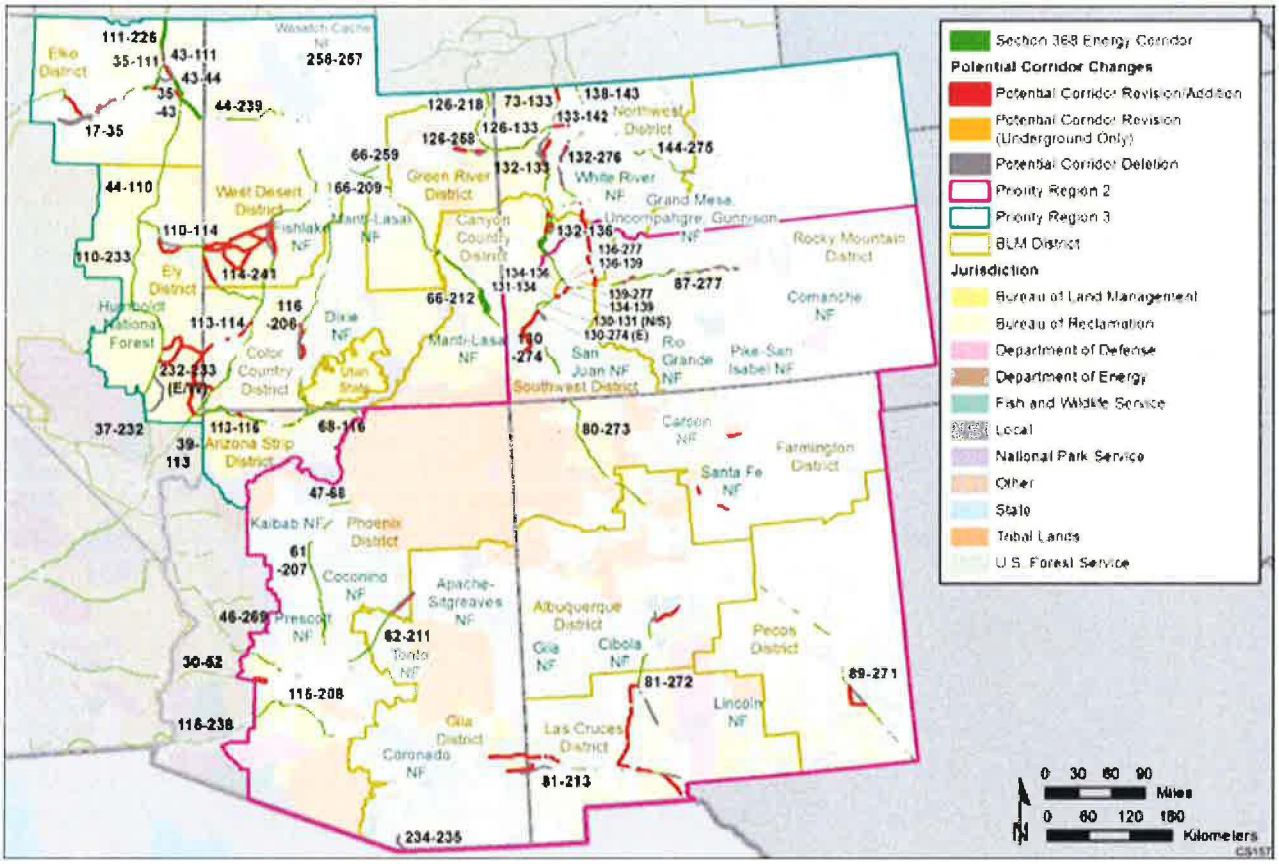
# REGIONS 2 & 3:
# STAKEHOLDER INPUT - ABSTRACTS
## Section 368 Energy Corridor Regional Review



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# Regions 2 & 3 Stakeholder Input on Corridor Abstracts

This document is a record of stakeholder input received on Corridor Abstracts during the Regions 2 & 3 Review and serves as a reference document for the Regions 2 & 3 Report.

Preliminary Region 2 & 3 corridor abstracts were released to the public on January 10, 2018. Stakeholders were given 45 days to provide input; the public input period closed February 25, 2018. All written stakeholder input received within that timeframe is provided in this document. This input was used to update the corridor abstracts and develop Agency recommendations as presented in the Region 2 & 3 Report.

Stakeholder input focused on the general Regional Review process, environmental concerns, and cultural resource and tribal concerns regarding individual Section 368 energy corridors within Regions 2 & 3. There were recommendations for specific corridor revisions, deletions, and additions, as well as recommendations for a new Section 368 energy corridor in Regions 2 & 3.

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# Contents

10065 Lucky Corridor LLC....1
10066 Duchesne County, Utah....97
10067 Clark County (NV) Comprehensive Planning....99
10068 USDA-NRCS Utah....104
10069 Peter Humm....105
10070 TransCanyon....106
10071 Wasatch County....111
10072 Nevada Department of Wildlife....112
10073 Nevada Department of Wildlife....113
10074 Nevada Department of Wildlife....114
10075 Nevada Department of Wildlife....115
10076 Nevada Department of Wildlife....116
10077 Nevada Department of Wildlife....117
10078 Nevada Department of Wildlife....118
10079 San Juan County, Utah....119
10080 Arizona Game and Fish Department....121
10081 Arizona Game and Fish Department....122
10082 Arizona Game and Fish Department....123
10083 Arizona Game and Fish Department....124
10084 Arizona Game and Fish Department....125
10085 Arizona Game and Fish Department....126
10086 Arizona Game and Fish Department....127
10087 Arizona Game and Fish Department....128
10088 Mesa County, Colorado....129
10089 Nevada Department of Wildlife....131
10090 Nevada Department of Wildlife....132
10091 Nevada Department of Wildlife....133
10092 Nevada Department of Wildlife....134
10093 Nevada Department of Wildlife....135
10094 Nevada Department of Wildlife....136
10095 Nevada Department of Wildlife....137
10096 Nevada Department of Wildlife....138
10097 Nevada Department of Wildlife....139
10098 Nevada Department of Wildlife....140
10099 Nevada Department of Wildlife....141
10100 Nevada Department of Wildlife....142
10101 Nevada Department of Wildlife....143
10102 Nevada Department of Wildlife....144
10103 Nevada Department of Wildlife....145
10104 Nevada Department of Wildlife....146
10105 Nevada Department of Wildlife....147
10106 Nevada Department of Wildlife....148
10107 Nevada Department of Wildlife....149
10108 Nevada Department of Wildlife....150

# Contents

10109 Nevada Department of Wildlife....151
10110 Nevada Department of Wildlife....152
10111 Nevada Department of Wildlife....153
10112 Nevada Department of Wildlife....154
10113 Nevada Department of Wildlife....155
10114 Nevada Department of Wildlife....156
10115 Nevada Department of Wildlife....157
10116 Nevada Department of Wildlife....158
10117 Nevada Department of Wildlife....159
10118 Nevada Department of Wildlife....160
10119 Nevada Department of Wildlife....161
10120 Nevada Department of Wildlife....162
10121 Nevada Department of Wildlife....163
10122 Nevada Department of Wildlife....164
10123 Nevada Department of Wildlife....165
10124 Nevada Department of Wildlife....166
10125 Nevada Department of Wildlife....167
10126 Las Placitas Association....169
10127 Common Ground Community Trust....170
10128 Wildlands Network....184
10129 Wildlands Network....196
10130 Reid Bandeen....208
10131 Church History Department, The Church of Jesus Christ of Latter-day Saints....219
10132 Denver Water....222
10133 Outdoor Alliance....226
10134 The Wilderness Society....274
10135 Board of County Commissioners of the County of Gunnison, Colorado....279
10136 U.S. Fish and Wildlife Service Utah Field Office....284
10137 U.S. Fish and Wildlife Service Utah Field Office....285
10138 U.S. Fish and Wildlife Service Utah Field Office....286
10139 U.S. Fish and Wildlife Service Utah Field Office....287
10140 U.S. Fish and Wildlife Service Utah Field Office....289
10141 U.S. Fish and Wildlife Service Utah Field Office....290
10142 U.S. Fish and Wildlife Service Utah Field Office....291
10143 U.S. Fish and Wildlife Service Utah Field Office....292
10144 U.S. Fish and Wildlife Service Utah Field Office....294
10145 U.S. Fish and Wildlife Service Utah Field Office....295
10146 U.S. Fish and Wildlife Service Utah Field Office....296
10147 U.S. Fish and Wildlife Service Utah Field Office....298
10148 U.S. Fish and Wildlife Service Utah Field Office....299
10149 U.S. Fish and Wildlife Service Utah Field Office....300
10150 U.S. Fish and Wildlife Service Utah Field Office....301
10151 New Mexico Dept. of Game and Fish, Mining and Energy Habitat Specialist....302
10152 Carbon County....304
10153 New Mexico Dept. of Game and Fish, Mining and Energy Habitat Specialist....311

# Contents (cont.)

10154 Sustainable Development Strategies Group....313
10155 New Mexico Energy, Minerals and Natural Resources Department....319
10156 New Mexico Dept. of Game and Fish, Mining and Energy Habitat Specialist....472
10157 Colorado River Indian Tribes....474
10158 The Wilderness Society....478
10159 US Fish and Wildlife Service - New Mexico Field Office....509
10160 US Fish and Wildlife Service - New Mexico Field Office....510
10161 US Fish and Wildlife Service - New Mexico Field Office....511
10162 US Fish and Wildlife Service - New Mexico Field Office....512
10163 US Fish and Wildlife Service - New Mexico Field Office....513
10164 US Grand Mesa, Uncompahgre and Gunnison National Forests....514
10165 National Trust for Historic Preservation....516
10166 Apache-Sitgreaves National Forests....521
10167 Apache-Sitgreaves National Forests....525
10168 Apache-Sitgreaves National Forests....529
10169 Apache-Sitgreaves National Forests....532
10170 Apache-Sitgreaves National Forests....536
10171 Sandoval County New Mexico....539
10172 Apache-Sitgreaves National Forests....543
10173 Apache-Sitgreaves National Forests....546
10174 Apache-Sitgreaves National Forests....549
10175 Apache-Sitgreaves National Forests....553
10176 Mary Rose Szoka-Valladares....557
10177 Mary Rose Szoka-Valladares....580
10178 Apache-Sitgreaves National Forests....584
10179 Apache-Sitgreaves National Forests....587
10180 Esther Morgan....589
10181 Apache-Sitgreaves National Forests....591
10182 Basin and Range Watch....593
10183 Basin and Range Watch....595
10184 Coldharbour Institute....598
10185 New Mexico Wildlife Federation....609
10186 Colorado Native Plant Society....615
10187 San Miguel County, Colorado....617
10188 Lucky Corridor, LLC....655
10189 The Wilderness Society....659
10190 The Wilderness Society....661
10191 The Wilderness Society....663
10192 The Wilderness Society....665
10193 The Wilderness Society....667
10194 The Wilderness Society....669
Defenders of Wildlife....671
Southern Nevada Water Authority....706
State of Utah....712
Colorado Parks and Wildlife....722
Department of Defense....725

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|---|---|
| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10065] |
| **Date:** | Monday, January 15, 2018 1:10:51 PM |
| **Attachments:** | ID_10065_RODFONSICNF.pdf<br>ID_10065_SupplementtoSF29981417FLinks.pdf<br>ID_10065_LCLLCWAPAMOUFinal110211.pdf |

Thank you for your input, lynn greene.

The comment tracking number that has been assigned to your comment is 10065. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: January 15, 2018 13:10:03 CST

First Name: lynn
Last Name: greene
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Lucky Corridor, LLC

Topics
Energy Planning Issues
Existing infrastructure/available space

Geographic Area
Regions 2 & 3 > New Region 2 & 3 Corridor Opportunities

Input

NOMINATION OF NEW 368 CORRIDOR-NEW MEXICO On behalf of Lucky Corridor, LLC, a FERC-authorized entity ("Applicant"), we hereby nominate 12 miles of the Carson National Forest, all within Taos County, New Mexico, as a Section 368 Corridor. There is no available transmission capacity in the 115kV facilities currently within this non-exclusive utility corridor. The 345 kV facilities proposed by Applicant will likely need to be co-located with the 115kV facilities. Legal description and other important facts will be detailed in the exhibits, attached. New facilities in the nominated corridor would attach northern New Mexico's large, untapped wind zone, which produces energy unusually coincident with SW US load, to existing transmission built to distribute coal-fired generation from the Four Corners NYMEX trading hub, therefore helping to repower that hub. The nominated Corridor is the shortest pathway in the Southwest to accomplish this, also thereby yielding the lowest delivered cost of energy for retail users. If new transmission isn't built to New Mexico's wind, solar and other first rate clean energy resource zones, all uniquely found in northern New Mexico, the principal coal plants at Four Corners could retire without a sufficient replacement supply of clean energy, causing very significant price increases to retail electricity users in the US Southwest. Upon request, Applicant can supply support letters from the Governor of New Mexico, various elected officials, the Taos Pueblo, economy development organizations, and more. Supporting documents include: • Decision Notice and Finding of No Significant of Impact for improved road access to Corridor, issued 2016, after 8 years of study of existing 115kV facilities, now solely occupying non-exclusive area; • 2017 Supplement to Applicant's pending SF-299, containing legal description, citations to Applicant's FERC authority in Section 7 (a), 368 rational at Section 7 (i); please also see Applicant's entire file with USFS back to 2011; BLM file 2013; • Applicant's MOU with DOE, won after an active competition re nationally important infrastructure projects; • Dense maps and graphs available, but exceed File limits here. Thank you. Lynn Greene, CEO, lynn@luckycorridor.com, 303 758 9294

Attachments

ROD FONSI CNF.pdf, Supplement to SF299 8 14 17 F Links.pdf, LCLLC WAPA MOU Final 11-02-11.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov <mailto:corridoreiswebmaster@anl.gov>

# MEMORANDUM OF UNDERSTANDING

# No. 12-TIP-0048

# AMONG

# LUCKY CORRIDOR, LLC

# AND

# UNITED STATES

# DEPARTMENT OF ENERGY
# WESTERN AREA POWER ADMINISTRATION
# TRANSMISSION INFRASTRUCTURE PROGRAM

# FOR

# THE LUCKY CORRIDOR PROJECT

# Memorandum of Understanding

**Lucky Corridor Project**

**November 2, 2011**

## Recitals

**Whereas**, the American Recovery and Reinvestment Act of 2009 (Recovery Act), Public Law No. 111-5, was signed into law on February 17, 2009, for the following enumerated national purposes: (1) preserving and creating jobs and promoting economic recovery; (2) assisting those most impacted by the recession; (3) providing investments needed to increase economic efficiency by spurring technological advances in science and health; (4) investing in transportation, environmental protection, and other infrastructure that will provide long-term economic benefits; (5) stabilizing State and local government budgets to minimize and avoid reductions in essential services and increases in State and local taxes, and

**Whereas**, the Recovery Act provides that the President and the heads of Federal departments and agencies shall manage and expend the funds made available in the Recovery Act so as to achieve the enumerated purposes, including commencing expenditures and activities as quickly as possible consistent with prudent management, and

**Whereas**, the Recovery Act, in Section 402 (42 U.S.C. § 16421a, Pub. Law 111-5 123 Stat. 141, Div A, Title IV, § 402 (2009)), amends and adds Section 301 to the Hoover Power Plant Act of 1984 (Hoover Act of 1984) (Pub. Law 98-381, Title III, § 301), provides the Administrator of the Western Area Power Administration (Western) with the discretion to borrow up to $3.25 billion from the United States Treasury for the purpose of: (1) constructing, financing, facilitating, planning, operating, maintaining, or studying

# Memorandum of Understanding

**Lucky Corridor Project**
**~~October~~ NOVEMBER 2, 2011**

## Recitals

**Whereas**, the American Recovery and Reinvestment Act of 2009 (Recovery Act), Public Law No. 111-5, was signed into law on February 17, 2009, for the following enumerated national purposes: (1) preserving and creating jobs and promoting economic recovery; (2) assisting those most impacted by the recession; (3) providing investments needed to increase economic efficiency by spurring technological advances in science and health; (4) investing in transportation, environmental protection, and other infrastructure that will provide long-term economic benefits; (5) stabilizing State and local government budgets to minimize and avoid reductions in essential services and increases in State and local taxes, and

**Whereas**, the Recovery Act provides that the President and the heads of Federal departments and agencies shall manage and expend the funds made available in the Recovery Act so as to achieve the enumerated purposes, including commencing expenditures and activities as quickly as possible consistent with prudent management, and

**Whereas**, the Recovery Act, in Section 402 (42 U.S.C. § 16421a, Pub. Law 111-5 123 Stat. 141, Div A, Title IV, § 402 (2009)), amends and adds Section 301 to the Hoover Power Plant Act of 1984 (Hoover Act of 1984) (Pub. Law 98-381, Title III, § 301), provides the Administrator of the Western Area Power Administration (Western) with the discretion to borrow up to $3.25 billion from the United States Treasury for the purpose of: (1) constructing, financing, facilitating, planning, operating, maintaining, or studying

construction of new or upgraded electric power transmission lines and related facilities with at least one terminus within the area served by Western; and (2) delivering or facilitating the delivery of power generated by renewable energy resources constructed or reasonably expected to be constructed after the date of enactment of Section 402 of the Recovery Act, and

**Whereas**, since enactment of the Recovery Act and amendment of the Hoover Act of 1984, Western has undertaken two public processes specified in Section 301 of the Hoover Act of 1984, to: (1) develop practices and policies for a Transmission Infrastructure Program (TIP) designed to implement the authority granted Western under the Recovery Act; and (2) solicit Statements of Interest from entities interested in identifying potential projects to be developed under this authority, and

**Whereas**, more than 100 entities responded to the Request for Interest issued by Western on March 4, 2009, including a proposal submitted by **Lucky Corridor, LLC (entity was formerly named Luck of the Irish, LLC)**, and

**Whereas**, **Lucky Corridor, LLC** has been identified by Western for further detailed evaluation and consideration of its proposed project, to wit, the **Lucky Corridor** Project (the Project), and

**Whereas**, Western and **Lucky Corridor, LLC** desire to conduct one or more meetings to define the Project (including, but not limited to, ownership rights, operational matters, cost-sharing mechanisms, governance structure, budgets, and other major parameters of the Project), identify the Project's benefits, and ultimately to expedite Western's decision-making process,

**Therefore, it is hereby agreed** that Western and **Lucky Corridor, LLC** (also referred to individually as "Party" and jointly as "Parties") enter into this Memorandum of

Understanding (MOU), thereby representing their intent to move forward with further detailed review and evaluation of the Project.

## Statements of Understanding

1. **General Terms:**

   a. Western is proceeding with evaluation and consideration of the Project in accordance with the requirements set out in section 402 of the Recovery Act and as set out in the evaluation criteria developed in the TIP public process.

   b. Unless agreed to in writing, each Party shall bear its own costs of participation in Western's efforts to review and evaluate the Project; and if Western agrees to further participate in the Project, the cost associated with developing additional agreements necessary to move the Project forward. Western's participation and obligations will be contingent upon contributed funding by **Lucky Corridor, LLC**, loans from the U.S. Treasury, appropriations, and the authority and limitations of other applicable Federal laws and policies.

2. **Project Definition and Scope:**

   Project Capabilities: The Project is expected to facilitate a total capability of approximately 1000 MW of bidirectional transmission capability between the Gladstone and Ojo Substations, allowing transmission of 850 MW in the east-to-west direction west of the Taos Substation, 1050 MW east to west between the Gladstone and Taos Substations, and 500 MW west to east between the Taos and Gladstone Substations, creating a combined system rating of the upgraded Project line between the Taos and Gladstone substations of 1,550 MW. The

Parties have yet to determine the precise incremental increase in the transfer capability made possible by the Project. The final scope and design of the Project will be determined through further review, evaluation and negotiations among the Parties.

3. **Schedule:**

To ensure the necessary review, evaluation and potential approval by Western can be completed in an expeditious manner; the Parties agree to set an aggressive schedule. Lucky Corridor, LLC agrees to diligently provide Western with all necessary information needed for Western's review and evaluation. If Western agrees to participate, the Parties similarly agree to develop and execute in an expeditious manner the necessary Project agreements. As stated in section 1.b., above, each Party will cover its own labor, travel, and other costs associated with these efforts. If the Parties do not develop the necessary agreements or execute the agreements in a timely manner, Western may remove the Project from consideration under Section 301 of the Hoover Act of 1984.

4. **Subsequent Agreements:**

If the Project is approved for development by Western, and the Parties each wish to proceed (which each Party may determine in its sole and absolute discretion), they shall negotiate in good faith to enter into one or more follow-on agreements that provide for at least the initial funding of the Project development. Such subsequent agreements shall incorporate the intent of this MOU, except as may be agreed by the Parties in such subsequent agreements. Such subsequent agreements shall provide for the governance structure, ownership rights, percentages and responsibilities (to include rates and Project cost repayment), coordinated operations, Project work products and more detailed definition of the Project scope, and the mitigation of adverse impacts to any effected system. To ensure subsequent agreements are in keeping with the

intent of Section 301 of the Hoover Act of 1984, they are necessarily subject to approval by.

5. **Monetary Contributions:**

In accordance with Section 1.b, each Party shall fund its own initial costs that may arise from actions envisioned by this MOU. No funds will be owing or collected under this MOU. All joint Project financing and/or funding shall be collected under subsequent agreements.

6. **Confidentiality of Market Sensitive Information:**

The Parties shall maintain the confidentiality of all the documents, data, and any other information provided to them by the other Party containing market sensitive information, where such document, data or other information is designated as confidential by that other Party and shown to contain market sensitive information. Such information must be clearly marked "Confidential." provided, however, that the information will not be held confidential by the receiving Party if (1) the designating Party is required to provide such information for public disclosure or (2) the information becomes available to the public on a non-confidential basis (other than from the receiving Party).

Disclosure of Confidential Information: Notwithstanding the above, if either Party is required by applicable laws or regulations, or in the course of administrative or judicial proceedings to disclose information that is otherwise required to be maintained in confidence, the Party may disclose such information; provided, that as soon as such Party learns of the disclosure requirement and prior to making such disclosure, such Party shall notify the other Party of the requirement and the terms thereof. The affected Party may, at its sole discretion and own costs direct any challenge to or defense against the

disclosure requirement and the disclosing Party shall cooperate with such affected Party to the maximum extent practicable to minimize the disclosure of the information consistent with applicable law. The disclosing Party shall cooperate with the affected Party to obtain proprietary or confidential treatment of confidential information by the person to whom such information is disclosed prior to any such disclosure.

7. **Public Statements:**

The Parties agree that neither Party to this MOU will make any public statement regarding the arrangements between the Parties as described in this MOU without the prior written consent of the other Party, which consent shall not he unreasonably delayed or withheld. The Parties agree to negotiate a public statement to be released concerning this MOU. The Parties acknowledge and agree that no financing or transaction is confirmed hereby nor settled in any respect. The Parties further agree to act jointly and with mutual agreement for all news releases and public statements with respect to such arrangements, unless any Party is compelled to make such statements by judicial or administrative process or by the requirements of law.

8. **Termination of this MOU and Liability Hereunder:**

Either Party may terminate this MOU for any reason with ninety (90) days' notice. The Parties also agree that, other than for a breach of duties owed under section 6, and consistent with the cost allocation provisions of Section 1.b. above, no liability is established for a breach of this MOU. The Parties also agree that the only provision of this MOU that shall survive termination of this MOU is section 6, regarding confidentiality.

9. **No Implied Approval of Project by Western:**

In executing this MOU, the Parties expressly understand and agree that following review and evaluation of the Project, Western may decide to participate in the Project under Section 301 of the Hoover Act of 1984. In the event Western does not participate in the Project, Lucky Corridor, LLC shall have no cause of action against Western due to its decision not to participate, including no cause of action for any costs Lucky Corridor, LLC may have incurred during Western's review and evaluation of the Project.

10. **Signature Clause:**

The signatories to this MOU represent that they are authorized to enter into this MOU on behalf of the party for whom they sign. This MOU may be executed in counterparts and shall be effective this 2ND day of NOVEMBER, 2011.

**LUCKY CORRIDOR, LLC**

By: _____

Name: Lynn Chapman Greene

Title: President/CEO

Date: 10-24-11

**WESTERN AREA POWER ADMINISTRATION**
**TIP REPRESENTATIVE**

By: _____

Name: Timothy J. Meeks

Title: Administrator

Date: 11/2/11

SUPPLEMENTAL INFORMATION TO:

SECOND AMENDED STANDARD FORM 299

APPLICATION FOR TRANSPORTATION AND UTILITY SYSTEMS AND FACILITIES ON FEDERAL (USFS) LANDS

LUCKY CORRIDOR

# 345kV TRANSMISSION LINE PROJECT

**SUPPLEMENTAL INFORMATION TO:**

**SECOND AMENDED STANDARD FORM 299**

**APPLICATION FOR TRANSPORTATION AND**

**UTILITY SYSTEMS AND FACILITIES ON FEDERAL (USFS) LANDS**

**LUCKY CORRIDOR 345KV TRANSMISSION PROJECT**

**FILED AUGUST 22, 2016**

**"2nd Amended SF-299"**

**SUPPLEMENTED AUGUST 14, 2017**

**"Supplement to 2nd Amended SF-299"**

Prepared by:

LUCKY CORRIDOR, LLC **("Applicant")**

With assistance from:

EAGLE PEAK LAND SURVEYING, INC.

ECOSPHERE ENVIRONMENTAL SERVICES, INC.

ESC ENGINEERING, INC.

WATSON ENVIRONMENTAL

**From:** mail_corridoreiswebmaster
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10066]
**Date:** Monday, January 29, 2018 12:10:41 PM

Thank you for your input, Mike Hyde.

The comment tracking number that has been assigned to your comment is 10066. Please refer to the comment tracking number in all correspondence relating to this comment.

Comment Date: January 29, 2018 12:09:59 CST

First Name: Mike
Last Name: Hyde
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Duchesne County, Utah

Topics
Energy Planning Issues
Existing infrastructure/available space
Ecological resources
Lands and realty
Specially designated areas

Geographic Area
Regions 2 & 3 > Specific Region 2 & 3 corridors

66-259 [1, 18]

Input

Corridor Segment #66-259 is not an acceptable corridor for future use. The analysis shows that this corridor goes through inventoried roadless areas and as a result, the corridor is only 100 feet wide at certain pinch points. There is already one transmission line in this corridor and the 100 foot wide area does not allow enough room for additional lines to be placed there unless underground. Trans West Express should not be allowed to be installed in this corridor because of this. This corridor would place existing and future transmission lines in a very vulnerable area for damage in a wildfire. Corridors in more open areas on lands to the south should be utilized. The area is prime for wildfire due to years of inactive forest management. The corridor analysis states that "The Platts data do not show any planned projects near this corridor." This information is incorrect. Please contact Doug Smith at Wasatch County Planning (55 South 500 East, Heber City, UT 84032, dsmith@wasatch.utah.gov, 435-657-3205 to inquire about a large recreational development being planned in this area that would be adversely impacted by additional transmission line development in this corridor. I believe that the Development is called Strawberry Highlands.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov <mailto:corridoreiswebmaster@anl.gov>

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10067]
**Date:** Friday, February 9, 2018 11:40:26 AM
**Attachments:** ID_10067_ABOVEGROUNDUTILPLANwmap31Jan2017.pdf

Thank you for your input, Garrett TerBerg.

The comment tracking number that has been assigned to your comment is **10067**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 09, 2018 11:40:01 CST

**First Name:** Garrett
**Last Name:** TerBerg
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Clark County (NV) Comprehensive Planning

**Topics**
Energy Planning Opportunities

**Geographic Area**
General (not corridor-specific)

**Input**

From my reading of the maps, it appears that Clark County is entirely located within Region 1; therefore, I have no comments other than the connectivity of energy corridors with our jurisdiction. We have an adopted Above Ground Utility Plan as mandated by our State Statutes, and will most likely need to amend the plan after adoption of the new RMP. Please see the attached map and text containing our current plan

**Attachments**

ABOVEGROUND UTIL PLAN w map 31 Jan 2017.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# CLARK COUNTY, NEVADA

## ABOVEGROUND UTILITY PLAN

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10068]
**Date:** Friday, February 9, 2018 6:03:47 PM

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Thank you for your input, Renee Chi.

The comment tracking number that has been assigned to your comment is **10068**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 09, 2018 18:02:58 CST

**First Name:** Renee
**Last Name:** Chi
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** USDA-NRCS Utah

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Lands and realty

**Geographic Area**
General (not corridor-specific)

**Input**

There is a wetland easement approximately 2 miles from milepost 139 on the 116-206 line. In addition, on the western side of Summit County, in the center of Weber County, and eastern side of Box Elder County, we have records of easements. Once a more specific alignment is identified through that area, we can provide more detailed information on easements that may conflict with any alignment being considered through that area.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10069]
**Date:** Friday, February 16, 2018 11:12:59 AM

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Thank you for your input, Peter Humm.

The comment tracking number that has been assigned to your comment is **10069**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 16, 2018 11:12:39 CST

**First Name:** Peter
**Last Name:** Humm
**Email:**

**Are you submitting input on the behalf of an organization?** No

**Topics**
Energy Planning Opportunities

**Geographic Area**
General (not corridor-specific)

**Input**

The general issue of national concern on for the western power grid is that this grid, as it is today, was designed for the electric load of 30 years ago. Any failure of a major transmission line (fires, terrorist acts, ice storms, etc.) is likely to result in the collapse of a significant portion of the western grid, with very grave consequences for human health, safety, and the economy. In addition, any solar flare of a "Carrinigton Event" magnitude, or any EMP attack by rogue states, is likely to result in a grid collapse. Both of these issues need to be highlighted as justification for the completion of this corridor planning as soon as possible, and any opposition to this planning effort must be described as potentially hazardous to the continued operation of the western grid, with the major negative consequences to the human environment described above. In addition, this planning document should include the recommendations for hardening the grid against EMP, as described in the 2008 "Report of the Commission to Assess the Threat to the United States from Electromagnetic Pulse (EMP) Attack: Critical National Infrastructures".

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10070] |
| **Date:** | Monday, February 19, 2018 12:48:59 PM |
| **Attachments:** | ID_10070_20180219TCCommentsforRegion23EvaluationvFinalsigned.pdf |

Thank you for your input, Robert Smith.

The comment tracking number that has been assigned to your comment is **10070**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 19, 2018 12:48:11 CST

**First Name:** Robert
**Last Name:** Smith
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** TransCanyon

**Topics**
Energy Planning Opportunities

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Please see attached letter and map for TransCanyon's comments. TransCanyon appreciates the opportunity to participate in the review of Section 368 energy corridors for Regions 2 and 3.

**Attachments**

2018-02-19 TC Comments for Region 23 Evaluation vFinal-signed.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

TRANSCANYON

ROBERT SMITH
Vice President,
Transmission Planning
and Development

February 19, 2018

Jeremy Bluma
National Project Manager
Bureau of Land Management
(202) 373-3847
jbluma@blm.gov

**Re: TransCanyon Comments for Region 2 & 3 Evaluation**

Mr. Bluma,

TransCanyon appreciates the opportunity to participate in the review of Section 368 energy corridors for Regions 2 and 3. TransCanyon, a joint venture between Berkshire Hathaway Energy's subsidiary, BHE U.S. Transmission, and Pinnacle West Capital Corporation's subsidiary, Bright Canyon Energy, is an independent developer of electric transmission strategically focused on the western United States. TransCanyon is supportive of efforts to review Section 368 corridors as part of the settlement agreement and pleased to provide comments. TransCanyon believes in the responsible siting, permitting, construction, operation, and ultimately decommissioning of electric transmission facilities. Further, TransCanyon supports the four siting principles identified in the Settlement Agreement.

*Cross-Tie 500kV Transmission Line*

TransCanyon has proposed the Cross-Tie 500kV Transmission Line (Cross-Tie). TransCanyon filed a SF-299 application for right-of-way with the Fillmore Field Office in June of 2016. The proposed transmission line runs from the planned 500kV addition to the existing Clover Substation near the town of Nephi, UT to the existing Robinson Summit substation located northwest of Ely, NV. This proposed transmission line is approximately 213 miles long and provides a new intertie between the Northern Tier Transmission Group (NTTG) and WestConnect Regional Planning Groups. Cross-Tie will greatly increase the transmission capability between the Utah/Wyoming and the

Nevada/California areas of WECC. Cross-Tie will help meet regional needs within NTTG, WestConnect, and the CAISO. Cross-Tie will provide for more efficient and lower cost dispatch energy across the West, increase cost-saving transactions between EIM entities, and enhance the overall reliability of the transmission system. Cross-Tie would also help facilitate the transmission of high capacity renewable resources from Wyoming and Utah to customers in southern Nevada and California as well as provide access for the oversupply of solar energy seen at times from the CAISO to customers in Utah and Wyoming.

*Relation of Cross-Tie to Section 368 Corridors in Region 2 & 3 Review*

Cross-Tie is proposed to parallel existing 230kV (or greater) overhead transmission line along virtually all of its length. TransCanyon believes that co-locating new transmission facilities with existing transmission facilities is environmentally beneficial and is supported by the four siting principles. Approximately 87.5 miles of its 213 miles of length are located along Section 368 corridors.

The following comments relate to the four areas indicated on the attached Comment Map:

1. Cross-Tie runs along approximately 71 miles of Corridor 110-114 which is identified as a corridor of concern primarily for biological resources in Nevada. TransCanyon supports the continued designation of Corridor 110-114 in the area identified as Comment 1 on the included map. The existing Intermountain 230kV transmission line is located within the corridor and Cross-Tie would be adjacent and parallel to the existing transmission line.

2. Cross-Tie would be parallel and adjacent to the existing Intermountain 230kV transmission line between corridors 110-114 and 114-241. TransCanyon proposes the designation of a new Section 368 corridor in this area identified as Comment 2 on the included map. This new Section 368 corridor would support Cross-Tie specifically and would include existing overhead transmission facilities as well as provide a connection between, and continuity with, the two previously mentioned corridors. Further, a Section 368 corridor designation in this area promotes the consolidation and co-location of transmission facilities.

3. Cross-Tie also utilizes an approximately 16.5 mile portion of Corridor 114-241 which is not identified as a corridor of concern. TransCanyon supports the continued designation of Corridor 110-114 in the area identified as Comment 3 on the included map. The existing Milford Wind 345kV transmission line is located within the corridor and Cross-Tie would be adjacent and parallel to the existing transmission line.

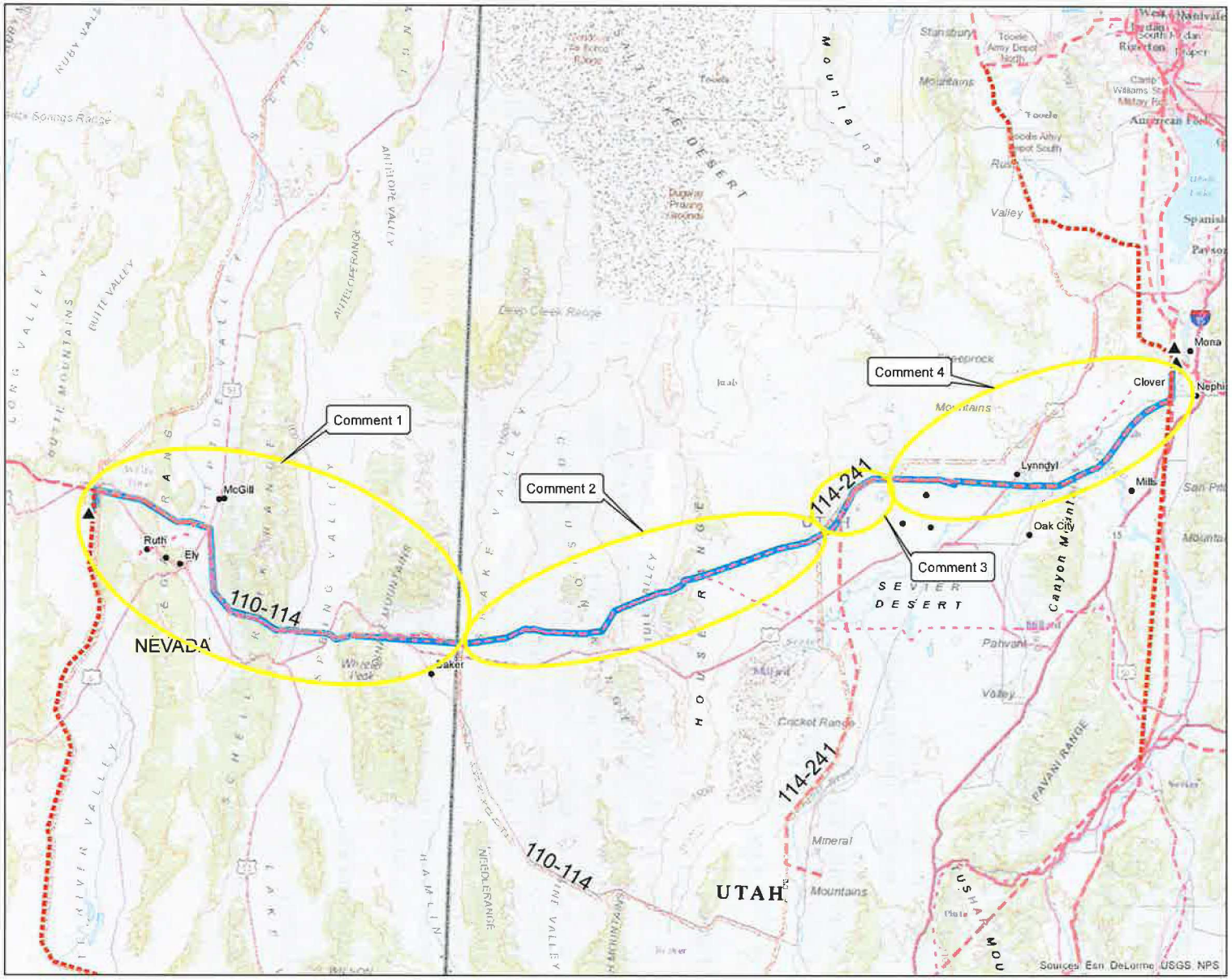
4. In this area, Cross-Tie parallels an existing Intermountain Power Agency 345kV transmission line from its departure from Corridor 114-241 to the Clover substation. TransCanyon proposes the designation of a new Section 368 corridor in this area identified as Comment 4 on the included map. A new Section 368 corridor designation in this area supports Cross-Tie and includes existing overhead transmission facilities. Further, a Section 368 corridor designation in this area promotes the consolidation and co-location of transmission facilities.

