects are not identifiable at this time. Further, as corridor designations are not intended to restrict or limit possible options, a full range of corridor options and possibilities should remain open. Any associated environmental impacts would need to be addressed through appropriate National Environmental Policy Act ("NEPA") or other measures once a plan or route is identified.

PacifiCorp respectfully submits the following comments based on interpretive designations and general observations presented in the Draft PEIS. As identified rights-of-way represent "preferred" routes, the comments assume the criteria (alternatives and potential consequences) included in Chapters 2 and 3 will be maintained for each prospective corridor or route.

1. Environmental Impacts, Executive Summary, Table ES-2, Page ES-28: Table ES-2, Ecological resources states the following: "Impacts from project development may include habitat fragmentation, wildlife disturbance, habitat loss and modification, exposure to accidental releases of hazardous materials, and the loss or injury of biota within physically disturbed portions of the project rights-of-way. Construction and operation activities, together with physically disturbed habitats at the rights-of-way, could lead to the spread or establishment of invasive species." This paragraph continues with "The nature, magnitude, and extent of project-related impacts would depend on the type, location, length, and design of the individual projects."

50449-010

Stating that "impacts from project development *may* include [listed disturbances]" does not provide either substantiation or justification to conclude that these alleged impacts which are likely overstated would necessarily occur. PacifiCorp agrees that the impacts could result from various ground-disturbing actions; however, if sufficient care is taken to avoid sensitive resources and proper restorative measures are implemented, such impacts may be largely avoided and/or mitigated (*e.g.*, re-seeded/re-stabilized) to either minimize or eliminate disturbances to resources.

2. Volume 1 Chapter 3 Section 3.8.4.1, Pages 3-191- 218: This section, entitled "What are the usual impacts to ecological resources of building and operating energy transport project?" attempts to describe impacts to various ecological resources in the abstract, without having any project-specific details to analyze. The results are gross overstatements and inaccurate assessments of potential impacts or potential risks (*i.e.*, electromagnetic field exposure,

50449-011

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- herbicide use, contaminants, electrocutions, habitat fragmentation and noise and migration behavior) from transmission lines to numerous environmental resources as shown in Table 3.8-9. However, only Environmental Protection Agency (“EPA”)-approved herbicides are used for vegetation management, oil or contaminant spills are required to be contained and timely cleaned up under state and federal regulations and many alleged behavioral impacts are not scientifically proven. Accordingly, PacifiCorp requests that this section of the Final PEIS be rewritten and that issues pertaining to specific biological issues be addressed in any ensuing project-specific Environmental Assessment/Environmental Impact Statement (“EA/EIS”) action. 50449-011 (cont.)
3. Volume I Chapter 3 Section 3.8.13 “Upland Game Birds” Page 3-157: This chapter states “While no single or combination of factors has been proven to have caused a decline in Sage Grouse numbers...is thought to be due to...power lines.” PacifiCorp asserts that the placement of transmission or distribution poles causing a reduction in Sage Grouse numbers is unfounded. Accordingly, PacifiCorp requests that this statement be removed in the Final PEIS and that issues pertaining to specific biological issues be addressed in any ensuing project-specific EA/EIS action as required in completing the NEPA process. 50449-012
4. Volume I Chapter 3 Text Box 3.8-2 – Suggested Management Practices (“SMP”) for Sage Grouse Page 3-204: The table recommends that “Anti-perching devices be installed on new and existing power lines in occupied sage grouse habitat.” Recent studies conducted by HawkWatch International in Western Wyoming and Utah State University in Southern Utah indicate that anti-perching devices on transmission and distribution lines are ineffective. Most avian species find other locations on the structure or wires to perch. Accordingly, PacifiCorp does not support this SMP or the elimination of guy wires (pg. 3-231) as recommended in the PEIS and requests that they be removed. 50449-013
5. Volume I Chapter 3 Operational and Maintenance Impacts Page 3-209: This section states that “[d]uring the operation and maintenance of the energy transport system, wildlife may be affected by (1) electrocution and electromagnetic field exposure from transmission lines; (2) noise;...”. However, on the very same page the document states that “No electrocution of raptors would be expected when they are on the transmission line structures because the spacing between a conductor and...would exceed the wing span of the California condor...”. All new power lines that cross federal and state lands would be required to be built to current avian-safe designs and any effects of electromagnetic fields on wildlife is not scientifically documented. Accordingly, PacifiCorp requests that these statements be removed from the Final PEIS and that any specific biological issues be addressed in a project-specific EA/EIS as required in the NEPA process. 50449-014
6. Volume I Chapter 3 Page 3-211: The last paragraph of this section entitled, “Electrocution and Electromagnetic Effects”, states that “Electromagnetic field exposure can potentially alter the behavior, physiology, endocrine systems, and immune functions of birds, which in theory, could result in negative repercussions on their reproduction...”. PacifiCorp 50449-015

