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**SOUTHERN UTAH WILDERNESS ALLIANCE**

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**FAX COVER SHEET**

**TO:** Office of Electricity and Energy Reliability  
Energy Corridor PEIS

**FROM:** Stephen Bloch

**TOTAL PAGES (including cover page):** 10

**COMMENTS:**

*SUWA comments re. Draft map PEIS*

**IMPORTANT**

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utah  
wilderness  
alliance

VIA FAX (202-586-7031) FIRST CLASS MAIL

July 10, 2006

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

Re: Southern Utah Wilderness Alliance Scoping Comments  
Preliminary Draft Utah Energy Corridor Map  
PEIS – Designation of Energy Corridors on Federal Lands in the 11  
Western States<sup>1</sup>

Greetings:

The Southern Utah Wilderness Alliance (SUWA) appreciates the opportunity to submit the following comments on the Programmatic Environmental Impact Statement – Designation of Energy Corridors on Federal Lands in the 11 Western States (referred to herein as the “Energy Corridor PEIS” or “the PEIS”) Preliminary Draft Utah Energy Corridor Map (referred to herein as the “PEIS Draft Utah Map”). We submit these comments on our own behalf as well as on behalf of our 15,000 members. SUWA members regularly use and enjoy Utah’s spectacular public lands, and are intensely interested in highly controversial public lands issues such as the PEIS.

These scoping comments are necessarily broad in scope because the Agencies have provided the public with only a broad – and in some instances, misleading – map of potential energy corridors in Utah. Indeed, the scale of this map and its general lack of specificity makes it virtually impossible for SUWA to provide the Agencies with detailed comments regarding the potential impacts to natural resources and historic properties from the designation of various energy corridors. We strongly encourage the Agencies to provide more detailed, state specific maps before the draft PEIS is released.

We raise the following points for your review:

<sup>1</sup> SUWA incorporates by reference the comments submitted that it submitted on November 28, 2005, as well as the comments submitted by The Wilderness Society on July 10, 2006 and November 23, 2005.

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*SUWA Scoping Comments  
Energy Corridor PEIS -- Preliminary Draft Utah Map  
July 10, 2006*

**I. The Draft Utah Map is Misleading and Does Not Accurately Reflect Proposals that the Agencies Have Solicited from Industry**

SUWA has obtained the minutes of a meeting held on May 18, 2006 between industry representatives and BLM, Forest Service, and Park Service representatives regarding the designation of energy corridors near Moab, Utah, as well as a map entitled "proposed Alternative Utility Corridors." See Utility Corridor Meeting, BLM Moab Field Office (May 18, 2006) (attached hereto as Exhibit 1); Proposed Alternative Utility Corridors (Map - undated) (attached hereto as Exhibit 2). Read together, it is clear that after the public scoping period closed, the Agencies solicited input from industry regarding potential locations for additional utility corridors on sensitive public lands near Moab and prepared a map to reflect that input. These meeting minutes and "proposed Alternative Utility Corridors" map have never been made public. Quite to the contrary, the Agencies have sought comment on the PEIS Draft Utah Map, even though it apparently does not represent the Agencies' current thinking.

This information raises serious questions about the integrity of the NEPA process and the Agencies' attempt to quell public concern about the location of energy corridors on some of Utah's most spectacular public lands by seeking public comment on a fraudulent, inaccurate map. Indeed, the "Proposed Alternative Utility Corridors" map depicts a mile wide energy corridor in the heart of Utah's redrock country and through several areas identified by BLM as having wilderness character (Goldbar wilderness inventory area; Hunter Canyon wilderness inventory area; and, Hatch Canyon wilderness inventory area), as well as areas proposed by the Utah Wilderness Coalition for Wilderness designation. In addition, this proposed corridor - which in some places would be buried in "slickrock" sandstone - runs along the Kane Creek riparian corridor (a sensitive perennial stream), and through the popular "Poison Spider/The Portal" multiple use trails. In short, SUWA strongly opposes the "proposed alternative" energy corridor depicted in Exhibit 2 and urges the Agencies to adopt a proposed alternative in the draft PEIS that restricts energy corridors in the area to the Moab valley.