TransCanyon is happy to answer any questions regarding these comments and will continue to monitor the process, participate where possible, and provide comments throughout the review of Regions 2 & 3. Please contact Bob Smith, Vice President, Transmission Planning and Development at robert.smith@transcanyon.com or (602) 371-6909.

Sincerely,

Bob Smith

cc: Georgeann Smale, Reggie Woodruff, Brian Mills




# Comment Map for Regions 2 & 3 Review

## Legend

- Cross-Tie Proposed Route
- Existing Substation
- Section 368 Corridor

**Existing Transmission**

- 500 kV
- 345 kV
- 230 kV
- 115-230kV

*Note: Not all existing transmission lines are shown due to incomplete available data. Additionally, the spatial accuracy of the transmission lines shown may be relativley low.*

**2/16/2018**

N

Miles

0 5 10 20 30 40

TRANSCANYON

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10071]
**Date:** Tuesday, February 20, 2018 11:53:21 AM

Thank you for your input, Douglas Smith.

The comment tracking number that has been assigned to your comment is **10071**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 20, 2018 11:53:01 CST

**First Name:** Douglas
**Last Name:** Smith
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Wasatch County

**Topics**
Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

66-259 [blank, blank]

**Input**

To Whom It May Concern, This message is regarding the 66-259 corridor alignment in Wasatch County. Thank you for allowing me to comment. This corridor runs through an area that is highly prized for recreation and is visited by many people throughout the state and beyond for its angling, camping and off road opportunities. Along with the concerns of the impacts to tourism there is an approved development on approximately 7,000 acres along this alignment. This development may have up to 1,234 units. The County is concerned with property value impacts as well as visual impacts to future residents and visitors to the County. The County feels that there are less obtrusive routes for this corridor outside of such a highly prized recreational area and have states this as a stakeholder and participating agency in the previous reviews. If there are any questions please contact me at 435-657-3205.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10072]
**Date:** Wednesday, February 21, 2018 10:56:46 AM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10072**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 10:56:09 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [143, 189]

**Input**

There are 2 active greater sage-grouse leks, 1 pending lek, and 4 unknown leks within this corridor area. These sites are crucial for breeding season.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10073]
**Date:** Wednesday, February 21, 2018 10:57:53 AM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10073**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 10:57:32 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [215, 220]

**Input**

There is 1 active greater sage-grouse lek, 2 pending leks, and 1 unknown lek within this corridor area. These sites are crucial for breeding season.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10074]
**Date:** Wednesday, February 21, 2018 11:00:03 AM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10074**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 10:59:31 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [276, 277]

**Input**

This is one greater sage-grouse lek within this corridor area with a currently unknown activity status. This status means that more information or data needs to be collected at this time, but that this could be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10075]
**Date:** Wednesday, February 21, 2018 11:01:07 AM

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Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10075**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 11:00:25 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [294, 302]

**Input**

There are 3 active greater sage-grouse leks, 1 pending lek, and 2 unknown leks within this corridor area. These sites are crucial for breeding season.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10076]
**Date:** Wednesday, February 21, 2018 11:02:40 AM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10076**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 11:01:47 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [311, 311]

**Input**

This are two greater sage-grouse leks within this corridor area with a currently unknown activity status. This status means that more information or data needs to be collected at this time, but that this could be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10077]
**Date:** Wednesday, February 21, 2018 11:07:44 AM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10077**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 11:07:15 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 131,631 acres of Priority greater sage-grouse habitat and 400,991 acres of General greater sage-grouse habitat. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10078]
**Date:** Wednesday, February 21, 2018 11:12:37 AM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10078**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 11:11:46 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [177, 190]
17-35 [201, 209]
17-35 [211, 216]
17-35 [229, 233]
17-35 [304, 311]

**Input**

These areas have been identified as mule deer migration corridors and should be avoided if at all possible. Unimpaired migration is crucial to mule deer life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10079]
**Date:** Wednesday, February 21, 2018 12:36:26 PM
**Attachments:** ID_10079_EnergyZoneMap12.2.14.pdf

---

Thank you for your input, Nick Sandberg.

The comment tracking number that has been assigned to your comment is **10079**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:35:55 CST

**First Name:** Nick
**Last Name:** Sandberg
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** San Juan County, Utah

**Topics**
Energy Planning Opportunities

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

66-212 [blank, blank]

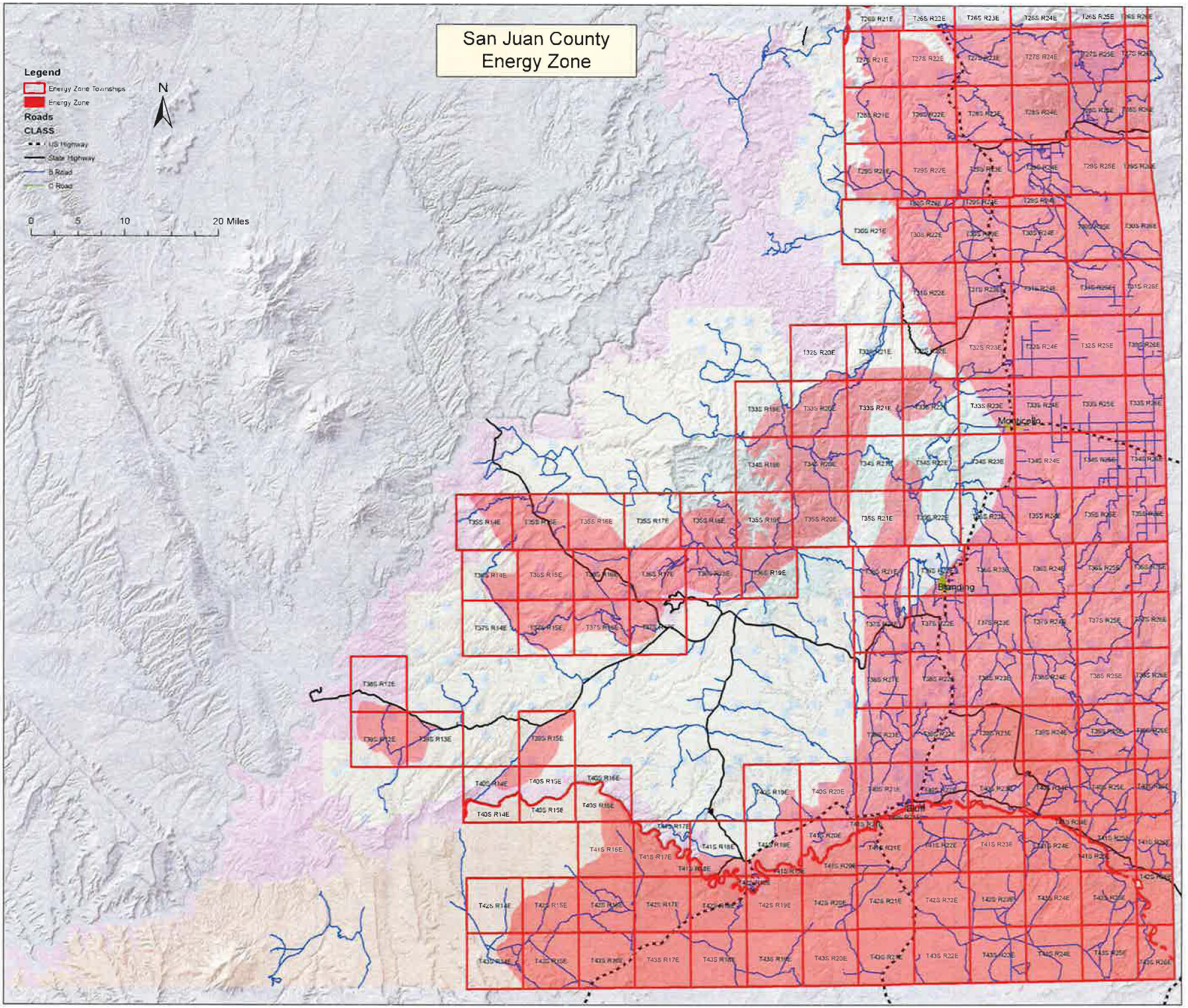
**Input**

Agency Review and Analysis in the Abstract appears to be accurate for the San Juan County, Utah portion of the corridor. The Mapping Tool, Energy and Energy Zones, could include the San Juan County Energy Zone which includes Corridor 66-212. This zone and similar zones in other counties, was designated through Utah House Bill 393, Energy Zones Amendments, as signed into law on March 23, 2015. The intent of these zones is to communicate to BLM the importance of development of energy in these zones. Such development is dependent upon timely and expedited processing of applications for exploration and development of energy resources, both renewable and non-renewable. Such emphasis includes continued maintenance and increased development of roads, power lines, pipeline infrastructure and other utilities related to energy exploration and development. Continued use of Corridor 66-212 is consistent with the intent of the San Juan Energy Zone.

**Attachments**

EnergyZoneMap12.2.14.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov


San Juan County
Energy Zone
Legend
Energy Zone Townships
Energy Zone
Roads
CLASS
US Highway
State Highway
B Road
D Road
N
0
5
10
20 Miles
Monticello
Blanding
Eden

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10080]
**Date:** Wednesday, February 21, 2018 12:44:40 PM

Thank you for your input, Ginger Ritter.

The comment tracking number that has been assigned to your comment is **10080**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:44:18 CST

**First Name:** Ginger
**Last Name:** Ritter
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

115-208 [16, 60]

**Input**

Wildlife Movement: The current placement of Corridor 115-208 (MP16-60) would further fragment habitat connectivity between the Buckeye Hills and Gila Bend/Eagle Tails/Saddle Mountain Wilderness complex; fragment habitat connectivity between Estrella Mountains and Sonoran Desert Monument (Rainbow Valley); and further fragment habitat connectivity between Buckeye Hills and Sonoran Desert Monument. The corridor goes across BLM lands east of I-85 and north of SDNM that have high recreational value (OHV, trail riding, hiking). The Department is trying to promote connectivity in these areas. The Department recommends rerouting the corridor along I-8 and SR85.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10081]
**Date:** Wednesday, February 21, 2018 12:47:39 PM

Thank you for your input, Ginger Ritter.

The comment tracking number that has been assigned to your comment is **10081**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:47:20 CST

**First Name:** Ginger
**Last Name:** Ritter
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

62-211 [9, blank]

**Input**

Riparian Crossing: Corridor 62-211 crosses various creeks and Bartlett Lake (MP#9). There are several species that are dependent on the Verde River. Limit project activities during the breeding season for birds, generally May through late August, depending on species in the local area. Raptors breed in early February through May. Conduct avian surveys to determine bird species that may be utilizing the area and develop a plan to avoid disturbance during nesting season. Be aware aquatic species breed at different times throughout the year. Review the biology of each species to determine a timeframe and actions (e.g. limiting sediment input into the river during construction) that would minimize impact to the species. Lastly, riparian areas are impacted by transmission line maintenance roads. The roads increase sediment flow into aquatic systems and OHV use within stream channels and associated riparian areas. Please ensure roads are constructed in a way to limit erosion.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10082]
**Date:** Wednesday, February 21, 2018 12:49:11 PM

Thank you for your input, Dave Dorum.

The comment tracking number that has been assigned to your comment is **10082**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:48:46 CST

**First Name:** Dave
**Last Name:** Dorum
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

62-211 [60, 62]

**Input**

Beaver Turkey Ridge Wildlife Quiet Area: Corridor 62-211 would also impact the Beaver Turkey Ridge Wildlife Quiet Area (roughly between MP 60 and 62). Although an existing energy corridor currently impacts the southeast portion of this quiet area, corridor 62-211 would have a significantly greater impact. To reduce this impact, corridor 62-211 should be shifted to the east to align with the existing energy corridor.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10083]
**Date:** Wednesday, February 21, 2018 12:50:39 PM

---

Thank you for your input, Dave Dorum.

The comment tracking number that has been assigned to your comment is **10083**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:50:20 CST

**First Name:** Dave
**Last Name:** Dorum
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

62-211 [67, 68]

**Input**

Commissioned owned property: Corridor 62-211 would impact the Department's Vincent Ranch property located between MP 67 and 68. Shifting the corridor to the east would exclude the Vincent Ranch parcel form impacts associated with corridor 62-211.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10084]
**Date:** Wednesday, February 21, 2018 12:51:35 PM

Thank you for your input, Dave Dorum.

The comment tracking number that has been assigned to your comment is **10084**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:51:07 CST

**First Name:** Dave
**Last Name:** Dorum
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

62-211 [blank, blank]

**Input**

Misalignment with existing energy corridor: The entire length of corridor 62-211 on the Apache-Sitgreaves National Forests runs parallel to, but is offset to the west of the existing energy corridor. This alignment, as described in the Corridor 62-211 Analysis Table, would have greater impacts to riparian and upland wildlife habitat than would occur if corridor 62-211 followed the alignment of the existing corridor. I recommend that corridor 62-211 be shifted to the east, to be roughly centered on the existing energy corridor.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10085]
**Date:** Wednesday, February 21, 2018 12:53:23 PM

Thank you for your input, Kristin Terpening.

The comment tracking number that has been assigned to your comment is **10085**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:52:51 CST

**First Name:** Kristin
**Last Name:** Terpening
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

234-235 [blank, blank]

**Input**

Santa Rita-Tumacocori Wildlife Linkage: Corridor 234-235 intersects the Santa Rita-Tumacocori Wildlife Linkage at both the north and south limits of the energy corridor. The Department encourages rerouting this portion of Corridor 234-235 that runs through the Coronado NF. Although there is current infrastructure (an existing pipeline constructed many years ago), the potential maximum buildout (i.e. 9 separate 500-kV transmission lines, as many as 35 liquid petroleum pipelines or up to 29 natural gas pipelines) would be a catastrophic disruption to wildlife movement through the area. Accommodation of wildlife movement corridors would be a critical component of the designation of WWEC 234-235 if it is to remain in its current location through the Coronado N.F.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10086]
**Date:** Wednesday, February 21, 2018 12:55:14 PM

Thank you for your input, Dee Kephart.

The comment tracking number that has been assigned to your comment is **10086**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:54:47 CST

**First Name:** Dee
**Last Name:** Kephart
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

61-207 [23, 65]

**Input**

Pronghorn Habitat: Corridor 61-207, between MP#65-23, is proximate to Pronghorn habitat throughout the Paulden/Chino Valley/ Prescott Valley areas. It appears the corridor falls on the outer edge of the grassland habitat within this corridor, mostly in the transition area from grasslands to the mixed conifer/pinyon-juniper woodland vegetation of the rising foothill plateaus. Pronghorn use these edges during fawning season when grasses are too short to provide fawning cover. The Department recommends coordinating with us to ensure construction timeframes do not cause disturbance during fawning season.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10087] |
| **Date:** | Wednesday, February 21, 2018 12:56:24 PM |

Thank you for your input, Dee Kephart.

The comment tracking number that has been assigned to your comment is **10087**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 12:55:57 CST

**First Name:** Dee
**Last Name:** Kephart
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Arizona Game and Fish Department

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

61-207 [blank, blank]

**Input**

Riparian Crossing: Corridor 61-207 crosses over two major rivers, the Verde River (MP#65) and the Aqua Fria River (MP#30). There are several species that are dependent on the Verde River. •Limit project activities during the breeding season for birds, generally May through late August, depending on species in the local area. Raptors breed in early February through May. Conduct avian surveys to determine bird species that may be utilizing the area and develop a plan to avoid disturbance during nesting season. Be aware aquatic species breed at different times throughout the year. Review the biology of each species to determine a timeframe and actions (e.g. limiting sediment input into the river during construction) that would minimize impact to the species. Lastly, riparian areas are impacted by transmission line maintenance roads. The roads increase sediment flow into aquatic systems and OHV use within stream channels and associated riparian areas. Please ensure roads are constructed in a way to limit erosion.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10088]
**Date:** Wednesday, February 21, 2018 4:09:14 PM

Thank you for your input, Keith Fife.

The comment tracking number that has been assigned to your comment is **10088**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 16:08:53 CST

**First Name:** Keith
**Last Name:** Fife
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Mesa County, Colorado

**Topics**
Lands and realty
Specially designated areas

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

132-136 [3.8, 4.6]
132-136 [23.7, 34.2]
132-276 [blank, blank]

**Input**

There are several issues identified in the abstracts that may have an impact on the energy corridors in Mesa County. Most have been addressed through management practices or by narrowing/ changing the corridor path. The few issues listed below offered no real solution in the Abstracts for lessening the impact on visual, ecological or cultural resources. Our suggestions follow each specific issue. Specially Designated Areas Grand Mesa Scenic and Historic Byway (ID#132-136.034, MP 3.8-4.6)- According to Agency analysis there are no ROW exclusions or avoidance prescriptions for intersecting the byway in either the Grand Junction RMP or the Grand Mesa Scenic Byway Corridor Management Plan. Avoidance of the Byway and coordination with the Colorado Scenic and Historic Byways Commission for mitigation measures should be required. Old Spanish National Historic Trail Grand Mesa Scenic Byway Corridor Management Plan (ID#132-136.035, MP 23.7-34.2)- The Agency analysis identifies the need for a new IOP for development in Section 368 energy corridors. Mesa County concurs and suggests exploring mitigation measures. Lands and Realty: Rights-of-Way and General Land Use NSO Area (ID#132-136.028, MP: scattered over full corridor length)- The Agency has identified this as "Not an issue. NSO is oil and gas terminology and does not apply to the corridor". This analysis is a contradiction to the NSO Area in the Corridor 132-276 Abstract. Need to be consistent in how NSO areas are treated. NSO Area (ID#132-276.019, MP: scattered throughout corridor) - The analysis that "This is a concern that cannot be easily resolved during corridor level planning," may be contradictory to

the Corridor 132-136 Abstract. Need to be consistent in how NSO areas are treated.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10089]
**Date:** Wednesday, February 21, 2018 4:49:21 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10089**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 16:48:58 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [146, 152]
17-35 [161, 163]
17-35 [208, 212]
17-35 [229, 239]

**Input**

These areas have been identified as crucial winter habitat for mule deer and should be avoided if at all possible.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10090]
**Date:** Wednesday, February 21, 2018 4:51:01 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10090**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 16:50:42 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [143, 152]
17-35 [184, 191]
17-35 [261, 282]

**Input**

These areas have been identified as crucial winter habitat for pronghorn antelope and should be avoided if at all possible.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10091]
**Date:** Wednesday, February 21, 2018 4:53:54 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10091**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 16:53:30 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [283, 284]

**Input**

This area crosses the Humboldt River, a fishable waterway, and should be avoided if possible. If avoidance is not possible, extra planning and/or measures should be incorporated to reduce or minimize impacts to this waterway.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10092]
**Date:** Wednesday, February 21, 2018 4:56:17 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10092**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 16:55:47 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

17-35 [227, 228]
17-35 [203, 202]
17-35 [160, blank]

**Input**

This area crosses Maggie Creek, Humboldt River, and Rock Creek, all fishable waterways, and these areas should be avoided if possible. If avoidance is not possible, extra planning and/or measures should be incorporated to reduce or minimize impacts to these waterways.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10093]
**Date:** Wednesday, February 21, 2018 5:00:13 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10093**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 16:59:48 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-43 [blank, 1]

**Input**

There are 2 active greater sage-grouse leks, and 2 unknown status leks within this corridor area. These sites are crucial for breeding season. The "unknown" status means that more information or data needs to be collected at this time, but that this is likely to be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10094]
**Date:** Wednesday, February 21, 2018 5:02:47 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10094**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:02:26 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-43 [15, blank]

**Input**

This is one greater sage-grouse lek within this corridor area with a currently unknown activity status. This status means that more information or data needs to be collected at this time, but that this site is likely to be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10095]
**Date:** Wednesday, February 21, 2018 5:03:56 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10095**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:03:39 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-43 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 45,523 acres of Priority greater sage-grouse habitat and 52,694 acres of General greater sage-grouse habitat. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10096]
**Date:** Wednesday, February 21, 2018 5:09:34 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10096**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:09:09 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-43 [blank, 6]
43-111 [21, 15]
44-110 [116, 109]
44-110 [91, 73]
44-110 [65, 54]
44-110 [47, 31]
111-226 [26, 23]
111-226 [8, 3]
110-114 [62, 64]

**Input**

These areas have been identified as crucial winter habitat for pronghorn antelope and should be avoided if at all possible.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10097]
**Date:** Wednesday, February 21, 2018 5:11:03 PM

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Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10097**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:10:44 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [67, 29]

**Input**

These areas have been identified as crucial summer habitat for pronghorn antelope and impacts to this habitat should be avoided or minimized if at all possible.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10098]
**Date:** Wednesday, February 21, 2018 5:15:24 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10098**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:14:58 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

111-226 [24, 28]
111-226 [26, 26]
110-233 [36, 37]
110-114 [31, 32]

**Input**

These areas cross Salmon River Creek, Cottonwood Creek, White Creek, and Steptoe Creek, all fishable waterways, and should be avoided if possible. If avoidance is not possible, extra planning and/or measures should be incorporated to reduce or minimize impacts to these waterways.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10099]
**Date:** Wednesday, February 21, 2018 5:19:56 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10099**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:19:32 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [65, 66]

**Input**

This area crosses Silver Creek, a fishable waterway. Silver Creek contains Bonneville Cutthroat Trout (Oncorhynchus clarkii utah). This species has been petitioned to be listed as Threatened or Endangered, however the listing was determined not warranted in 2008. We believe this waterway should be avoided if possible.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10100]
**Date:** Wednesday, February 21, 2018 5:27:51 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10100**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:27:44 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

43-44 [4, 16]
43-111 [29, blank]
44-239 [5, 12]
44-110 [121, 115]
44-110 [111, 91]
44-110 [104, 91]
111-226 [28, 24]
111-226 [blank, 9]
110-233 [101, 103]
110-233 [107, 116]
110-114 [4, 10]

**Input**

These areas have been identified as crucial winter habitat for mule deer and should be avoided if at all possible. If avoidance is not possible, extra planning and/or measures should be incorporated to reduce or minimize impacts to this habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10101]
**Date:** Wednesday, February 21, 2018 5:29:17 PM

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Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10101**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:28:45 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

111-226 [12, 9]

**Input**

This area has been identified as transitional range for mule deer and extra planning and/or measures should be incorporated to reduce or minimize impacts to this habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10102]
**Date:** Wednesday, February 21, 2018 5:32:53 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10102**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:32:38 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

44-110 [114, 123]
110-233 [blank, 18]
110-233 [27, 67]
110-233 [92, 99]
110-233 [112, 139]
232-233(E) (W) [12, 17]
110-114 [blank, 8]
110-114 [31, 44]
110-114 [50, 65]

**Input**

These areas have been identified as mule deer migration corridors and should be avoided if at all possible. Unimpaired migration is crucial to mule deer life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10103]
**Date:** Wednesday, February 21, 2018 5:53:55 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10103**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:53:44 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-111 [blank, 6]

**Input**

There are 4 active status greater sage-grouse leks, 2 pending status leks, and 3 unknown status leks within this corridor area. These sites are crucial for breeding season. The "pending" status indicates that sage-grouse breeding activity has been observed at this site and the site is awaiting additional data collection. The "unknown" status means that more information or data needs to be collected at this time, but that this is likely to be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10104]
**Date:** Wednesday, February 21, 2018 5:54:56 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10104**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:54:43 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-111 [17, 19]

**Input**

There are 2 active status greater sage-grouse leks within this corridor area. These sites are crucial for breeding season.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10105]
**Date:** Wednesday, February 21, 2018 5:57:10 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10105**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:57:02 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-111 [17, 19]
43-44 [8, 10]
43-111 [20, 22]

**Input**

Each of these areas contain 2 active status greater sage-grouse leks, These sites are crucial for breeding season.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10106]
**Date:** Wednesday, February 21, 2018 5:59:14 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10106**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 17:59:02 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-111 [23, 26]
43-111 [25, 29]
44-110 [114, 115]

**Input**

There are 2 unknown status leks within these corridor areas. The "unknown" status means that more information or data needs to be collected at this time, but that this is likely to be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10107]
**Date:** Wednesday, February 21, 2018 6:01:36 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10107**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:01:13 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

43-44 [2, 3]
44-110 [56, blank]
44-110 [59, blank]
44-110 [88, blank]

**Input**

This is one greater sage-grouse lek within each of these corridor areas with a currently unknown activity status. This status means that more information or data needs to be collected at this time, but that this is likely to be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10108] |
| **Date:** | Wednesday, February 21, 2018 6:03:49 PM |

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10108**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:03:06 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

35-111 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 139,801 acres of Priority greater sage-grouse habitat and 10,006 acres of General greater sage-grouse habitat. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10109]
**Date:** Wednesday, February 21, 2018 6:05:08 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10109**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:04:41 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

43-44 [4, 6]

**Input**

There is 1 pending status lek, and 1 unknown status lek within this corridor area. These sites are crucial for breeding season. The "pending" status indicates that sage-grouse breeding activity has been observed at this site and the site is awaiting additional data collection. The "unknown" status means that more information or data needs to be collected at this time, but that this is likely to be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10110]
**Date:** Wednesday, February 21, 2018 6:06:03 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10110**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:05:33 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

43-44 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 61,530 acres of Priority greater sage-grouse habitat and 41,505 acres of General greater sage-grouse habitat. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10111]
**Date:** Wednesday, February 21, 2018 6:06:40 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10111**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:06:32 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

43-111 [blank, blank]

**Input**

This is one greater sage-grouse lek within this corridor area with a currently unknown activity status. This status means that more information or data needs to be collected at this time, but that this could be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10112]
**Date:** Wednesday, February 21, 2018 6:08:10 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10112**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:08:01 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

43-111 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 90,4841 acres of Priority greater sage-grouse habitat and 400,991 acres of General greater sage-grouse habitat, as well as 29,129 acres of Sagebrush Focal Area. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10113]
**Date:** Wednesday, February 21, 2018 6:10:56 PM

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Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10113**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:10:33 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

44-110 [71, 121]

**Input**

There are 9 active status greater sage-grouse leks, and 1 pending status lek, within these corridor areas. These sites are crucial for breeding season. The "pending" status indicates that sage-grouse breeding activity has been observed at the site and the site is awaiting additional data collection.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10114]
**Date:** Wednesday, February 21, 2018 6:11:43 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10114**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:11:38 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

44-239 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 25,299 acres of General greater sage-grouse habitat. This category of habitat are important for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10115]
**Date:** Wednesday, February 21, 2018 6:20:46 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10115**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:20:39 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [1, 5]
110-233 [31, 36]

**Input**

There are 2 active status greater sage-grouse leks within four (4) miles of these corridor areas. These sites are crucial for breeding season and should be avoided. If avoidance is not possible extra planning and/or measures should be incorporated to reduce or minimize impacts to this habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10116]
**Date:** Wednesday, February 21, 2018 6:21:57 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10116**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:21:46 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [13, blank]
110-114 [20, blank]
110-233 [17, blank]

**Input**

There is one (1) active status greater sage-grouse lek within four (4) miles of these corridor areas. These sites are crucial for breeding season and should be avoided. If avoidance is not possible extra planning and/or measures should be incorporated to reduce or minimize impacts to this habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10117]
**Date:** Wednesday, February 21, 2018 6:31:20 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10117**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:30:30 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [25, 31]

**Input**

There are 3 active status greater sage-grouse leks within four (4) miles of this corridor area. These sites are crucial for breeding season and should be avoided. If avoidance is not possible extra planning and/or measures should be incorporated to reduce or minimize impacts to this habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10118]
**Date:** Wednesday, February 21, 2018 6:31:44 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10118**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:31:30 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

44-110 [70, 105]

**Input**

There are 6 active status greater sage-grouse leks within four (4) miles of this corridor area. These sites are crucial for breeding season and should be avoided. If avoidance is not possible extra planning and/or measures should be incorporated to reduce or minimize impacts to this habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10119]
**Date:** Wednesday, February 21, 2018 6:32:25 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10119**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:32:02 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

44-110 [103, 223]

**Input**

There are 5 active status greater sage-grouse leks within four (4) miles of this corridor area. These sites are crucial for breeding season and should be avoided. If avoidance is not possible extra planning and/or measures should be incorporated to reduce or minimize impacts to this habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10120]
**Date:** Wednesday, February 21, 2018 6:33:52 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10120**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:33:32 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 41,591 acres of Priority greater sage-grouse habitat and 117,541 acres of General greater sage-grouse habitat. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10121]
**Date:** Wednesday, February 21, 2018 6:45:03 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10121**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:44:52 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-233 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 58,164 acres of Priority greater sage-grouse habitat and 72,887 acres of General greater sage-grouse habitat. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10122]
**Date:** Wednesday, February 21, 2018 6:46:31 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10122**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:46:25 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

111-226 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 211,038 acres of Priority greater sage-grouse habitat and 27,175 acres of General greater sage-grouse habitat, as well as 202,919 acres of Sagebrush Focal Area. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10123]
**Date:** Wednesday, February 21, 2018 6:49:06 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10123**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:48:55 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

111-226 [27, 15]
111-226 [1, 5]

**Input**

There are 6 active status greater sage-grouse leks, 6 pending status leks, and 7 unknown status leks within these corridor areas. These lek sites are crucial for breeding season. The "pending" status indicates that sage-grouse breeding activity has been observed at this site and the site is awaiting additional data collection. The "unknown" status means that more information or data needs to be collected at this time, but that this is likely to be a significant area for sage-grouse breeding.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10124]
**Date:** Wednesday, February 21, 2018 6:50:15 PM

---

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10124**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:49:58 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

44-110 [blank, blank]

**Input**

Please apply a 4-mile buffer around corridor. This corridor contains 150,341 acres of Priority greater sage-grouse habitat and 184,413 acres of General greater sage-grouse habitat. These categories of habitat are essential for the sage-grouse life cycles.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10125]
**Date:** Wednesday, February 21, 2018 6:57:01 PM

Thank you for your input, Jasmine Kleiber.

The comment tracking number that has been assigned to your comment is **10125**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 21, 2018 18:56:48 CST

**First Name:** Jasmine
**Last Name:** Kleiber
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Nevada Department of Wildlife

**Topics**
Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Additional feedback, comments, and questions the Nevada Department of Wildlife have that were not appropriate to identify to specific corridors are included below. 1.How does the disturbance cap established in the ARMPA apply to the development or expansion of energy corridors? 2.We recommend implementing the ARMPA across energy corridors within Nevada (there several references to local RMPs that have lesser requirements) for consistency. 3.Utilize latest Sage Grouse habitat categorization map along with updated 2017 NDOW lek data. 4.Include robust cumulative impacts analysis of additional perches within sage grouse habitat. 5.Recommend APLIC standards for construction or any retrofits for powerlines. 6.Please provide clarification on what the mitigation hierarchy for sage grouse is. 7.Identify mule deer crucial summer and winter range in context of loss of habitat along with fragmentation along with the indirect impacts associated with infrastructure. 8.Impacts to migration corridors need to be considered. 9.35-43 is a new proposed line which we question the utilization along with why it isn't collocated (1-80 corridor is close). Also question why have the tie into SWIP at this location as the two larger powerlines merge further north. 10.Line 110-114 topography doesn't lend itself for additional transmission lines from Mile post 34-42. There are likely other portions of corridors that this would also apply. Additionally the topography is likely to compound affects to wildlife species in the some areas. 11.Question why transmission corridor 111-226 is 15,000 feet wide. Perhaps this is a mistake? 12.Recommend that all infrastructure that has been decommissioned be removed from the

landscape.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10126]
**Date:** Thursday, February 22, 2018 7:27:08 AM
**Attachments:** ID_10126_EnergyCorridorLPAComments.docx

Thank you for your input, Sandra Johnson.

The comment tracking number that has been assigned to your comment is **10126**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 22, 2018 07:26:52 CST

**First Name:** Sandra
**Last Name:** Johnson
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Las Placitas Association

**Topics**
Air quality
Cultural resources
Ecological resources
Lands with wilderness characteristics
Public access and recreation
Visual resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

80-273 [blank, blank]
81-272 [blank, blank]
89-271 [blank, blank]
89-271 [blank, blank]

**Input**

[Blank]

**Attachments**

Energy Corridor LPA Comments.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10127] |
| **Date:** | Thursday, February 22, 2018 11:09:59 AM |
| **Attachments:** | ID_10127_PublicCommentsonNECplan_Final.pdf |

Thank you for your input, Elaine Cimino.

The comment tracking number that has been assigned to your comment is **10127**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 22, 2018 11:09:35 CST

**First Name:** Elaine
**Last Name:** Cimino
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Common Ground Community Trust

**Topics**
Physical barrier
Jurisdiction
Existing infrastructure/available space
Air quality
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Livestock grazing
Paleontology
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources
Interagency Operating Procedures

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

80-273 [blank, blank]
81-272 [blank, blank]

**Input**

[Blank]

**Attachments**

Public Comments on NEC plan_Final.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# *Public Comments on the New Energy Corridor Plan*

## *Pipeline Notification Protocol Systems needed in State and or Counties for Private Property Owners Impacted by Pipeline Siting: Aging infrastructure, re-routes, repurpose, new route construction implementation on the New Energy Corridor Plan*

This comment period has several deficiencies:

- The notification period should be extended to fully incorporate public response and outreach including tribal consultation and with Indian Allotment Landowners, and private property land owners not under federal jurisdiction, and for a county wide notification protocol through out the state to be established as part of the best practice and policy under the BLM Gold Book best practices policy and procedure protocols.
- Most residents cannot respond to the website announcement in the areas of reroutes and new corridor plans and are without the proper public notification in rural areas where Broadband Internet communications are not wholly accessible and where there are language barriers.
- Most residents phone polled in the area did not know all of the types of pipelines that were currently in their communities or the differences in the regulations between the types of hazardous substances transmitted and the impacts to private property owners. Most notably, communities have indicated that they know they have pipelines passing through but that they did not know what type they are and have no idea on any new pipelines such as the hydrogen line that was introduced in the this public comment process.
- More information on the impacts to these county communities is buried in data that most people do not have ability to access due to time, education, and ability to do this research. An educational forum should be given to all rural communities so that they know where the pipelines are located, what flows through these pipeline or realize what siting indicate that new routes were being developed and how it will impact them. No notification of intent needs a prefilling by pipelines owners, and little efforts on the part of operators has been made to notify property owners of potential eminent domain issues that will impacts them.

- There are residents who have pipelines in their region and do not know what pipeline companies operated and who managed the pipelines or how to contact them. They are unable to name the companies.
- Only a small percentage of citizens impacted knew approximately how many total miles of pipelines existed within their counties it usually residents who have already been impacted by oil and gas extraction, which were knowledgeable about what these impacts could be.

***Implementation of Current Pipeline Notification Protocols***

There is no pipeline notification protocol to work within or for those who live in close proximity to existing pipeline.

Most communities have indicated that they did not have such a notification protocol. The most common type of notification protocol used was 811-Call Before You Dig for all excavation in urban areas operated mostly by natural gas distributors. This was used mostly in urban or semi urban areas indicating they had a current protocol of call before you dig. The second most commonly used type of notification protocol that should be under the consideration of existing pipeline infrastructure for review of new land development plans, should be followed by above-ground signs and markers along existing right of ways (ROWs). These should apply to existing and new development plans.

The problem with this notification protocol is that there is no notification prior to the start of work and that pipeline companies state that under federal regulations they must operate, they are not required by their company to submit plans for review by local communities.

There is not a notification protocol for proposed pipeline projects in several counties in the state that the current plans for new transmission, gathering and distribution lines and most people do not know where to look, if they had such a protocol. Most areas of semi rural and urban use two types of protocols:

1) Obtaining and reviewing proposed pipeline ROW maps and other documents from companies, operators, and contractors, and 2) holding consultation meetings between municipal officials and pipeline companies, operators, and contractors. Communities that who have a notification protocol for new pipeline projects also seek to hold

consultation meetings between municipal/county officials, pipeline companies, and adjacent residents. After that, most counties indicate that they post information on their municipal website (they have NO pre-defined Consultation Planning Zones or community district overlays and/or Ordinances established for construction of new pipelines in any counties that we are aware of). Pipeline operators communicate with residents at their leisure or "appropriate time." There was no indication of what that "appropriate time" might be.

Consultation Zones (CZs) are a planning tool used by local counties or other zoning authorities as recommended by our groups in the Rio Grande Citizens Alliance Network (RGCAN). We recommend Best Practices Policies and Procedures Gold Book procedures to be followed to document and enhancing pipeline safety and risk-informed land use planning in countywide communities is needed. With many of the TAG funding cuts it has made pipeline Notification Protocol more difficult for citizens to access unbiased information and be protected for health and safety. CZs are generically defined as "an area extending from each side of a transmission pipeline, the distance of which should be defined by local governments through Community District overlays, to describe when a property developer/owner, who is planning new property development in the vicinity of an existing transmission pipeline, should initiate a dialogue with a transmission pipeline operator." Model ordinances for creating CZs are not being recognized by local authorities and will cause greater conflicts by their biased support for taking of property from private property owners. Most people are not familiar with the appropriate planning tools that can be utilized with CZs as a mechanism for communication between property developers/owners and operators of nearby transmission pipelines when new land uses and property developments are being planned, most citizens have indicated that they were not familiar with CZs. We ask for support in the EIS process for Counties to develop ordinances on pipeline safety land use protocols and procedures, which RGCAN has drafted ordinances ready to be considered in this matter.

