



From: corridoreiswebmaster@anl.gov
To: [Corridoreisarchives;](#)
CC:
Subject: Energy Corridor Programmatic EIS Comment 80098
Date: Monday, November 28, 2005 10:17:37 PM
Attachments: [2005.11.28 -
_potential transmission corridors connecting areas rich in generation potential with metro areas -
_draft_80098.pdf](#)

Thank you for your comment, Iain Kinnis.

The comment tracking number that has been assigned to your comment is 80098. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 10:17:33PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80098

First Name: Iain
Middle Initial: D
Last Name: Kinnis
Organization: National Grid
Address: 257 East 200 South
Address 2: Suite 330
City: Salt Lake City
State: UT
Zip: 84111
Country: USA
Email: iain.kinnis@us.ngrid.com
Privacy Preference: Don't withhold name or address from public record
Attachment: S:\Programmatic EIS\2005.11.28 - potential transmission corridors connecting areas rich in generation potential with metro areas - draft.pdf

Comment Submitted:

Attached are two files (two separate submissions made) that expand upon the testimony presented at the Scoping Meeting in Phoenix, Arizona on Thursday November 3, 2005.

National Grid looks forward to engaging with the Federal agencies and other stakeholders in developing the Programmatic EIS.

Iain Kinnis
Senior Project Manager
(801) 328-2177

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

From: corridoreiswebmaster@anl.gov
To: [Corridoreisarchives;](#)
CC:
Subject: Energy Corridor Programmatic EIS Comment 80099
Date: Monday, November 28, 2005 10:20:08 PM
Attachments: [2005.11.28 -](#)
[Energy Corridor Programmatic EIS Comments 80099.doc](#)

Thank you for your comment, Iain Kinnis.

The comment tracking number that has been assigned to your comment is 80099. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 10:19:54PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80099

First Name: Iain

Middle Initial: D

Last Name: Kinnis

Organization: National Grid

Address: 257 East 200 South

Address 2: Suite 330

City: Salt Lake City

State: UT

Zip: 84111

Country: USA

Privacy Preference: Don't withhold name or address from public record

Attachment: S:\Programmatic EIS\2005.11.28 - Energy Corridor Programmatic EIS Comments.doc

Comment Submitted:

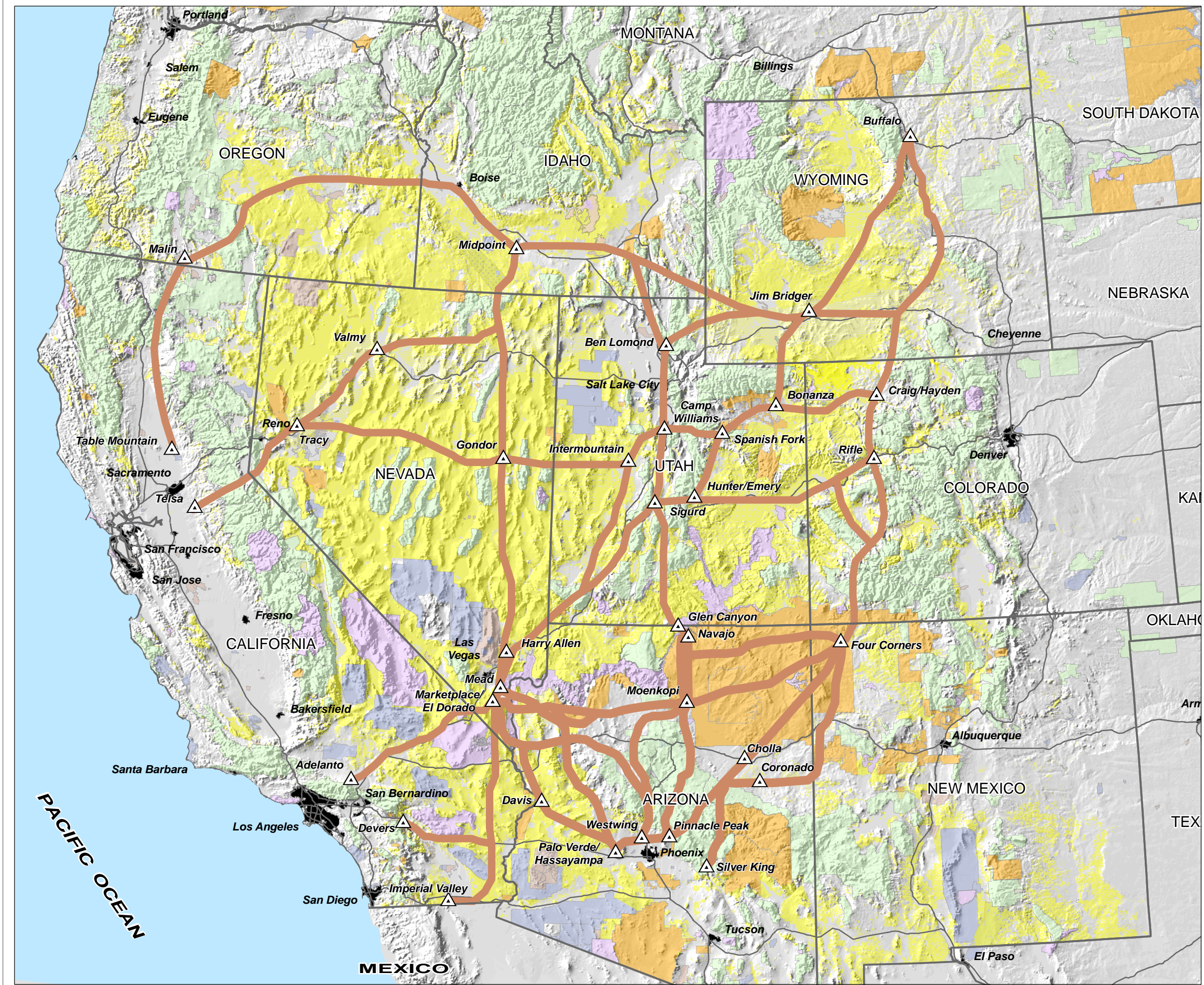
Attached are two files (two separate submissions made) that expand upon the testimony presented at the Scoping Meeting in Phoenix, Arizona on Thursday November 3, 2005.

