

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 3:46 PM
To: Corridor EIS Archives
Subject: Preliminary Draft Corridor Map Comment M0104

Attachments: SMWC.EnergyCorridorTestimony-DWillis-final6-27-06_M0104.doc



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dorTestimony-D...

Thank you for your comment, Dave Willis.

The comment tracking number that has been assigned to your comment is M0104. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 03:45:44PM CDT

Preliminary Draft Corridor Map Comment: M0104

First Name: Dave
Last Name: Willis
Organization: Soda Mountain Wilderness Council
Address: P.O. Box 512
City: Ashland
State: OR
Zip: 97520
Country: USA
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\My Documents\SMWC.EnergyCorridorTestimony-DWillis-final6-27-06.doc

Comment Submitted:

On June 27, 2006 I submitted comments, on behalf of Sierra Treks, to the Joint House Subcommittees on Water and Power, and Forests and Forest Health re: proposed Western Energy Corridors. I am also submitting those same June 27 comments now on behalf of the Soda Mountain Wilderness Council, P.O. Box 512, Ashland, OR 97520. If there is a problem with the attachment, or even if there is not, please consider my June 27 Sierra Treks subcommittee/s hearing comments as also submitted by the Soda Mountain Wilderness Council into this July 10 deadline comment process.

Dave Willis, Coordinator
Soda Mountain Wilderness Council
sodamtn@mind.net

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

“...to reemphasize: The Soda Mountain area is more than just botanically interesting; it is an important link for migration, dispersion, and the process of evolution in the Northwest.”

Dr. Tom Atzet, U.S. Forest Service
Southwest Oregon Area Ecologist
March 22, 1994

“The Soda Mountain Area near Medford, Oregon.... This decision recognizes the special biological qualities of this unique area and directs the BLM to evaluate carefully the values of the Soda Mountain area as a biological connectivity corridor and propose any additional management protection necessary, including a special designation...to protect those values.”

Record of Decision: “Northwest Forest Plan”
April 1994, page 30

“Manage...near Soda Mountain and Agate Flat areas as the Cascade/Siskiyou Ecological Emphasis Area.... Management will consider four varied plant communities, two RNAs, two ACECs, special status plant and animal populations, crucial deer range for an interstate herd, and the outstanding recreation and scenic values.”

Record of Decision and Resource Management Plan
USDI, BLM, Medford District, June 1995
Page 56 (“Special Areas”)

With towering fir forests, sunlit oak groves, wildflower-strewn meadows, and steep canyons, the Cascade-Siskiyou National Monument is an ecological wonder, with biological diversity unmatched in the Cascade Range. This rich enclave of natural resources is a biological crossroads – the interface of the Cascade, Klamath, and Siskiyou ecoregions, in an area of unique geology, biology, climate, and topography....The monument is home to a spectacular variety of rare and beautiful species of plants and animals, whose survival in this region depends upon its continued ecological integrity.”

First words of the June 9, 2000 Proclamation establishing the
Cascade-Siskiyou National Monument (www.or.blm.gov/CSNM)

My name is Dave Willis. For over thirty years, I’ve tried to run a program called Sierra Treks. We offer backpacking and climbing trips for church and school groups in Pacific states wild areas. We help our students understand the obvious, but too often forgotten, truth that while Congress can protect wild areas, Congress does not create them. And, with our students, we mourn the historically unprecedented, relentless loss of de facto wild areas our world suffers each day.

I live in SW Oregon where I also try to coordinate a local conservation group called the Soda Mountain Wilderness Council. We worked hard for the designation of Oregon’s newest National Monument, the Cascade-Siskiyou – a not-completely wild area now legally slated for, and desperately in need of, more than merely de facto protection. For over twenty-five years, I’ve made my home right next to BLM land that is now BLM Monument land. (The neighborhood is improving.)