*Creating a Pipeline Notification Protocol through out the state and for Sandoval County New Mexico and all counties in the State where these pipelines traverse is indicated and needed.*

**Table 1. Information needed in a Pipeline Notification Protocol (PNP)**

| Information Required in a Pipeline Notification Protocol |
|---|
| Emergency contact name and information for pipeline operator(s) and County Department of Emergency Services |
| Contact name and information for pipeline companies, operators, and contractors |
| Description of the work to be conducted or construction and operation of the new pipeline |
| Traffic impacts that could occur as a result of the work or construction (for example: road detours, temporary roadways and detours, volume of heavy truck traffic) |
| Boundaries of project area, including a map of the proposed work-space or development location, existing pipeline ROWs, other current land uses, and other relevant information |
| Details of the type of project under construction (for example: new pipeline construction or reconstruction, pipeline repair or maintenance, new development or land use near existing pipeline) |
| Expected duration of proposed projects, including daily hours of operation during maintenance or construction |
| Environmental and other transportation impacts to waterways, protected areas, roads, rail lines, including crossings of streams, creeks, wetlands, other protected areas, roads, and rails |
| Emergency management and response plan for the operation of existing and new pipelines |
| Parcels and landowner names immediately adjacent to where the work or new project is proposed to occur |
| Length and diameter of existing and new pipelines and associated ROWs |
| Details regarding the grubbing, trimming, or removal of trees or native vegetation, including a restoration plan for vegetation along existing or new ROWs |
| Materials being transported through existing pipeline ROWs or proposed to be transported through new pipelines (for example: natural gas, petroleum, hazardous liquids) |
| List of all parcels within 1,000 feet of the work-space or new pipeline |
| Current operating pressure(s) of pipelines within existing ROWs and of proposed pressure(s) for new pipeline construction |
| |

Courtesy of the Pipeline Safety Coalition

| Table 2 Concerns about Existing Pipeline Right-of-Ways |
|---|
| General safety |
| Maintenance and inspections leading to risk of leaks and spills (air and water) |
| Environmental and health impacts |
| Proximity to residential areas/dense housing development |
| Communication with and notification of landowners |
| Property destruction/inadequate site restoration |
| Increasing ROW size/expansion of ROW |
| Mistrust in government agency and companies |
| Increasing existing pipe size and pressure |
| Using existing ROWs for new lines instead of taking more land |
| Property values, financial impacts |
| Public education |
| Disturbance of ROW by landowners and developers |
| Abandoned in place pipelines |
| Standards through sensitive areas |
| Poor signage |
| Exclusion of property owners from decision-making |
| Pipeline companies have political and legal advantages |
| Age of existing pipelines |

Courtesy of the Pipeline Safety Coalition

**Table 3.Landowner Survey: Concerns about Proposed Pipeline Projects**

| Table 3. Concerns about Proposed Pipeline Projects |
|---|
| Environmental and health impacts |
| General safety |
| Property destruction, inadequate site management during construction and restoration |
| Timely communication with landowners, opportunities for input from community and local government |
| Cumulative nature of projects |
| Loss in property values, financial impacts |
| Impacts on cultural, historic and scenic landscapes |
| No more new pipeline ROWs, use existing ROWs for new pipelines |
| Proximity to residential areas, gathering places, appropriate placement of ROWs |
| Lack of information from pipeline companies, lies and "half-truths" and withheld information |
| Alternatives fully and fairly evaluated by FERC |
| Citizens are uninformed and disempowered to do anything |
| Adequacy of maintenance, inspections, oversight |
| Regulation inadequate or uncertain |
| Hiring of unqualified and cheapest contractors |
| Property takings and rights of landowners |
| Impact to livestock |
| Pipeline companies lack knowledge of local conditions |
| Traffic impacts |
| Increasing ROW size/expansion of ROW |
| Increasing existing pipe size and pressure |

Courtesy of the Pipeline Safety Coalition

The majority of Counties are telling citizens that federal regulation preemption means that operators do not need to tell the local municipalities, counties or states and or citizens of their plans, nor does the County have any jurisdictions to help the property owners. This is false and misleading. One reason for this discrepancy is likely due to biases for unfettered streamlined regulations for short-term revenues, different operators operating in different areas under different jurisdictions and regulations due to the type of hazardous substance being transmitted. This raises the important issue of knowing which operators are operating in

which municipalities and regions throughout the county and the state in order to avoid such problems as outlined in the above tables 1,2,3.

There are no pipeline notification protocols for new pipeline projects. There were two types of protocols that were cited as being most frequently used: 1) obtaining and reviewing proposed pipeline ROW maps and other documents from companies, operators, and contractors, and 2) holding consultation meetings between municipal officials and pipeline companies, operators, and contractors, these are the two most common protocols. The most transparent protocols that are followed start by holding consultation meetings between municipal officials, pipeline companies, and adjacent residents, and local citizens organizations, and general public include posting information on their municipal website, and implementing pre-defined Consultation Planning Zones and/or work on Ordinances to establish surface land use rules for construction of new pipelines. Municipalities report when having difficulties implementing these protocols cited problems with getting meetings with the operators of newly proposed pipelines. Signage needs to be posted in high frequently travel areas, where people can safely pull of the road ways to read the signs on where to find information and what is happening in the region. The Common Ground Community Trust, RGCAN grou ps, will be following up with regional community groups who indicated problems with a notification protocol to get more information about their experiences to date. It is also clear that education regarding what a 'Consultation Zone' is and how it can be used in local land-use planning regarding health and public safety is necessary to the county government and community groups. These items should Standard Operating procedures and a part of GOLD Book policy and procedures when it comes to public safety and eminent domain land takings.

It is recommended that Table 1, that a ranking of possible notification protocol information be used to prioritize the type of information that county planning zoning commissions would find most useful to their planning notification processes and that should be considered for inclusion in a County-wide pipeline notification protocol.

**Pipeline Operator Responses and Information Must Be Shared**

A survey of pipeline operators and managers should be implemented to understand which companies operate pipeline infrastructure in Sandoval County, who is responsible for pipeline notifications within companies, the nature of their pipeline systems (e.g., number of pipeline miles, type of materials and facilities, etc.), sharing of information regarding High

Consequence Areas and Pipeline Impact Radius, how they currently manage communication and notification in the County with regard to working within existing pipeline right-of-ways and proposing new pipeline projects, and their willingness to share information about their existing pipeline systems, especially in high consequence areas (HCAs). The federal government has not enforced HCAs and the industry has gotten a free ride to unfettered access for years. Current HCAs in water dwelling areas will need a state of emergency declared to protect the public welfare.

**Distribution of Survey**

An on-line survey to pipeline operators should be distributed via an electronic mail invitation to Tribes, State, County and other government regulators, USFS and or BLM, RGCAN and any other public group by means of notification, not dependent of internet as outlined above, (from 3 current pipeline companies operating in e.g. Sandoval county and any pipeline company that is proposing to operate pipelines in the county) currently. A follow-up reminder needs to be sent to these same contacts.

Consideration for appropriations and or tariffs should be given for a Pipeline Mapping System Operation to the NM Pipeline Safety Public Bureau at the Public Regulation Commission. The State needs the database and supplemented with data about operators known to be potentially new, that includes track records, violations and fines anywhere in the world, as well as operators who participate at meetings in the County and or State. Enterprise indicated to the Pipeline Safety Coalition that that the role they played in the company depended on the type of pipeline that the notifications were referring to (i.e., transmission versus distribution).

***Nature of Pipeline Systems in County***

Preliminary analysis of the results shows that the miles of transmission pipelines operated by all companies who responded ranged to between 20 and 40 miles (hazardous liquids transmission lines owned by Enterprise. We had no responses from inquiries from companies to our proposal on aging infrastructure or the operation LNG plants and facilities or gas gathering pipelines.

***Sharing of High Consequence Areas and Pipeline Impact Radius Information***

In terms of sharing databases of High Consequence Areas (HCA) or Pipeline Impact Radius (PIR) with Sandoval County, most do not share this information. The RGCAN County Emergency Response task force would like the Federal government to share the engineering data on life expectancy of existing pipelines and prove in updated engineering reports through third independent party the life expectancy of existing pipelines in the state many buried prior to 1976 and contain highly hazardous liquids and natural gas.

***Notification and Communication Regarding Existing Pipeline Right-of-Ways and Proposed/New Pipeline Projects***

All four respondents operating pipelines in Sandoval County indicated that their company does implement a current notification protocol when working within existing pipeline right-of-ways (ROWs). NM Gas Company indicated that they notify people in mail and in person when possible, and that is dependent on when they follow federal, state, and local protocols, The Pipeline Safety Coalition in their interview with Enterprise indicates that they (Enterprise) contact their Land Department, said that their Damage Prevention Team notifies the NM 811 One Call System. This happens more urban and suburban areas. However, in rural areas that are becoming more populated, there is no emergency safety response and it takes many hours if not days for the operators to respond appropriately as we seen for the fracking explosion in Nageezi in 2016. Safety Response was virtually closing a road and letting pipes or facilities burn. Operators make money on clean up, too.

Three of the four pipeline operators in the state indicated that their company also implements a notification protocol for proposed pipeline projects, while the one operator (Enterprise) indicated that they did not know if such a protocol for proposed pipelines was

implemented. None of the pipeline respondents were familiar with Consultation Zones (CZs) in pipeline land use planning.

When the Pipeline Safety Coalition (PSC) asked what they saw as the most important form of communication needed in a State and/or County pipeline notification protocol, whether for existing ROWs or proposed pipeline projects, Internet and websites ranked as the first most important form, e-mail, phone calls, public meetings, and postal mail all ranked second, while local newspapers, signage and face-to-face meetings with landowners ranked third.

***Willingness to Publicly Share Information about Pipeline Systems***

In order to gauge the willingness of companies to share specifics about pipeline operations, including locations and materials, with the public, they did not know whether their company would consider incorporating an interactive Google Map of their pipeline systems into their company website, most indicate they would need to get approval from their Legal and Security Departments before putting up this type of information on their website.

***Creating a Pipeline Notification Protocol for Sandoval County, NEW MEXICO***

"If you were creating a pipeline notification protocol for Sandoval County, New Mexico, what would it look like?" in other areas of the country the operators indicate that they would most likely be a spreadsheet with the county PIN number, the street address of the property, the landowner's name, address, phone, and e-mail address where available.

**Conclusions**

Pipeline operators in Sandoval County and those who do not operate any pipelines in the County but plan to, should pre-file new construction, reroutes, repurpose, and decommission plans and support implementing a Pipeline Notification Protocol and NM database system though tariff legislation enacted by the NM Legislature and PRC Commission.

Operators who have or are planning to have pipelines in the county need to indicate that they use a pipeline notification protocol for work within existing pipeline right-of-ways. They all use different types of protocols, so it is important the operators follow-up on the exact implementation that is recommended to find out what a common denominator could be to used in designing the State and or County land use planning protocol for existing right-of-ways.

With regards to proposed new pipeline projects, none of the current operators indicate that they use a notification protocol. This is similar to their protocol for existing right-of-ways, and as a company who is planning to operate in a county in the future, they indicated in the survey that they attempt to meet with all affected third parties to address concerns. Most importantly, all eight respondents to the PSC survey answered that they were unfamiliar with 'Consultation Zones' in local pipeline land use planning. This was a surprising finding since one of the respondents is from a company that was part of the team that introduced the Consultation Zone process.

It is important to note that oil industry consultants conclude that the lack of familiarity with Consultation Zones was most likely due to the fact that information is usually sent to public relations firms, community outreach, and land acquisition staff from the companies who are less likely to work on land use planning decisions at the local government level. Consultation Zones should be used by the operators and must be mandated by state and local Commissions for pipeline notification protocol. Therefore, in moving forward it is recommended in the design and implementation of the State and countywide pipeline notification protocol that the Associations of Counties develop a working relationship between the governmental affairs staff,

liaisons company reps in order to ensure that all communications is conducted with staff who are familiar with the concept of Consultation Zones or who have experience in local government land use planning and community outreach inclusive of tribal and culturally diverse populations in the State of New Mexico.

In terms of operators' willingness to share information and participate in a countywide pipeline notification protocol, most operator respondents indicated some willingness to share information with certain County stakeholders and to participate to the extent that the decision-makers in their company allowed. This should be mandatory. Therefore, similar to the issue of Consultation Zones, it is recommended that the county develop a working relationship with the Association of Counties, governmental affairs to bridge, educate staff about each company's background and plans to operate in the county or municipality. It is in the public safety and welfare interests of federal, state and county governments to make decisions on the most updated engineering data of pipeline life expectancies in HCAs that information that companies are willing or forced to share with various stakeholders about their operations. A better understanding about the parameters each company will help with data sharing and stakeholder participation that is necessary in order to ensure that the design of the countywide pipeline notification protocol can be implemented effectively and that pre-filing notification is followed in the State of New Mexico.

Without countywide consultation zones any notifications given by the BLM and or USFS in this matter is ineffectual and defeats the process of public participation and notification on land takings in any county in the State of New Mexico.

These comments are submitted by:
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**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10128]
**Date:** Thursday, February 22, 2018 11:50:30 AM
**Attachments:** ID_10128_CedarCity_BlackBear_Corridors_PropWild.pdf
ID_10128_CedarCity_Lion_Corridors_PropWild.pdf
ID_10128_CedarCity_MuleDeer_Corridors_PropWild.pdf
ID_10128_WildLifeLines_WildlandsNetwork_WhitePaper_lowrescopy.pdf

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Thank you for your input, Katie Davis.

The comment tracking number that has been assigned to your comment is **10128**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 22, 2018 11:50:02 CST

**First Name:** Katie
**Last Name:** Davis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Wildlands Network

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

The Cedar City Field Office (CCFO) comprises significant wildlife habitat. Corridor #110-114 runs through the CCFO in an east-west direction, cutting through known wildlife habitat and movement areas. Wildlands Network's partner organization, Grand Canyon Wildlands Council, previously completed analysis and mapping of significant habitat and movement corridors for mountain lion, black bear and mule deer within the CCFO. The resulting maps show that each of these three native species move across Corridor # 110-114. We ask the BLM to consider the connectivity and habitat needs for these species when evaluating this corridor. The maps showing the areas of concern for each species are included as attachments. Specifically, appropriate mitigation measures should be included in any and all design, implementation and monitoring of this corridor if it was used for a transmission or pipeline project of any kind. We also suggest that, to the extent possible, any additional transmission or pipeline infrastructure be integrated into the existing highway footprint, so as to prevent disturbance and fragmentation of additional habitat areas along this corridor path. Wildlands Network would also like to highlight the importance of this area to regional wildlife connectivity. Corridor #110-114 cuts through the Grand Canyon-Central Idaho Megalinkage. As the name implies, this regional wildlife megalinkage extends from the Grand Canyon ecoregion, including the Arizona Strip and St. George Field Office lands, through western Utah and eastern Utah into central Idaho. The Utah section consists of the Indian Peak Mountain Home ranges; with the Wah Wah-Confusion Range Mountains extending into Millard County and northward. This regional connectivity is highlighted in research and

mapping completed by Wildlands Network and Colorado State University in 2010. This "Wild Lifelines" analysis, attached, identifies areas important for landscape connectivity. It should be taken into account in the design, implementation and mitigation of any infrastructure within the transmission/pipeline corridors being evaluated. GIS data used to create the maps and analysis referenced in these comments and attached can be obtained by emailing Katie Davis at k.davis@wildlandsnetwork.org.

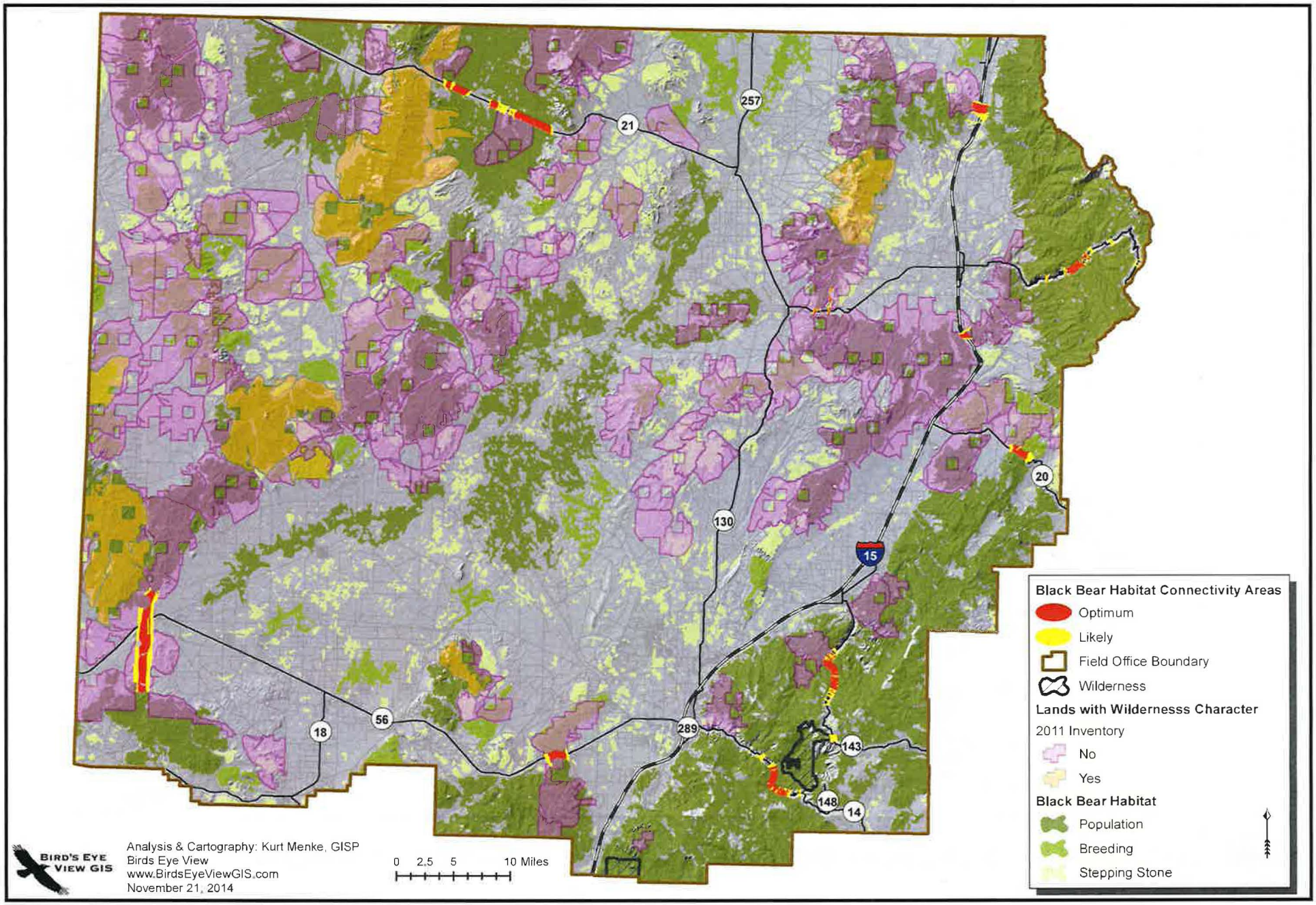
**Attachments**

CedarCity_BlackBear_Corridors_PropWild.pdf, CedarCity_Lion_Corridors_PropWild.pdf, CedarCity_MuleDeer_Corridors_PropWild.pdf, Wild-LifeLines_Wildlands-Network_White-Paper_low-res-copy.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# Cedar City Field Office - Black Bear Habitat Connectivity

GRAND CANYON WILDLANDS COUNCIL

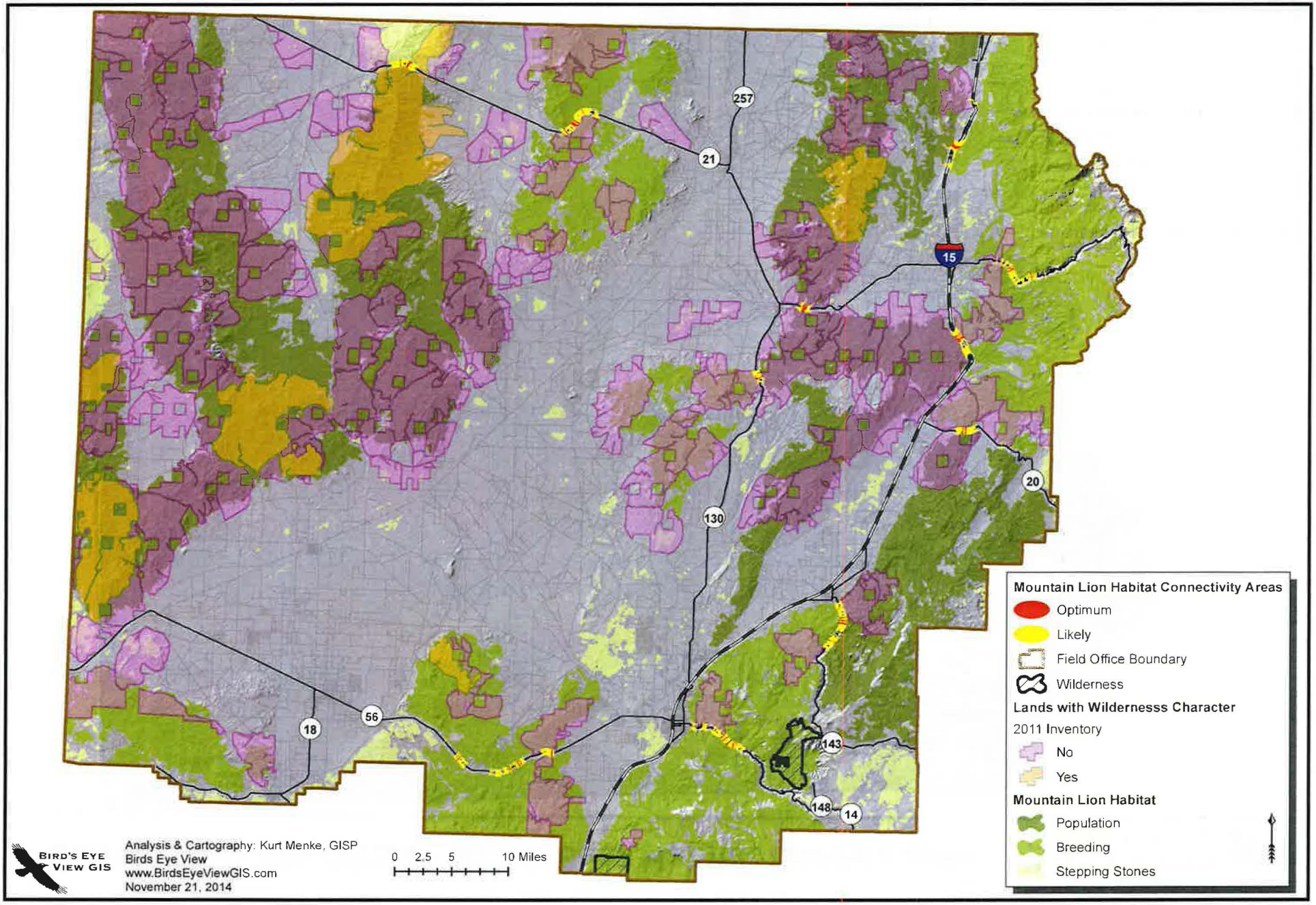



BIRD'S EYE VIEW GIS

Analysis & Cartography: Kurt Menke, GISP
Birds Eye View
www.BirdsEyeViewGIS.com
November 21, 2014

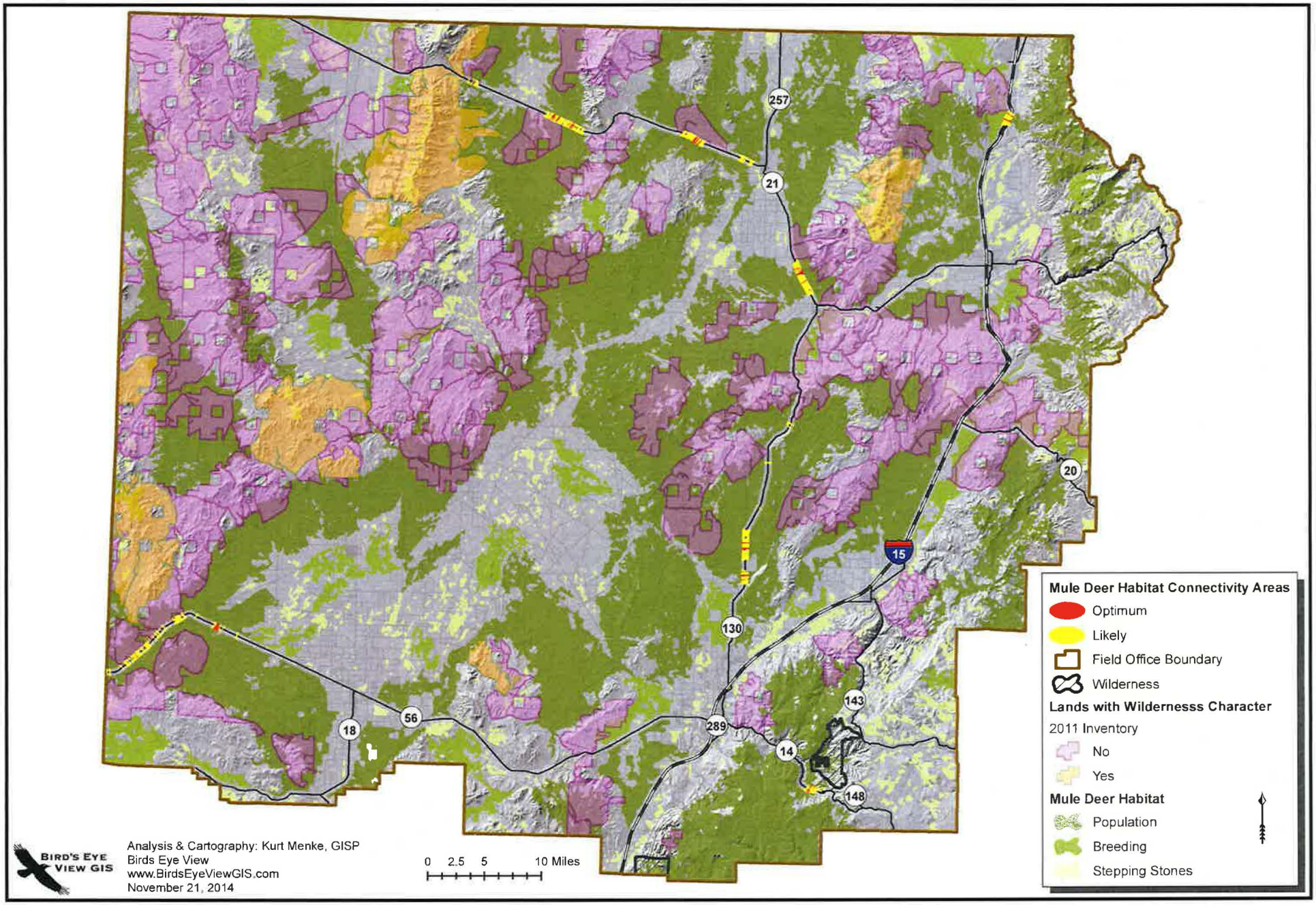
# Cedar City Field Office - Mountain Lion Habitat Connectivity

GRAND CANYON WILDLANDS COUNCIL



# Cedar City Field Office - Mule Deer Habitat Connectivity

GRAND CANYON WILDLANDS COUNCIL



WILDLANDS NETWORK
RECONNECTING NATURE IN NORTH AMERICA

RESEARCH WHITE PAPER

July 24, 2010

Colorado State University
Knowledge to Go Places

# MODELING POTENTIAL BROADSCALE WILDLIFE MOVEMENT PATHWAYS WITHIN THE CONTINENTAL UNITED STATES

Kenyon Fields[1], Dr. David M. Theobald[2]; Dr. Michael Soulé[3].

1. Wildlands Network; Kenyon@wildlandsnetwork.org; www.wildlandsnetwork.org
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3. Prof. Emeritus UC Santa Cruz, rewild@tds.net

## ABSTRACT

*Wild LifeLines™ depict potential movement pathways in the U.S. between the Mexican and Canadian borders that emphasize the least human modification and highest extant connectivity for wildlife. These pathways are the result of a novel modeling approach that is based on a map of Natural Landscapes built from layers of land cover types, distance to roads, traffic volume, and housing density, and which then identifies the least fragmented connections between remaining natural areas. Wild LifeLines complement identification of cores and linkages within conservation planning boundaries that might secure landscape capacity for broad-scale wildlife movement within extant high-connectivity lands.*

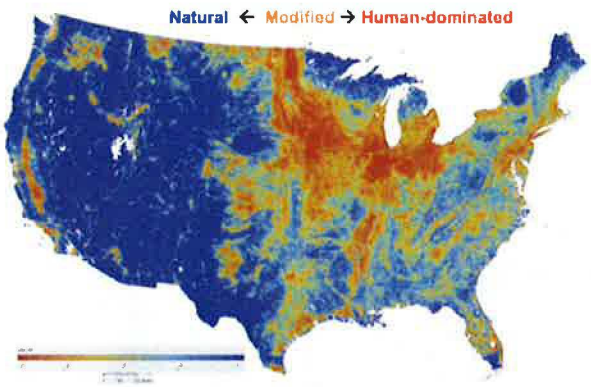
*Although Wild LifeLines identify areas important for landscape connectivity, the intent is not to prioritize selection of parcels or local scale linkages, but rather to identify the most efficient existing pathways allowing broad-scale movement. Wild LifeLines is a powerful new expression of places and pathways that are important for maintaining connected landscapes, providing for the movement of wide-ranging species, and facilitating adaptation to climate change.*

## INTRODUCTION

America's protected areas do not exist as contiguous corridors but as scattered islands of relatively wild habitat surrounded by increasing human modification of the landscape. However, many relatively wild or natural landscapes exist outside of protected areas. These lands serve a vital role in allowing for continued movement and habitation by wildlife. If we are to conserve the existing potential for wildlife movement between undisturbed lands at the landscape, regional, and national scales, what are the pathways along which that movement would best occur? Our goal, therefore, is to provide a broad scale look at landscape connectivity based on landscape naturalness, without a focus on any particular individual species. We assume that wildlife movement will be least restricted across "natural" areas and most restricted across "human-modified" areas.

Wild LifeLines™ are the product of a novel modeling approach that seeks to identify the least fragmented pathways across lands with the best natural condition. We began by mapping *Natural Landscapes* [Theobald, 2010], based on national datasets such as natural land cover types, presence of roads, highway traffic volume, housing density, and others [Figure 1]. We then developed a new method to measure variable resistance to wildlife movement that employs naturalness as a proxy for permeability. Wild LifeLines uses the concept of hydrological flow and asks: "If animals are "dropped" or distributed across the landscape and then are constrained to "flow" across the landscape avoiding human-modified areas, how would they move across landscape? Where would

Figure 1: Natural Landscapes




pathways converge? Note this differs from typical corridor mapping that builds from patches of focal species and computes all possible nearest-neighbor combinations.

As a physical metaphor for this method, rain falling across the top of a mountain begins to run down-slope; as enough water gathers, a headwater stream forms, and begins to incise into the surface. Headwater streams merge to form second-order streams, and so on, until the flows converge to form a river, which represents the accumulation of all flows. As water flows across the surface of the mountain it follows paths of least resistance. Analogously, the dendritic pattern of the Wild LifeLines™ represents the most efficient flow patterns across the landscape if following lands of least resistance (most natural).

**MAP PRODUCT** The result is a map displaying a branching system of pathways (or Wild LifeLines) representing the highest permeability or highest-scored paths that allow movement across the landscape while avoiding areas of human-modification. The total system of lines can thereby be considered a "wildlife circulatory system" or a "civilization avoidance network" for the nation. [Figure 2]

Wild LifeLines show the accumulation of natural areas as they flow across the landscape. The areas overlain by thicker "arteries" represent convergences of highest likely contribution to connectivity, as a function of both local natural values and the respective cells' positions within the broader network of all locations in the study area. The accumulated values thereby indicate the importance (or priority) of any location to national-scale connectivity. Thinner secondary and tertiary lines represent the best ways for wildlife to get to primary arteries if constrained to move across the most natural areas.

The data can be normalized to state boundaries, as shown for Colorado in Figure 3.

Our analysis is derived from the Natural Landscapes map and is not influenced by the land ownership or protected status of lands. Although protected areas are important elements of conservation reserve systems, they are not sufficient due to their isolation and their utility is uncertain in the face of climate change.

Unlike typical methodologies to examine connectivity, our approach does not attempt to indicate what areas should be cores or linkages (although it can be used to help shape such decisions). The specific acres covered by Wild LifeLines are not necessarily areas of high habitat value. Instead, we identify the shortest and least disturbed pathways across the nation following lands of the highest Natural Landscapes metric. In this sense, the Wild LifeLines method employs an innovative approach that can provide planners with a new way to evaluate conservation priorities, as it focuses on the landscape's capacity to allow for movement. The naturalness value of any given cell and its position relative to project-wide naturalness values determines the relative importance of a location, whereas traditional analyses identify sites based on such factors as their habitat value for specific species or the rarity of the biophysical setting.

Thus, if ultimately our goal is to protect connectivity at the broad, national scale, Wild LifeLines can serve as a guide, from which protection and restoration efforts would likely extend outward. We expect that refinements will be made based on more detailed data for local areas, and to incorporate specific needs for well-known species through "focal species" modeling efforts. Comparable data for Canada and Mexico will help to further refine the specific location of pathways connecting beyond the U.S., but broad patterns are fairly robust to these "boundary effects" – the condition across the borders.

Figure 2: Wild LifeLines™

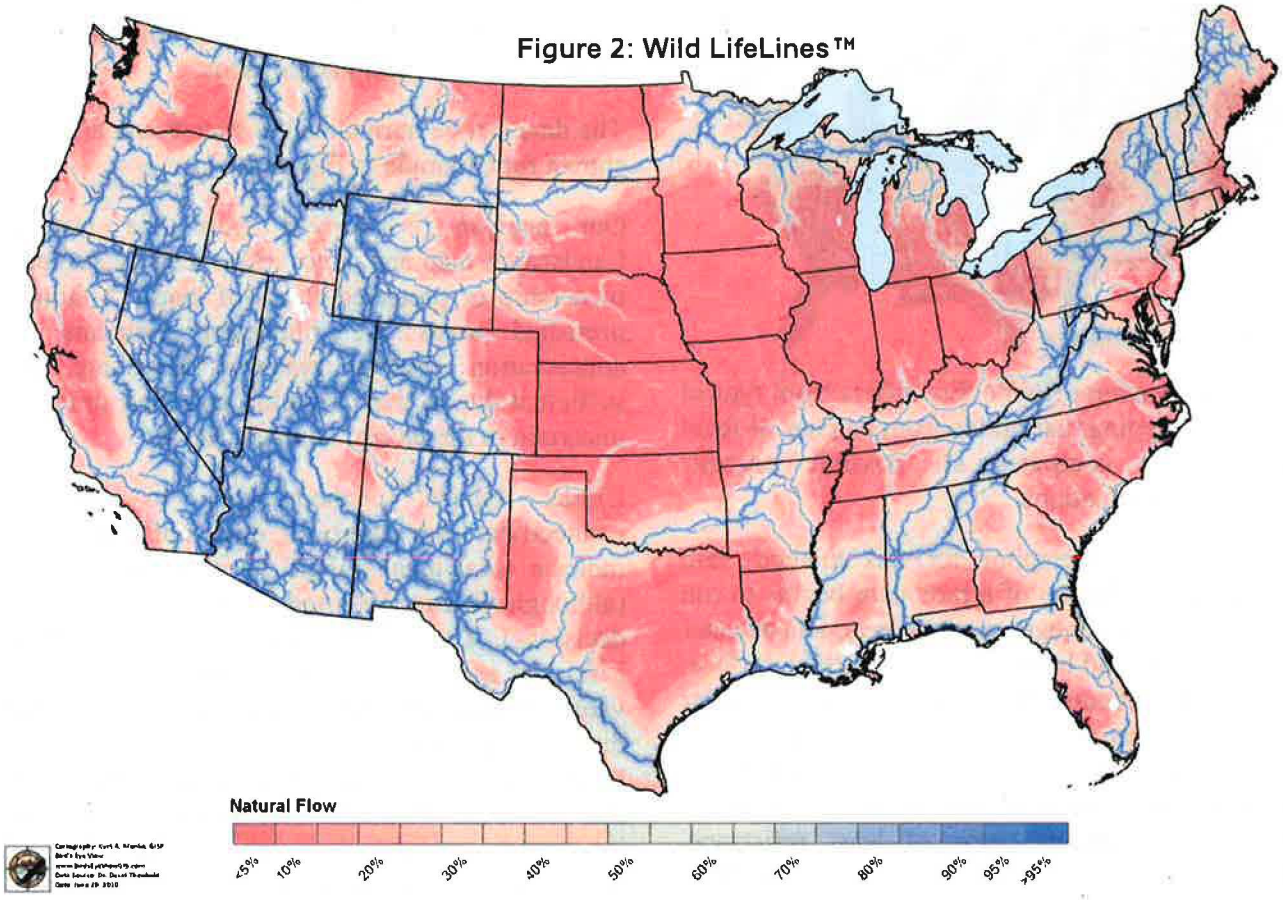
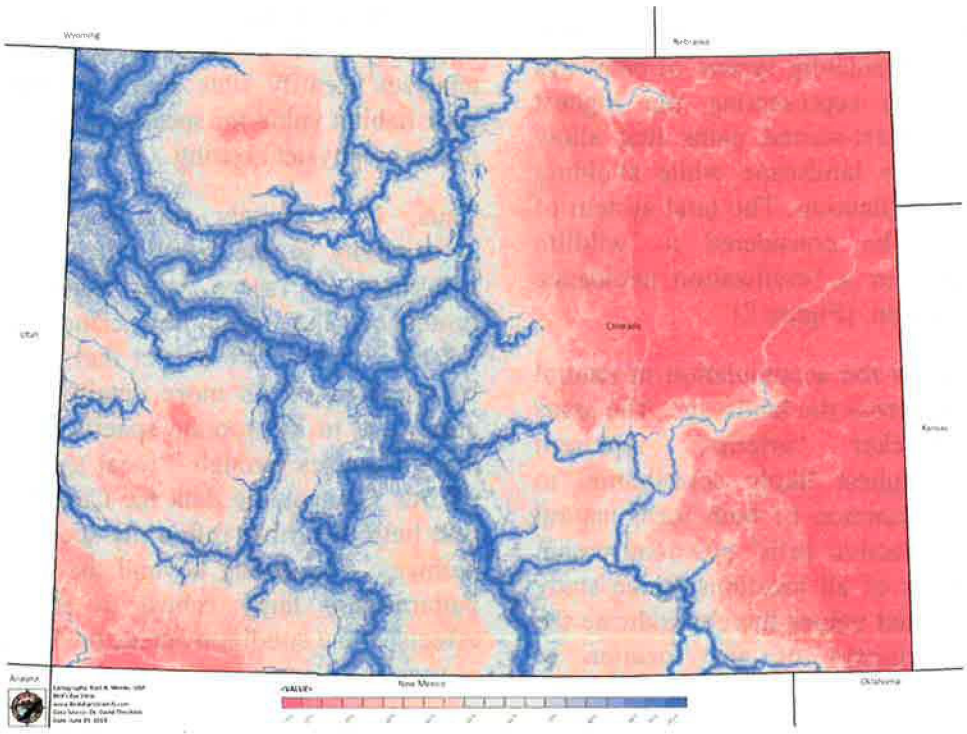



**Figure 2: Wild LifeLines™ normalized to Colorado state boundaries.**



## APPLYING WILD LIFELINES TO LOCAL, REGIONAL, & LARGE LANDSCAPE CONSERVATION INITIATIVES

Wild LifeLines can be employed as a complementary tool to conservation network planning methodologies, and provides information to allow comparative prioritization based on the relative importance of any location within the national scale to all other locations. We believe this will be helpful to organize local conservation efforts, by providing a means for relative valuation of projects' potential to assist in protecting extant connectivity at the national scale. If we are to conserve existing landscape connectivity, it is clear that we should first identify and conserve the least fragmented connections within broader natural landscapes. We stress that this approach complements species-specific approaches and finer-scale analyses.

