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National Park Service  
U.S. Department of the Interior

Pacific West Regional  
Office

1111 Jackson Street  
Suite 700  
Oakland, CA 94607

510-817-1302 phone  
510-817-1485 fax

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## PACIFIC WEST REGIONAL OFFICE FAX

Date: 7/7/06

To: Ms. Julia Souder

Fax Number: (202) 586-1472

From: Ceci Alonzo

Pages to follow: 3 pages

Comments:

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# United States Department of the Interior

## NATIONAL PARK SERVICE

Pacific West Region  
1111 Jackson Street, Suite 700  
Oakland, California 94607-4807



IN REPLY REFER TO:

D50 (PWR-FM)

JUL 08 2006

Ms. Julia Souder  
U.S. Department of Energy  
Room 8H-033  
Office of Electricity, Delivery, and Energy Reliability  
1000 Independence Avenue, SW  
Washington, DC 20585  
Fax: (202) 586-1472

Re: Comments on the West-wide Energy Corridor PEIS Preliminary Draft Map of Potential Energy Corridors on Federal Lands

Dear Ms. Souder:

The Pacific West Region (PWR) of the National Park Service (NPS) submits the following comments on the West-wide Energy Corridor PEIS Preliminary Draft Map of Potential Energy Corridors on Federal Lands (Map) prepared by the Office of Electricity Delivery and Energy Reliability, Department of Energy (DOE) and the Bureau of Land Management (BLM), Department of the Interior (DOI). These comments are designed to supplement earlier comments PWR sent in December 2005 in regards to the Notice of Intent to prepare the PEIS for the project. We appreciate the opportunity to comment at this early stage of project development.

The NPS is participating in the planning process because NPS units in the PWR may be impacted by the project. The PWR encompasses all NPS units in California, Idaho, Nevada, Oregon, and Washington and a few NPS units in Arizona and Montana.

### Specific Comments

The Map indicates that the following PWR units may be impacted by the project:

Craters of the Moon NM (ID)	Lake Roosevelt NRA (WA)
Hagerman Fossil Beds NM (ID)	Lassen Volcanic NP (CA)
Joshua Tree NP (CA)	Minidoka Internment NM (ID)
Lake Mead NRA (NV/AZ)	Mojave National Preserve (CA)

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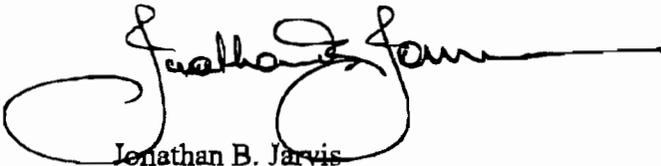
- The PWR again requests that new energy corridors be located outside of National Park sites. Utility corridors are not compatible with the protected status of NPS sites. Congress, the President, and the American People have designated these sites as NPS units in order to preserve and protect them in an unimpaired condition, and it is imperative that the resources found within the parks not be sacrificed for utility development.
- NPS has limited authority to issue NPS right-of-way permits to allow the location of utilities on NPS lands. NPS has no authority to allow oil, gas, or other petroleum product pipelines through the parks. With respect to electrical transmission and distribution facilities, applicable law and policy provides that electrical transmission and distribution rights-of-way shall not exceed 100 feet in width. Utility corridors, as shown on the map and described in the literature, would likely exceed these limits. NPS is also under obligation not to allow any uses of NPS lands that would impair or be a derogation of the values and purposes for which park units were authorized and NPS would consider this obligation in any request to locate a new utility line within a park unit.
- Protection of resources in and around the parks is paramount. PWR would require new utilities utilize existing infrastructure or seek non-wire alternatives along existing corridors to the greatest extent feasible and require mitigation to reduce or eliminate environmental impacts, including possible removal of outdated equipment. For a detailed discussion of potential resource impacts please refer to PWR scoping comments submitted in December 2005.
- The Map clearly shows a corridor through Lake Mead National Recreation Area along an existing utility corridor. Preliminary analysis indicates that this existing corridor is at capacity, such that new infrastructure would overburden the area. In the event that the corridor is at capacity, the PWR requests that this particular proposed project utilize a corridor outside of the park boundary.
- The Map does not identify Wild and Scenic Rivers, National Natural Landmarks, or places of cultural significance, including National Historic Landmarks. These resources should be added as the maps become more detailed and avoided as necessary.
- The Map does not identify areas preserved through the Land and Water Fund (LWCF) program. Property acquired or developed with LWCF assistance (LWCF lands), including state and local parks, may not be wholly or partially converted to uses other than public outdoor recreation without the prior, written approval of the NPS Regional Director. Conversion decisions trigger National Environmental Policy Act (NEPA) compliance obligations, which are carried out by the party seeking the conversion, subject to NPS review and approval. Converted lands must be replaced with lands that meet the requirements of the LWCF Act and its implementing regulations and policies.

Mapping LWCF lands will need to be completed to determine if specific proposed projects fall on LWCF lands. Identifying these areas early in the process will assist in determining whether proposed projects may trigger a conversion process. The PWR requests that the project proponents begin identifying these areas and developing a GIS layer in conjunction with further definition of the energy corridors.

- As the maps are further developed, NPS will provide additional information on the resources and visitor experiences that may be impacted by the project.

Thank you for consideration of these comments. Please direct questions to David Reynolds, on our staff at (510) 817-1425.

Sincerely,



Jonathan B. Jarvis

Regional Director, Pacific West Region

cc: Mike Snyder, Regional Director, Intermountain Region  
Field Solicitor, SF Field Office  
Deputy Regional Solicitor (Bill Back), Pacific Northwest Regional Office