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Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585
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RE: Designation of Energy Corridors on Federal Lands in 11 Western States, Comment on the Preliminary Draft Energy Corridor Map

Dear Julia:

On behalf of the Western Business Roundtable, I am writing to applaud the efforts thus far of the Department of Energy, the Department of Interior's Bureau of Land Management, the USDA Forest Service, and the Department of Defense ("the Agencies") to designate preliminary Western energy corridors. This preliminary draft map takes us one step closer to designating energy corridors on federal lands in the Western States for electricity transmission and distribution facilities and for gas and hydrogen pipelines, as directed by Section 368 of the Energy Policy Act of 2005 ("EPAct 05").

The Agencies' efforts to move forward to implement Section 368 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, including wind, hydropower, solar power and clean coal and natural gas.

We understand that comments received in response to the preliminary draft map of potential energy corridors will be reviewed and considered in the preparation of the Programmatic Environmental Impact Statement (PEIS) under the National Environmental Policy Act of 1969 (NEPA). Based on the information and analyses developed in the PEIS, the Agencies will amend its respective land use plans by designating a series of energy corridors.

As the process continues, we encourage the Agencies to focus on an outcome that helps achieve the goal of domestic energy self-sufficiency that Congress envisioned with passage of EPAct 05. Our recommendations, which follow, first address the preliminary draft maps, and second, address the PEIS in general. We believe that these recommendations, if implemented, can assist in achieving this goal.

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

ROUNDTABLE RECOMMENDATIONS – PRELIMINARY MAPS**1. Provide detailed maps.**

We recognize that providing maps with specific details, including global positioning coordinates, is a significant task. However, it is essential to ensure that the feedback provided by the public and other interested stakeholders is meaningful. Using existing technology, the Agencies can provide detailed and comprehensive maps so that stakeholders can assess the adequacy of the corridors in meeting the American West's energy needs.

2. Use technical and engineering requirements in providing corridor specifications.

Corridor specifications should be based on technical and engineering requirements and vegetation management needs. Specifications should provide for the following:

- Existing corridors should be considered for expansion (i.e. width expansion to accommodate 69kV and above electricity transmission lines). This will allow for the expansion or upgrading of facilities to improve reliability and expand system capacity;
- In expanding the use of existing corridors, the specifications need to address areas of existing corridors that are constricted. Equitable policies should be put in place for current rights-of-way holders and new users; and
- Corridors should be large enough 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.

ROUNDTABLE RECOMMENDATIONS – PEIS**1. Create sound and efficient siting procedures.**

Establishment of sound and efficient procedures for the siting of energy facilities within designated corridors is vital. To that end, effective federal corridor siting procedures should:

- Eliminate duplicate environmental analyses;
- Allow FLMs to approve some segments of a linear project that fall within bounds and limits of the PEIS without additional field surveys;
- Include a rebuttable presumption that compatible facilities seeking to be sited within a designated corridor qualify as a categorical exclusion from NEPA;

- Provide for a streamlined consultation process where threatened or endangered species are implicated and limit any necessary review to specific known habitat and immediate surrounding areas, rather than broad, expanded areas;
- Assure that each energy sector receives equitable consideration in the siting process; and
- Ensure that the permit terms for infrastructure align with the useful life of that infrastructure.

2. Protect corridors when public land ownership is transferred.

Land disposal or swaps that would allow land subject to corridor designations to be transferred to private ownership can create obstacles for the use of such corridors. Such transfers should generally be considered an incompatible use. If allowed, stipulations should be required to assure that: the land is used as a corridor; adequate authority is granted to maintain and operate that corridor; and increased rental fees are prevented.

Along with protecting these corridors from land transfers, provisions need to be included to meet the needs of private landowners who may be in the energy corridor, without disrupting the creation and use of the corridor.

3. Provide for the designation of additional corridors.

Designated energy corridors under this PEIS should not be considered the exclusive energy corridors to be sited on federal lands in the West. It is impossible to successfully anticipate, today, the energy infrastructure needs of the Western region 15 to 20 years down the road. Thus, it is critical that part of the scoping exercise 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.

4. Remember: corridor designations are not a panacea for the siting of all energy infrastructure.

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 infrastructure development outside designated corridors. This process should not forestall energy infrastructure developers from seeking permits elsewhere on federal lands, so long as any environmental impacts can be properly mitigated.

5. Establish methods for revising or updating corridor lists or studies

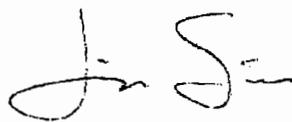
Because of the long-term aspects of energy corridor designations, it would be advisable to have in place a review process that could update the list of corridors, or revise the initial studies underlying the designations, in order to take into account changed circumstances or new developments.

About The Roundtable

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, financial services, internet technologies, manufacturing, mining, oil and gas, pharmaceuticals, pipelines, telecommunications, and 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.

On behalf of the member companies of the Roundtable, I urge your support for these recommendations as part of the draft PEIS. If our members can be of further assistance in your scoping process, we would welcome the opportunity to do so.

Sincerely,



James T. Sims
Executive Director

cc: Vice President Dick Cheney
Department of Energy Secretary Bodman
Deputy Secretary of Energy Garman
Kevin Kolevar, Department of Energy
House Resources Committee Chair Richard Pombo
House Resources Committee Members
Senate Energy Committee Members
Western Governors