There are several ambitious large landscape conservation initiatives underway in North America, such as Wildlands Network's *Spine of the Continent (Western Wildway) Initiative* and *Eastern Wildway Initiative*, the *Two Countries One Forest* effort, and the *Yellowstone to Yukon Conservation Initiative.* These are examples of networks of organizations working across political and jurisdictional borders to conserve connected systems of lands. Wild LifeLines can help such initiatives identify which of their proposed new core and linkage/corridor protections within conservation planning boundaries should be prioritized if the goal is to contribute to protection of existing connectivity at broad scales.

Proposed cores or linkages that have been derived from site selection analyses, and which fall along or near, Wild LifeLines could be prioritized for campaigning, assuming other socio-political and ecological factors are considered as well. In regions where no reserve design exists, our analysis helps us identify where to concentrate conservation-planning activity to "fill the gaps." For example, Figure 4 displays the top 10-percentile class Wild LifeLines over the proposed cores and linkages identified in the Southern Rockies Wildlands Network Design, and existing protected areas.

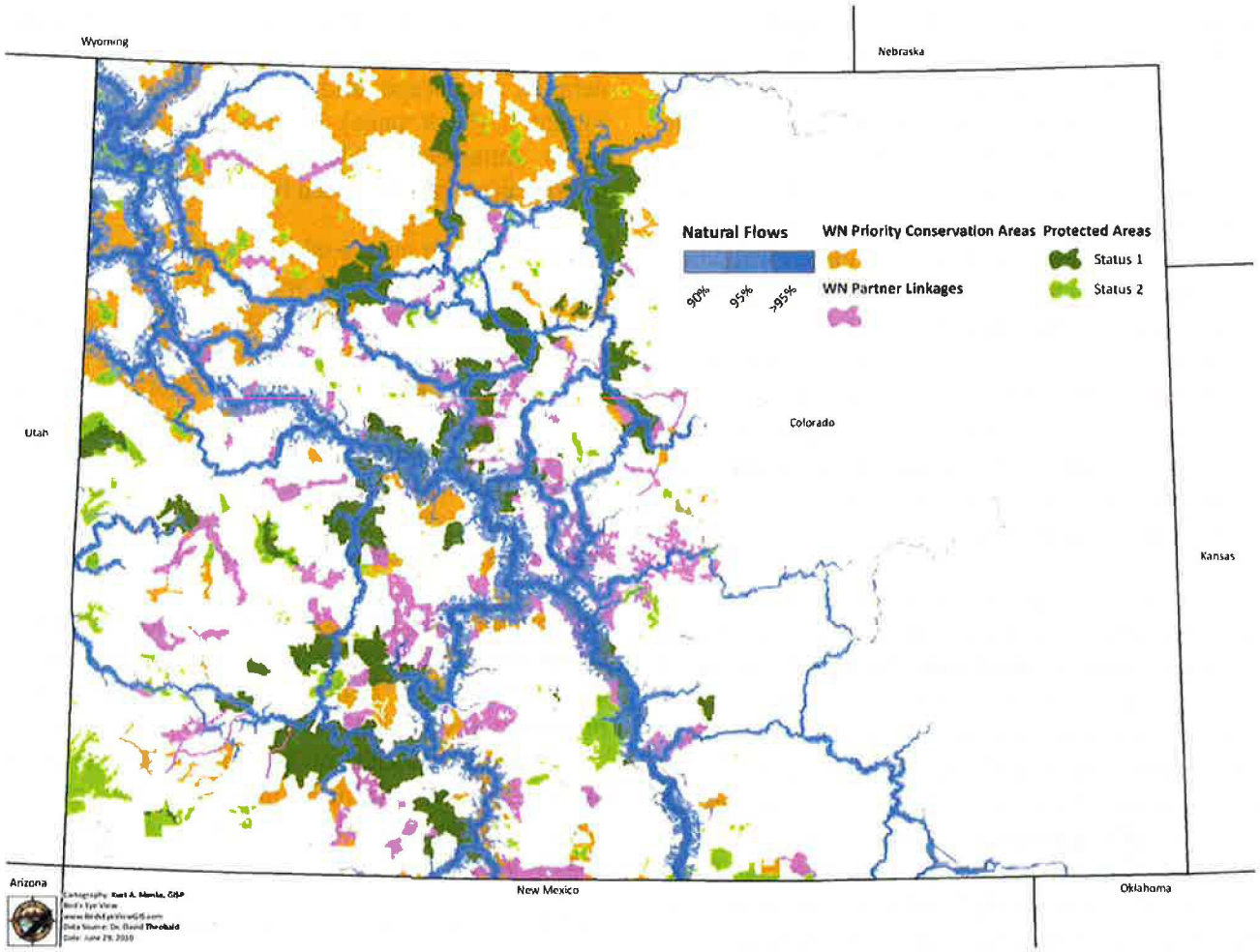
Further, our analysis provides general guidance and priorities for potential highway crossing structure projects, in conjunction with more detailed landscape and field-based information. Figure 5 (back page) identifies locations where roads intersect Wild LifeLines, and these intersections can be sorted by traffic volume.

Land trusts can assess which of their easement or fee simple opportunities would best contribute to the larger context. Our analysis can also help guide preferred locations for restoration projects. For example, given numerous opportunities for landscape restoration in a region, those adjacent to, or directly within, the highest percentile classes of Wild LifeLines could be prioritized due to the contribution that such restored lands would provide to the national scale connectivity pattern.

The model does not assume that wildlife have a destination, but recognizes the need for movement at a variety of scales. This is of particular relevance given that wildlife will be forced to undertake large-scale range shifts over the next decades, Wild LifeLines indicate many of the most valuable pathways to conserve for climate change adaptation.

Lastly, this innovative science-based approach to identifying the most intact landscapes and connections can lay the foundation for funding support. When overlain on Wildlands Network Designs, Nature Conservancy Ecoregional Assessments, or other conservation area designs, Wild LifeLines will provide the best guide available for identifying specific conservation projects that need rapid implementation. Thus they are a means to focus the conversation between local, regional and national agencies and NGOs about where to concentrate implementation activities in the near future. Lastly, our analysis helps identify key areas where we must avoid fragmentation because of these areas' relative importance to national-scale landscape permeability.

Figure 4




## CONCLUSION

As our nation and continent are rapidly modified in order to benefit the well-being of human interests in commerce, livestock production, farming, resource exploitation, real estate development, and border security, it is imperative that we quickly identify the most critical lands and the natural pathways between them to help ensure continued resilience of biodiversity. We are pleased to present this new tool to help us meet the mounting challenges facing conservation.


### Acknowledgements:

The authors wish to thank the following for contributing to this project: Dr. Kevin Crooks, Dr. Sarah Reed, Conner Bailey, Kurt Menke, the staff at Wildlands Network and the Spine of the Continent Steering Committee.


### References:


Theobald, DM (2010) Estimating natural landscape changes from 1992 to 2030 in the conterminous US. Landscape Ecol. Published online May 1, 2010.



™ *Wild LifeLines is a trademark held by Wildlands Network.*

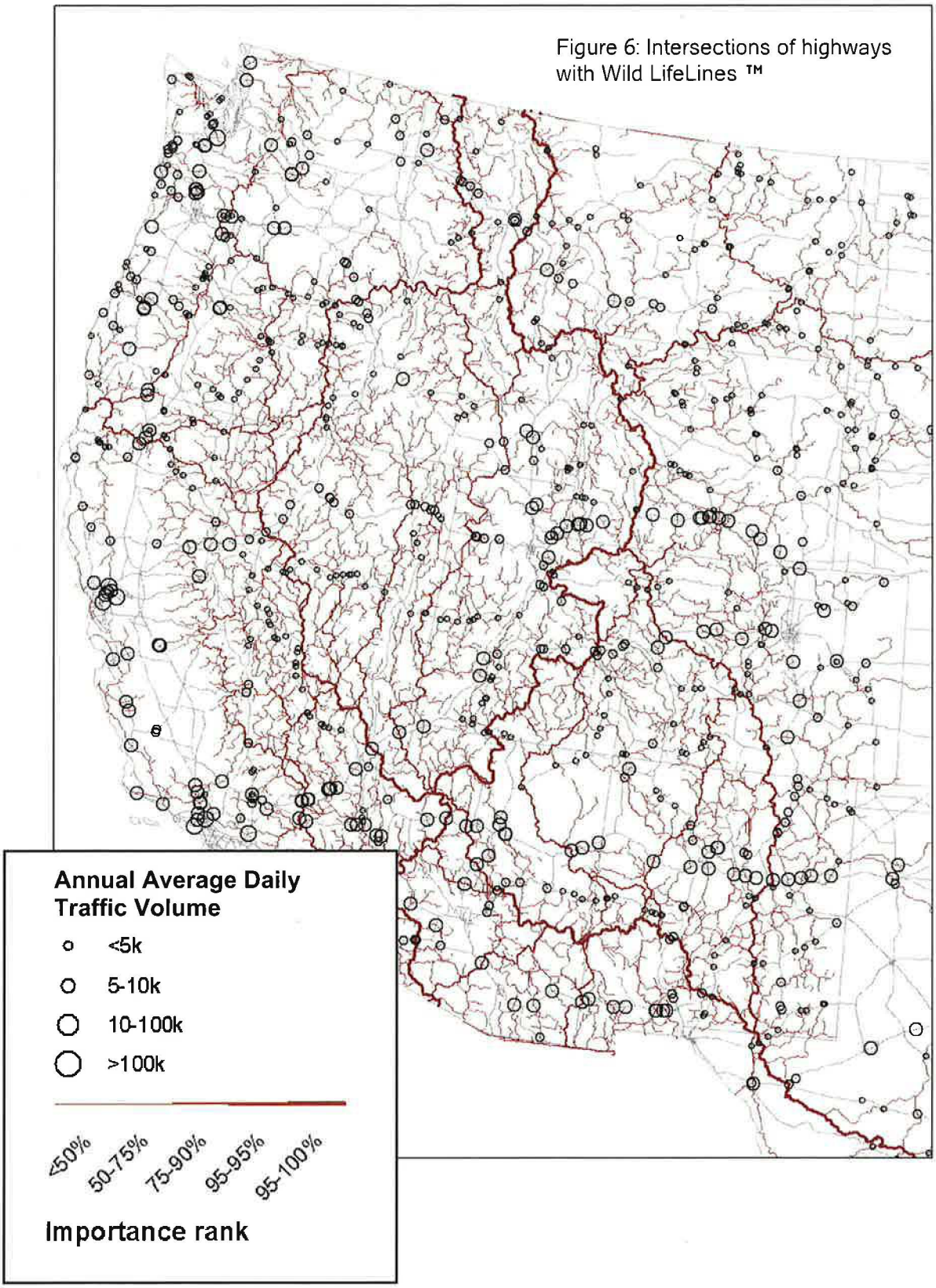
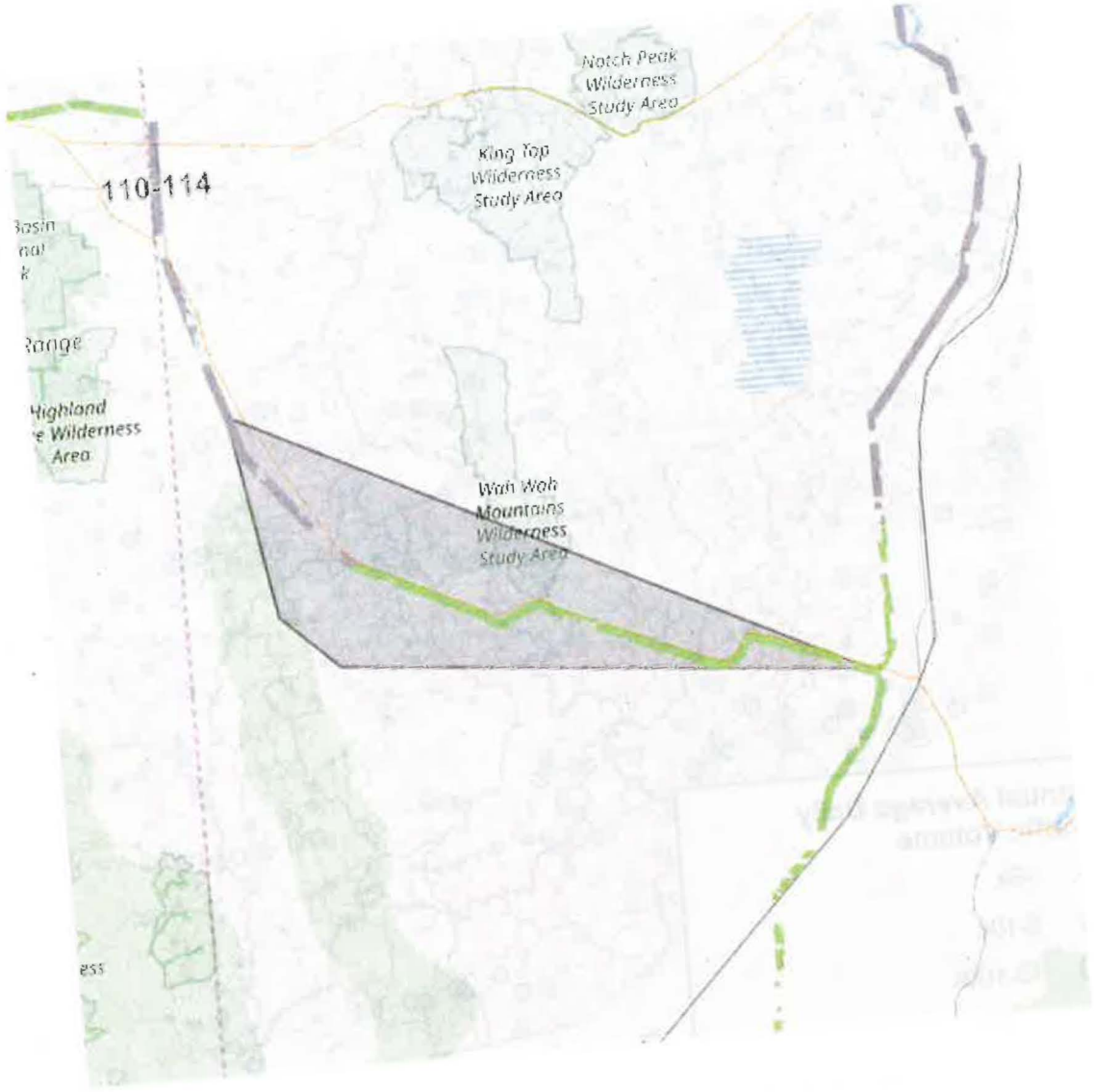



Figure 6: Intersections of highways with Wild LifeLines ™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Thank you for your input, Katie Davis.

The comment tracking number that has been assigned to your comment is **10129**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 22, 2018 11:55:14 CST

**First Name:** Katie
**Last Name:** Davis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Wildlands Network

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

The Cedar City Field Office (CCFO) comprises significant wildlife habitat. Corridor #113-114 runs through the CCFO in a north-south direction, cutting through known wildlife movement areas. Wildlands Network's partner organization, Grand Canyon Wildlands Council, previously completed analysis and mapping of significant habitat and movement corridors for mountain lion, black bear and mule deer within the CCFO. The resulting maps show that each of these three native species move across Corridor # 113-114. We ask the BLM to consider the connectivity and habitat needs for these species when evaluating this corridor. The maps showing the areas of concern for each species are included as attachments. Specifically, appropriate mitigation measures should be included in any and all design, implementation and monitoring of this corridor if it was used for a transmission or pipeline project of any kind. We also suggest that, to the extent possible, any additional transmission or pipeline infrastructure be integrated into the existing highway footprint, so as to prevent disturbance and fragmentation of additional habitat areas along this corridor path. Wildlands Network would also like to highlight the importance of this area to regional wildlife connectivity. Corridor #113-114 runs near the Grand Canyon-Central Idaho Megalinkage. As the name implies, this regional wildlife megalinkage extends from the Grand Canyon ecoregion, including the Arizona Strip and St. George Field Office lands, through western Utah and eastern Utah into central Idaho. The Utah section consists of the Indian Peak Mountain Home ranges; with the Wah Wah-Confusion Range Mountains extending into Millard County and northward. This regional connectivity is highlighted in research and mapping completed by Wildlands

Network and Colorado State University in 2010. This "Wild Lifelines" analysis, attached, identifies areas important for landscape connectivity. It should be taken into account in the design, implementation and mitigation of any infrastructure within the transmission/pipeline corridors being evaluated. GIS data associated with the maps and analysis referenced and attached can be obtained by emailing Katie Davis at k.davis@wildlandsnetwork.org.

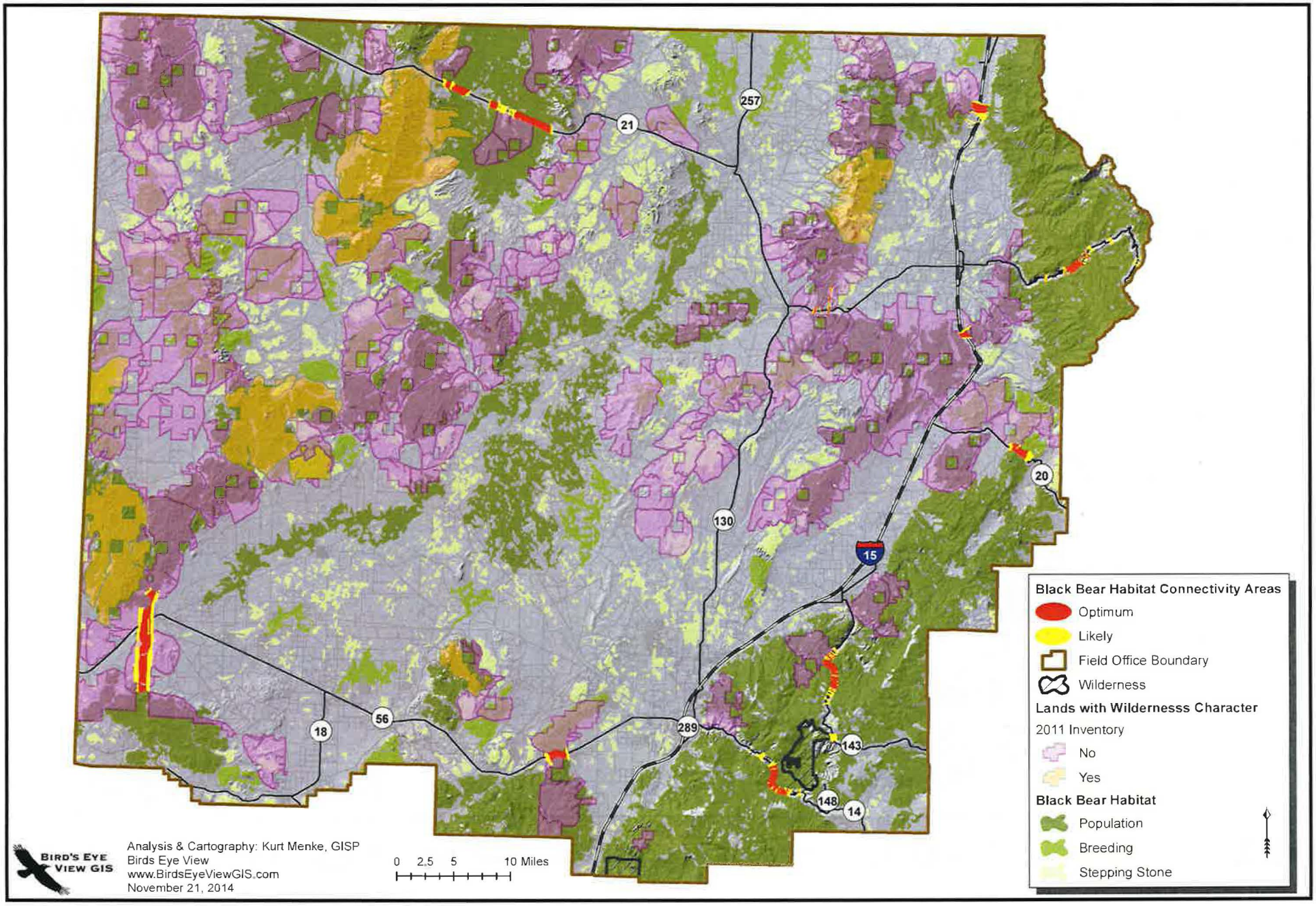
**Attachments**

CedarCity_BlackBear_Corridors_PropWild.pdf, CedarCity_Lion_Corridors_PropWild.pdf, CedarCity_MuleDeer_Corridors_PropWild.pdf, Wild-LifeLines_Wildlands-Network_White-Paper_low-res-copy.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# Cedar City Field Office - Black Bear Habitat Connectivity

GRAND CANYON WILDLANDS COUNCIL

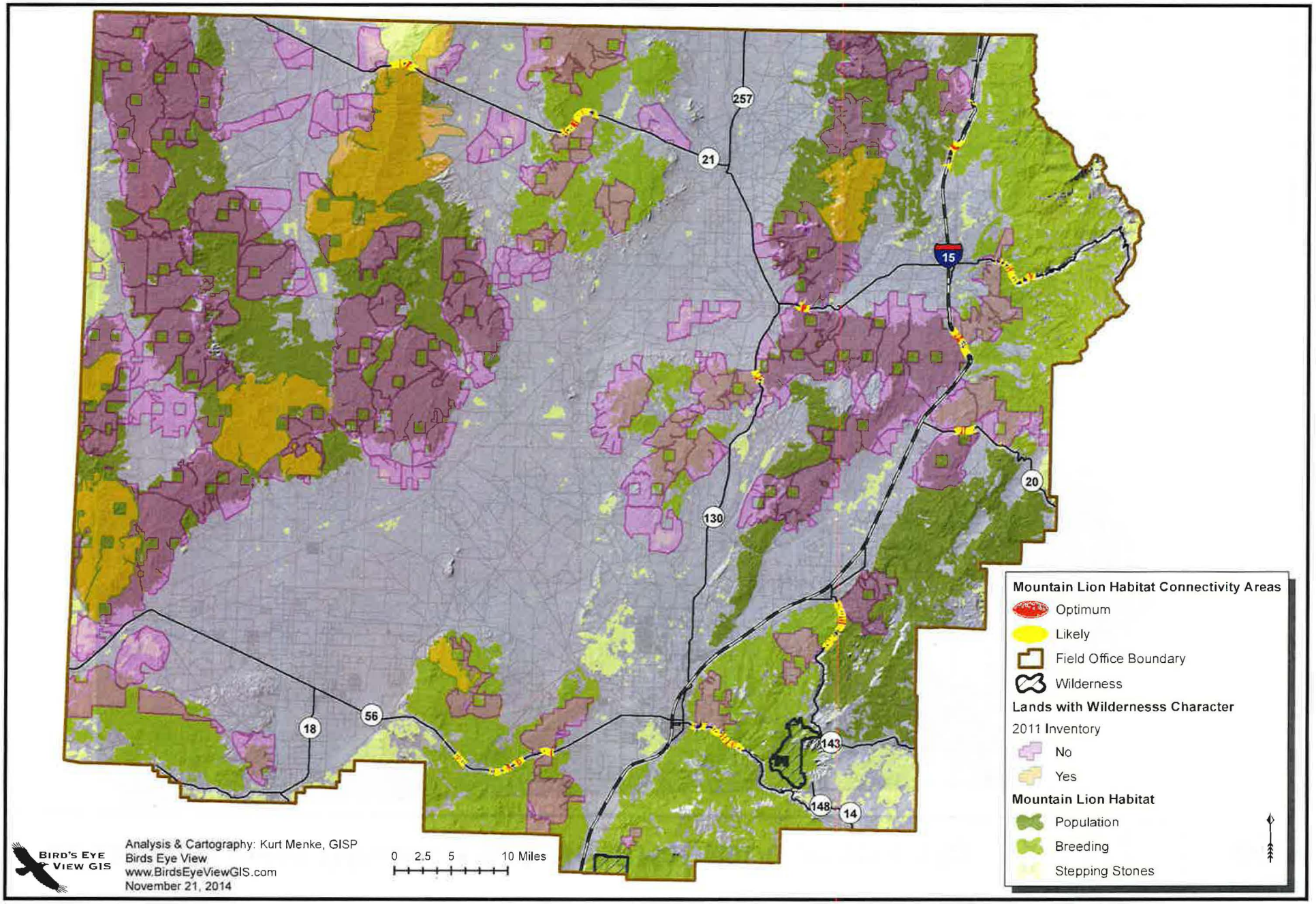



BIRD'S EYE VIEW GIS

Analysis & Cartography: Kurt Menke, GISP
Birds Eye View
www.BirdsEyeViewGIS.com
November 21, 2014

# Cedar City Field Office - Mountain Lion Habitat Connectivity

GRAND CANYON WILDLANDS COUNCIL

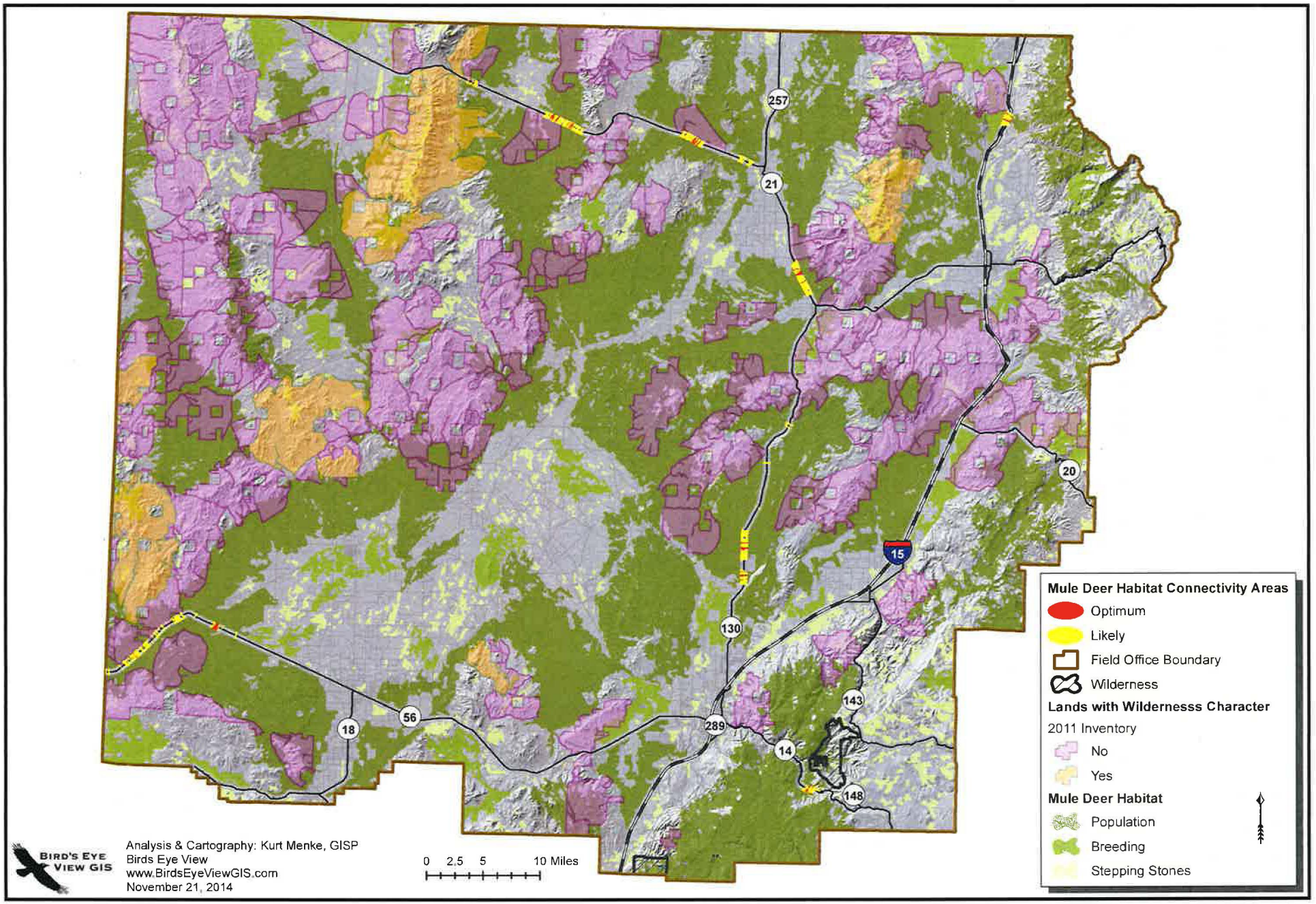



BIRD'S EYE VIEW GIS

Analysis & Cartography: Kurt Menke, GISP
Birds Eye View
www.BirdsEyeViewGIS.com
November 21, 2014

# Cedar City Field Office - Mule Deer Habitat Connectivity

GRAND CANYON WILDLANDS COUNCIL




BIRD'S EYE VIEW GIS

Analysis & Cartography: Kurt Menke, GISP
Birds Eye View
www.BirdsEyeViewGIS.com
November 21, 2014

WILDLANDS NETWORK
RECONNECTING NATURE IN NORTH AMERICA

RESEARCH WHITE PAPER

July 24, 2010

Colorado State University
Knowledge to Go Places

# MODELING POTENTIAL BROADSCALE WILDLIFE MOVEMENT PATHWAYS WITHIN THE CONTINENTAL UNITED STATES

Kenyon Fields[1], Dr. David M. Theobald[2]; Dr. Michael Soulé[3].

1. Wildlands Network; Kenyon@wildlandsnetwork.org; www.wildlandsnetwork.org
2. Natural Resource Ecology Lab, Colorado State University, Fort Collins; davet@warnercnr.colostate.edu
3. Prof. Emeritus UC Santa Cruz, rewild@tds.net

## ABSTRACT

*Wild LifeLines™ depict potential movement pathways in the U.S. between the Mexican and Canadian borders that emphasize the least human modification and highest extant connectivity for wildlife. These pathways are the result of a novel modeling approach that is based on a map of Natural Landscapes built from layers of land cover types, distance to roads, traffic volume, and housing density, and which then identifies the least fragmented connections between remaining natural areas. Wild LifeLines complement identification of cores and linkages within conservation planning boundaries that might secure landscape capacity for broad-scale wildlife movement within extant high-connectivity lands.*

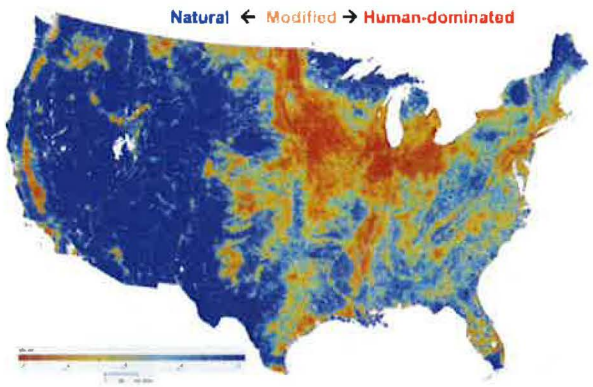
*Although Wild LifeLines identify areas important for landscape connectivity, the intent is not to prioritize selection of parcels or local scale linkages, but rather to identify the most efficient existing pathways allowing broad-scale movement. Wild LifeLines is a powerful new expression of places and pathways that are important for maintaining connected landscapes, providing for the movement of wide-ranging species, and facilitating adaptation to climate change.*

## INTRODUCTION

America's protected areas do not exist as contiguous corridors but as scattered islands of relatively wild habitat surrounded by increasing human modification of the landscape. However, many relatively wild or natural landscapes exist outside of protected areas. These lands serve a vital role in allowing for continued movement and habitation by wildlife. If we are to conserve the existing potential for wildlife movement between undisturbed lands at the landscape, regional, and national scales, what are the pathways along which that movement would best occur? Our goal, therefore, is to provide a broad scale look at landscape connectivity based on landscape naturalness, without a focus on any particular individual species. We assume that wildlife movement will be least restricted across "natural" areas and most restricted across "human-modified" areas.

Wild LifeLines™ are the product of a novel modeling approach that seeks to identify the least fragmented pathways across lands with the best natural condition. We began by mapping *Natural Landscapes* [Theobald, 2010], based on national datasets such as natural land cover types, presence of roads, highway traffic volume, housing density, and others [Figure 1]. We then developed a new method to measure variable resistance to wildlife movement that employs naturalness as a proxy for permeability. Wild LifeLines uses the concept of hydrological flow and asks: "If animals are "dropped" or distributed across the landscape and then are constrained to "flow" across the landscape avoiding human-modified areas, how would they move across landscape? Where would

Figure 1: Natural Landscapes




pathways converge? Note this differs from typical corridor mapping that builds from patches of focal species and computes all possible nearest-neighbor combinations.

As a physical metaphor for this method, rain falling across the top of a mountain begins to run down-slope; as enough water gathers, a headwater stream forms, and begins to incise into the surface. Headwater streams merge to form second-order streams, and so on, until the flows converge to form a river, which represents the accumulation of all flows. As water flows across the surface of the mountain it follows paths of least resistance. Analogously, the dendritic pattern of the Wild LifeLines™ represents the most efficient flow patterns across the landscape if following lands of least resistance (most natural).

**MAP PRODUCT** The result is a map displaying a branching system of pathways (or Wild LifeLines) representing the highest permeability or highest-scored paths that allow movement across the landscape while avoiding areas of human-modification. The total system of lines can thereby be considered a "wildlife circulatory system" or a "civilization avoidance network" for the nation. [Figure 2]

Wild LifeLines show the accumulation of natural areas as they flow across the landscape. The areas overlain by thicker "arteries" represent convergences of highest likely contribution to connectivity, as a function of both local natural values and the respective cells' positions within the broader network of all locations in the study area. The accumulated values thereby indicate the importance (or priority) of any location to national-scale connectivity. Thinner secondary and tertiary lines represent the best ways for wildlife to get to primary arteries if constrained to move across the most natural areas.

The data can be normalized to state boundaries, as shown for Colorado in Figure 3.

Our analysis is derived from the Natural Landscapes map and is not influenced by the land ownership or protected status of lands. Although protected areas are important elements of conservation reserve systems, they are not sufficient due to their isolation and their utility is uncertain in the face of climate change.

Unlike typical methodologies to examine connectivity, our approach does not attempt to indicate what areas should be cores or linkages (although it can be used to help shape such decisions). The specific acres covered by Wild LifeLines are not necessarily areas of high habitat value. Instead, we identify the shortest and least disturbed pathways across the nation following lands of the highest Natural Landscapes metric. In this sense, the Wild LifeLines method employs an innovative approach that can provide planners with a new way to evaluate conservation priorities, as it focuses on the landscape's capacity to allow for movement. The naturalness value of any given cell and its position relative to project-wide naturalness values determines the relative importance of a location, whereas traditional analyses identify sites based on such factors as their habitat value for specific species or the rarity of the biophysical setting.

Thus, if ultimately our goal is to protect connectivity at the broad, national scale, Wild LifeLines can serve as a guide, from which protection and restoration efforts would likely extend outward. We expect that refinements will be made based on more detailed data for local areas, and to incorporate specific needs for well-known species through "focal species" modeling efforts. Comparable data for Canada and Mexico will help to further refine the specific location of pathways connecting beyond the U.S., but broad patterns are fairly robust to these "boundary effects" – the condition across the borders.