Thank you, Chairman Radonovich and Chairman Walden, for allowing me to address the Programmatic EIS being prepared per section 368 of the Energy Policy Act of 2005, which currently puts a 3,500 foot wide – two-thirds of a mile wide – energy corridor right through the middle of the Cascade-Siskiyou National Monument.

As the people's representatives, Congress has an unenviable task and heavy burden. Discerning between America's energy needs and wants is challenging. The on-the-ground evidence is that incremental policy drift defines every energy want as a demand that must be met. This is a dangerous, though historic, megatrend – not only dangerous globally (in many painful ways), but also dangerous locally for many precious wildlands and human communities.

I appreciate the “Note” on the June 2006 “Potential Energy Corridors” website map (<http://corridoreis.anl.gov/eis.pdmap/index.cfm>) that says, “The majority of the preliminary energy corridors utilize existing corridors and/or rights-of-way....” However, in the Cascade-Siskiyou National Monument, trying to fit a new 3,500 foot, two-thirds of a mile, wide corridor into an existing powerline swath of a few hundred feet or less is like trying to get a python to swallow a brontosaurus. And the Interstate-5 corridor, the nearest likely alternative to the west, is *already* a serious ecological barrier to the primary connectivity reason the Cascade-Siskiyou Monument was designated.

The Klamath-Siskiyou eco-region of SW Oregon and NW California is the most botanically diverse coniferous forest in North America, if not the world -- a veritable Noah's Ark of botanical diversity. Its relatively undeveloped, relatively high elevation connecting land bridge to the Cascades and Great Basin genetically connects the Klamath-Siskiyou with the rest of the West. The Cascade-Siskiyou Monument area is the ecological loading dock for the botanically diverse Klamath-Siskiyou ark – that's the scientific reason it was protected as a National Monument. And that's why the Monument Proclamation calls the area “an ecological wonder” and “a biological crossroads.”

Though 23,000 acres of the 53,000 acre Monument are wild enough for Wilderness designation, much of the Monument's remaining 30,000 acres are not pristine. But the Monument wasn't protected for its “pristinity.” It was protected for its important biological connectivity function – as a genetic “loading dock.”

Two conjoining “small” powerline corridors – 100 and 200 feet wide -- already fragment the Monument. (Their days may be legally numbered). And Interstate-5 on Siskiyou Pass to the west, plus private logging and past public logging, as well as so-called development throughout, further fragment the area.

The Monument was designated – more than “in spite of” – but *because* of so much pre-existing fragmentation and the very real danger of more. *Because* of the important ecological connectivity values of the area, and *because* of both public and private impacts, as many acres of public land here possible needed (and still need) the best protection possible. The Cascade-Siskiyou connection has been an unraveling, ecological thread. Public lands are the area's best anchors for protection. We need to be repairing the thread here and turning it into a rope that becomes a biologically resilient ecological connectivity cable.

Through financial incentives, ranchers are collaborating with conservationists to reduce or eliminate the impacts of livestock grazing here. Timber companies and land trusts are reversing the impacts of industrial logging here. The BLM is about to release a Monument management

plan ostensibly aimed at ecological protection, restoration, and enhancement here. This unique area does *not* need a 3,500 foot wide government-sponsored mega-swath further fragmenting an ecologically strategic landscape just as management for the area is finally and at long last turning toward recovery.

A further irony here would be the social, if not political, impact of a two-thirds of a mile wide energy corridor busting through private lands adjacent to the Monument. The chief argument against the Monument before and after its designation was brought by sincerely mistaken folks who feared the government was really out to take private land and make it public. That was ridiculous – especially in light of Secretary Norton’s first lead Monument staff’s statement to five of us local landowners in June 2001 that, “We don’t even want public land to be public.”

Now the very party that local private property rights advocates cleave to for succor seems about to turn the tables on them. Back in 2001, I told Monument opponents the only talk of eminent domain I was hearing about was in VP Cheney’s Energy Plan. Chairman Walden, do you really want me to be able to tell my neighbors -- these local constituents of yours -- “I told you so”?

