

From: corridoreiswebmaster@anl.gov
To: [Corridoreisarchives;](#)
CC:
Subject: Energy Corridor Programmatic EIS Comment 80106
Date: Tuesday, November 29, 2005 1:38:32 AM
Attachments: [LETTER_Federal_Corridors_80106.doc](#)

Thank you for your comment, Jim Sims.

The comment tracking number that has been assigned to your comment is 80106. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 29, 2005 01:38:26AM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80106

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

Attachment: Y:\WBRT\2005\Committees\Energy\Federal Energy Bill\Letters
\LETTER_Federal_Corridors.doc

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.

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:

On behalf of the Western Business Roundtable, I am writing to express our strong support for Section 368 of the recently enacted Energy Policy Act of 2005 (Public Law 109-58), which directs Federal Land Management agencies (FLMs) to expedite the designation of energy corridors on federal lands in the 11 Western States for electricity transmission and distribution facilities and for gas and hydrogen pipelines.

What is done in the American West will, in large measure, be determinate of whether our nation is really serious about reducing its reliance on foreign energy. Our region is the “Persian Gulf” of American energy, with a wide diversity of resources that can go far in meeting domestic energy needs well into the 24th Century. For that to occur, however, there must be a long-term plan to ensure that the energy infrastructure necessary to develop, deliver and utilize those resources is in place.

We applaud the various FLM agencies, under the leadership of the U.S. Department of Energy and the Bureau of Land Management, for moving forward so aggressively to implement Section 368. If done right, this process can go far in increasing the regulatory certainty upon which energy infrastructure investment depends.

We understand that the first major step in that process is preparation of a Programmatic Environmental Impact Statement (PEIS) under the National Environmental Policy Act of 1969 (NEPA). Based on the information and analyses developed in this PEIS, each FLM agency will amend its respective land use plans by designating a series of energy corridors.

We appreciate the opportunity to provide you our input on the process. We believe that the following recommendations, if implemented, can assure that the corridor designation process helps achieve the goal of domestic energy self-sufficiency that Congress envisioned with passage of EPA05.

ROUNDTABLE RECOMMENDATIONS

1. Assure alignment of land use and energy planning timelines.

Timelines for federal land use and energy planning can be incongruent. Aligning these processes requires 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.

We recommend 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 governments, energy associations, energy companies and other interested groups and individuals.

2. Create sound and efficient siting procedures.

Establishment of sound and efficient procedures for the siting of energy facilities within designated corridors is vital. To that end, effective federal corridor siting procedures should:

- Eliminate duplicate environmental analyses;
- Ensure that a sufficient width for each corridor is designated and included in the PEIS, to maximize multiple use of that corridor and to accommodate alignment changes that may occur as a result of detailed engineering for the facilities as projects are actually developed;

- Allow FLMs to approve some segments of a linear project that fall within bounds and limits of the PEIS without additional field surveys;
- Include a rebuttable presumption that compatible facilities that are seeking to be sited within a designated corridor qualify as a categorical exclusion from NEPA;
- Provide for a streamlined consultation process where threatened or endangered species are implicated;
- Assure that each energy sector receives equitable consideration in the siting process; and
- Ensure that the permit terms for infrastructure align with the useful life of that infrastructure.

3. Use technical and engineering requirements in providing corridor specifications.

By basing corridor specifications on technical and engineering requirements and vegetation management needs, flexibility can be provided for multiple users. Specifications should provide for the following:

1. Existing corridors should be considered for expansion (i.e. width expansion to accommodate 69kV and above transmission lines). This will allow for the expansion or upgrading of facilities to improve reliability and expand capacity;
2. In expanding the use of existing corridors, the specifications need to address areas of existing corridors that are constricted. Equitable policies should be put in place for current rights-of-way holders and new users; and
3. Corridors should be large enough to accommodate multiple energy infrastructure facilities in adjoining rights-of-way without impeding or encroaching on each other for technical or logistical reasons.

4. Multiple-use will be central to workable energy corridors

One of the benefits to be derived from the designation of energy corridors will be from multiple uses. Today, a number of civil and electrical engineering solutions are helping to make the siting of pipelines and transmission lines

more compatible. Thus, where it is beneficial for multiple energy systems and facilities to share the same corridor, an adequately designated width must be allowed for safe operations.

5. Protect corridors when public land ownership is transferred.

Land disposal or swaps that would allow land subject to corridor designations to be transferred to private ownership can create obstacles for the use of such corridors. Such transfers should generally be considered an incompatible use. If allowed, stipulations should be required to assure that: the land is used as a corridor; adequate authority is granted to maintain and operate that corridor; and increased rental fees are prevented.

Along with protecting these corridors from land transfers, provisions need to be included to meet the needs of private land owners who may be in the energy corridor, without disrupting the creation and use of the corridor.

6. Provide for the designation of additional corridors.

Designated energy corridors under this PEIS should not be considered the exclusive energy corridors to be sited on federal lands in the West. It is impossible to successfully anticipate, today, the energy infrastructure needs of the Western Region 15 to 20 years down the road. Thus, it is critical that part of the scoping exercise be devoted to developing a process for designation of future corridors. This process should allow for an integrated, multi-jurisdictional evaluation and decision-making process.

7. Remember: corridor designations are not a panacea for the siting of all energy infrastructure.

While the Roundtable is an ardent supporter of designated corridors, we do not believe that all energy infrastructure activities on federal lands can, or should, be limited exclusively to such corridors. There are circumstances where the resource location, technical efficiencies, economics and location of energy markets will dictate infrastructure development outside designated corridors. This process should not forestall energy infrastructure developers from seeking permits elsewhere on federal lands, so long as any environmental impacts can be properly mitigated.

8. Establish methods for revising or updating corridor lists or studies

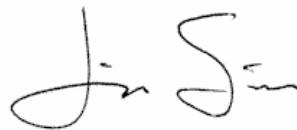
Because of the long-term aspects of energy corridor designations, it would be advisable to have in place a review process that could update the list of corridors, or revise the initial studies underlying the designations; in order to take into account changed circumstances or new developments.

About The Roundtable

The Western Business Roundtable is a non-profit business trade association comprised of CEOs and senior executives of organizations doing business in the Western United States. Our member companies are involved in a broad range of industries, including agricultural products, accounting, chemicals, coal, construction and construction materials, conventional and renewable energy production, energy services, engineering, financial services, internet technologies, manufacturing, mining, oil and gas, pharmaceuticals, pipelines, telecommunications, and public and investor-owned utilities. We work for a common sense, balanced approach to economic development and environmental conservation, and we support public policies that encourage economic growth, opportunity and freedom of enterprise.

On behalf of the member companies of Roundtable, I urge your support for these recommendations as part of the draft PEIS. If our members can be of further assistance in your scoping process, we would welcome the opportunity to do so.

Sincerely,



James T. Sims
Executive Director

cc: Department of Energy Secretary Bodman
Kevin Kolevar, Department of Energy
Deputy Secretary of Energy Garman
Vice President Dick Cheney
House Resources Committee Chair Richard Pombo
Senate Energy Committee Members

Interior Secretary Gale Norton
BLM Director Kathleen Clarke
CEQ Chairman Jim Connaughton
Western Governors' Association
Western Governors
Western Congressional delegations