Figure 2: Wild LifeLines™

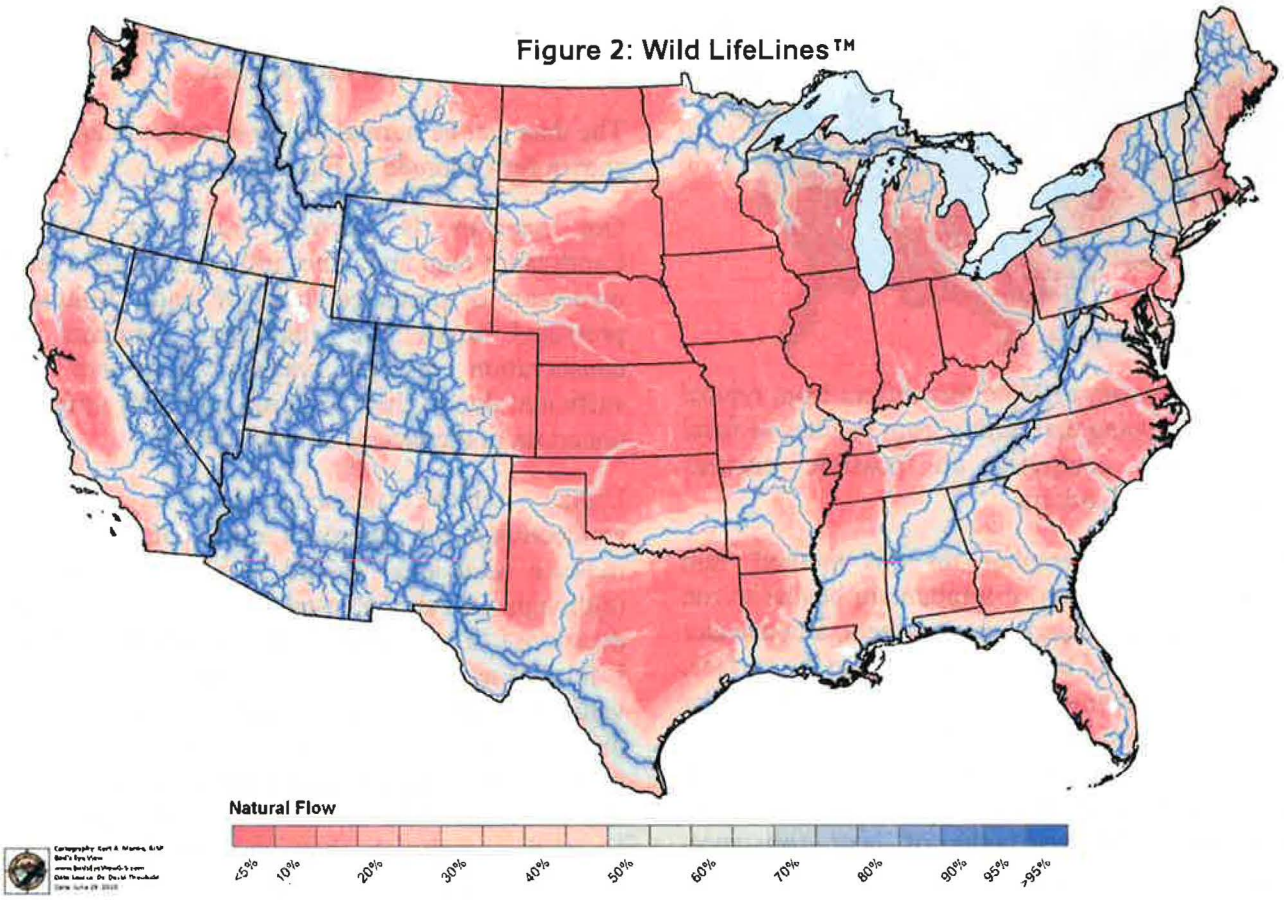
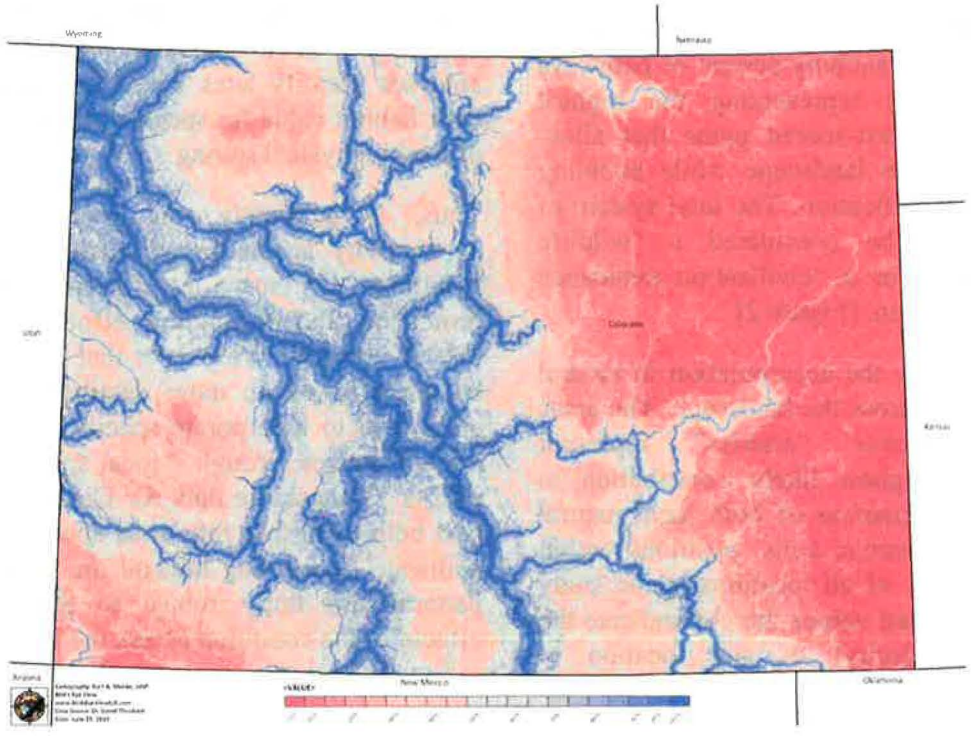



**Figure 2: Wild LifeLines™ normalized to Colorado state boundaries.**



## APPLYING WILD LIFELINES TO LOCAL, REGIONAL, & LARGE LANDSCAPE CONSERVATION INITIATIVES

Wild LifeLines can be employed as a complementary tool to conservation network planning methodologies, and provides information to allow comparative prioritization based on the relative importance of any location within the national scale to all other locations. We believe this will be helpful to organize local conservation efforts, by providing a means for relative valuation of projects' potential to assist in protecting extant connectivity at the national scale. If we are to conserve existing landscape connectivity, it is clear that we should first identify and conserve the least fragmented connections within broader natural landscapes. We stress that this approach complements species-specific approaches and finer-scale analyses.

There are several ambitious large landscape conservation initiatives underway in North America, such as Wildlands Network's *Spine of the Continent (Western Wildway) Initiative* and *Eastern Wildway Initiative*, the *Two Countries One Forest* effort, and the *Yellowstone to Yukon Conservation Initiative.* These are examples of networks of organizations working across political and jurisdictional borders to conserve connected systems of lands. Wild LifeLines can help such initiatives identify which of their proposed new core and linkage/corridor protections within conservation planning boundaries should be prioritized if the goal is to contribute to protection of existing connectivity at broad scales.

Proposed cores or linkages that have been derived from site selection analyses, and which fall along or near, Wild LifeLines could be prioritized for campaigning, assuming other socio-political and ecological factors are considered as well. In regions where no reserve design exists, our analysis helps us identify where to concentrate conservation-planning activity to "fill the gaps." For example, Figure 4 displays the top 10-percentile class Wild LifeLines over the proposed cores and linkages identified in the Southern Rockies Wildlands Network Design, and existing protected areas.

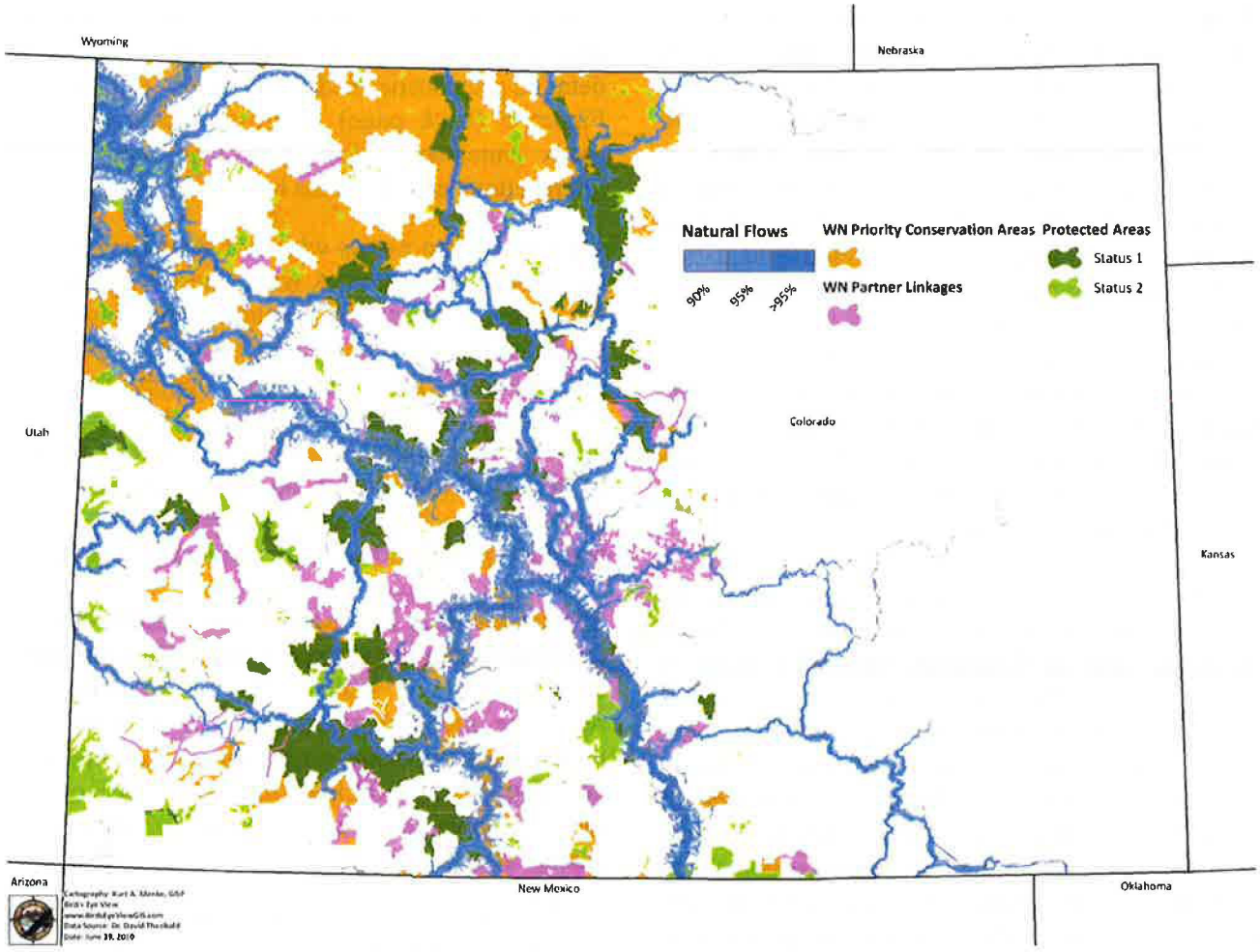
Further, our analysis provides general guidance and priorities for potential highway crossing structure projects, in conjunction with more detailed landscape and field-based information. Figure 5 (back page) identifies locations where roads intersect Wild LifeLines, and these intersections can be sorted by traffic volume.

Land trusts can assess which of their easement or fee simple opportunities would best contribute to the larger context. Our analysis can also help guide preferred locations for restoration projects. For example, given numerous opportunities for landscape restoration in a region, those adjacent to, or directly within, the highest percentile classes of Wild LifeLines could be prioritized due to the contribution that such restored lands would provide to the national scale connectivity pattern.

The model does not assume that wildlife have a destination, but recognizes the need for movement at a variety of scales. This is of particular relevance given that wildlife will be forced to undertake large-scale range shifts over the next decades, Wild LifeLines indicate many of the most valuable pathways to conserve for climate change adaptation.

Lastly, this innovative science-based approach to identifying the most intact landscapes and connections can lay the foundation for funding support. When overlain on Wildlands Network Designs, Nature Conservancy Ecoregional Assessments, or other conservation area designs, Wild LifeLines will provide the best guide available for identifying specific conservation projects that need rapid implementation. Thus they are a means to focus the conversation between local, regional and national agencies and NGOs about where to concentrate implementation activities in the near future. Lastly, our analysis helps identify key areas where we must avoid fragmentation because of these areas' relative importance to national-scale landscape permeability.

Figure 4




## CONCLUSION

As our nation and continent are rapidly modified in order to benefit the well-being of human interests in commerce, livestock production, farming, resource exploitation, real estate development, and border security, it is imperative that we quickly identify the most critical lands and the natural pathways between them to help ensure continued resilience of biodiversity. We are pleased to present this new tool to help us meet the mounting challenges facing conservation.

**Acknowledgements:**

The authors wish to thank the following for contributing to this project: Dr. Kevin Crooks, Dr. Sarah Reed, Conner Bailey, Kurt Menke, the staff at Wildlands Network and the Spine of the Continent Steering Committee.

**References:**

Theobald, DM (2010) Estimating natural landscape changes from 1992 to 2030 in the conterminous US. Landscape Ecol. Published online May 1, 2010.

™ *Wild LifeLines is a trademark held by Wildlands Network.*

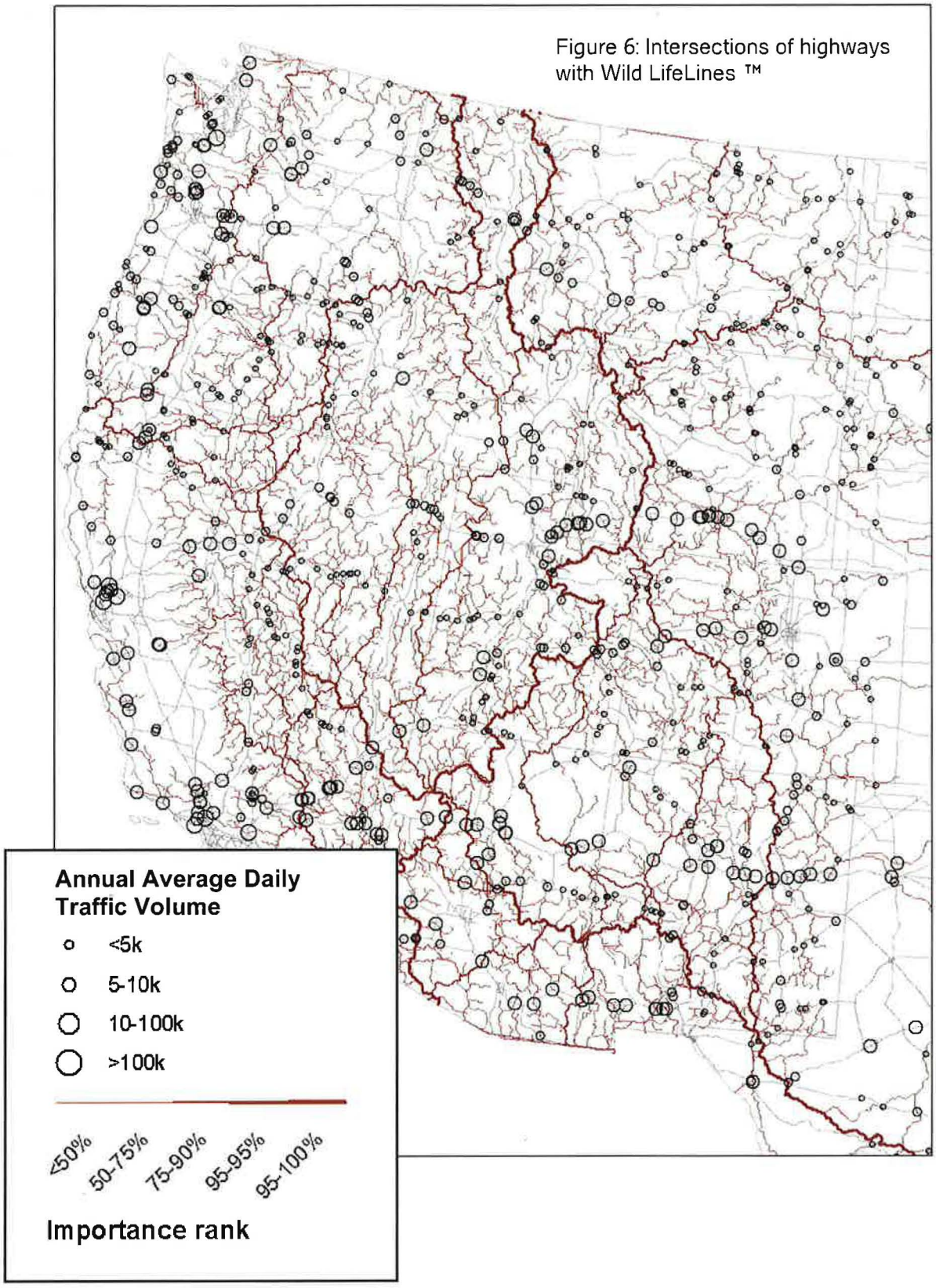
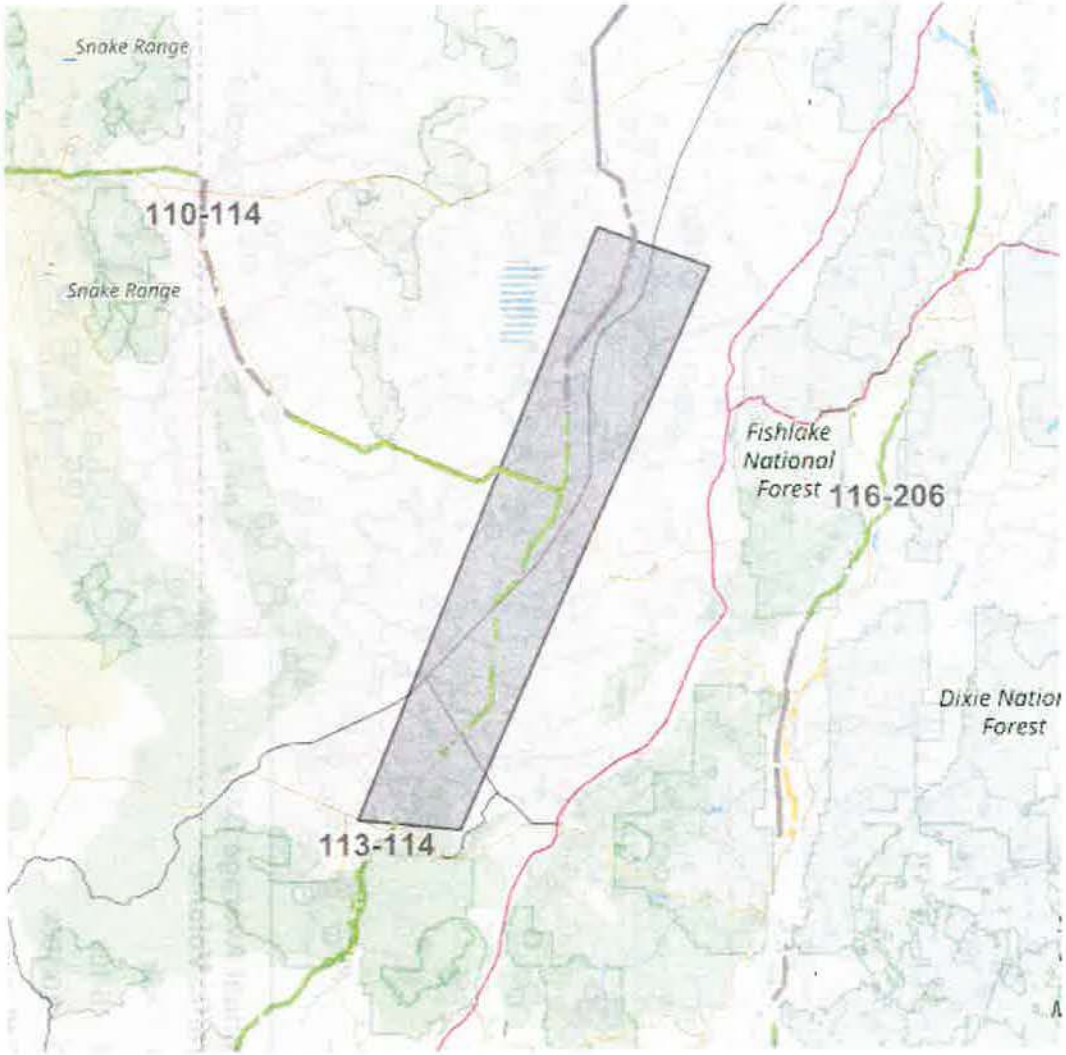



Figure 6: Intersections of highways with Wild LifeLines ™


Snake Range
110-114
Snake Range
Fishlake
National
Forest
116-206
Dixie Natio
Forest
113-114

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|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10130] |
| **Date:** | Thursday, February 22, 2018 2:35:42 PM |
| **Attachments:** | ID_10130_LPAComments021408_Final1copy.pdf<br>ID_10130_WillsonLtr0707081.pdf<br>ID_10130_Part_6_WWEC_Final_PEIS_Corridor_Revisions.pdf |

Thank you for your input, Reid Bandeen.

The comment tracking number that has been assigned to your comment is **10130**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 22, 2018 14:35:17 CST

**First Name:** Reid
**Last Name:** Bandeen
**Email:**

**Are you submitting input on the behalf of an organization?** No

**Topics**
Energy Planning Opportunities
Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Air quality
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Public access and recreation
Soils/erosion
Tribal concerns
Visual resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

80-273 [blank, blank]
89-271 [blank, blank]

**Input**

February 25, 2018 To Whom it May Concern: Please find attached documents pertaining to my previous comments presented in February 2008 regarding the previous Section 368 Corridor public comment period. Most of the prior comments still apply. The maps presented in Section 2 of the PEIS still only show sections of corridors, not complete corridors, leaving considerable uncertainty regarding where and how the designated corridor may effect the community and environs of Placitas, New Mexico, 87043, located in Sandoval County. Many

individual citizens, Citizen's Groups, Native American Tribes, and the Sandoval County government all expressed numerous concerns with potential impacts of a Section 368 Corridor located in eastern Sandoval County with respect to economic impacts, infrastructure impacts, impacts to ecological values, water quality, tribal cultural values and sacred ceremonial cites, wildlife habitat, and human health and safety. All of these remain as valid today as they were in 2008. The U.S. Congresswoman representing our district in 2008 informed us that the potential corridor designated for the northern part of Placitas, New Mexico would likely not be included in the final PEIS. As far as we can tell, the revisions to the corridor maps found in Part 6 of the PEIS indicate segments of removed corridor (Base Map Index area G8) that are located within eastern Sandoval County. I believe I speak for the majority of residents of this area that it is our preference that these removed corridors remain removed from consideration for any Section 368 Corridor plans that may develop in the future. A Resource Management Plan (RMP) in preparation for the Rio Puerco Field Office area of the Bureau of Land Management, which includes eastern Sandoval County, is still in draft form, so it was not possible for us to determine whether any Section 368 corridors have been mapped in conjunction with the final RMP. Attached are several reference documents relevant to community concerns in 2008, that remain relevant today: Attachment 1: Comments submitted on behalf of the Las Placitas Association, February 14, 2008. Attachment 2: Correspondence from U.S. Congresswoman Heather Wilson, regarding Section 368 Corridor designations and revisions for the Placitas area of eastern Sandoval County. Attachment 3: PEIS Part 6, Corridor Section 2 illustrating removed sections of Corridor within the area of Base Map Index G8. Thank you for your consideration. Reid Bandeen P.O. Box 541 Placitas, NM 87043

**Attachments**

LPAComments021408_Final[1] copy.pdf, WiilsonLtr070708[1].pdf, Part_6_WWEC_Final_PEIS_Corridor_Revisions.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# LAS PLACITAS ASSOCIATION

February 14, 2008

***Delivered via electronic mail and U.S. Certified Mail***

West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

Re: Scoping Comments for the West-wide Energy Corridor Programmatic Environmental Impact Statement

To Whom It May Concern:

Please fully consider the following comments on behalf of the Las Placitas Association. For over 20 years, Las Placitas Association has strived to protect open space, restore riparian watersheds, promote recreational, educational and rural activities, and engage the members of our community in appreciating the environmental and cultural richness of the Placitas area of Sandoval County, New Mexico.

The Programmatic Environmental Impact Statement (PEIS) for the Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386) is fundamentally flawed and unlawful in that it attempts to represent non-contiguous segments on federal land as a complete network of continuous corridors traversing both federal and non-federal lands, without conducting the necessary consultation, notification, disclosure and assessment of environmental impacts on the non-federal lands as required by the National Environmental Policy Act (NEPA) and the Energy Policy Act of 2005 (EPAct).

Although the PEIS describes corridor designation exclusively on federal land and "does not…establish energy corridors on nonfederal lands" (PEIS, p. ES-5), maps obtained from the Bureau of Land Management (BLM) under a Freedom of Information Act request illustrate internal BLM planning maps, not disclosed as part of the PEIS, that

demonstrate corridor designations on private and tribal lands in the vicinity of Placitas, New Mexico, in addition to federal lands (Attachment 1). Such non-disclosure is in violation of the consultation requirements presented in EPAct (PEIS, p. ES-1), and the assessment of potential conflicts of the proposed action with State, local and tribal land use plans, as required by NEPA Section 1502.16.( c).

"An agency acts arbitrarily and capriciously when it relies on factors Congress did not intend it to consider, entirely fails to consider an important aspect of the problem, offers an explanation for its decision that runs counter to the facts before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise." *Motor Vehicle Mfrs. Ass'n of U.S. v. State Farm Mutual Automobile Ins. Co., 463 U.S. 29, 42 (1983).*

The PEIS is arbitrary and capricious in the following respects:

The PEIS is arbitrary and capricious in that it fails to explain that the designated corridors will not expedite construction of any infrastructure until private and tribal corridors are designated and some of the same permitting required for federal land is obtained on private land. Many of the same laws that apply to permitting on federal land (the Endangered Species Act, the Clean Water Act, etc.) will apply to the construction of facilities on private and tribal land. For that reason, the EIS is arbitrary and capricious in its insistence that it has somehow expedited the installation of energy infrastructure when it has accomplished nothing of the kind. This explanation for its decision is implausible, if not misleading and deceptive.

The PEIS is arbitrary and capricious because it fails to explain that the way the corridors will be completed is through the threat of eminent domain against private landowners and fails to consider the impacts of such broad scale eminent domain across the west. Instead, the PEIS uses language such as "Project applicants would secure authorizations across private lands *in the same manner that they currently do*..... " [PEIS, Section ES.10, pg. ES-9.] If the federal government is going to promote wholesale eminent domain, it is not too much to ask that it refer to it as such instead of vague terms that fail to explain the actual intent. Furthermore, the impact of wholesale eminent domain across the west is entirely omitted from the NEPA analysis of impacts. This is an instance where the agencies have entirely failed to consider an important aspect of the problem, and thus have acted arbitrarily and capriciously.

The PEIS is arbitrary and capricious in that it fails to explain that the strategy of designating corridors on federal land without designating corridors on private land is ineffective and poor planning because an informed decision about where to locate the corridors on federal land cannot be made without an implicit decision about where the corridors should be located on private land. Furthermore, the agencies entirely fail to propose and analyze corridors between supplies of energy and locations with forecasted unmet demand for energy. Yet this "analysis" is supposed to be the foundation to justify

amendment of resource management *plans*. This activity is not worthy of the term "planning" and the agencies' justification for it is so implausible that it cannot be ascribed to the product of agency expertise and entirely fails to consider important elements of the problem.

The PEIS is arbitrary and capricious because it represents that there are no environmental impacts to the designation of corridors. First, this representation is fundamentally illogical because an Environmental Impact Statement is only prepared for federal decisions whose effects may be major. In fact, BLM's own regulations define preparation of a resource management plan as a major federal action significantly affecting the quality of the human environment. 43 CFR § 1601.0-6; *NM Wilderness Coalition*, 129 IBLA 158 (1994). What would the purpose of requiring BLM to do an EIS for a plan if plans don't affect the environment until a particular project is proposed and thus can't possibly have significant impacts?

Second, this misrepresentation has the effect of persuading people not to comment on or object to the EIS, thus manipulating the public process to discourage timely comments. Analysis of specific projects will be tiered to the amended resource management plans resulting from the Corridor EIS. 40 CFR §§ 1520.20 and 1508.28(b) ("Tiering...is appropriate when it helps the lead agency to focus on issues which are ripe for decision and exclude from consideration issues already decided...") Thus, by telling the public that no impacts result from this decision, the agencies are dissuading the public from commenting, defeating the role that commenting should play in a NEPA decision. 40 CFR § 1503.1 to 4.

Finally, this misrepresentation substitutes for meaningful environmental analysis of the real impacts of planning. These include:

1) Plans that provide for one type of use implicitly discourage uses incompatible with that type of use. Here, encouraging large scale industrial energy development will encourage other large scale industrial types of development and will discourage setting aside land for conservation, open space, recreation and other low impact uses.
2) Plans that encourage industrial development adjacent to residential properties are likely to decrease residential property values.
3) Plans influence land use for decades and plans are difficult to change so these impacts will go on for years.

This flawed analysis is arbitrary and capricious in that it entirely omits an important aspect of the problem, the impacts of planning. Indeed, the agency denies that such impacts even exist, a view which can only be ascribed to the product of a *lack of* agency expertise. The PEIS must be supplemented to include adequate analysis of the environmental impacts of planning.

By internally designating energy corridors on privately owned and Tribally owned lands, the author Agencies, U.S. Department of Interior (DOI) BLM, U.S. Department of

Energy (DOE) have arbitrarily and capriciously located the non-federal lands corridors (Attachment 1) without assessment of the socioeconomic, environmental and cultural impacts of these corridors. As a result of non-consultation with local, state and Tribal authorities, knowledge of alternative corridor routes that could minimize socioeconomic, environmental and cultural impacts relative to the proposed action were not considered in formulating the proposed action. For example, the map illustrated in Attachment 2 demonstrates two hypothetical alternative routes that incorporate existing utility and/or transportation Rights of Way north of Placitas, New Mexico that would have significantly fewer impacts to environmental quality, human health, cultural resources, private land values and other associated socioeconomic impacts than the proposed action. A proper consultation and dialog with private landowners, County and state governments and Tribes may have resulted in more optimal corridor locations such as those illustrated in Attachment 2.

The Las Placitas Association recommends:

a). The PEIS be revised to account for the reasonably foreseeable significant adverse effects on the human and natural environment that will occur as the result of energy corridor implementation on private, state and Tribal lands, as required by NEPA.

b). The revised PEIS give due consideration, in full consultation with the affected parties, to alternative potential corridor routes across private and Tribal lands, other than those internally published but not publicly disclosed by the author Agencies (Attachment 1). The map illustrated in Attachment 2 provides examples of more optimal corridor placements in the vicinity of Placitas, New Mexico.

c). Locations in or adjacent to Placitas, including the Placitas Development Area (per Sandoval County Land Use Planning documents) should be avoided as such sitings would adversely impact the human and natural environment, contribute to loss of property value and damage the integrity of the community.

d). Alternative corridors should be sited away from residential areas;

e). Location of the energy corridor on the BLM land located to the north and east of the Placitas Open Space and residential area on Indian Flats Mesa is unacceptable for the same reason that the proposed energy corridor location is unacceptable, i.e, adverse impact on the human and natural environments.

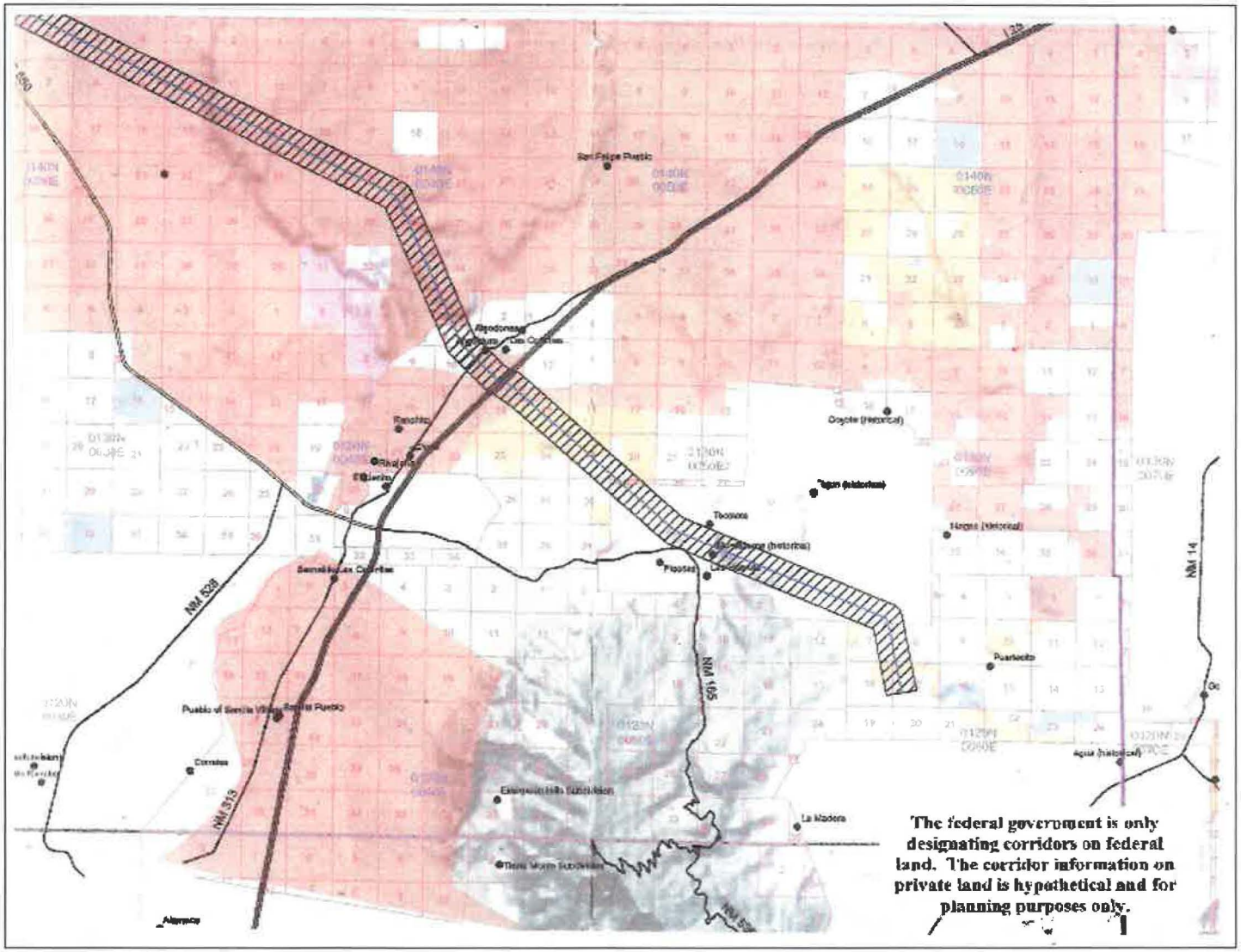
Respectfully Submitted,
Las Placitas Association

Reid F. Bandeen
Board President

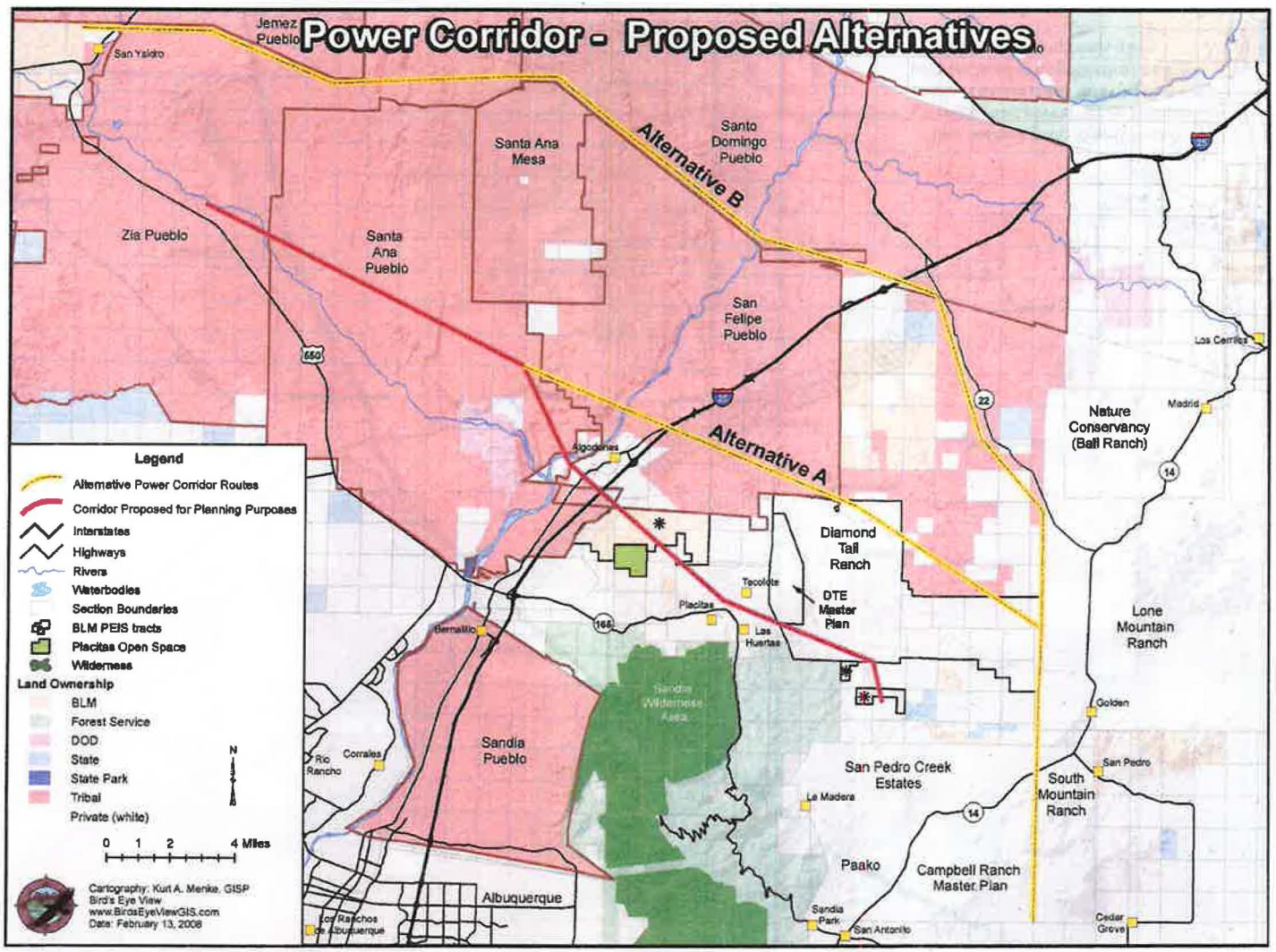
Las Placitas Association, Placitas, New Mexico. Comments on DOE/EIS-0386