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 February 14, 2008
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contends that the effects of electromagnetic fields on birds and their reproduction are unfounded. Accordingly, PacifiCorp requests that this statement be removed in the Final PEIS and that issues pertaining to specific biological issues be addressed in any ensuing project-specific EA/EIS action as required in completing the NEPA process.

50449-015
 (cont.)

7. Volume I Chapter 3 Mitigation recommendations Page 3-229: One of the recommendations suggests that raptor nest and roost surveys be conducted each year and states “generally, nests and roosts are considered active if they are currently in use or have been occupied within the last 2 to 3 years...”. This definition of an active nest is incorrect as defined in a U.S. Fish and Wildlife Service (“USFWS”) memorandum dated April 15, 2003, which states that Migratory Bird Treaty Act protects certain protected species nests and all active migratory bird nests (when they have eggs or young). A nest should not be considered active and constraints should not be imposed unless it contains eggs or young. Accordingly, PacifiCorp requests that the definition of active nest be revised in the Final PEIS to be consistent with the USFWS memorandum and specific survey criteria should not be included in the PEIS.

50449-016

8. Volume I Chapter 3 Mitigation recommendations Page 3-230: One of the recommendations in this section suggests that “The transmission lines should be designed and constructed in conformance with the *Avian Protection Plan Guidelines* (APLIC and USFWS 2005).” The APP Guidelines do not contain specific line design criteria and are intended to be used in conjunction with *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (Edison Electric Institute, APLIC and the California Energy Commission 2006). Accordingly, PacifiCorp requests that the Final PEIS include the correct cited document and eliminate references to the APP Guidelines..

50449-017

9. Volume I Chapter 3 Mitigation recommendations Page 3-232: One of the recommendations suggests that “Aircraft flight paths (e.g., for corridor inspections) should respect...seasonal buffer zones. Where intrusions within these zones occur...maintain a minimum elevation of 1,000 feet and speed of 30 mph.” The North American Electric Reliability Corporation requires a maintenance and operating plan. For PacifiCorp, this plan includes bi-annual aerial inspections to maintain a safe and reliable system. This PEIS recommendation is not feasible as it would not allow the required seasonal aerial line inspections to be conducted. Accordingly, PacifiCorp requests that this recommendation be removed in the Final PEIS and that issues pertaining to specific biological issues be addressed in any project-specific EA/EIS as required in the NEPA process.

50449-018

Additionally, in emergency situations, it is critical to maintain access to the system by a variety of methods to identify, isolate and repair problems. PacifiCorp respectfully requests that the Final PEIS include language in this section clarifying that under emergency situations this requirement is not applicable. Additionally, PacifiCorp requests that the Final PEIS include the definition of an Electrical Emergency Condition. As defined in PacifiCorp’s rights-of-way grants with the BLM, an “Electrical Emergency Condition” is a condition or situation that is

50449-019

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imminently likely to endanger life or property or that is imminently likely to cause a material adverse effect on the security of, or damage to, PacifiCorp's electrical system. The Final PEIS should make it clear that utilities with infrastructure in a right-of-way have the right of access to the corridors via mechanized vehicles for routine operation and maintenance, emergency situations (power outages) and for conducting line patrols. Utility employees need to be able to conduct emergency work anywhere it is necessary.

50449-019
 (cont.)