The Cascade-Siskiyou National Monument is, no doubt, not the only natural or ecologically important area for which a 3,500 foot wide energy corridor is preliminarily proposed. Energy corridors do not belong in National Monuments, Wilderness areas, Wilderness Study Areas, roadless areas, threatened and endangered species habitat, core habitat/linkage areas, migration corridors, citizen-proposed wilderness, watersheds, National Parks, or National Wildlife Refuges.

And, beyond the earnest outpouring of my bleeding green heart, there are pragmatic factors prudent planners should consider. Specifically, in the Cascade-Siskiyou National Monument:

- The Proclamation says these 53,000 acres “are hereby set apart and reserved...*for the purpose of protecting* the objects” identified in the Proclamation’s pre-amble. (A list of those “objects” pretty much covers every native plant, animal, and feature you’ll find there.) With regard to utilities, despite an admirable statement of protection purpose, BLM’s proposed Monument management plan seems to say, “Monument? What Monument?” That’s what proposing an energy corridor there says, too. Judges will not be so confused as to what does and does not constitute “protection” under the Monument Proclamation.
- The U.S. Fish and Wildlife Service’s map shows proposed energy corridors passing through more than one area of threatened and/or endangered species habitat – including a habitat area in the Cascade-Siskiyou Monument. This particular species, if its habitat area is sufficiently incrementally degraded, could upset an already very precarious Pacific Northwest federal forest planning appletart and bring federal logging in the region to another standstill. The current situation, called “gridlock” by some now, would be regarded then, after the next screeching halt, as a cornucopian “Camelot.”
- Any 3,500 foot corridor that violates a BLM Wilderness Study Area -- as the preliminary corridor through the Cascade-Siskiyou Monument would violate the Monument’s Soda Mountain Wilderness Study Area – violates the non-impairment standard of the Federal Land Policy and Management Act.

But I’m not a lawyer. I’m just an eco-hack, has-been outfitter. I submit that if I *were* a lawyer, my list for prudent planners would be longer. That’s why I’m glad to read on the preliminary map’s “Note” that “All officially designated corridors will be in compliance with applicable laws

and regulations” and that the mapped “corridors are subject to change until they are officially established in August 2007.”

Faith that corridor planners will indeed link applicable laws and regulations with pragmatic planning and political sensitivity, has me hoping that no final corridor will be planned for the Cascade-Siskiyou National Monument or any other natural or ecologically sensitive area. I hope my faith in planner compliance is not misplaced.

Finally, as our elected representatives, I implore you to move us beyond writing off serious energy conservation measures as an optional “personal virtue.” I implore you to not simply regard every energy demand as a commanding, irrefutable need. I implore you to use boldness and creativity – to be the leaders we elected you to be – to give us the inspiration and incentive to *reduce* our energy demand. This is certainly easier said than done. I don’t envy the national responsibility you each campaigned for and – at least temporarily -- have achieved.

We’re all temporary. Behind the energy map is the nagging question of what kind of world we’ll leave when we’re gone – the question of whether our grandchildren will bless or curse us. “Personal virtues,” contrary to the inference of some, are necessary. But, without virtuous *policy*, the special Baldy Creeks, Soda Mountains, Camp Creeks, Skookum Creeks, and Agate Flats of this one lovely, irreplaceable world that we did not create and cannot replace are doomed to be just more banal casualties of mindless, insatiable appetite. Guaranteed: our descendants will curse us for that -- if they have even an inkling of what they’re missing.

The Cascade-Siskiyou Monument’s Proclamation says the area “is home to a spectacular variety of rare and beautiful species of plants and animals whose survival in this region depends upon its continued ecological integrity.” Behind our current unbridled energy consumption, there is more than plant and animal survival at stake. And more than ecological integrity is at stake, as well, in setting energy policy.

Thank you for considering my remarks.

