Corridor EIS Archives

From: Sent: To: Subject: corridoreiswebmaster@anl.gov Monday, July 10, 2006 9:27 PM Corridor EIS Archives Preliminary Draft Corridor Map Comment M0139

Attachments: Energy_Corridor_map_cmmts_(7-10-06)_M0139.pdf



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Thank you for your comment, Kristin Ruether.

The comment tracking number that has been assigned to your comment is M0139. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 09:27:18PM CDT

Preliminary Draft Corridor Map Comment: M0139

First Name: Kristin Last Name: Ruether Organization: Oregon Natural Desert Association Address: 917 SW Oak St. Address 2: Ste. 409 City: Portland State: OR Zip: 97205 Country: USA Email: kruether@onda.org Privacy Preference: Don't withhold name or address from public record Attachment: C:\Documents and Settings\HP_Owner\My Documents\aONDA work\Misc\Energy Corridor map cmmts (7-10-06).pdf

Comment Submitted: Please see attached PDF document.

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.



Oregon Natural Desert Association

VIA WEB

July 10, 2006

Julia Souder U.S. Department of Energy Office of Electricity Delivery and Energy Reliability 1000 Independence Ave. SW Washington, DC 20585 Fax (202) 586-1472

Re: Preparation of Programmatic Environmental Impact Statement entitled "Designation of Energy Corridors on Federal Land in the 11 Western States."

Dear Ms. Souder:

The following comments on the Programmatic Environmental Impact Statement to designate energy corridors on federal land in the 11 western states are submitted on behalf of the Oregon Natural Desert Association ("ONDA"). ONDA is a non-profit public interest organization dedicated to preserving and protecting the public lands of eastern Oregon. ONDA has a long history of interest and involvement in eastern Oregon's public land management. ONDA's mission is to protect, defend, and restore forever the health of Oregon's native deserts. The members and staff of ONDA use and enjoy the public lands, waters, and natural resources within the proposed corridor pathway for recreational, scientific, spiritual, educational, aesthetic, and other purposes. ONDA and its members also participate in information gathering and dissemination, education and public outreach, commenting upon proposed agency actions, and other activities relating to the federal government's management and administration of the public lands of eastern Oregon.

Impacts of the project on the wilderness resource.

ONDA notes that the corridor route has been revised so as to avoid some sensitive areas. This is a positive development. However, the proposed corridor route still crosses two proposed Wilderness Study Areas: the Hart Mountain proposed WSA and the Spaulding proposed WSA (see attached map). It also runs adjacent to WSAs and

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designated wilderness on several occasions. ONDA urges the DOE to again revise the route so as to avoid all proposed WSAs, WSAs, and wilderness.

The EIS must present and analyze the effects of the proposed action on the wilderness resource. This discussion should include effects on impacted wilderness, WSAs and proposed WSAs. Descriptions of the wilderness values of the Hart Mountain proposed WSA can be found in ONDA's Wilderness Inventory Recommendations for the Lakeview BLM district, at page 87, posted at:

<http://www.onda.org/projects/ohdpa/LakeviewInvRep.pdf>. Descriptions of the wilderness values of the Spaulding proposed WSA can be found at the same document at page 209.

The EIS should present and discuss the significant wilderness values documented in detail in ONDA's wilderness inventory reports and consider whether any aspect of the proposed action would impact wilderness values or these areas' ability to be designated as wilderness in the future. It should also consider cumulative effects on the wilderness resource.

The U.S. District Court for the District of Oregon recently held that impacts to such proposed wilderness areas should be considered at the project level pursuant to NEPA. The court held that the BLM "was obligated under NEPA to consider whether there were changes to or additions to the wilderness values within the [project area], and whether the proposed action in that area might negatively impact those wilderness values, if they exist." <u>ONDA v. Rasmussen</u>, Civ. No. 05-1616-AS (D.Or. April 20, 2006), F&R slip op. at 17.

The EIS also should include detailed maps showing the locations of the ONDAinventoried areas, as compared to the project proposal areas, current WSAs and wilderness areas and other similarly important information

Again, ONDA strongly urges the DOE to consider reducing or eliminating the need for these corridors through the aggressive adoption of renewable alternative energy sources. ONDA incorporates by reference its previous comments dated November 28, 2005 as well as the comments filed by The Wilderness Society dated July 10, 2006. Please keep us informed on this project. Thank you.

Sincerely,

s/ Kristin Ruether Staff Attorney Oregon Natural Desert Association 917 SW Oak St. Ste. 409 Portland, OR 97205

cc: Bill Marlett, Executive Director Oregon Natural Desert Association