National Grid looks forward to engaging with the Federal agencies and other stakeholders in developing the Programmatic EIS.

Iain Kinnis
Senior Project Manager
(801) 328-2177

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




Potential Corridors for Future Transmission Lines

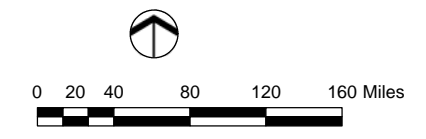


LEGEND

-  Proposed Alternative Transmission Line Corridors
-  Bureau of Land Management
-  Bureau of Indian Affairs
-  U.S. Forest Service
-  National Park Service
-  Department of Defense
-  U.S. Fish & Wildlife Service
-  State/Private

REFERENCE FEATURES

-  State Boundary
-  Major Interstate
-  Major Substation



Data Source Information

Land Ownership and BLM Field Office Boundaries: BLM Denver Service Center, 2004.

NOTE: Transmission corridors and substation locations are schematics and do not necessarily represent precise locations.

November 28, 2005



West-wide Energy Corridor Programmatic Environmental Impact Statement Comments

November 28, 2005

National Grid's Transmission organization believes that properly managing the siting and licensing activities for transmission projects is critical to obtaining successful outcomes. For a transmission project, a successful outcome is one in which:

- The transmission project is completed in a timely manner to address the underlying reliability and/or economic needs.
- Transmission system technical and operational requirements are satisfied in a prudent manner, including those of National Grid and the applicable reliability organizations (e.g., Western Electricity Coordinating Council).
- Environmental and permitting requirements are satisfied, as specified at the Federal, state and local level.
- The public, including abutters, state and local government officials, public interest groups and other interested parties, feels that their input has been considered, and the implemented project represents a good faith effort to address their concerns within the constraints of technical acceptability and overall cost to customers.
- National Grid's reputation is maintained, and if possible, enhanced.

These objectives are pursued in accordance with National Grid's *Framework for Responsible Business*.

Recognizing these guiding principles for the successful and sustainable siting of transmission projects, criteria to be considered in the Programmatic Environmental Impact Statement should address:

Environmental Criteria

Based on our experience in the siting of transmission lines we have found, in general, that four environmental resources should be evaluated to determine opportunity and constraints for locating utility corridors. They include:

- (1) land use (jurisdiction, existing and future land use, recreation, and utilities);
- (2) visual (most land management agencies have defined visual resources and determined management levels);
- (3) cultural (this includes archaeology, historical and traditional cultural properties);
and
- (4) biology (vegetation, wildlife, habitat, threatened and endangered species, etc.).