Dave Willis, Coordinator
Sierra Treks
15187 Greensprings Highway
Ashland, OR 97520
541/482-8660
sodamtn@mind.net

Recap of key points and considerations:

When energy needs are real, and after all conservation measures have been seriously implemented through energy policy, designating corridors to transport energy across the nation is a good idea, but it is vital that these corridors are located only in appropriate places, and that their construction and use are also carefully determined. Thoughtful planning is the best way to protect people and the rest of the natural environment.

The Cascade-Siskiyou National Monument is a prime example of a place that a corridor of the substantial width and range of uses contemplated by Section 368 of the Energy Policy Act should not be placed. The risk of damaging the Monument's values is too great and exposing the Monument to such a risk would be inconsistent with the Presidential Proclamation.

- The proposed corridor through the Cascade-Siskiyou National Monument is located in old growth forest, as well as habitat for the Northern spotted owl. Most of the existing corridor is accessed by only a very rough, four-wheel drive track. The proposed 3,500 foot wide corridor appears to follow an existing right-of-way, but the current corridor is only 100 to 200 feet wide and is only for a powerline. Placing a wider corridor in this location would damage the special values of the Monument.
- The broader range of uses that would be authorized for the proposed corridor would also increase the risk of contamination from activities in the corridor and the amount of damage from activities to construct facilities and to access the area. (Introduction of noxious weeds in the Monument's "Diversity Emphasis Area" by the soil disturbance a mammoth corridor require would not increase the type of "diversity" the Monument was established to protect – and directly contradicts stated Monument planning direction.) It is likely that more development would occur based on the location of the new corridor – in fact, that is why these larger corridors are being identified: to increase the opportunities for energy development projects. The impacts of expanded development would place an unacceptable burden on the Monument.

The corridor in the Cascade-Siskiyou National Monument is also instructive for the broader issues that arise in placing the proposed energy corridors on public lands in general.

- **Some places are not suitable for designation of energy corridors under the accelerated process and wide range of uses set out in Section 368 of the Energy Policy Act.** These places include: Wilderness Areas; Wilderness Study Areas (WSAs); National Parks; National Wildlife Refuges; National Monuments; National Conservation Areas; other lands within BLM's National Landscape Conservation System (NLCS), such as Outstanding Natural Areas; National Historic and National Scenic Trails; National Wild, Scenic, and Recreational Rivers, study rivers and segments, and eligible rivers and segments; Areas of Critical Environmental Concern (ACECs); Forest Service Roadless Areas; threatened, endangered and sensitive species habitat, as well as critical cores and linkages for wildlife habitat; citizen-proposed wilderness areas and other lands with wilderness characteristics.
- **Siting corridors along existing highways and/or right-of-ways is a good start, but further inquiry is still necessary before placing large, intensive use corridors.** In this context, it is also important to consider that the corridors will draw additional projects. As a result, where an existing right-of-way is not along a road, is along a narrow or unpaved road, or is along a road through sensitive areas (such as citizen-proposed wilderness), designation of the substantial energy corridors envisioned by the Energy Policy Act may not be appropriate.

- **Where the federal agencies make a reasoned determination that a location is safe and suitable for a large energy corridor, it is still essential to assess necessary limits on the construction and use of corridors.** Responsible management practices can help to diminish the potential impacts on both human health and the natural environment. By mandating these measures in the Programmatic EIS, the federal agencies can best ensure that they are uniformly applied and most effective. For instance:
 - if there is a watershed nearby, then oil and gas pipelines may not be an approved use;
 - if there is valuable scenery or wildlife habitat present, then buried lines may be required to reduce impacts on visual resources or wildlife;
 - if there is fragile vegetation, then only a narrower corridor may be permitted.

The federal agencies have a critical responsibility in designating energy corridors. They should fulfill this responsibility by first ensuring that they consider all relevant information on the values of the public lands. Then, the agencies should avoid certain areas altogether, such as the Cascade-Siskiyou National Monument, and, for those areas where corridors can be responsibly located, apply conditions to minimize the risks of environmental damage.