The Agencies must explain whether the Proposed Alternative Utility Corridors map was their "proposed alternative" when they solicited public comment on the PEIS Draft Utah Map, and if so, what the rationale was that decision. The Agencies should also be forthcoming about whether other meetings have been held between industry representatives and the Agencies regarding energy corridors in other parts of Utah. If so, have additional maps been prepared that reflect more current thinking about the potential location of energy corridors? The Agencies should release this information to the public and seek additional public input before the release of the draft PEIS.

*SUWA Scoping Comments*  
*Energy Corridor PEIS – Preliminary Draft Utah Map*  
*July 10, 2006*

## **II. The PEIS Draft Utah Map Lacks Critical Information**

The PEIS Draft Utah Map does not include several critical data layers that are essential for thoughtful public review and input on the proposed designation of energy corridors in Utah. Specifically, the Map does not show any of the following congressional or administrative designations – but must do so to solicit relevant public feedback:

- designated Wilderness areas (Forest Service and BLM)
- the Grand Staircase-Escalante National Monument (BLM)
- wilderness study areas (BLM)
- wilderness inventory areas (BLM)
- areas with a “reasonable probability” of wilderness character (BLM)
- areas of critical environmental concern (BLM)
- eligible stretches of wild and scenic rivers (BLM, Forest Service, NPS)
- National Historic Districts (BLM, Forest Service, NPS)
- designated critical habitat (BLM, Forest Service, NPS, FWS)
- roadless areas (Forest Service)
- research natural areas (Forest Service)

In addition, the Map should depict areas proposed by the Utah Wilderness Coalition (UWC) for Wilderness designation in America’s Redrock Wilderness Act (H.R. /S.). BLM’s Utah State Office has a current and updated copy of the data layers for the UWC proposal; a copy can also be obtained from Jim Catlin at the Wild Utah Project (801/328-3550; [wup@xmission.com](mailto:wup@xmission.com)). The map should also include the following relevant information:

- big game habitat (BLM, Forest Service, NPS, FWS)<sup>2</sup>
- candidate and sensitive species habitat (BLM, Forest Service, NPS, FWS)
- proposed areas of critical environmental concern; proposed eligible stretches of wild and scenic rivers (BLM and Forest Service -- prepared as part of agency land use planning)

It is absolutely critical that the above-detailed information be provided in whatever future draft maps the Agencies make available for public review and comment.

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<sup>2</sup> The state of Utah’s Division of Wildlife Resources has this information available in digital format and has provided it to the BLM and Forest Service. See <http://www.wildlife.utah.gov/>.

*SUWA Scoping Comments  
Energy Corridor PEIS - Preliminary Draft Utah Map  
July 10, 2006*

### III. Designated Energy Corridors Must Avoid Sensitive Public Lands

Whenever it is technically feasible to do so, the Agencies' preferred alternative must avoid designating energy corridors in "sensitive" public lands. This would include, but not be limited to, the categories identified above (i.e., designated Wilderness, wilderness study areas, wilderness inventory areas, areas of critical environmental concern, etc.). If the Agencies determine that energy corridors must be sited in sensitive lands, a full explanation for that decision must be provided in the draft PEIS, including a discussion regarding how the Agencies have independently verified and confirmed industry claims that more environmentally sensible corridor siting is not technically feasible.

Thank you for your time and consideration in reviewing these comments. I request that Southern Utah Wilderness Alliance be placed on your mailing list to receive a print copy of the draft programmatic environmental impact statement, as well as print copies of all other notification regarding this proposed action. Please send these items to my attention at the following address: Southern Utah Wilderness Alliance, 425 East 100 South, Salt Lake City, Utah 84111. Feel free to contact me with any questions: (801) 486-3161 x. 3981.

Sincerely,



Stephen Bloch  
Staff Attorney

# EXHIBIT 1

Utility Corridor Meeting  
BLM Moab Field Office  
May 18, 2006

Objectives of the Meeting

1. Determine from industry representatives if there are known needs for utility facilities through the Moab Field Office for the next 20 years (planning period of the Resource Management Plan revision).
2. Examine existing utility corridors and identify needs for additional corridor designation through the planning process.