5

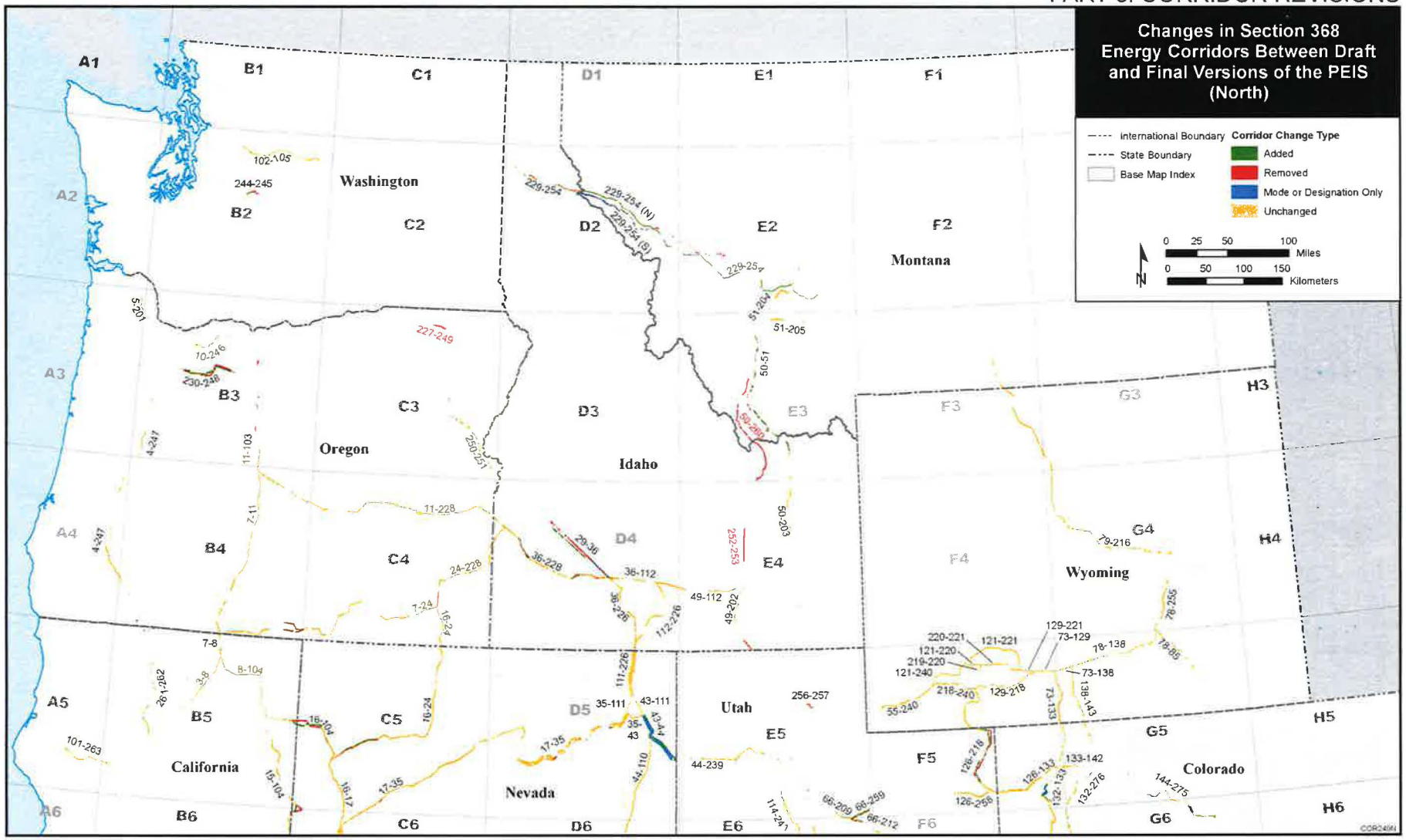
Attachment 1



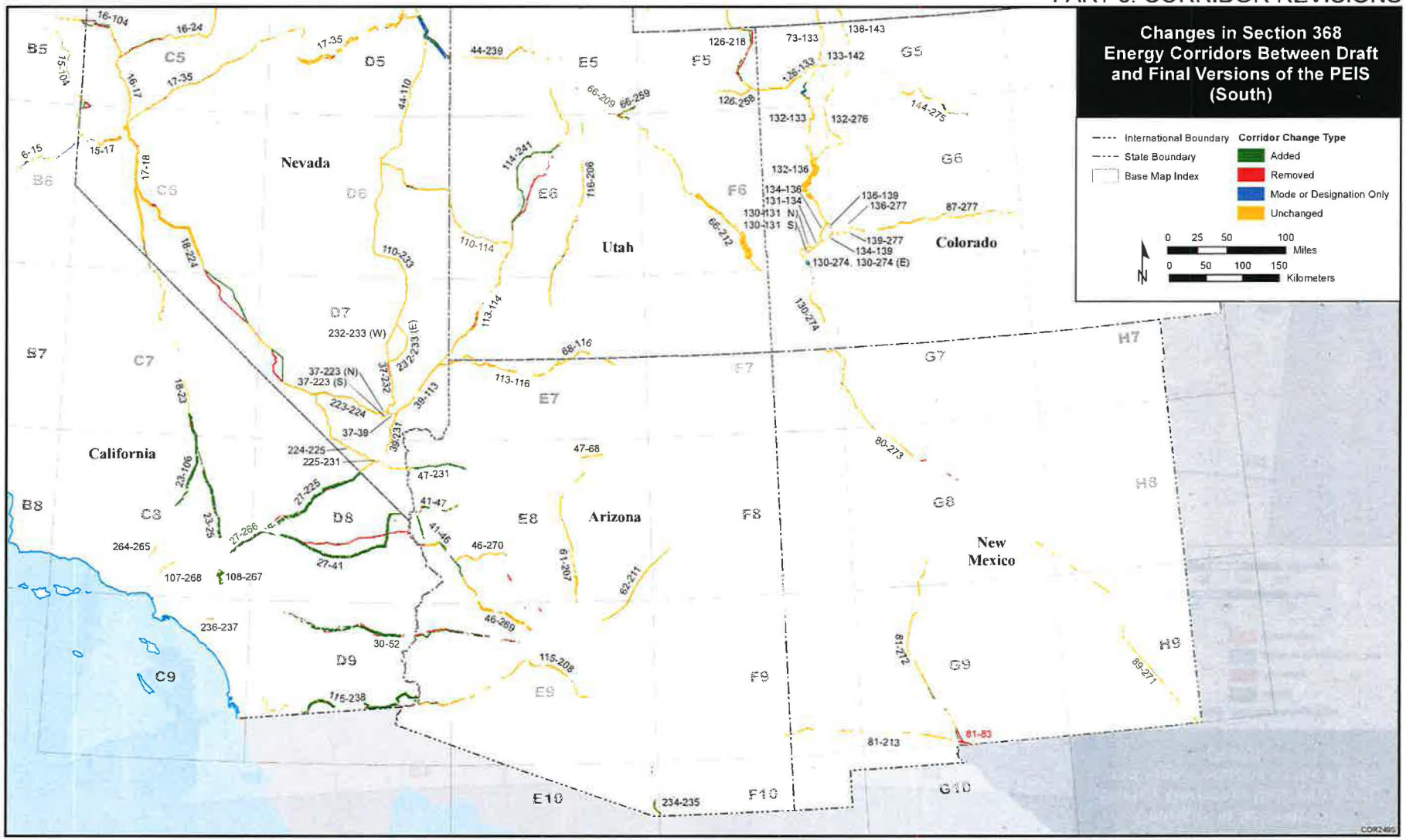
Attachment 2



# PART 6: CORRIDOR REVISIONS



# PART 6: CORRIDOR REVISIONS



HEATHER WILSON
1ST DISTRICT, NEW MEXICO

ENERGY AND COMMERCE
SUBCOMMITTEES:
TELECOMMUNICATIONS AND THE INTERNET
HEALTH
ENVIRONMENT AND HAZARDOUS MATERIALS

PERMANENT SELECT COMMITTEE ON INTELLIGENCE
SUBCOMMITTEES:
TECHNICAL AND TACTICAL INTELLIGENCE
RANKING MEMBER
OVERSIGHT

# Congress of the United States
## House of Representatives
Washington, DC 20515–3101

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July 7, 2008

Mr. Reid Bandeen
PO Box 541
Placitas, New Mexico 87043

Dear Reid,

Thank you for your contacting me earlier this year about the Programmatic Environmental Impact Statement (PEIS) for Energy Transmission Corridors on federal land in eleven western states. I wanted you to know the latest information we received from the DOE/BLM Interagency Team developing the PEIS.

The staff in my Albuquerque and Washington offices have been in contact with several constituents on this issue and also attended the DOE hearings in Albuquerque on January 24th and in Washington, D.C. on February 5th. My staff and I also met with several representatives of the Las Placitas Association in February and in May to discuss this issue.

I contacted Ms. Laverne Kyriss, the Department of Energy Project Manager for the PEIS. My staff followed up with Ms. Kate Winthrop, the BLM Project Manager, to emphasize the need to reconcile the 121 comments submitted by respondents from New Mexico regarding the September Draft PEIS and the concerns with the Placitas area corridor. The Department of Energy has informed me that the DOE/BLM Interagency Project Team is likely to eliminate the Placitas area corridor from the Draft PEIS. This PEIS will be presented to DOE/BLM Senior Management for final approval and a Record of Decision this fall. I have been told that it is extremely unlikely that senior managers will overturn the Project Team's recommendation.

Because of the active involvement of the citizens of Placitas, the Placitas area is unlikely to be included in the energy corridor. We will continue to monitor this issue going forward, but I thought you would want to know where things stand.

Please continue to contact me about issues that are important to you. While I commute from my home in Albuquerque to Washington D.C., for voting and committee hearings, you can always check my web site for upcoming community events to find where you can catch me around town.

Sincerely,

Heather


PRINTED ON RECYCLED PAPER

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10131]
**Date:** Friday, February 23, 2018 9:34:13 AM
**Attachments:** ID_10131_MapforEnergyCorridorReview.pdf

Thank you for your input, Benjamin Pykles.

The comment tracking number that has been assigned to your comment is **10131**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 09:33:18 CST

**First Name:** Benjamin
**Last Name:** Pykles
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Church History Department, The Church of Jesus Christ of Latter-day Saints

**Topics**
Cultural resources
Visual resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

113-114 [51, 53]

**Input**

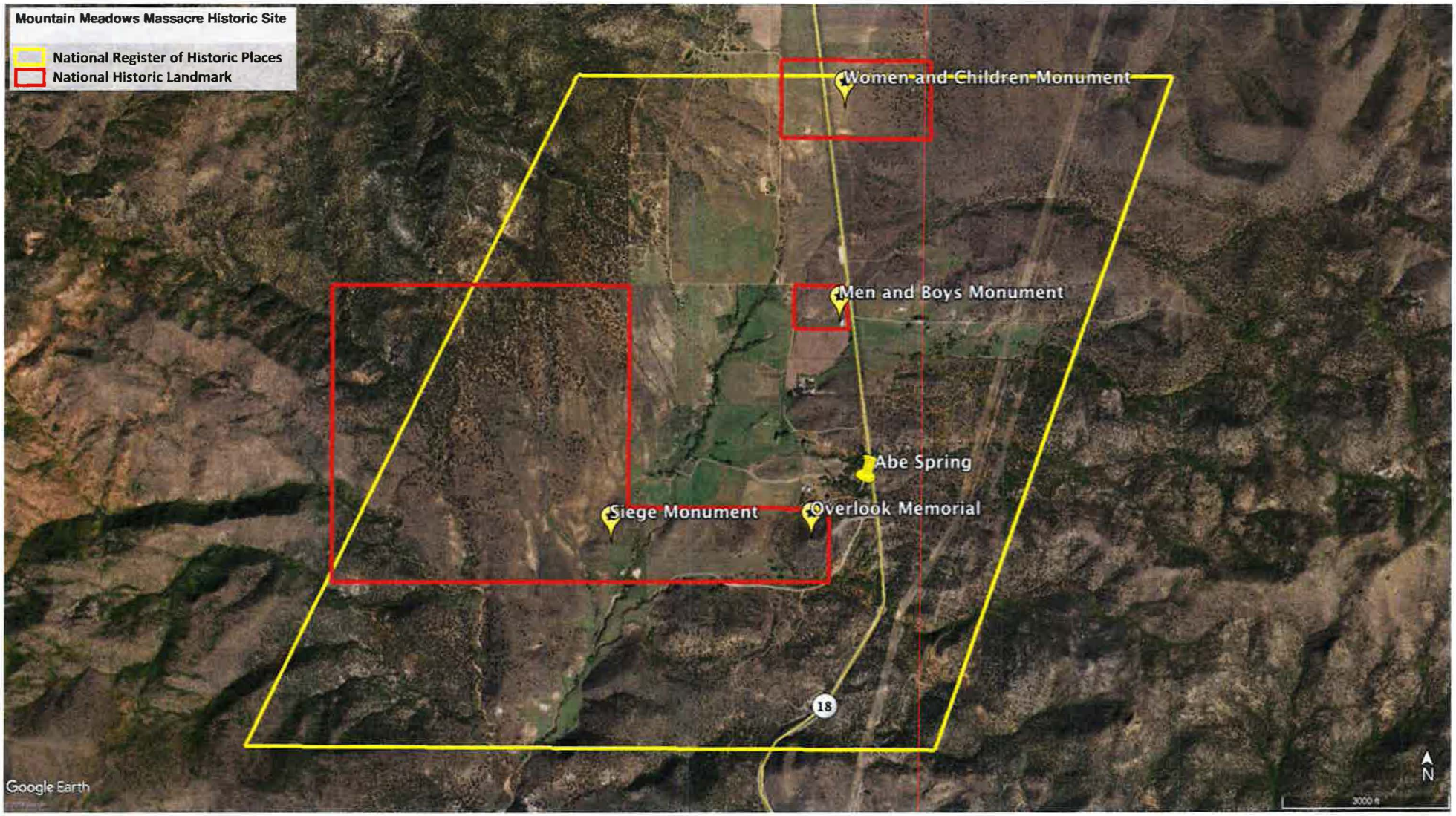
We commend you for the great work you have done in compiling the tremendous amount of data for this study and for the very useful online map tool. It is truly an impressive and very timely undertaking. We similarly thank you for providing an opportunity for public input. In that spirit, we wish to share a few of our concerns, stemming from our role as land-owners and principal stewards of the Mountain Meadows Massacre site (MMM NRHP) and the Mountain Meadows Massacre Site National Historic Landmark (MMM NHL). We are concerned that some areas within the boundaries of the MMM NRHP and some areas within the separate boundaries of the MMM NHL are not identified as having high potential conflict. We see that the corridor of the Old Spanish National Historic Trail (OST NHT) is appropriately listed as having high potential conflict. That corridor passes through the boundaries of the MMM NRHP and the MMM NHL because the victims of the massacre were traveling on the Old Spanish Trail/California Road at the time of the tragedy. However, there are other highly sensitive locations outside the OST NHT corridor, but within the MMM NRHP and NHL boundaries, that are not currently listed as having high potential conflict. For example, the location of Overlook Memorial on Dan Sill Hill is only classified as medium potential conflict, yet it is one of the main commemorative and interpretive areas of the NHL. The same is true for the location of the Men & Boys Monument, another of the main monuments of the NHL. A third example is the location of Abe's Spring, where the perpetrators camped prior to the massacre, which is also only categorized as medium potential. Finally, the locations of other important massacre-related sites remain unknown. For example, because the victims

remains were scavenged by wild animals following the massacre, there is the potential for human remains throughout the area. This grim reality has led the Church and other agencies to consider the entire valley a highly sensitive area for cultural resources related to the massacre. We avoid ground disturbance in the entire area because of the high potential for disturbing human remains and other objects associated with the massacre. Another concern is that the NRHP and NHL boundaries are not included on the maps of the Abstract for corridor 113-114, nor are the actual boundaries available as a layer in the online map tool. When the NRHP sites and NHL sites are not included or only represented as single points on these maps, it makes it difficult, if not impossible, for reviewers to accurately assess the potential for conflict with the energy corridors under review. We also wish to emphasize and underscore the language of the Abstract on page 9 under "Cultural Resources" (ID 113-114 .022), which states: "Due to limited physical availability within the corridor (3 existing transmission lines and 2 natural gas pipelines) and because it is a culturally sensitive area, the corridor may not be able to accommodate additional future development." The last transmission line to be constructed in the corridor was the Sigurd to Red Butte line. Finalizing the route for that line was extremely difficult because of the congested nature of this section of the corridor. Several compromises had to be made that could not be repeated in the future, including crossing into the boundaries of the NRHP site and into the boundaries of an Inventoried Roadless Area. Complicating matters further are the negative visual impacts of additional transmission lines on the historical and cultural resources associated with the MMM NRHP and NHL as well as the OST NHT. The truth of the matter is that there is simply no more room for additional energy lines in this part of the corridor. Fortunately, the recent Record of Decision approving a route for the proposed TransWest Express transmission line creates an opportunity to establish a new section of energy corridor to the west of the Mountain Meadows Massacre NRHP and NHL. We believe this is what the Abstract is referring to on page 14, under "Specially Designated Areas" (ID 113-114 .045), which states: "There is an opportunity to consider moving the corridor to the west to avoid or eliminate entirely the corridor impacts on the OSNHT, in addition to the National Historic Landmark." We fully support this consideration and hope that it will be taken very seriously given the great difficulties associated with siting additional energy lines in the existing corridor. Simply put, there does not appear to be a sensible way to locate additional energy lines in this section of the existing corridor without adversely impacting significant historical, cultural, and natural resources. Moving the energy corridor to the west would permanently avoid any potential negative adverse affects (physical and visual) to the significant resources in the area. Attached is a map that shows the boundaries of the Mountain Meadows Massacre NRHP site and the boundaries of the MMM NHL. The map also identifies the locations of key monuments and other massacre-related features. We again thank you for the great work you have done and for the opportunity to comment on this important study. Should you have any questions about our comments, please feel free to contact us at any time.

**Attachments**

Map for Energy Corridor Review.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov


Mountain Meadows Massacre Historic Site
National Register of Historic Places
National Historic Landmark
Women and Children Monument
Men and Boys Monument
Abe Spring
Siege Monument
Overlook Memorial
18
Google Earth
N

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10132] |
| **Date:** | Friday, February 23, 2018 12:15:09 PM |
| **Attachments:** | ID_10132_DenverWaterDenverWaterWWECCommentletterCorridor144275.pdf |

Thank you for your input, Jason Marks.

The comment tracking number that has been assigned to your comment is **10132**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 12:14:44 CST

**First Name:** Jason
**Last Name:** Marks
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Denver Water

**Topics**
Energy Planning Issues
Existing infrastructure/available space
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

144-275 [8, 17]

**Input**

Please see attached letter from Denver Water regarding Corridor 144-275 in the vicinity of our historic and future operations in the Williams Fork River Basin (between approximately MP 8 and MP 17).

**Attachments**

Denver Water Denver Water WWEC Comment letter - Corridor 144-275.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

DENVER WATER

1600 West 12th Ave
Denver, CO 80204-3412
303.628.6000
denverwater.org

February 23, 2018

West-wide Energy Corridor, C/O:
Bureau of Land Management: Georgeann Smale
United States Forest Service: Reggie Wolf
Department of Energy: Brian Mills

**RE: West-wide Energy Corridor Review – Section 368 Stakeholder Comments**

To Whom It May Concern,

The City and County of Denver, acting by and through its Board of Water Commissioners ("Denver Water"), is pleased to submit these comments on the West-wide Energy Corridor (WWEC) Review. Denver Water is responsible for the collection, storage, quality control and distribution of drinking water to 1.4 million people in the city of Denver and surrounding suburbs, comprising nearly one quarter of the population of Colorado.

Per the WWEC Energy Corridor Information Center website, we have reviewed the abstract for Corridor 144-275, as well as the Section 368 Energy Corridor Mapping Tool. The abstract for Corridor 144-275 indicates that this 98.8-mile corridor crosses 45.2 miles of BLM and Forest Service-administered lands in Clear Creek, Grand and Routt counties. A portion of Corridor 144-275 extends across the Williams Fork River Basin where Denver Water owns and operates infrastructure in our water collection system.

Denver Water owns both absolute and conditional water rights in the Williams Fork River Basin (Grand County) between Jones Pass and the Williams Fork Reservoir. In the Upper Williams Fork River Basin, our Williams Fork Diversion Project became operational in 1940, and was constructed pursuant to a right-of-way (ROW) granted by the United States Land Office, Department of Interior, numbered 027915, dated May 5, 1924. We also hold a special use permit from the Arapaho-Roosevelt National Forest (ARNF) to operate and maintain the Jones Pass Road, which provides access to this remote area.

The Williams Fork Diversion Project is a critical part of Denver Water's water collection system. The Williams Fork Diversion Project is composed of three diversion dams on tributary streams to the Williams Fork River (Bobtail, Steelman and McQueary creeks), numerous smaller intake structures, approximately 3.6 miles of buried conduit, and the three-mile long Gumlick Tunnel. Water that is diverted via the Williams Fork Diversion Project is transported through the Gumlick Tunnel to the eastern side of the Continental Divide. Through additional infrastructure (including two more tunnels – Vasquez and Moffat), this water is ultimately stored in Gross Reservoir, before it is treated and distributed for municipal use. In addition, Xcel Energy operates a 115-kV overhead electrical transmission line along the northern aspect of the Williams Fork River Basin (between MP 0 and MP 18.1 of Corridor 144-275).

Per the abstract for Corridor 144-275, the 2012 Settlement Agreement identified this as a corridor of concern (CEC) related to "... coal access, wilderness areas, and a National Historic Place" (Corridor 144-275 Abstract, page 4). The Section 368 Energy Corridor Mapping Tool also indicates that, between MP 0 and MP 20, Corridor 144-275 is within a *High Conflict* area. We agree, as this is a remote and pristine area. The abstract indicates that "There does not appear to be much opportunity to avoid the high potential conflict areas from MP 0 to MP 20." However, we note that the abstract indicates that during scoping for the WWEC Programmatic EIS, there were no recommendations for a corridor in this area. Likewise, agencies indicated that there were no pending ROW applications within Corridor 144-275.

We question why, between (roughly) MP 8.5 and MP 22, Corridor 144-275 closely follows, but does not coincide with, the existing 115-kV overhead transmission line operated by Xcel Energy. As indicated on the attached graphic, Corridor 144-275 overlaps a small (920 square feet) portion of Denver Water's property on the eastern side of Jones Pass (approximately MP 8.5) at the east portal of the Gumlick Tunnel. It does not appear that Corridor 144-275 would directly overlap Denver Water property, or our ROW, in the Williams Fork River Basin; however, it would come into close proximity.

We wish to reiterate that the Williams Fork Diversion Project, which is between (approximately) MP 8.5 and MP 17, is a critical component of Denver Water's collection system. In addition to our existing water collection infrastructure, we also own conditional water rights to tributary streams in further reaches of the Upper Williams Fork River Basin that will be developed in the future. Although the abstract for Corridor 144-275 clearly states that "... corridor segments located in the [ARNF] are for electrical transmission only," any future project proposals that could potentially include road construction, ground disturbing activities, and long-term maintenance access could jeopardize Denver Water's existing and future operations within our ROW, as well as the water quality within this pristine, headwaters basin.

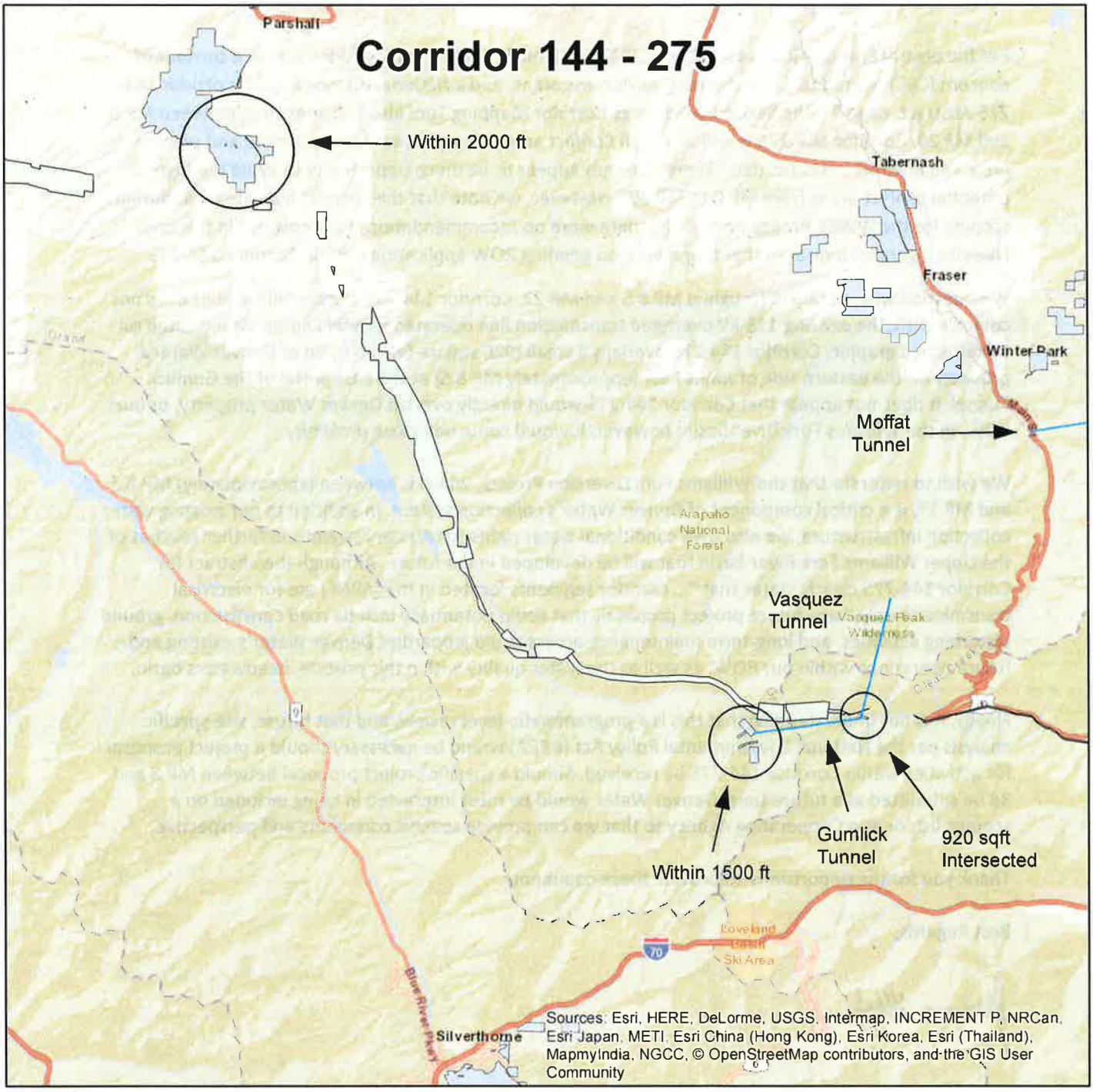
Finally, it is our understanding that this is a programmatic-level review, and that future, site-specific analysis per the National Environmental Policy Act (NEPA) would be necessary should a project proposal for activities within Corridor 144-275 be received. Should a specific project proposal between MP 8 and 38 be submitted at a future time, Denver Water would be most interested in being included on a scoping list, or as a Cooperating Agency to that we can provide specific comments and perspective.

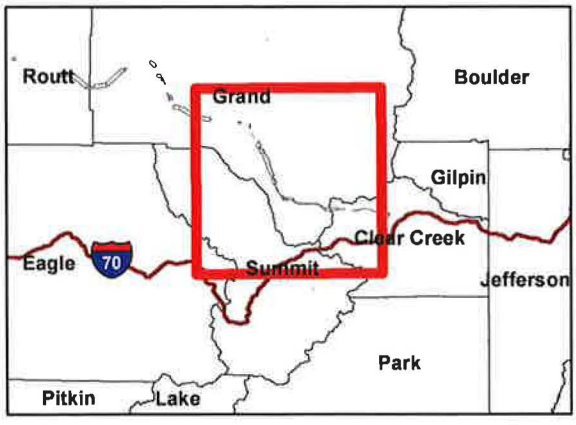
Thank you for the opportunity to provide these comments.

Best Regards,

Jason Marks
Denver Water
1600 West 12th Avenue, Mail Code 415
Denver, CO 80204
jason.marks@denverwater.org
(303) 628-6327

Attachment: *Corridor 144-275 Vicinity Map in Relation to Denver Water Facilities*




## Legend

- Section 368 Corridor
- Denver Water Property

N

0 2 4 8 12 Miles

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10133] |
| **Date:** | Friday, February 23, 2018 12:21:34 PM |
| **Attachments:** | ID_10133_OutdoorAlliance_Sec368_EnergyCorridors_RecAnalysis_20180220.xlsx |

Thank you for your input, Levi Rose.

The comment tracking number that has been assigned to your comment is **10133**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 12:21:11 CST

**First Name:** Levi
**Last Name:** Rose
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Outdoor Alliance

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Public access and recreation

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Outdoor Alliance appreciates the opportunity to offer comments and data to Region 2 and 3 reviews. To ensure that future revisions, deletions, or additions to Section 368 energy corridors are meeting settlement objectives, we have performed GIS analyses to determine potential areas of conflict. Attached is an excel document that summarizes (by region) and details human-powered recreation within Section 368 energy corridors. Planning built on robust public engagement is an essential step towards alleviating conflicts and ensuring appropriately balanced uses. We ask that you consider adding human-powered recreation to the activities listed in the Corridors of Concern. GIS data of these resources is available upon request. Outdoor Alliance is a coalition of nine member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, and Colorado Mountain Club represents the interests of the millions of Americans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes.

**Attachments**

OutdoorAlliance_Sec368_EnergyCorridors_RecAnalysis_20180220.xlsx

Questions? Contact us at: corridoreiswebmaster@anl.gov

Table: Summary of recreation resources within Section 368 Energy Corridors.
Baseline recreation analysis: 2/20/18

| | Region | | | | | |
|---|---|---|---|---|---|---|
| **Recreation** | **1** | **2** | **3** | **4** | **5** | **6** |
| Rock Climbing (cliffs and boulders) | 7 | | 8 | | 23 | 3 |
| Paddling (miles) | | 8.9 | 8.3 | | 2.7 | 9.1 |
| | | | | | | |
| Trails (miles) | | | | | | |
| Hiking | 12.5 | 1.9 | 2.2 | | 8.5 | 6.0 |
| Mountain Biking | 9.6 | 20.0 | 12.2 | | 4.9 | 10.5 |
| Hiking/Equestrian | 0.8 | 7.6 | | | | 3.2 |
| Hiking/Mountain Biking | 1.0 | 3.0 | 31.2 | 1.0 | 0.1 | 5.7 |
| Hiking/Mountain Biking/Equestrian | 4.7 | 8.5 | 0.6 | | | 1.6 |
| Motorcycle/Mountain Biking/Equestrian/Hiking | 8.6 | 7.6 | | | | 3.6 |
| ATV/Mountain Biking/Equestrian/Hiking | | | | | | 0.8 |
| ATV/Motorcycle/Mountain Biking/Equestrian/Hiking | 2.7 | 9.9 | 0.4 | | | 44.8 |
| 4WD Vehicle/Mountain Biking/Equestrian/Hiking | | | | | | 0.1 |
| 4WD Vehicle/ATV/Motorcycle/Mountain Biking/Equestrian/Hiking | | 3.7 | | | | 8.7 |
| Total Trail Miles | 39.9 | 62.1 | 46.5 | 1.0 | 13.4 | 85.0 |
| | | | | | | |
| Winter Trails | | | | | | |
| Cross Country Ski/Snowshoe | | 2.6 | 1.5 | | | 4.2 |
| Snowmobile/Cross Country/Snowshoe | | 20.5 | 4.2 | | | 3.6 |
| Total Winter Trail Miles | | 23.1 | 5.7 | | | 7.8 |

*The recreation metrics present in this workbook are compiled from several public sources and some areas may be incomplete. The recreation information (trail miles, river miles, rock climbing routes, etc.) is a good starting point, but more vetting may be needed to confirm completeness of geospatial datasets.