Obviously this analysis should include public and agency concerns.

Opportunities for utility corridors can be generally identified as:

- (1) those following lineal features (e.g., existing or future transmission lines, roads, railroads, pipelines, lineal communication facilities [fiber optic lines], canals, and jurisdictional lines, etc.); or
- (2) areas with low resource sensitivity allowing for new transmission lines. National Grid encourages future communication with the PEIS study team to assist in delineating levels of sensitivity in order to develop a process for siting of these facilities.

Jurisdictional Issues

In the western states being evaluated in the PEIS, a large amount of the land is federal and state as well as Indian reservation land. Several federal lands have designations that limit new transmission lines. These areas must have additional corridor widths (3 to 5 miles) to allow for future lines to be sited without exposing the regional electric transmission grid to reduced reliability at times of system stress. The following examples should be considered throughout the west.

- National Monuments – Recently designated (2001) national monuments contained corridors critical to future transmission line projects. Currently, these monuments prohibit new transmission lines and therefore should be widened or opened to new lines (corridor widths of 3 to 5 miles). For example, the 230kV transmission line that crosses the Grande Staircase – Escalante National Monument should be widened and preserved for future transmission lines between Utah and Arizona.
- National Recreation Areas – National recreation areas, currently under the management of the National Park Service, should allow for numerous future lines with corridor widths of 3 to 5 miles. For example, transmission lines between Utah and Arizona currently cross the Glen Canyon Recreation Area – this corridor should be widened and preserved. Likewise east-west lines across the

Lake Mead National Recreation Area (Utah and Nevada) are now fully utilized and should be widened to accept more east-west transmission lines.

- Military Lands – Military lands, under BLM management, have blocked any potential overhead transmission development or have low height restrictions that prohibit future line development (e.g., the Hill and Wendover Air Force Ranges).
- U.S. Fish and Wildlife Service Lands – U.S. Fish and Wildlife Service lands have developed around or in some cases block the potential for future lines. Examples include the Kofa National Wildlife Refuge with one existing 500kV line and a second 500kV line planned, traveling east to west. This corridor should be widened to allow for future lines to access the Palo Verde or Dever substations.
- Indian Reservations – Numerous lines currently traverse reservations with more infrastructure anticipated for the wheeling of energy in the future. In order to allow future transmission line paths, locational alternatives around these reservations should be planned and included in the PEIS. For example, crossing from Wyoming into northeast Utah there are a number of federal designations including the Flaming Gorge National Recreation Area, Dinosaur National Monument, and wilderness areas (High Uintas Primitive area). This area is further restricted because of the Uintah and Ouray Indian Reservation.

Taking a holistic view of the west demands that *plans* for Federal lands are coordinated with those for state and private lands, etc.

Engineering Criteria

Agencies vary in the width of corridors identified in their current management plans. For example, oftentimes corridors in the Forest Service Management Plans only identify existing rights-of-way. These should be expanded to a width of 3 to 5 miles. Within the BLM RMPs some corridors are only ¼ mile wide while others are up to 3 miles wide. All existing lines and identified corridors should be expanded to 3 to 5 miles. The corridor width of 3 to 5 miles will allow for the siting of lines in new corridors or existing corridors to avoid environmentally sensitive areas, physical constraints, and meet Western Electrical Coordinating Council (WECC) criteria for separation of lines. Engineering risk factors as currently being evaluated by WECC and should also be included in the overall analysis of corridor location as well as line separation.

Mitigation

Mitigation as it may pertain to new lines (new or existing corridors) should also be evaluated for engineering, cultural and environmental issues. For example, should additional capacity be required, one mitigation strategy could be to replace existing conductors and insulators with ones having a higher loading capacity but still suspended from the original, but possibly reinforced, structures.

Further Comments

To expand upon any of the issues outlined above please contact Iain Kinnis at:

257 East 200 South
Suite 330
Salt Lake City, UT 84111

Office (801) 328-2177
Fax (801) 328-2139
Cell (216) 965-9260
iain.kinnis@us.ngrid.com