Attendance

Mary von Koch, BLM, Moab Field Office  
Mike DeKeyrel, BLM, Utah State Office  
Joel Nowak, Forest Service, Moab  
Lee Nielson, Utah Power, Richfield  
Kirt Rhoads, PacifiCorp, Salt Lake City  
Scott Patterson, Northwest Pipeline, SLC  
Laura Joss, Arches National Park, Moab  
Todd A. Pfister, Enterprise MAPCO  
B. Todd Stubbs, Williams/NWP, Moab

Brent Northrup, BLM, Moab Field Office  
Maggie Wyatt, BLM, Moab Field Office  
Daryl Trotter, BLM, Moab Field Office  
Katie Stevens, BLM, Moab Field Office  
Dave Wood, Park Service, Moab  
Jeff Alexander, Forest Service S.O.  
Maxine Deeter, BLM, Monticello Field Office  
Gregg Tibbetts, Williams/NWP, Moab  
Doug Wight, BLM, Moab Field Office

Discussion of Future Needs and Constraints

**Arches National Park:** The 26" NWP Ignacio-Sumas pipeline, constructed in 1955, crosses Arches National Park. The company has the right to continue maintenance on the 50-year-old pipeline. Looping the pipeline within the park boundary is not an option for the future.

**Williams:** The company has need for placement of an additional 26" to 30" pipeline moving gas north and south through the Moab area. They have room to loop the pipeline in Moab Canyon within their right-of-way. The offset from the existing pipeline would be 15 feet. A route outside Moab Canyon would be desirable.

**Enterprise:** The product in their pipeline system is liquid hydrocarbons moving in a north-south direction. To move the product, it has to be pumped on uphill grades and pressurized to constrain the flow on downhill sections. Therefore, a corridor in terrain with steep climbs and drops does not meet their future needs. Currently, there is room within their right-of-way in Moab Canyon to place an additional pipeline. Increased product is coming online from Meeker which will result in increased need for facilities in the Moab planning area.

**PacifiCorp:** Within the planning period, it is likely that a 500 kV powerline needs to be constructed through the Moab area. It is possible that the existing 69 kV powerline can be upgraded to 500 kV. The new line would be on single-pole pre-oxidized steel poles, taller than those currently in Moab Canyon. The company prefers a separation of at least one mile between powerlines. An alternative corridor would be beneficial for reliability.

**Forest Service:** A corridor running from SR-46 (the highway to La Sal) to Interstate Highway 70 could not be designated within the Forest Service's avoidance area that includes the Manti-La Sal peaks. There is little infrastructure between the forest and the Utah/Colorado boundary. Any facilities constructed in this area would be difficult to maintain. The industry representatives did not look at this possibility during the meeting, but may submit a route by the June 16<sup>th</sup> deadline (see future actions below).

Evaluation of Alternative Corridor Routes

1. Mesa above Moab Canyon's west side:

This 5-mile alternative to Moab Canyon is being considered in the commodity and balanced alternatives of the Moab Resource Management Plan (RMP) revision. It is located within the most restrictive class for visual resource management outside of Wilderness Study Areas (VRM Class II), therefore, this route would be considered for buried utilities only. The industry representatives considered the route viable for gas and liquid hydrocarbon pipelines if a better route is identified at the southeast end with a more gradual down slope in an area that does not cross the railroad track.

