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November 28, 2005

Julia Souder  
U.S. Department of Energy  
Office of Electricity Delivery and Energy Reliability  
1000 Independence Avenue, SW  
Washington, DC 20585;

**Re: *DOE/EIS-0386 – Designation of Energy Corridors on Federal Lands in  
11 Western States***

Dear Ms. Souder:

Since the enactment of NEPA (1969) Williams has analyzed, permitted and constructed thousands of miles of pipeline facilities, as well as fiber optic transmission lines. Our facilities in the Western U.S include Northwest Pipeline, a 4,000-mile interstate natural gas transmission line that serves nearly all of the natural gas markets of Idaho, Oregon and Washington with natural gas from the San Juan Basin, the Rockies and Canada. We also have approximately 7,000 miles of natural gas gathering lines in the West, smaller pipelines that connect producing wells to larger transmission pipelines. The vast majority of these 11,000 miles of facilities are on public lands.

Overall, Williams supports the preparation of a PEIS for designation of energy corridors in the Western Region. While § 368(d) weights Federal policy for West-wide Energy Corridors toward electricity transmission, the goals of improving reliability, relieving congestions, and enhancing the ability of the grid to deliver energy affect and depend upon all energy sources and transmission systems. Williams urges the lead agencies to ensure that the scope of the PEIS reflect this. Identifying and developing procedures to streamline facility siting for all utilities within designated corridors will likely provide the most significant benefits to affected entities and most closely meet the goals of the Act.

Williams, through its subsidiaries, primarily finds, produces, gathers, processes and transports natural gas. The company also manages a wholesale power business. Williams' operations are concentrated in the Pacific Northwest, Rocky Mountains, Gulf Coast, Southern California and Eastern Seaboard.

Williams respectfully submits the following comments for the West-wide Energy Corridor Programmatic EIS Public Scoping (PEIS).

## **The Williams Companies, Inc. Recommendations**

### **Corridors should not be exclusive solution**

It should be recognized in the PEIS that there exists a range of construction and maintenance issues for operators of both electric and pipeline transmission facilities that can be mitigated with engineering planning and avoided only by locating pipelines and high voltage transmission lines in separate pathways. For instance, in common corridors electric transmission lines can induce currents in pipelines, loads on pipelines from vehicles servicing high voltage transmission lines must be mitigated by installing pipeline in deeper trenches, and pipeline relief valves must be offset from electric transmission lines to avoid accidental ignition in the event that flammable gas must be released. So while pipeline and transmission can co-exist, we recommend that adopted standards shouldn't be so rigid as to preclude development outside of an identified corridor.

### **Corridor siting should be a rebuttable presumption**

Williams understands that once energy corridors are incorporated into land use plans the presumption by Federal Land Managers (FLM) will be that the best location for a new pipeline would be in a designated corridor. However, because unforeseen factors specific to a proposed project may, in the end, frustrate the goal of pre-designated energy corridors, alternatives must be considered. Therefore, Williams believes that if FLMs make presumptions that the best locations for new facilities would be in a corridor designated in the PEIS it is important that such presumptions be rebuttable. Clearly project sponsors might not enjoy certain advantages deriving from locating a project in a designated corridor, but they should not be deprived of the opportunity to present and defend siting or alignment alternatives for important new infrastructure.

### **Multiple-use issues central to workable energy corridors**

One of the benefits to be derived from the designation of energy corridors will be from multiple uses. Developments in the industry currently provide a number of civil and electrical engineering solutions that make pipelines and power lines compatible, this is especially true in congested corridors within congested areas. Some of the multiple use issues should include:

*Corridor Width* - In some cases, due to civil and electrical engineering issues described above, i.e., induced currents in pipelines, surface loading on pipelines and offsetting of pipeline relief valves, consideration should be given to making any identified corridors sufficiently wide as to safely accommodate both electricity and natural gas (or other fluid) transmission facilities under the most conservative assumptions about proximity of multiple facilities.

*Additional Products and Facilities* - While § 368(d) weights Federal policy for West-wide Energy Corridors toward electricity transmission, Williams submits the scoping for the West-wide Energy Corridor PEIS should equally consider the range of facilities listed in § 368(a)(1) that are similar in their siting requirements.

*Unforeseen Issues* - Technological advances; results of scientific research, additional regulation and control requirements, security concerns, and/or socio-political events or circumstances may present unforeseen demands on use and engineering. The corridor identification should therefore be as broad and flexible as possible to accommodate such issues and challenges they will present.

### **Siting process should be streamlined and flexible**

A sound and effective streamlined procedure for siting facilities within designated corridors is vital to the goals of EPA Act 05. To this end, effective federal corridor siting procedures should:

- Have clearly defined criteria;
- Eliminate duplicate environmental analyses;
- Allow FLMs to approve some segments of a linear project that fall within ambit of the PEIS without additional field surveys;
- Include, to the extent possible, NEPA categorical exemptions for applicable facilities to be sited within a designated corridor;
- Provide for streamlined consultation process where threatened or endangered species are implicated;
- Assure that each energy sector receives equitable consideration in the siting process; and
- Ensures that the permit terms for infrastructure align with the useful life of that infrastructure.

### **Establish method for revising or updating corridor lists or studies**

Because of the long-term aspects of the 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. Williams would suggest that the initial inventory of corridor designations should be reviewed and updated at least every five years, in order to achieve the long-term objectives of facilitating new infrastructure investment in the most regionally efficient manner.

### **Other considerations**

*Pre-Draft Workgroups* - Timelines for federal land use and energy planning can be incongruent. Alignment of the timelines will require the FLM agencies to take a "long view" and anticipate energy needs. FLMs need to aggressively pursue the expertise and assistance of energy providers and other stakeholders involved in energy planning efforts in the Region. Williams recommends that the FLMs assemble a work group to identify a list of proposed energy corridors. This work group should include representatives from the FLMs, state and local government, energy associations, and energy companies and other interested groups and individuals.

*Land Swap Criteria* - Land disposal or swaps that would allow land subject to corridor designation to be transferred to private ownership can create obstacles for the use of the corridor. Such transfers should be considered an incompatible use, but if allowed, should require stipulations that the land is to be used as a corridor, provide adequate authority to maintain and operate the corridor, and prevent increased rental fees.

*Private Landowner Issues* - Along with protecting these corridors from land transfers, provisions need to be included for addressing the concerns of private land owners in the energy corridor without disrupting the creation and use of the corridor or otherwise thwarting its purpose or integrity.

It is important that the PEIS Team consider these comments not only for any New Corridor Alternatives it considers, but even more so for Optimization Criteria Alternatives where an existing pipeline corridor might provide the environmental and landscape features around which to align an optimized, wider corridor that would also include electric transmission lines.

Williams looks forward to reviewing and commenting on the Draft PEIS.

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Larrea", written over a horizontal line.

John G. Larrea  
State Governmental Affairs