10. Volume 1 Chapter 4 Table 4-1-1 Page 4-3, 4-4: The section of the table in this section that lists Oil/Gas and Renewable Energy types of actions fails to mention transmission or distribution electric lines in the associated activities/facilities column. Accordingly, PacifiCorp requests that the Final PEIS correct this omission.

50449-020

11. Corridor Routes (Volumes II and III): Multiple corridors and routes are represented throughout the eleven Western states, with varying use criteria. Some of these routes incorporate PacifiCorp's existing and/or prospective transmission lines and facilities, while other routes do not. It is also important to note that some future routes will undoubtedly require consideration of where loads, resources and facilities are either located or needed, and these will not necessarily coincide with pre-designated corridors. While PacifiCorp supports in concept the intent of providing joint agency support for corridor planning, we request that the Final PEIS give proper recognition that future and proposed company needs will presumably require independent evaluation of routing needs separate from the pre-designated corridor alignments. An appropriate level of environmental evaluation would accompany such choices and any related alternatives.

50449-021

12. Use and Occupancy of Energy Corridors; Consolidation, Section 2.4.2, Page 2-28: The narrative in this section includes a comment that corridors are to be efficiently used. It also suggests that each applicant, in cooperation with the relevant agency, should consolidate proposed infrastructure. This would include limiting the number of access roads including their length and width, wherever possible, using existing roads where feasible and minimizing construction support areas and borrow areas. Additionally, under the Proposed Action as presented in Chapter 2, "Section 368 energy corridors would be designated within federal lands in the 11 western states as identified by environmental, engineering, and land use screening criteria to reduce potential environmental and land use conflicts."

50449-022

PacifiCorp understands the intent and merit of this objective. Although this statement addresses screening measures, onsite physical and reliability parameters must also be taken into consideration, as well as energy compatibility issues. PacifiCorp would apply its planning and design criteria, in conjunction with constructability measures, to facilitate constructing a given transmission facility or project. However, PacifiCorp's design may include relevant environmental, safety clearances and security, right-of-way requirements and other necessary measures that may not always support consolidation of resources within a given corridor. Spatial separation of transmission lines per industry reliability standards may not necessarily coincide with "efficient use," especially where joint occupancy of a corridor is proposed. Accordingly,

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PacifiCorp requests that the Final PEIS acknowledge that overall benefits versus potential liabilities of consolidation within energy corridors must be evaluated on a case-by-case basis.

50449-022
 (cont.)

13. Use and Occupancy of Energy Corridors; Standards, Section 2.4.2, Page 2-28: Plan amendments for the Proposed Action would involve adoption of interagency operating procedures ("IOPs"), to be selected on a corridor- and project-specific basis as described in Section 2.3. IOPs are subsequently identified as findings and standards for project planning and conditions with which all project applications must comply. PacifiCorp is concerned about having to meet all IOP conditions within regional land management plans. While PacifiCorp recognizes that such plans are necessary to ensure conformity and a unified set of standards for issues including land use and preservation of sensitive features, its experience has been that in some instances such documents (including resource management plans) do not always adequately address utility concerns, or coincide with its objectives or project requirements. Such concerns may include providing necessary access to transmission facilities, generalized descriptions of resource features or sensitive area needs and corridor-related routing options.

50449-023

Accordingly, PacifiCorp requests that the Final PEIS give due consideration to reasonable exceptions to land use documents when a conditional departure, administrative variance or exception can be supported and justified. We would encourage that the Record of Decision amend respective land use plans where energy corridors have been omitted. This modification would permit PacifiCorp to meet its specific site- or route-related objectives and concurrently allow BLM to still comply with its land management responsibilities. It would also avoid project applications being initially rejected on the basis of non-conformance in instances when a minor adjustment or exception can be readily agreed upon.

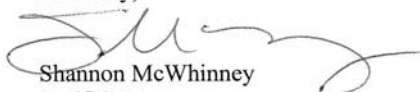
Conclusion

PacifiCorp sincerely appreciates the opportunity to further participate in this process. If you have any questions on these comments, or would like additional information, please feel free to contact:

Brian Fritz
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 503-813-7237

Terry Ray
terry.ray@pacificorp.com
 801-220-4115

Sincerely,



Shannon McWhinney
 PacifiCorp
 Office of the General Counsel