2. Alternative route identified for the Western Energy Corridor System:

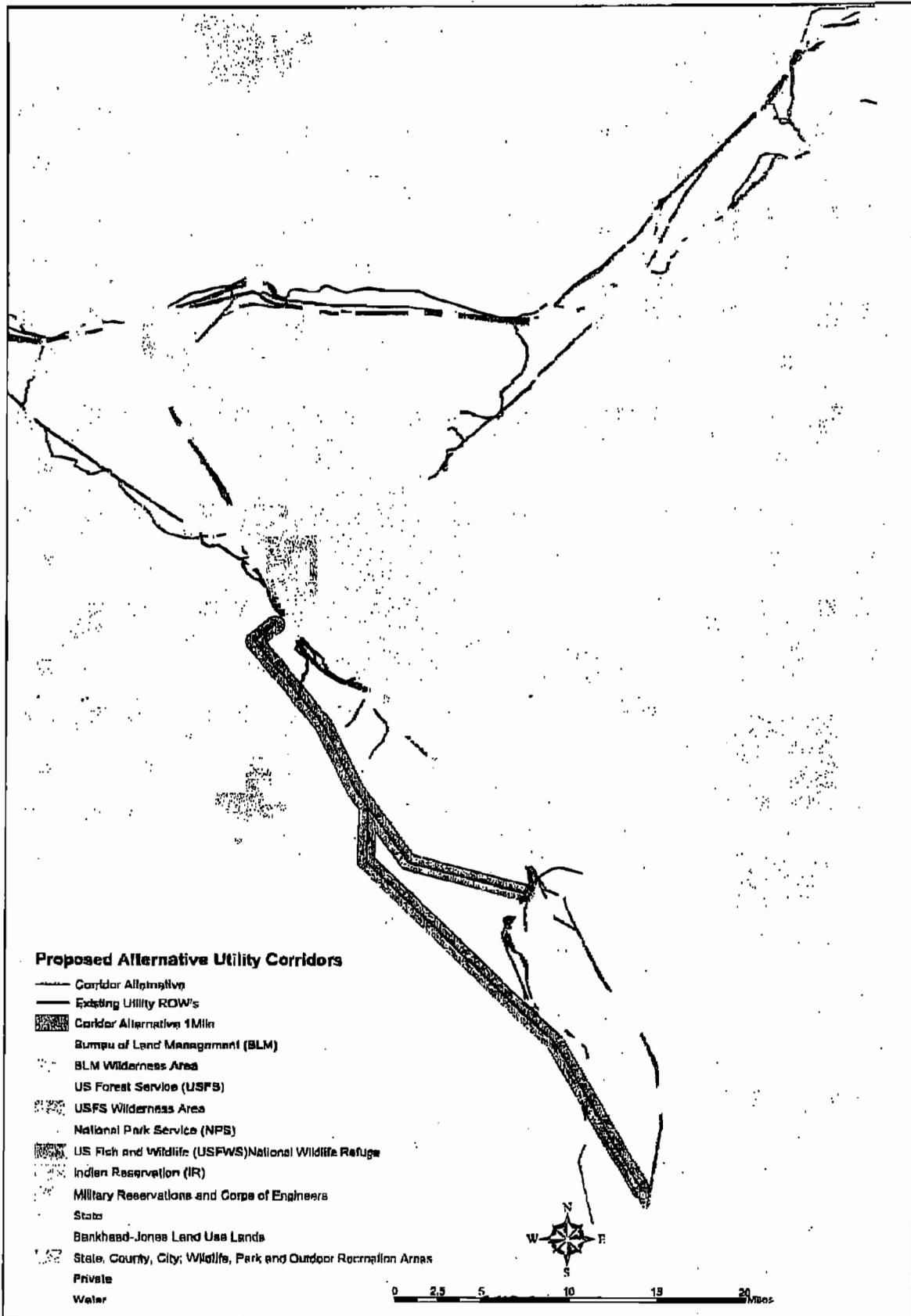
The straight-line route currently being considered for the EIS was modified, with two variations, to avoid Dead Horse Point State Park and the private and state land used by Intrepid for the Moab Salt potash mining operation. The corridor would be 1 mile wide to allow flexibility in utility placement. A single structure could span the Colorado River, from rim to rim, to support all utilities.

The alternative route would be 23 miles long leaving the existing corridor in the area of SR-313 and rejoining the corridor south of Behind the Rocks, and approximately 27 miles long rejoining the corridor west of La Sal Junction.

Future Actions

People attending the meeting will provide written comments and/or map revisions after returning to their offices. The deadline is June 16, 2006 to incorporate the information in the RMP revision. BLM's comments on the Programmatic Energy Corridor EIS proposed corridors are due to Scott Powers and Argonne National Labs by May 26th.

# EXHIBIT 2





**FAX TRANSMITTAL**  
**Office of NEPA Policy and Compliance**  
**US Department of Energy**  
**Phone 202-586-4600**  
**FAX 202-586-7031**

**TO:** *To Whom It May Concern*  
**FAX:** *6-1472*

**FROM:** *Lettie Stormley*  
**DATE:** *7/11/06*

**Number of pages, including cover:** *11*

**MESSAGE:**

*This fax came to our office by mistake. I called Mr. Bloch and asked what the correct fax number he needed this sent to.*

*I welcome a call on 6-4610 to confirm your receipt of this material.*