Table: Detailed recreation resources within Section 368 Energy Corridors.
Baseline recreation analysis: 2/20/18

| State | Region | Agency | Corridor ID | Width Feet | Locally Designated | Designated Use | Section 368 Status | Comments | Recreation | Winter Recreation |
|---|---|---|---|---|---|---|---|---|---|---|
| <Null> | <Null> | BLM | 126-218 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling | |
| <Null> | <Null> | BLM | 132-136 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling | |
| Colorado | <Null> | BLM | 132-136 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking | |
| Nevada | <Null> | BLM | 18-224 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking | |
| Nevada | <Null> | BLM | 18-224 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking | |
| <Null> | <Null> | BLM | 66-212 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling | |
| California | 1 | BLM | 115-238 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Equestrian | |
| Arizona | 1 | BLM | 115-238 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | ntain Biking/Equestrian/Hiki | |
| Arizona | 1 | BLM | 115-238 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | Hiking/Mountain Biking/Equestrian/Hiki | |
| Arizona | 1 | BLM | 115-238 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | ng Mountain Biking | |
| Arizona | 1 | BLM | 115-238 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | Mountain Biking | |
| California | 1 | BLM | 27-41 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Hiking | |
| Arizona | 1 | BLM | 41-46 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | Hiking/Mountain | |
| Arizona | 1 | BLM | 41-46 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | Hiking/Mountain Biking/Equestrian/Hiki | |
| Arizona | 1 | BLM | 41-47 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | ng ntain Biking/Equestrian/Hiki | |
| Arizona | 1 | BLM | 46-269 | 5280 | Yes | Underground-only | Designated | Underground only, designated, 5280' width | ntain | |
| Arizona | 1 | BLM | 46-269 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Biking/Equestrian/Hiki | |
| California | 1 | USFS | 107-268 | 1000 | Yes | Electric-only | Designated | Electric only, designated, 1000' width | Hiking | |
| California | 1 | USFS | 108-267 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking | |
| California | 1 | USFS | 108-267 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking | |
| California | 1 | USFS | 108-267 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Mountain Biking | |
| California | 1 | USFS | 108-267 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Mountain Biking | |
| California | 1 | USFS | 108-267 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Mountain Biking | |
| California | 1 | USFS | 108-267 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Mountain Biking | |
| California | 1 | USFS | 115-238 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Equestrian | |
| California | 1 | USFS | 115-238 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Mountain | |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| California | 1 | USFS | 115-238 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Mountain Biking |
| California | 1 | USFS | 115-238 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Mountain Biking |
| California | 1 | USFS | 236-237 | 2000 | Yes | Electric-only | Designated | Electric only, designated, 2000' width | Hiking/Mountain |
| California | 1 | USFS | 236-237 | 2000 | Yes | Electric-only | Designated | Electric only, designated, 2000' width | Hiking/Mountain |
| California | 1 | USFS | 236-237 | 2000 | Yes | Electric-only | Designated | Electric only, designated, 2000' width | Mountain Biking |
| California | 1 | USFS | 264-265 | 1000 | Yes | Electric-only | Designated | Electric only, designated, 1000' width | Hiking |
| California | 1 | USFS | 264-265 | 1000 | Yes | Electric-only | Designated | Electric only, designated, 1000' width | Hiking |
| California | 1 | USFS | 264-265 | 1000 | Yes | Electric-only | Designated | Electric only, designated, 1000' width | Hiking |
| California | 1 | USFS | 264-265 | 1000 | Yes | Electric-only | Designated | Electric only, designated, 1000' width | Hiking |
| California | 1 | USFS | 264-265 | 1000 | Yes | Electric-only | Designated | Electric only, designated, 1000' width | Hiking |
| California | 1 | USFS | 264-265 | 1000 | Yes | Electric-only | Designated | Electric only, designated, 1000' width | Hiking |
| <Null> | 2 | BLM | 130-131 (N) | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Paddling |
| <Null> | 2 | BLM | 130-131 (S) | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| Colorado | 2 | BLM | 134-136 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Colorado | 2 | BLM | 134-136 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 | BLM | 136-139 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| <Null> | 2 | BLM | 139-277 | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Paddling |
| Colorado | 2 | BLM | 139-277 | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 | BLM | 139-277 | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 | BLM | 139-277 | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 | BLM | 139-277 | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 | BLM | 139-277 | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Arizona | 2 | BLM | 61-207 | -1 | No | All | Designated | Multimodal, not designated, variable width | Vehicle/ATV/Motorcycle/Mountain Biking/Equestrian/Hiki |
| Arizona | 2 | BLM | 61-207 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Arizona | 2 | BLM | 61-207 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking/Equestrian |
| Arizona | 2 | BLM | 61-207 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Arizona | 2 | BLM | 61-207 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Equestrian |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Arizona | 2 BLM | 61-207 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| <Null> | 2 BLM | 80-273 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| New Mexico | 2 BLM | 80-273 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| New Mexico | 2 BLM | 80-273 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| New Mexico | 2 BLM | 81-213 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 1000 Yes | All | Designated | Multimodal, designated, 1000' width | Mountain Biking |
| <Null> | 2 BLM | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Paddling |
| Colorado | 2 BLM | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 5280 Yes | All | Designated | Multimodal, designated, 5280' width | Mountain Biking |
| Colorado | 2 BLM | 87-277 | 5280 Yes | All | Designated | Multimodal, designated, 5280' width | Mountain Biking |
| <Null> | 2 USFS | 130-274 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Paddling |
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain Biking/Equestrian/Hiki |
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiki ng |

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|---|---|---|---|---|---|---|---|
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Equestrian |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking/Equestrian |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | ntain |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | ntain |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Arizona | 2 USFS | 47-68 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Arizona | 2 USFS | 61-207 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | ntain Biking/Equestrian/Hiking |
| Arizona | 2 USFS | 61-207 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Hiking |
| Arizona | 2 USFS | 61-207 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Biking/Equestrian/Hiking |
| Arizona | 2 USFS | 61-207 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| <Null> | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |

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|---|---|---|---|---|---|---|---|
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain Biking/Equestrian/Hiki |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Equestrian |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Equestrian |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Equestrian |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking/Equestrian |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking/Equestrian |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Equestrian |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking/Equestrian |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 USFS | 87-277 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Colorado | 2 USFS | 87-277 | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |

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|---|---|---|---|---|---|---|---|---|
| <Null> | 3 | BLM | 126-218 | 3500 | No | All | 368 multimodal, but underground-only in subsequent GRSG ARMPA RMP amendment | Multimodal, not designated, default 3500' width | Paddling |
| <Null> | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Paddling |
| Colorado | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Mountain Biking |
| Colorado | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Mountain Biking |
| Colorado | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Mountain Biking |
| <Null> | 3 | BLM | 133-142 | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Paddling |
| <Null> | 3 | BLM | 144-275 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| <Null> | 3 | BLM | 66-209 | 3500 | Yes | Electric-only | Prohibited by 2000 National Defense Authorization Act | Electric only, designated, default 3500' width | Paddling |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |

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|---|---|---|---|---|---|---|---|
| Utah | 3 | BLM | 66-212 | -1 No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |

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|---|---|---|---|---|---|---|---|---|
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Mountain Biking |
| Arizona | 3 | BLM | 68-116 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | Biking/Equestrian/Hiking/Mountain |
| Arizona | 3 | BLM | 68-116 | 5280 | Yes | All | Designated | Multimodal, designated, 5280' width | Biking/Equestrian/Hiking/Mountain |
| Nevada | 3 | USFS | 110-114 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| <Null> | 3 | USFS | 144-275 | 200 | No | All | Designated | Multimodal, not designated, 200' width | Paddling |
| <Null> | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | Paddling |
| Colorado | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | <Null> |
| Colorado | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | <Null> |
| Colorado | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | <Null> |
| Colorado | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | <Null> |
| Colorado | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | Hiking |
| Colorado | 3 | USFS | 144-275 | 2500 | No | Electric-only | Designated | Electric only, not designated, 2500' width | <Null> |
| Colorado | 3 | USFS | 144-275 | 2500 | No | Electric-only | Designated | Electric only, not designated, 2500' width | <Null> |
| Colorado | 3 | USFS | 144-275 | 2500 | No | Electric-only | Designated | Electric only, not designated, 2500' width | Hiking/Mountain Biking |
| Colorado | 3 | USFS | 144-275 | 2500 | No | Electric-only | Designated | Electric only, not designated, 2500' width | Hiking/Mountain Biking |
| Colorado | 3 | USFS | 144-275 | 2500 | No | Electric-only | Designated | Electric only, not designated, 2500' width | Mountain Biking |

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|---|---|---|---|---|---|---|---|---|
| <Null> | 3 | USFS | 144-275 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| <Null> | 3 | USFS | 144-275 | 3500 | No | Electric-only | Designated | Electric only, not designated, default 3500' width | Paddling |
| Utah | 3 | USFS | 256-257 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking/Mountain |
| Utah | 3 | USFS | 256-257 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking/Mountain |
| Utah | 3 | USFS | 256-257 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking/Mountain |
| Utah | 3 | USFS | 256-257 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking/Mountain |
| Utah | 3 | USFS | 256-257 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking/Mountain |
| Utah | 3 | USFS | 256-257 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Hiking/Mountain |
| <Null> | 3 | USFS | 66-209 | 3500 | Yes | Electric-only | Designated | Electric only, designated, default 3500' width | Paddling |
| Utah | 3 | USFS | 66-209 | 3500 | Yes | Electric-only | Designated | Electric only, designated, default 3500' width | Hiking/Mountain Biking |
| Utah | 3 | USFS | 66-209 | 3500 | Yes | Electric-only | Designated | Electric only, designated, default 3500' width | Mountain Biking |
| Utah | 3 | USFS | 66-209 | 3500 | Yes | Electric-only | Designated | Electric only, designated, default 3500' width | Mountain Biking |
| Utah | 3 | USFS | 66-212 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Utah | 3 | USFS | 66-212 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Utah | 3 | USFS | 66-259 | -1 | No | All | Designated | Multimodal, not designated, variable width | <Null> |
| Utah | 3 | USFS | 66-259 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking |
| Utah | 3 | USFS | 66-259 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Utah | 3 | USFS | 66-259 | -1 | No | All | Designated | Multimodal, not designated, variable width | Hiking/Mountain Biking |
| Wyoming | 4 | BLM | 78-138 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| <Null> | 5 | BLM | 15-17 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Paddling |
| Nevada | 5 | BLM | 15-17 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Mountain Biking |
| Nevada | 5 | BLM | 15-17 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Mountain Biking |
| California | 5 | BLM | 18-23 | 1320 | No | All | Designated | Multimodal, not designated, 1320' width | Mountain Biking |
| <Null> | 5 | BLM | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| <Null> | 5 | USFS | 101-263 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| <Null> | 5 | USFS | 101-263 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| California | 5 | USFS | 261-262 | 2000 | No | Electric-only | Designated | Electric only, not designated, 2000' width | Hiking/Mountain |
| California | 5 | USFS | 261-262 | 2000 | No | Electric-only | Designated | Electric only, not designated, 2000' width | Mountain Biking |

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|---|---|---|---|---|---|---|---|---|
| California | 5 | USFS | 8-Mar | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 8-Mar | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |

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|---|---|---|---|---|---|---|---|
| Nevada | 5 USFS | 15-Jun | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 USFS | 15-Jun | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 USFS | 15-Jun | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 USFS | 15-Jun | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Nevada | 5 USFS | 15-Jun | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| California | 5 USFS | 15-Jun | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Hiking |
| California | 5 USFS | 15-Jun | 3500 Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Oregon | 6 BLM | 10-246 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Oregon | 6 BLM | 10-246 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Oregon | 6 BLM | 10-246 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| Oregon | 6 BLM | 10-246 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Mountain Biking |
| <Null> | 6 BLM | 102-105 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| Oregon | 6 BLM | 11-103 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | ntain Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiki ntain |
| Oregon | 6 BLM | 11-103 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiki |

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|---|---|---|---|---|---|---|---|
| Oregon | 6 BLM | 11-103 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain Biking/Equestrian/Hiki |
| Oregon | 6 BLM | 11-103 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain Biking/Equestrian/Hiki |
| Oregon | 6 BLM | 11-103 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain Biking/Equestrian/Hiki |
| Oregon | 6 BLM | 11-228 | 1500 Yes | All | Designated | Multimodal, designated, 1500' width | ntain Biking/Equestrian/Hiki |
| Oregon | 6 BLM | 11-228 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | ntain Biking/Equestrian/Hiki |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Idaho | 6 BLM | 112-226 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| <Null> | 6 BLM | 229-254 | 2000 No | All | Designated | Multimodal, not designated, 2000' width | Paddling |
| Idaho | 6 BLM | 229-254 | 2000 No | All | Designated | Multimodal, not designated, 2000' width | Hiking |
| Idaho | 6 BLM | 229-254 | 2000 No | All | Designated | Multimodal, not designated, 2000' width | Mountain Biking |
| Idaho | 6 BLM | 24-228 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Oregon | 6 BLM | 4-247 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Idaho | 6 BLM | 50-203 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| <Null> | 6 BLM | 50-51 | 2640 Yes | All | Designated | Multimodal, designated, 2640' width | Paddling |
| <Null> | 6 BLM | 50-51 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| <Null> | 6 BLM | 51-204 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Montana | 6 | BLM | 51-205 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Montana | 6 | BLM | 51-205 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Montana | 6 | BLM | 51-205 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Montana | 6 | BLM | 51-205 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Montana | 6 | BLM | 51-205 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Montana | 6 | BLM | 51-205 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Montana | 6 | BLM | 51-205 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Mountain Biking |
| Oregon | 6 | BLM | 11-Jul | 1500 | Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hikintain |
| Oregon | 6 | BLM | 11-Jul | 1500 | Yes | All | Designated | Multimodal, designated, 1500' width | Biking/Equestrian/Hikintain |
| Oregon | 6 | BLM | 11-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hikintain |
| Oregon | 6 | BLM | 11-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiki |
| Oregon | 6 | USFS | 10-246 | 1320 | No | Electric-only | Designated | Electric only not designated, 1320' width | Hiking |
| Oregon | 6 | USFS | 10-246 | 1320 | No | Electric-only | Designated | Electric only not designated, 1320' width | Hiking |
| Oregon | 6 | USFS | 10-246 | 1320 | No | Electric-only | Designated | Electric only not designated, 1320' width | Hiking |
| Oregon | 6 | USFS | 10-246 | 1320 | No | Electric-only | Designated | Electric only not designated, 1320' width | Hiking/Mountain |
| <Null> | 6 | USFS | 102-105 | -1 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, variable width | Paddling |
| <Null> | 6 | USFS | 102-105 | -1 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, variable width | Paddling |
| Washington | 6 | USFS | 102-105 | -1 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, variable width | Hiking |
| Washington | 6 | USFS | 102-105 | -1 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, variable width | Hiking |
| Washington | 6 | USFS | 102-105 | -1 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, variable width | Hiking |
| Washington | 6 | USFS | 102-105 | -1 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, variable width | Hiking/Equestrian |
| <Null> | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Paddling |
| <Null> | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Paddling |
| <Null> | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Paddling |
| <Null> | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Paddling |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| <Null> | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Paddling |
| Washington | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Hiking/Mountain Biking |
| Washington | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Hiking/Mountain Biking/Equestrian |
| Washington | 6 | USFS | 102-105 | 500 | Yes | Elec-only, Upgr-only | Designated | Electric upgrade only, designated, 500' width | Mountain Biking |
| Montana | 6 | USFS | 229-254 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Equestrian |
| Montana | 6 | USFS | 229-254 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Mountain Biking |
| Montana | 6 | USFS | 229-254 | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Mountain Biking ntain |
| Idaho | 6 | USFS | 229-254 | 2000 | No | All | Designated | Multimodal, not designated, 2000' width | Biking/Equestrian/Hiki |
| Idaho | 6 | USFS | 229-254 | 2000 | No | All | Designated | Multimodal, not designated, 2000' width | Hiking |
| Idaho | 6 | USFS | 229-254 | 2000 | No | All | Designated | Multimodal, not designated, 2000' width | Mountain Biking |
| Idaho | 6 | USFS | 229-254 (N) | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Vehicle/Mountain Biking/Equestrian/Hiki |
| Montana | 6 | USFS | 229-254 (N) | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Equestrian |
| Montana | 6 | USFS | 229-254 (N) | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Equestrian |
| Montana | 6 | USFS | 229-254 (N) | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Equestrian |
| Montana | 6 | USFS | 229-254 (N) | 1000 | No | Electric-only | Designated | Electric only, not designated, 1000' width | Hiking/Equestrian |
| Montana | 6 | USFS | 229-254 (S) | 2000 | No | Underground-only | Designated | Underground only, not designated, 2000' width | Hiking |
| Montana | 6 | USFS | 229-254 (S) | 2000 | No | Underground-only | Designated | Underground only, not designated, 2000' width | Hiking |
| Montana | 6 | USFS | 229-254 (S) | 2000 | No | Underground-only | Designated | Underground only, not designated, 2000' width | Hiking/Equestrian |
| Montana | 6 | USFS | 229-254 (S) | 2000 | No | Underground-only | Designated | Underground only, not designated, 2000' width | Hiking/Equestrian |
| Montana | 6 | USFS | 229-254 (S) | 2000 | No | Underground-only | Designated | Underground only, not designated, 2000' width | Hiking/Equestrian |
| <Null> | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Paddling |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Vehicle/ATV/Motorcycle/Mountain Biking/Equestrian/Hiki |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Oregon | 6 | USFS | 230-248 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Washington | 6 | USFS | 244-245 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Equestrian |
| Montana | 6 | USFS | 51-205 | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Hiking/Mountain Biking |
| Montana | 6 | USFS | 51-205 | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Mountain Biking |
| Oregon | 6 | USFS | 11-Jul | 3500 | No | All | Designated | Multimodal, not designated, 3500' width | ntain Biking/Equestrian/Hiki |
| Oregon | 6 | USFS | 11-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Biking/Equestrian/Hiking |
| Oregon | 6 | USFS | 11-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking/Equestrian |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | <Null> |
| Oregon | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Hiking/Mountain Biking/Equestrian |

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|---|---|---|---|---|---|---|---|
| Colorado | 2 BLM | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Colorado | 2 USFS | 131-134 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Colorado | 2 USFS | 134-136 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Colorado | 2 USFS | 134-139 | 3500 No | Electric-only | Designated | Electric only, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Arizona | 2 USFS | 62-211 | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Utah | 3 USFS | 66-259 | -1 No | All | Designated | Multimodal, not designated, variable width | Snowmobile/Cross-Country Ski/Snowshoe |
| Oregon | 6 USFS | 24-Jul | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Oregon | 6 USFS | 24-Jul | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Oregon | 6 USFS | 24-Jul | 3500 No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Oregon | | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Snowmobile/Cross-Country Ski/Snowshoe |
| Arizona | | 2 | USFS | 62-211 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 2 | USFS | 87-277 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 2 | USFS | 87-277 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 2 | USFS | 87-277 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 3 | USFS | 144-275 | 500 | No | Electric-only | Designated | Electric only, not designated, 500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 3 | USFS | 144-275 | 2500 | No | Electric-only | Designated | Electric only, not designated, 2500' width | Cross-Country Ski/Snowshoe |
| Colorado | | 3 | USFS | 144-275 | 2500 | No | Electric-only | Designated | Electric only, not designated, 2500' width | Cross-Country Ski/Snowshoe |
| Oregon | | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Cross-Country Ski/Snowshoe |
| Oregon | | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Cross-Country Ski/Snowshoe |
| Oregon | | 6 | USFS | 24-Jul | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Cross-Country Ski/Snowshoe |
| California | <Null> | | BLM | 18-23 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |
| California | <Null> | | BLM | 18-23 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| California | <Null> | BLM | 18-23 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |
| California | | 1 BLM | 23-106 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |
| California | | 1 BLM | 23-106 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |
| California | | 1 BLM | 27-266 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |
| California | | 1 BLM | 30-52 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |
| California | | 1 BLM | 30-52 | 10560 | Yes | All | Designated | Multimodal, designated, 10560' width | Rock Climbing |
| Nevada | | 1 BLM | 47-231 | 2000 | Yes | All | Designated | Multimodal, designated, 2000' width | Rock Climbing |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| California | 1 | USFS | 108-267 | -1 | Yes | All | Designated | Multimodal, designated, variable width | Rock Climbing |
| Colorado | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Rock Climbing |
| Colorado | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Rock Climbing |
| Colorado | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Rock Climbing |
| Colorado | 3 | BLM | 132-136 | 26400 | Yes | All | Designated | Multimodal, designated, 26400' width | Rock Climbing |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Rock Climbing |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Rock Climbing |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Rock Climbing |
| Utah | 3 | BLM | 66-212 | -1 | No | All | Designated | Multimodal, not designated, variable width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| California | 5 | USFS | 15-Jun | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |
| Idaho | 6 | BLM | 49-202 | 3500 | No | All | Designated | Multimodal, not designated, default 3500' width | Rock Climbing |
| Oregon | 6 | USFS | 10-246 | 1320 | No | Electric-only | Designated | Electric only not designated, 1320' width | Rock Climbing |
| Montana | 6 | USFS | 51-205 | 3500 | Yes | All | Designated | Multimodal, designated, default 3500' width | Rock Climbing |

| TRAIL_NAME | Hike link | MTB link | River Name | Paddle link | Length Miles | Climbing Name | Route Count | Climbing Link | Data Source |
|---|---|---|---|---|---|---|---|---|---|
| <Null> | <Null> | <Null> | Green | http://www.americanwhitewater.org/content/River/detail/id/1852/ | 2.43 | | | | American Whitewater |
| <Null> | <Null> | <Null> | Gunnison | http://www.americanwhitewater.org/content/River/detail/id/10564/ | 0.48 | | | | American Whitewater |
| Dry Creek Road | <Null> | <Null> | <Null> | <Null> | 0.01 | | | | Trailforks |
| Beatty Wash | <Null> | <Null> | <Null> | <Null> | 0.81 | | | | Adventure Projects |
| Plutonium Ridge Loop | <Null> | <Null> | <Null> | <Null> | 0.08 | | | | Adventure Projects |
| <Null> | <Null> | <Null> | Price | http://www.americanwhitewater.org/content/River/detail/id/1865/ | 0.19 | | | | American Whitewater |
| PACIFIC CREST TRAIL-SOUTH FO | <Null> | <Null> | <Null> | <Null> | 0.38 | | | | USFS |
| | <Null> | <Null> | <Null> | <Null> | 0.14 | | | | BLM |
| | <Null> | <Null> | <Null> | <Null> | 3.37 | | | | BLM |
| | <Null> | <Null> | <Null> | <Null> | 6.35 | | | | BLM |
| Beach | <Null> | <Null> | <Null> | <Null> | 0.25 | | | | Adventure Projects |
| Hair Raiser - A short, dead-end trail. Very rough, | <Null> | <Null> | <Null> | <Null> | 0.25 | | | | Adventure Projects |
| Amboy Crater Trail | <Null> | <Null> | <Null> | <Null> | 0.53 | | | | OpenStreetMap |
| | <Null> | <Null> | <Null> | <Null> | 0.48 | | | | BLM |
| | <Null> | <Null> | <Null> | <Null> | 0.40 | | | | BLM |
| | <Null> | <Null> | <Null> | <Null> | 2.26 | | | | BLM |
| | <Null> | <Null> | <Null> | <Null> | 2.06 | | | | BLM |
| | <Null> | <Null> | <Null> | <Null> | 0.47 | | | | BLM |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.29 | | | | Angeles National Forest |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 4.60 | | | | San Bernardino National Forest |
| PCT - Section C | <Null> | <Null> | <Null> | <Null> | 4.92 | | | | OpenStreetMap |
| Dee's Descent | <Null> | <Null> | <Null> | <Null> | 2.52 | | | | Trailforks |
| Gunsmoke | <Null> | <Null> | <Null> | <Null> | 2.04 | | | | Trailforks |
| H.A.N.'s Highway | <Null> | <Null> | <Null> | <Null> | 2.00 | | | | Trailforks |
| Rags to Ridges | <Null> | <Null> | <Null> | <Null> | 1.28 | | | | Trailforks |
| PACIFIC CREST TRAIL-SOUTH FO | <Null> | <Null> | <Null> | <Null> | 0.46 | | | | USFS |
| THE NARROWS | <Null> | <Null> | <Null> | <Null> | 0.33 | | | | USFS |

| | | | | | | |
|---|---|---|---|---|---|---|
| Carvacre access trail | <Null> | <Null> | <Null> | <Null> | 0.23 | Trailforks |
| Carvacre Truck Trail | <Null> | <Null> | <Null> | <Null> | 0.12 | Trailforks |
| Smashmouth Trail | <Null> | <Null> | <Null> | <Null> | 0.49 | OpenStreetMap |
| SILVERADO MOTOR WAY | <Null> | <Null> | <Null> | <Null> | 0.61 | USFS |
| Main Divide (Four Corners to Motorway) | <Null> | <Null> | <Null> | <Null> | 0.90 | Trailforks |
| BUTTERFIELD 4X4 OHV TRAIL | <Null> | <Null> | <Null> | <Null> | 0.94 | USFS |
| DEER 4X4 OHV TRAIL | <Null> | <Null> | <Null> | <Null> | 0.13 | USFS |
| DRINKWATER 4X4 OHV TRAIL | <Null> | <Null> | <Null> | <Null> | 0.03 | USFS |
| HOUSE 4X4 OHV TRAIL | <Null> | <Null> | <Null> | <Null> | 0.21 | USFS |
| Pacific Crest Trail | <Null> | <Null> | <Null> | <Null> | 0.58 | OpenStreetMap |
| PORTAL OHV TRAIL | <Null> | <Null> | <Null> | <Null> | 0.28 | USFS |
| <Null> | <Null> | <Null> | San Miguel | http://www.americanwhitewater.org/content/River/detail/id/422/ | 1.05 | American Whitewater |
| <Null> | <Null> | <Null> | San Miguel | http://www.americanwhitewater.org/content/River/detail/id/422/ | 0.19 | American Whitewater |
| TRANSFER SNOWMOBILE/SKI | <Null> | <Null> | <Null> | <Null> | 0.01 | USFS |
| Dry Creek Road | <Null> | <Null> | <Null> | <Null> | 0.17 | Trailforks |
| Dry Creek Road | <Null> | <Null> | <Null> | <Null> | 0.48 | Trailforks |
| <Null> | <Null> | <Null> | Uncompahgre River | http://www.americanwhitewater.org/content/River/detail/id/429/ | 0.67 | American Whitewater |
| Buzzard Gulch Trail | <Null> | <Null> | <Null> | <Null> | 1.05 | Adventure Projects |
| Doubletrack Connector - Vulture Rim to Mailbox Tra | <Null> | <Null> | <Null> | <Null> | 0.13 | Adventure Projects |
| Mailbox Trail | <Null> | <Null> | <Null> | <Null> | 0.74 | Adventure Projects |
| P.J. Way | <Null> | <Null> | <Null> | <Null> | 0.07 | Adventure Projects |
| Vulture Rim | <Null> | <Null> | <Null> | <Null> | 0.69 | Adventure Projects |
| | <Null> | <Null> | <Null> | <Null> | 3.71 | BLM |
| Black Canyon Trail | <Null> | <Null> | <Null> | <Null> | 0.25 | BLM |
| Black Canyon Trail | <Null> | <Null> | <Null> | <Null> | 4.70 | BLM |
| Frontage rd to Maggie Mine | <Null> | <Null> | <Null> | <Null> | 0.10 | Trailforks |
| Black Canyon Trail | <Null> | <Null> | <Null> | <Null> | 3.10 | BLM |

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|---|---|---|---|---|---|---|
| Frontage rd to Maggie Mine | <Null> | <Null> | <Null> | <Null> | 0.61 | Trailforks |
| <Null> | <Null> | <Null> | Animas | http://www.americanwhitewater.org/content/River/detail/id/1203/ | 0.01 | American Whitewater |
| Continental Divide National Scenic Trail (CDT) | <Null> | <Null> | <Null> | <Null> | 0.82 | Adventure Projects |
| Mountain View Trail | <Null> | <Null> | <Null> | <Null> | 1.45 | Adventure Projects |
| CDT: NM Hwy 113 AP (NM Sec. 4) | <Null> | <Null> | <Null> | <Null> | 0.72 | Adventure Projects |
| Aberdeen Loop West | <Null> | <Null> | <Null> | <Null> | 0.07 | Adventure Projects |
| Back In | <Null> | <Null> | <Null> | <Null> | 0.31 | Trailforks |
| Bambi | <Null> | <Null> | <Null> | <Null> | 0.05 | Trailforks |
| Enchanted Forest | <Null> | <Null> | <Null> | <Null> | 0.12 | Adventure Projects |
| Josho's | <Null> | <Null> | <Null> | <Null> | 0.27 | Adventure Projects |
| Outback | <Null> | <Null> | <Null> | <Null> | 0.00 | Adventure Projects |
| Sawtooth | <Null> | <Null> | <Null> | <Null> | 0.05 | Adventure Projects |
| Skull Pass | <Null> | <Null> | <Null> | <Null> | 0.02 | Adventure Projects |
| Sky Line | <Null> | <Null> | <Null> | <Null> | 0.10 | Adventure Projects |
| <Null> | <Null> | <Null> | Arkansas | http://www.americanwhitewater.org/content/River/detail/id/6769/ | 0.32 | American Whitewater |
| Dead Bird | <Null> | <Null> | <Null> | <Null> | 0.23 | Adventure Projects |
| Double Rainbow | <Null> | <Null> | <Null> | <Null> | 0.56 | Adventure Projects |
| Little Rainbow | <Null> | <Null> | <Null> | <Null> | 4.62 | Adventure Projects |
| Loggie Gulch (cr 108) | <Null> | <Null> | <Null> | <Null> | 0.11 | Trailforks |
| Lost | <Null> | <Null> | <Null> | <Null> | 0.34 | Adventure Projects |
| Race Track | <Null> | <Null> | <Null> | <Null> | 0.49 | Adventure Projects |
| Aberdeen Loop West | <Null> | <Null> | <Null> | <Null> | 0.10 | Adventure Projects |
| Josho's | <Null> | <Null> | <Null> | <Null> | 0.77 | Adventure Projects |
| <Null> | <Null> | <Null> | Dolores | http://www.americanwhitewater.org/content/River/detail/id/384/ | 0.17 | American Whitewater |
| HIGHWAY 90 SNOWMOBILE/SKI | <Null> | <Null> | <Null> | <Null> | 0.35 | USFS |
| NORTH DIVIDE SNOWMOBILE/SKI | <Null> | <Null> | <Null> | <Null> | 1.09 | USFS |
| PARALLEL | <Null> | <Null> | <Null> | <Null> | 1.77 | USFS |
| GRAYS CREEK | <Null> | <Null> | <Null> | <Null> | 0.47 | USFS |

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|---|---|---|---|---|---|---|
| HORNET | <Null> | <Null> | <Null> | <Null> | 0.79 | USFS |
| POWERLINE | <Null> | <Null> | <Null> | <Null> | 3.68 | USFS |
| TRANSFER SNOWMOBILE/SKI | <Null> | <Null> | <Null> | <Null> | 8.57 | USFS |
| CUSHMAN MESA | <Null> | <Null> | <Null> | <Null> | 0.17 | USFS |
| PARALLEL | <Null> | <Null> | <Null> | <Null> | 0.03 | USFS |
| OLD TRANSFER | <Null> | <Null> | <Null> | <Null> | 0.73 | USFS |
| OLD TRANSFER BIKE TRAIL | <Null> | <Null> | <Null> | <Null> | 2.22 | USFS |
| HIGHWAY 90 SNOWMOBILE/SKI | <Null> | <Null> | <Null> | <Null> | 3.19 | USFS |
| NORTH DIVIDE SNOWMOBILE/SKI | <Null> | <Null> | <Null> | <Null> | 0.99 | USFS |
| SOUTH DIVIDE SNOWMOBILE/SKI | <Null> | <Null> | <Null> | <Null> | 0.26 | USFS |
| BUCK | <Null> | <Null> | <Null> | <Null> | 0.13 | USFS |
| DRY CREEK | <Null> | <Null> | <Null> | <Null> | 0.68 | USFS |
| PARALLEL | <Null> | <Null> | <Null> | <Null> | 3.29 | USFS |
| BUCK | <Null> | <Null> | <Null> | <Null> | 1.59 | USFS |
| HORNET | <Null> | <Null> | <Null> | <Null> | 0.93 | USFS |
| FSR 549 | <Null> | <Null> | <Null> | <Null> | 0.26 | Trailforks |
| ARIZONA TRAIL | <Null> | <Null> | <Null> | <Null> | 0.73 | USFS |
| 103 | <Null> | <Null> | <Null> | <Null> | 0.87 | USFS |
| Powerline Path | <Null> | <Null> | <Null> | <Null> | 0.64 | OpenStreetMap |
| 101 | <Null> | <Null> | <Null> | <Null> | 0.12 | USFS |
| 9003P | <Null> | <Null> | <Null> | <Null> | 0.46 | Trailforks |
| <Null> | <Null> | <Null> | Chevelon Creek | http://www.americanwhitewater.org/content/River/detail/id/113/ | 6.49 | American Whitewater |
| BEAR SNOWMOBILE LOOP | <Null> | <Null> | <Null> | <Null> | 2.26 | USFS |

| | | | | | | |
|---|---|---|---|---|---|---|
| DYE SNOWMOBILE LOOP | <Null> | <Null> | <Null> | <Null> | 2.70 | USFS |
| MOGOLLON RIM SNOWMOBILE C | <Null> | <Null> | <Null> | <Null> | 0.69 | USFS |
| MOGOLLON RIM SNOWMOBILE E | <Null> | <Null> | <Null> | <Null> | 0.38 | USFS |
| LONG DRAW OHV LOOP | <Null> | <Null> | <Null> | <Null> | 2.93 | USFS |
| CHEVELON CROSSING ACCESS | <Null> | <Null> | <Null> | <Null> | 0.04 | USFS |
| DURFEE CROSSING | <Null> | <Null> | <Null> | <Null> | 0.46 | USFS |
| CHEVELON CROSSING | <Null> | <Null> | <Null> | <Null> | 0.63 | USFS |
| LONG DRAW OHV SHORTCUT | <Null> | <Null> | <Null> | <Null> | 0.76 | USFS |
| SUNFLOWER | <Null> | <Null> | <Null> | <Null> | 1.11 | USFS |
| Arizona National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.96 | Arizona Trail Association |
| GENERAL CROOK | <Null> | <Null> | <Null> | <Null> | 0.71 | USFS |
| HIGHLINE | <Null> | <Null> | <Null> | <Null> | 0.82 | USFS |
| FR 27 | <Null> | <Null> | <Null> | <Null> | 1.32 | Trailforks |
| FR 626 | <Null> | <Null> | <Null> | <Null> | 0.80 | Trailforks |
| Old Monarch Pass | <Null> | <Null> | <Null> | <Null> | 1.29 | Adventure Projects |
| Skin up to Perfect Trees | <Null> | <Null> | <Null> | <Null> | 0.18 | Adventure Projects |
| The Perfect Trees | <Null> | <Null> | <Null> | <Null> | 0.38 | Adventure Projects |
| CDNST | <Null> | <Null> | <Null> | <Null> | 1.31 | USFS |
| CT - Segment 14: Highway 50 to Chalk Creek TH | <Null> | <Null> | <Null> | <Null> | 0.97 | Adventure Projects |
| BASIN VIEW | <Null> | <Null> | <Null> | <Null> | 0.07 | USFS |
| Fooses Creek Rd (cr 225) | <Null> | <Null> | <Null> | <Null> | 2.67 | Trailforks |
| South Fooses Creek (225c) | <Null> | <Null> | <Null> | <Null> | 0.03 | Trailforks |
| Loggie Gulch (cr 108) | <Null> | <Null> | <Null> | <Null> | 0.02 | Trailforks |

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|---|---|---|---|---|---|---|
| <Null> | <Null> | <Null> | Green | http://www.americanwhitewater.org/ content/River/detail/id/1852/ | 0.09 | American Whitewater |
| <Null> | <Null> | <Null> | Plateau Creek | http://www.americanwhitewater.org/ content/River/detail/id/4264/ | 2.98 | American Whitewater |
| Palisade Rim | <Null> | <Null> | <Null> | <Null> | 0.71 | Trailforks |
| Palisade Rim (upper) | <Null> | <Null> | <Null> | <Null> | 3.68 | Trailforks |
| Palisade Rim Connect | <Null> | <Null> | <Null> | <Null> | 0.74 | Trailforks |
| <Null> | <Null> | <Null> | Yampa | http://www.americanwhitewater.org/ content/River/detail/id/10523/ | 0.33 | American Whitewater |
| <Null> | <Null> | <Null> | Williams Fork | http://www.americanwhitewater.org/ content/River/detail/id/433/ | 1.07 | American Whitewater |
| <Null> | <Null> | <Null> | Spanish Fork | http://www.americanwhitewater.org/ content/River/detail/id/1876/ | 0.47 | American Whitewater |
| Bar B Hike | <Null> | <Null> | <Null> | <Null> | 0.04 | OrbitalView |
| Mill Creek Waterfall | <Null> | <Null> | <Null> | <Null> | 0.44 | OrbitalView |
| The Wall | <Null> | <Null> | <Null> | <Null> | 0.59 | OrbitalView |
| 24-Hours of Moab | <Null> | <Null> | <Null> | <Null> | 0.11 | Adventure Projects |
| Bar M | <Null> | <Null> | <Null> | <Null> | 0.06 | OrbitalView |
| Behind The Rocks | <Null> | <Null> | <Null> | <Null> | 0.80 | OrbitalView |
| Blue Hills | <Null> | <Null> | <Null> | <Null> | 1.56 | OrbitalView |
| Circle O | <Null> | <Null> | <Null> | <Null> | 0.14 | OrbitalView |
| Deadmans | <Null> | <Null> | <Null> | <Null> | 3.28 | OrbitalView |
| Deadmans Acc | <Null> | <Null> | <Null> | <Null> | 0.03 | OrbitalView |
| Deadmans Conn | <Null> | <Null> | <Null> | <Null> | 0.04 | OrbitalView |
| Escape | <Null> | <Null> | <Null> | <Null> | 0.20 | OrbitalView |
| Ez | <Null> | <Null> | <Null> | <Null> | 1.28 | OrbitalView |

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|---|---|---|---|---|---|---|
| Ez Access | <Null> | <Null> | <Null> | <Null> | 0.03 | OrbitalView |
| Gold Bar Rim | <Null> | <Null> | <Null> | <Null> | 1.13 | BLM |
| Goldbar (mag 7) | <Null> | <Null> | <Null> | <Null> | 0.23 | OrbitalView |
| Golden Spike | <Null> | <Null> | <Null> | <Null> | 2.27 | OrbitalView |
| Hidden Valley | <Null> | <Null> | <Null> | <Null> | 0.31 | OrbitalView |
| Killer B (dh) | <Null> | <Null> | <Null> | <Null> | 0.74 | OrbitalView |
| Lazy | <Null> | <Null> | <Null> | <Null> | 1.65 | OrbitalView |
| Longbranch | <Null> | <Null> | <Null> | <Null> | 1.09 | OrbitalView |
| Maverick | <Null> | <Null> | <Null> | <Null> | 0.40 | OrbitalView |
| Monitor And Merrimac | <Null> | <Null> | <Null> | <Null> | 0.69 | OrbitalView |
| North 40 | <Null> | <Null> | <Null> | <Null> | 1.89 | OrbitalView |
| Old Dump | <Null> | <Null> | <Null> | <Null> | 0.24 | OrbitalView |
| Pipe Dream | <Null> | <Null> | <Null> | <Null> | 4.03 | OrbitalView |
| Pipe Dream Connector Trail | <Null> | <Null> | <Null> | <Null> | 0.29 | BLM |
| Pipe Dream Spur | <Null> | <Null> | <Null> | <Null> | 0.09 | OrbitalView |
| Pipeline | <Null> | <Null> | <Null> | <Null> | 0.49 | OrbitalView |
| Pipeline Access | <Null> | <Null> | <Null> | <Null> | 0.11 | OrbitalView |
| Portal (poison Spider) | <Null> | <Null> | <Null> | <Null> | 0.26 | OrbitalView |
| Rusty Spur | <Null> | <Null> | <Null> | <Null> | 1.30 | OrbitalView |
| Rusty Spur Acc | <Null> | <Null> | <Null> | <Null> | 0.29 | OrbitalView |
| Sidewinder | <Null> | <Null> | <Null> | <Null> | 1.38 | OrbitalView |
| Sidewinder Access | <Null> | <Null> | <Null> | <Null> | 0.20 | OrbitalView |
| Bar M | <Null> | <Null> | <Null> | <Null> | 0.12 | Trailforks |

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|---|---|---|---|---|---|---|
| Bartlett Wash | <Null> | <Null> | <Null> | <Null> | 0.57 | Trailforks |
| Behind The Rocks Road | <Null> | <Null> | <Null> | <Null> | 0.46 | Trailforks |
| Below The Rocks | <Null> | <Null> | <Null> | <Null> | 0.19 | Trailforks |
| Chuckwagon | <Null> | <Null> | <Null> | <Null> | 0.25 | Adventure Projects |
| Dave's Trail | <Null> | <Null> | <Null> | <Null> | 0.24 | Adventure Projects |
| Gold Bar Rim | <Null> | <Null> | <Null> | <Null> | 0.12 | Trailforks |
| Golden Spike | <Null> | <Null> | <Null> | <Null> | 0.13 | Trailforks |
| Pipe Dream Connector | <Null> | <Null> | <Null> | <Null> | 0.32 | Adventure Projects |
| Sand Hill Climb | <Null> | <Null> | <Null> | <Null> | 0.47 | Trailforks |
| Seven Mile Flat | <Null> | <Null> | <Null> | <Null> | 1.19 | Trailforks |
| Cat Down | <Null> | <Null> | <Null> | <Null> | 0.21 | BLM |
| Cat Up | <Null> | <Null> | <Null> | <Null> | 0.19 | BLM |
| Mine Shaft Loop | <Null> | <Null> | <Null> | <Null> | 0.75 | Trailforks |
| <Null> | <Null> | <Null> | Clear Creek, West Fork | http://www.americanwhitewater.org/content/River/detail/id/1796/ | 2.43 | American Whitewater |
| <Null> | <Null> | <Null> | Clear Creek, West Fork | http://www.americanwhitewater.org/content/River/detail/id/1796/ | 0.04 | American Whitewater |
| Jones Pass West Fork Bowl Ascent | <Null> | <Null> | <Null> | <Null> | 0.16 | Adventure Projects |
| Peak 12666 Bowl and Way Back to the Car | <Null> | <Null> | <Null> | <Null> | 0.24 | Adventure Projects |
| Vasquez Glades | <Null> | <Null> | <Null> | <Null> | 0.02 | Adventure Projects |
| Vasquez Trees Ascent | <Null> | <Null> | <Null> | <Null> | 0.07 | Adventure Projects |
| Henderson Spur Trail | <Null> | <Null> | <Null> | <Null> | 0.09 | Adventure Projects |
| Jones Pass Bowl | <Null> | <Null> | <Null> | <Null> | 0.92 | Adventure Projects |
| Jones Pass South Ascent up Jones Pass Road | <Null> | <Null> | <Null> | <Null> | 0.08 | Adventure Projects |
| CDT - Jones Pass to Herman Gulch Trail | <Null> | <Null> | <Null> | <Null> | 0.39 | Adventure Projects |
| Continental Divide National Scenic Trail (CDT) | <Null> | <Null> | <Null> | <Null> | 0.13 | Adventure Projects |
| Jone's Pass Road | <Null> | <Null> | <Null> | <Null> | 0.17 | Trailforks |

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|---|---|---|---|---|---|---|
| <Null> | <Null> | <Null> | Clear Creek, West Fork | http://www.americanwhitewater.org/content/River/detail/id/1796/ | 0.11 | American Whitewater |
| <Null> | <Null> | <Null> | Williams Fork | http://www.americanwhitewater.org/content/River/detail/id/433/ | 0.66 | American Whitewater |
| Northern Skyline | <Null> | <Null> | <Null> | <Null> | 0.02 | OrbitalView |
| Pioneer East | <Null> | <Null> | <Null> | <Null> | 0.36 | OrbitalView |
| Pioneer West | <Null> | <Null> | <Null> | <Null> | 0.94 | OrbitalView |
| RIGHT FORK | <Null> | <Null> | <Null> | <Null> | 0.02 | USFS |
| Southern Skyline | <Null> | <Null> | <Null> | <Null> | 0.12 | OrbitalView |
| NORTH OGDEN CANYON | <Null> | <Null> | <Null> | <Null> | 0.57 | USFS |
| <Null> | <Null> | <Null> | Spanish Fork | http://www.americanwhitewater.org/content/River/detail/id/1876/ | 0.15 | American Whitewater |
| TEAT MOUNTAIN | <Null> | <Null> | <Null> | <Null> | 0.65 | USFS |
| S-Town | <Null> | <Null> | <Null> | <Null> | 1.25 | Trailforks |
| Yellow Brick Road | <Null> | <Null> | <Null> | <Null> | 0.81 | Trailforks |
| INDIAN CR TO WILLOW CR RIDGE | <Null> | <Null> | <Null> | <Null> | 0.38 | USFS |
| INDIAN CREEK SHEEP CAMP #1 | <Null> | <Null> | <Null> | <Null> | 0.62 | USFS |
| INDIAN CR/TRAIL HOLLOW LOOP | <Null> | <Null> | <Null> | <Null> | 4.16 | USFS |
| Miller Ridge | <Null> | <Null> | <Null> | <Null> | 0.07 | OrbitalView |
| French Hollow | <Null> | <Null> | <Null> | <Null> | 0.99 | OrbitalView |
| Tie Fork GWT | <Null> | <Null> | <Null> | <Null> | 0.91 | OrbitalView |
| Continental Divide National Scenic Trail (CDT) | <Null> | <Null> | <Null> | <Null> | 0.98 | <Null> |
| <Null> | <Null> | <Null> | Truckee | http://www.americanwhitewater.org/content/River/detail/id/1234/ | 1.21 | American Whitewater |
| Los Altos Connector | <Null> | <Null> | <Null> | <Null> | 0.07 | Trailforks |
| Zipper Loop | <Null> | <Null> | <Null> | <Null> | 0.08 | Adventure Projects |
| The Horse Trail | <Null> | <Null> | <Null> | <Null> | 0.30 | Adventure Projects |
| <Null> | <Null> | <Null> | Bear | http://www.americanwhitewater.org/content/River/detail/id/10173/ | 0.02 | American Whitewater |
| <Null> | <Null> | <Null> | Trinity, S. Fork | http://www.americanwhitewater.org/content/River/detail/id/3719/ | 1.44 | American Whitewater |
| <Null> | <Null> | <Null> | Trinity, S. Fork | http://www.americanwhitewater.org/content/River/detail/id/4497/ | 0.03 | American Whitewater |
| BAILEY COVE | <Null> | <Null> | <Null> | <Null> | 0.07 | USFS |
| Gateway Trail | | <Null> | <Null> | <Null> | 0.29 | Adventure Projects |

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|---|---|---|---|---|---|---|
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.10 | Shasta Trinity National Forest |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.01 | Sierra Pacific Industries |
| Billie Mack | <Null> | <Null> | <Null> | <Null> | 0.10 | OpenStreetMap |
| DLRT (Donner Lake Rim Trail): Castle Valley to Don | <Null> | <Null> | <Null> | <Null> | 2.39 | Adventure Projects |
| Donner Summit Lakes Trail | <Null> | <Null> | <Null> | <Null> | 0.33 | OpenStreetMap |
| Forest Service Ridge Trail | <Null> | <Null> | <Null> | <Null> | 0.26 | Adventure Projects |
| Overland Emigrant Commemorative Trail | <Null> | <Null> | <Null> | <Null> | 1.88 | Adventure Projects |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.01 | Donner Summit Public Utility Disctrict |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.08 | Private |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.04 | Southern Pacific Transportation Company |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 1.33 | Tahoe National Forest |
| Switchback Trail | <Null> | <Null> | <Null> | <Null> | 0.01 | Adventure Projects |
| Trail to Grouse Slab | <Null> | <Null> | <Null> | <Null> | 0.14 | OpenStreetMap |
| Emigrant Trail | <Null> | <Null> | <Null> | <Null> | 0.11 | Trailforks |
| Jacobs Lookout Bypass | <Null> | <Null> | <Null> | <Null> | 0.51 | Trailforks |
| Fisticufs | <Null> | <Null> | <Null> | <Null> | 0.42 | OpenStreetMap |
| KEYSTONE CANYON | <Null> | <Null> | <Null> | <Null> | 0.96 | USFS |
| East Bound and Down (unnamed connector) | <Null> | <Null> | <Null> | <Null> | 0.16 | Trailforks |
| Halo Trail (Snow Terrace to Kings Row) | <Null> | <Null> | <Null> | <Null> | 0.30 | Trailforks |
| Hoge-Evans Connector | <Null> | <Null> | <Null> | <Null> | 0.34 | Trailforks |
| Kings Row | <Null> | <Null> | <Null> | <Null> | 0.46 | Adventure Projects |
| Poedunk Trail | <Null> | <Null> | <Null> | <Null> | 0.64 | Trailforks |
| Reno Vista Trail | <Null> | <Null> | <Null> | <Null> | 0.07 | Trailforks |

| | | | | | | |
|---|---|---|---|---|---|---|
| Tabletop Run | <Null> | <Null> | <Null> | <Null> | 0.16 | Trailforks |
| UNR DH | <Null> | <Null> | <Null> | <Null> | 0.27 | Trailforks |
| UNR DH-Evans Connector | <Null> | <Null> | <Null> | <Null> | 0.12 | Trailforks |
| Upper "N" Trail | <Null> | <Null> | <Null> | <Null> | 0.02 | Trailforks |
| Upper Evans | <Null> | <Null> | <Null> | <Null> | 0.55 | Trailforks |
| LOCH LEVEN | <Null> | <Null> | <Null> | <Null> | 0.40 | USFS |
| Indian Springs Staging to Grouse Ridge Trail | <Null> | <Null> | <Null> | <Null> | 0.46 | Trailforks |
| Homestead Loop | <Null> | <Null> | <Null> | <Null> | 0.03 | Adventure Projects |
| Sandy Ridge-Hide And Seek Trail | <Null> | <Null> | <Null> | <Null> | 0.36 | BLM |
| Sandy Ridge-Laura's Loop Trail | <Null> | <Null> | <Null> | <Null> | 0.01 | BLM |
| Sandy Ridge-Quid Pro Flow Trail | <Null> | <Null> | <Null> | <Null> | 0.32 | BLM |
| <Null> | <Null> | <Null> | Entiat | http://www.americanwhitewater.org/content/River/detail/id/2116/ | 0.11 | American Whitewater |
| <Null> | <Null> | <Null> | <Null> | <Null> | 16.85 | BLM |
| Millican Plateau Tr 52 | <Null> | <Null> | <Null> | <Null> | 0.70 | BLM |
| Millican Plateau Tr 55 | <Null> | <Null> | <Null> | <Null> | 0.28 | BLM |
| Millican Plateau Tr 86 | <Null> | <Null> | <Null> | <Null> | 0.22 | BLM |
| Millican Plateau Tr 87 | <Null> | <Null> | <Null> | <Null> | 0.24 | BLM |
| Millican Plateau Tr 88 | <Null> | <Null> | <Null> | <Null> | 0.21 | BLM |
| Millican Plateau Tr100 | <Null> | <Null> | <Null> | <Null> | 0.32 | BLM |
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| Millican Plateau Tr 52 | <Null> | <Null> | <Null> | <Null> | 1.07 | BLM |
| Millican Plateau Tr 55 | <Null> | <Null> | <Null> | <Null> | 0.20 | BLM |
| Millican Plateau Tr 86 | <Null> | <Null> | <Null> | <Null> | 0.19 | BLM |

| | | | | | | |
|---|---|---|---|---|---|---|
| Millican Plateau Tr 87 | <Null> | <Null> | <Null> | <Null> | 0.68 | BLM |
| Millican Plateau Tr 88 | <Null> | <Null> | <Null> | <Null> | 0.18 | BLM |
| Millican Plateau Tr100 | <Null> | <Null> | <Null> | <Null> | 0.50 | BLM |
| <Null> | <Null> | <Null> | <Null> | <Null> | 1.94 | BLM |
| <Null> | <Null> | <Null> | <Null> | <Null> | 1.97 | BLM |
| Backdoor | <Null> | <Null> | <Null> | <Null> | 0.23 | Adventure Projects |
| Dry Gulch connector | <Null> | <Null> | <Null> | <Null> | 0.10 | Adventure Projects |
| Jummi | <Null> | <Null> | <Null> | <Null> | 0.09 | Trailforks |
| Lower Dry Gulch | <Null> | <Null> | <Null> | <Null> | 0.78 | Adventure Projects |
| Lower Sugar Loaf | <Null> | <Null> | <Null> | <Null> | 0.81 | Adventure Projects |
| Raggitt | <Null> | <Null> | <Null> | <Null> | 0.31 | Adventure Projects |
| Skull | <Null> | <Null> | <Null> | <Null> | 0.14 | Adventure Projects |
| Swami - North | <Null> | <Null> | <Null> | <Null> | 0.85 | Adventure Projects |
| Sweet n Low | <Null> | <Null> | <Null> | <Null> | 1.48 | Adventure Projects |
| <Null> | <Null> | <Null> | d'Alene, South Fork | http://www.americanwhitewater.org/content/River/detail/id/4452/ | 1.62 | American Whitewater |
| Blue Creek Bay Trail (Blue Trail) | <Null> | <Null> | <Null> | <Null> | 0.12 | Adventure Projects |
| Dirt Road to Lost Lake Trail | <Null> | <Null> | <Null> | <Null> | 0.36 | Trailforks |
| Squaw Creek | <Null> | <Null> | <Null> | <Null> | 2.04 | Adventure Projects |
| Drury Ridge Trail - Shotgun Cr | <Null> | <Null> | <Null> | <Null> | 0.42 | BLM |
| Continental Divide National Scenic Trail (CDT) | <Null> | <Null> | <Null> | <Null> | 0.16 | Adventure Projects |
| <Null> | <Null> | <Null> | Big Hole | http://www.americanwhitewater.org/content/River/detail/id/983/ | 0.72 | American Whitewater |
| <Null> | <Null> | <Null> | Big Hole | http://www.americanwhitewater.org/content/River/detail/id/983/ | 0.20 | American Whitewater |
| <Null> | <Null> | <Null> | Boulder (Jefferson R. tributary) | http://www.americanwhitewater.org/content/River/detail/id/992/ | 3.25 | American Whitewater |

| | | | | | | |
|---|---|---|---|---|---|---|
| BLM 14 West | <Null> | <Null> | <Null> | <Null> | 0.06 | <Null> |
| BLM 16 | <Null> | <Null> | <Null> | <Null> | 0.63 | <Null> |
| BLM 20 | <Null> | <Null> | <Null> | <Null> | 0.09 | <Null> |
| BLM 4 | <Null> | <Null> | <Null> | <Null> | 0.00 | <Null> |
| Ringing Rocks Jeep/MTB trail | <Null> | <Null> | <Null> | <Null> | 0.08 | <Null> |
| Welch Quarry | <Null> | <Null> | <Null> | <Null> | 0.16 | <Null> |
| Whiskey Gulch | <Null> | <Null> | <Null> | <Null> | 1.71 | <Null> |
| <Null> | <Null> | <Null> | <Null> | <Null> | 1.98 | BLM |
| North Millican Tr21 | <Null> | <Null> | <Null> | <Null> | 0.31 | BLM |
| <Null> | <Null> | <Null> | <Null> | <Null> | 2.69 | BLM |
| North Millican Tr21 | <Null> | <Null> | <Null> | <Null> | 0.43 | BLM |
| French's Dome Trail #776 | <Null> | <Null> | <Null> | <Null> | 0.10 | OpenStreetMap |
| FRENCHES DOME | <Null> | <Null> | <Null> | <Null> | 0.09 | <Null> |
| PACIFIC CREST NATIONAL | <Null> | <Null> | <Null> | <Null> | 0.31 | <Null> |
| SURVEYERS RIDGE | <Null> | <Null> | <Null> | <Null> | 0.24 | <Null> |
| <Null> | <Null> | <Null> | Deception Creek | http://www.americanwhitewater.org/content/River/detail/id/3168/ | 0.23 | American Whitewater |
| <Null> | <Null> | <Null> | Skykomish, S. Fork | http://www.americanwhitewater.org/content/River/detail/id/2213/ | 0.97 | American Whitewater |
| Deception Creek | <Null> | <Null> | <Null> | <Null> | 0.09 | <Null> |
| Surprise Creek | <Null> | <Null> | <Null> | <Null> | 0.10 | <Null> |
| Tunnel Creek | <Null> | <Null> | <Null> | <Null> | 0.00 | <Null> |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.39 | <Null> |
| <Null> | <Null> | <Null> | Beckler | http://www.americanwhitewater.org/content/River/detail/id/2066/ | 0.14 | American Whitewater |
| <Null> | <Null> | <Null> | Nason | http://www.americanwhitewater.org/content/River/detail/id/3431/ | 0.39 | American Whitewater |
| <Null> | <Null> | <Null> | Nason | http://www.americanwhitewater.org/content/River/detail/id/3432/ | 0.38 | American Whitewater |
| <Null> | <Null> | <Null> | Skykomish | http://www.americanwhitewater.org/content/River/detail/id/2209/ | 0.11 | American Whitewater |

| | | | | | | |
|---|---|---|---|---|---|---|
| <Null> | <Null> | <Null> | Tye | http://www.americanwhitewater.org/content/River/detail/id/2257/ | 0.51 | American Whitewater |
| Lanham Lake | <Null> | <Null> | <Null> | <Null> | 0.18 | <Null> |
| Rock Mountain | <Null> | <Null> | <Null> | <Null> | 0.04 | <Null> |
| USFS 5200 | <Null> | <Null> | <Null> | <Null> | 0.30 | <Null> |
| TYLER CREEK | <Null> | <Null> | <Null> | <Null> | 0.83 | <Null> |
| Continental Divide National Scenic Trail (CDT) | <Null> | <Null> | <Null> | <Null> | 0.21 | <Null> |
| 6.07 Trail | <Null> | <Null> | <Null> | <Null> | 0.20 | <Null> |
| 4TH OF JULY PASS OHV | <Null> | <Null> | <Null> | <Null> | 0.12 | USFS |
| MULLAN TRAIL | <Null> | <Null> | <Null> | <Null> | 0.42 | USFS |
| Forest Service Trail 3016 | <Null> | <Null> | <Null> | <Null> | 0.21 | Adventure Projects |
| STATE LINE | <Null> | <Null> | <Null> | <Null> | 0.06 | USFS |
| HAWK MOUNTAIN | <Null> | <Null> | <Null> | <Null> | 0.52 | <Null> |
| KEITH CREEK | <Null> | <Null> | <Null> | <Null> | 0.20 | <Null> |
| MILL CREEK | <Null> | <Null> | <Null> | <Null> | 0.20 | <Null> |
| RIVER TRAIL | <Null> | <Null> | <Null> | <Null> | 0.21 | <Null> |
| MAYNARD LOGE NATURE CONSERV. | <Null> | <Null> | <Null> | <Null> | 0.30 | <Null> |
| VISTA | <Null> | <Null> | <Null> | <Null> | 0.72 | <Null> |
| COPPER LAKE | <Null> | <Null> | <Null> | <Null> | 0.31 | <Null> |
| STORM PEAK | <Null> | <Null> | <Null> | <Null> | 0.16 | <Null> |
| UP UP RIDGE | <Null> | <Null> | <Null> | <Null> | 0.13 | <Null> |
| <Null> | <Null> | <Null> | Fish Creek | http://www.americanwhitewater.org/content/River/detail/id/10445/ | 0.41 | American Whitewater |
| McCubbins Gulch OHV Powerline | <Null> | <Null> | <Null> | <Null> | 8.75 | BLM |
| FISH CREEK MOUNTAIN | <Null> | <Null> | <Null> | <Null> | 0.43 | <Null> |
| PACIFIC CREST NATIONAL SCENIC | <Null> | <Null> | <Null> | <Null> | 0.84 | <Null> |
| HEADWATERS | <Null> | <Null> | <Null> | <Null> | 0.38 | <Null> |
| MILLER | <Null> | <Null> | <Null> | <Null> | 0.71 | <Null> |

| | | | | | | |
|---|---|---|---|---|---|---|
| OLD 1916 | <Null> | <Null> | <Null> | <Null> | 1.80 | <Null> |
| RAINY WHATUM | <Null> | <Null> | <Null> | <Null> | 0.12 | <Null> |
| RIVERSIDE | <Null> | <Null> | <Null> | <Null> | 0.90 | <Null> |
| McCubbins Gulch OHV Barton Loop | <Null> | <Null> | <Null> | <Null> | 0.63 | BLM |
| McCubbins Gulch OHV DB | <Null> | <Null> | <Null> | <Null> | 0.27 | BLM |
| McCubbins Gulch OHV Kents | <Null> | <Null> | <Null> | <Null> | 0.70 | BLM |
| McCubbins Gulch OHV Morel | <Null> | <Null> | <Null> | <Null> | 0.12 | BLM |
| McCubbins Gulch OHV Orchard Loop | <Null> | <Null> | <Null> | <Null> | 1.86 | BLM |
| Pacific Crest National Scenic Trail | <Null> | <Null> | <Null> | <Null> | 0.27 | <Null> |
| Continental Divide National Scenic Trail (CDT) | <Null> | <Null> | <Null> | <Null> | 1.01 | <Null> |
| Sketchy TwoTrack | <Null> | <Null> | <Null> | <Null> | 1.17 | <Null> |
| OHV #48 | <Null> | <Null> | <Null> | <Null> | 0.75 | <Null> |
| MTR2916055 | <Null> | <Null> | <Null> | <Null> | 0.79 | <Null> |
| SOUTHERN OREGON INTERTIE TRAIL | <Null> | <Null> | <Null> | <Null> | 0.89 | <Null> |
| NORDIC TRAIL #146B | <Null> | <Null> | <Null> | <Null> | 0.21 | <Null> |
| NORDIC TRAIL #146D | <Null> | <Null> | <Null> | <Null> | 1.78 | <Null> |
| SPUR 129A | <Null> | <Null> | <Null> | <Null> | 0.78 | <Null> |
| SPUR 129B | <Null> | <Null> | <Null> | <Null> | 0.74 | <Null> |
| SPUR THRU BALLARD CANYON | <Null> | <Null> | <Null> | <Null> | 1.31 | <Null> |
| WARNER NORDIC SKI TRAIL | <Null> | <Null> | <Null> | <Null> | 2.23 | <Null> |
| WARNER SNOWMOBILE TRAIL | <Null> | <Null> | <Null> | <Null> | 0.76 | <Null> |
| CRANE MTN. NAT'L REC TRAIL | <Null> | <Null> | <Null> | <Null> | 0.71 | <Null> |

| | | |
|---|---|---|
| TRANSFER SNOWMOBILE/SKI | 0.01 | USFS |
| HIGHWAY 90 SNOWMOBILE/SKI | 0.35 | USFS |
| NORTH DIVIDE SNOWMOBILE/SKI | 1.09 | USFS |
| TRANSFER SNOWMOBILE/SKI | 8.57 | USFS |
| HIGHWAY 90 SNOWMOBILE/SKI | 3.19 | USFS |
| NORTH DIVIDE SNOWMOBILE/SKI | 0.99 | USFS |
| SOUTH DIVIDE SNOWMOBILE/SKI | 0.26 | USFS |
| BEAR SNOWMOBILE LOOP | 2.26 | USFS |
| DYE SNOWMOBILE LOOP | 2.70 | USFS |
| MOGOLLON RIM SNOWMOBILE C | 0.69 | USFS |
| MOGOLLON RIM SNOWMOBILE E | 0.38 | USFS |
| INDIAN CR/TRAIL HOLLOW LOOP | 4.16 | USFS |
| SPUR 129A | 0.78 | <Null> |
| SPUR 129B | 0.74 | <Null> |
| SPUR THRU BALLARD CANYON | 1.31 | <Null> |

| | | | | | | |
|---|---|---|---|---|---|---|
| WARNER SNOWMOBILE TRAIL | 0.76 | | | | | <Null> |
| GENERAL CROOK | 0.71 | | | | | USFS |
| Old Monarch Pass | 1.29 | | | | | Adventure Projects |
| Skin up to Perfect Trees | 0.18 | | | | | Adventure Projects |
| The Perfect Trees | 0.38 | | | | | Adventure Projects |
| Jones Pass West Fork Bowl Ascent | 0.16 | | | | | Adventure Projects |
| Peak 12666 Bowl and Way Back to the Car | 0.24 | | | | | Adventure Projects |
| Vasquez Glades | 0.02 | | | | | Adventure Projects |
| Vasquez Trees Ascent | 0.07 | | | | | Adventure Projects |
| Jones Pass Bowl | 0.92 | | | | | Adventure Projects |
| Jones Pass South Ascent up Jones Pass Road | 0.08 | | | | | Adventure Projects |
| NORDIC TRAIL #146B | 0.21 | | | | | <Null> |
| NORDIC TRAIL #146D | 1.78 | | | | | <Null> |
| WARNER NORDIC SKI TRAIL | 2.23 | | | | | <Null> |
| | | Main Area | 0 | 3989 | https://www.mountainproject.com/v/main-area/11143 | Adventure Projects |
| | | Parking Lot Cliffs | 0 | 3996 | https://www.mountainproject.com/v/parking-lot-cliffs/11143 | Adventure Projects |

| | | | | |
|---|---|---|---|---|
| Upper Falls | 20 | https://www.mountainproject.com/v/upper-falls/110896363 | Adventure Projects | |
| Count Chossula | 1 | https://www.mountainproject.com/v/count-chossula/107330446 | Adventure Projects | |
| Green Eggs and Ham | 2 | https://www.mountainproject.com/v/green-eggs-and-ham/107507948 | Adventure Projects | |
| Manic Depressive Boulders | 0 | https://www.mountainproject.com/v/manic-depressive-boulders/107883916 | Adventure Projects | |
| Eagle Mountain Exit | 1 | https://www.mountainproject.com/v/eagle-mountain-exit/106779244 | Adventure Projects | |
| Hayfield Exit | 2 | https://www.mountainproject.com/v/hayfield-exit/106779237 | Adventure Projects | |
| Knob Hill South Face | 2 | https://www.mountainproject.com/v/knob-hill-south-face/112160430 | Adventure Projects | |

| | | | | |
|---|---|---|---|---|
| Mormon Slab | 3 | https://www.mountainproject.com/v/mormon-slab/106331 | 339 | Adventure Projects |
| Blueshift Block | 1 | https://www.mountainproject.com/v/blueshift-block/11066 | 6068 | Adventure Projects |
| Boudoir Boulder | 2 | https://www.mountainproject.com/v/boudoir-boulder/110 | 666061 | Adventure Projects |
| Tripping Triangle Rock | 1 | w.mountainproject.com/v/tripping-triangle-rock/11066 | 6054 | Adventure Projects |
| Venus Flytrap Stone | 1 | w.mountainproject.com/v/venus-flytrap-stone/1106 | 66087 | Adventure Projects |
| Crow's Nest Tower | 2 | w.mountainproject.com/v/crows-nest-tower/1062 | 18200 | Adventure Projects |
| Looking Glass Rock | 1 | w.mountainproject.com/v/looking-glass-rock/10686 | 1088 | Adventure Projects |

| | | | | |
|---|---|---|---|---|
| Sunvana wall | 6 | https://www.mountainproject.com/v/sunvana-wall/108459 | 078 | Adventure Projects |
| Wake-Up Call Bouldering Area | 3 | https://www.mountainproject.com/v/wake-up-call-bouldering-area/10621 | 8234 | Adventure Projects |
| Baboon Crag | 4 | https://www.mountainproject.com/v/baboon-crag/108352 | 642 | Adventure Projects |
| Bastille Slab (aka Nursery School Slab) | 1 | https://www.mountainproject.com/v/bastille-slab-aka-nursery-school-slab/110664 | 152 | Adventure Projects |
| Goldilocks Wall | 7 | https://www.mountainproject.com/v/goldilocks-wall/105898 | 551 | Adventure Projects |
| Grouse Slab | 26 | https://www.mountainproject.com/v/grouse-slab/105734 | 243 | Adventure Projects |
| School Rock | 14 | https://www.mountainproject.com/v/school-rock/10573 | 4189 | Adventure Projects |

| | | | | |
|---|---|---|---|---|
| | | | w.mountainproject.com/v/south-star-wall/105929 | |
| South Star Wall | 10 | 296 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/stealth-wall/107510 | |
| Stealth Wall | 8 | 731 | | Adventure Projects |
| | | | w.mountainproject.com/v/the-aspen-boulder/105 | |
| The Aspen Boulder | 3 | 734444 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/beeline-slab/109079 | |
| Beeline Slab | 4 | 449 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/central-area/10623 | |
| Central Area | 9 | 0232 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/ginja-ninja/11219 | |
| Ginja Ninja | 1 | 7587 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/johnny-wall/108105 | |
| Johnny Wall | 0 | 069 | | Adventure Projects |

| | | | | |
|---|---|---|---|---|
| | | | https://www.mountainproject.com/v/left-side/106229 | |
| Left Side | | 10 | 941 | Adventure Projects |
| | | | https://www.mountainproject.com/v/lower-cliffs-lower-tier/105734 | |
| Lower Cliffs, Lower Tier | | 11 | 543 | Adventure Projects |
| | | | https://www.mountainproject.com/v/lower-cliffs-middle-tier/105734 | |
| Lower Cliffs, Middle Tier | | 1 | 549 | Adventure Projects |
| | | | https://www.mountainproject.com/v/lower-cliffs-upper-tier/105734 | |
| Lower Cliffs, Upper Tier | | 8 | 546 | Adventure Projects |
| | | | https://www.mountainproject.com/v/no-name-slab/110170 | |
| No Name Slab | | 5 | 688 | Adventure Projects |
| | | | w.mountainproject.com/v/rainbow-a/11215440 | |
| Rainbow A | | 5 | 5 | Adventure Projects |
| | | | w.mountainproject.com/v/rainbow-b/11214141 | |
| Rainbow B | | 4 | 6 | Adventure Projects |

| | | | | |
|---|---|---|---|---|
| | | | w.mountainproject.com/v/rainbow-d/11214151 | |
| Rainbow D | 1 | 9 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/right-side/107798 | |
| Right Side | 1 | 772 | | Adventure Projects |
| | | | w.mountainproject.com/v/short-crack-slab/109079 | |
| Short Crack Slab | 0 | 491 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/superdog-dome/1117 | |
| Superdog Dome | 4 | 84667 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/boulder-wall/111473 | |
| Boulder Wall | 14 | 301 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/frenchs-dome/1057 | |
| French's Dome | 28 | 88992 | | Adventure Projects |
| | | | https://www.mountainproject.com/v/split-pinnacle/10 | |
| Split Pinnacle | 6 | 6503637 | | Adventure Projects |

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10134]
**Date:** Friday, February 23, 2018 12:41:58 PM
**Attachments:** ID_10134_Sitespecificcomments.docx

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Thank you for your input, Bruce Pendery.

The comment tracking number that has been assigned to your comment is **10134**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 12:41:23 CST

**First Name:** Bruce
**Last Name:** Pendery
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Lands with wilderness characteristics

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

232-233(E) (W) [5, 14]
232-233(E) (W) [25, 42]
81-272 [85, 91]
89-271 [77, 78]
116-206 [17, 24]
110-114 [123, 130]
110-114 [98, 101]
68-116 [20, 40]
87-277 [52, 53]
87-277 [68, 69]

**Input**

See attached document

**Attachments**

Site-specific comments.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

Corridor 232-233 E (mileposts 5-14 and 25-42):

This example of conflicts with WWEC and BLM wilderness-quality lands illustrates why all intersections with wilderness-quality lands must be eliminated by revising the corridors. While the western arm of Corridor 232-233 follows a highway and existing transmission line, the eastern arm (232-233 (E)) inexplicably takes a detour from the main corridor and cuts through BLM-inventoried lands with wilderness characteristics in a large wildlands complex. This area includes several large BLM Wilderness Areas as well as many contiguous and adjacent lands with wilderness characteristics. Driving energy infrastructure to this area through WWEC designation has unacceptable impacts on wilderness resources and does not access a population center or provide apparent benefits. Specifically, 232-233 (E) navigates a narrow corridor between the Delamar Mountains Wilderness and Meadow Valley Range Wilderness, a corridor which BLM has found contains wilderness characteristics (NV-040-156-4-2012) and is contiguous with the Meadow Valley Range Wilderness. Heading north from there, the eastern corridor's return route to the western arm cuts directly through a large BLM-inventoried lands with wilderness characteristics unit (NV-040-145a-2012) that encompasses the northern Delamar Mountains and Big Lime Mountains. BLM's LWC inventory area for this area documents its "excellent hunting, hiking, camping, rock hounding, and scenic opportunities" owing to its many draws, canyons, mountains and washes. This large and wild area would be bisected by the energy corridor. BLM should delete the eastern arm of this corridor to eliminate unnecessary impacts to wilderness resources.

Corridor 81-272 (mileposts 85-91):

This example of conflicts with WWEC and BLM wilderness-quality lands illustrates why all intersections with wilderness-quality lands must be eliminated by revising the corridors. Our analysis found that corridor 81-272 intersects with 1,029 acres of the Magdalena Mountains Citizen-Inventoried Lands with Wilderness Characteristics unit. The Magdalena Mountains unit is important habitat for pronghorn, mule deer, black bear, coyote, both red and gray fox, mountain lion and bobcat. The area consists of rolling volcanic hills, isolated mesas, and foothills dotted with pinyon pine, juniper and oak, with significant canyons leading to the heart of the range. Bird species include bald and golden eagle; prairie falcon, kestrel, Merriam turkey; Gambel, scaled, and Mearn's quail; and many species of hawks and owls. The agencies must revise the corridor to eliminate this intersection.

Corridor 89-271 (mileposts 77-78):

This example of conflicts with WWEC and BLM wilderness-quality lands illustrates why all intersections with wilderness-quality lands must be eliminated by revising the corridors. Our analysis found that corridor 89-271 intersects with 24 acres of the Mescalero Sands Citizen-Inventoried Lands with Wilderness Characteristics unit. The Mescalero Sands unit is some of the last habitat for the Dunes Sagebrush Lizard and is comprised of unique rolling red sand dunes, which are not represented in any other wilderness inventory unit. This landscape provides an important opportunity to study shinnery oak and lizard habitat, as well as other conduct other biological studies, photography and other types of primitive recreation. This area is also a rest stop for many migratory birds and should be protected. The agencies must revise the corridor to eliminate this intersection.

Corridor 116-206 (mileposts 17-24):

This example of conflicts with WWEC and BLM wilderness-quality lands illustrates why all intersections with wilderness-quality lands must be eliminated by revising the corridors. Corridor 116-206 bisects two BLM-identified wilderness characteristics (LWC) units, known as Upper Kanab Creek and Vermilion Cliffs. These areas are also included as part of the Utah Wilderness Coalition's wilderness proposal. America's Red Rock Wilderness Act (ARRWA). S. 948, H.R. 2044 (115th Congress). Described by BLM as "exceptionally scenic," the Upper Kanab Creek LWC unit is located to the east of Zion National Park and abuts the western boundary of Grand Staircase-Escalante National Monument. BLM, Utah Wilderness Inventory (1999), 36-36M. The unit also "provides critical winter range for the important Paunsaugunt deer herd." *Id.* In its path through the Upper Kanab Creek LWC unit, the corridor bisects directly through a natural, undeveloped wilderness landscape. Further south, the corridor clips the eastern boundary of the Vermilion Cliffs LWC unit—identified by the Kanab BLM as part of its 2008 Resource Management Plan revision—and is located in close proximity to the western boundary of Grand Staircase-Escalante National Monument, as designated by President Clinton in Proclamation No. 6920, 61 Fed. Reg. 50223 (Sept. 18, 1996). Importantly, **the corridor follows no existing disturbance** through either of these wilderness-quality landscapes and would therefore result in a significant and unacceptable loss of wilderness characteristics throughout the LWC units. It is imperative that the Agencies adjust the corridor to avoid these wilderness-quality lands and all others. If the Agencies are not able to adjust the corridor to avoid these impacts, they should consider eliminating the corridor.

Corridor 110-114 (mileposts 123-130 and 98-101):

This example of conflicts with WWEC and BLM wilderness-quality lands illustrates why all intersections with wilderness-quality lands must be eliminated by revising the corridors. Corridor 110-114 runs through Utah's West Desert, a vast and undeveloped Great Basin landscape of expansive valleys and rising mountain ranges. While, on paper, the corridor follows an existing right-of-way corridor, an on-the-ground review of the corridor illustrates the significant impact that any development would have on the area's remote and wild nature. The corridor would directly impact wilderness characteristics within the BLM-identified Central Wah Wah Mountains LWC unit, a 58,400-acre landscape that is also proposed for wilderness designation in ARRWA. As described by BLM, the Central Wah Wah Mountains LWC unit "provide[s] beautiful views of rugged mountain topography" with "spectacular scenic vistas in all directions from the higher elevations." BLM, Utah Wilderness Inventory (1999), 19-19M. The corridor also intersects the southern boundary of the North Wah Wah Mountains LWC unit, which is contiguous and in close proximity to the Wah Wah Mountains Wilderness Study Area (WSA). *Id.* at 19-19M. Due to the vast viewsheds and lack of development throughout the larger project area, the corridor would result in adverse impacts to wilderness values. Continuing west, the corridor cuts into the northern portion of Mountain Home Range North, a proposed wilderness unit in ARRWA. In total, in a landscape known for its remoteness, lack of development, pristine viewsheds, and dark night skies, corridor siting and development will undoubtedly result in undesired, adverse impacts to these wilderness-quality lands. It is imperative that the Agencies adjust the corridor to avoid these wilderness-quality lands and all others. If the Agencies are not able to adjust the corridor to avoid these impacts, they should consider eliminating the corridor.

Corridor 68-116 (mileposts 20-40):

This example of conflicts with WWEC and BLM wilderness-quality lands illustrates why all intersections with wilderness-quality lands must be eliminated by revising the corridors. Corridor 68-116 intersects the southern portion of Grand Staircase-Escalante National Monument, as designated by President Clinton in Proclamation No. 6920, 61 Fed. Reg. 50223 (Sept. 18, 1996). It also impacts the Pine Hollow citizen-proposed wilderness. While this corridor has existing transmission within it, additional transmission or other energy infrastructure should not be sited in the Monument or proposed wilderness, and therefore corridor designation is inappropriate. President Clinton designated Grand Staircase-Escalante National Monument under Proclamation No. 6920, 61 Fed. Reg. 50223 (Sept. 18, 1996) for the explicit purpose of protecting and preserving identified historic and scientific objects. We maintain that Proclamation No. 9682 (Dec. 4, 2017) attempting to reduce the size of Grand Staircase-Escalante National Monument is an unlawful revocation of the existing monument and will be overturned in a court of law. The president only has the authority to create a national monument under the Antiquities Act of 1906 (16 U.S.C. §§ 431-433). Only Congress can revoke or reduce a national monument. President Trump's illegal proclamation is already being challenged in court by a multitude of plaintiffs. An attempt to site energy infrastructure within the original boundaries of the Monument would certainly lead to protracted conflict, and therefore this conflict must be identified in this review process and BLM should take this opportunity to commit to de-designating the corridor and eliminating the conflict. BLM should recognize the conflict with Grand Staircase-Escalante National Monument and the Pine Hollow proposed wilderness in the corridor abstract and recommend de-designation of the corridor.

Corridor 87-277 (mileposts 52-53 and 68-69)

These examples of conflicts with Roadless Areas illustrate why all intersections with USFS wilderness quality lands must be eliminated by revising the corridors. Our analysis found that 144 acres of the Chipeta CRA and 37 acres of the Sangre de Cristo: Silverheels Gulch to Hunts Creek CRA intersect with corridor 87-277.

The 28,686-acre Chipeta CRA is remarkable habitat for many species, including the Federally endangered Uncompahgre fritillary butterfly; the Federally threatened Canada lynx and part of an important Poncha Pass lynx linkage area; and several Forest Service Region 2 sensitive species including bighorn sheep, Townsend's big-eared bat, boreal toad and goshawk. The CRA also contains some lands within the Colorado Natural Heritage Program Pahlone Slopes Potential Conservation Area, which was identified for its very high biodiversity significance due to the presence of globally imperiled Crandall's rock-cress (*Boechera crandallii*). The Chipeta CRA is a Bighorn Sheep production area, winter concentration area and is considered severe winter range. The CRA is also an elk production area and winter concentration area as well as Mule Deer winter concentration area. The Continental Divide National Scenic Trail also traverses this CRA. Data sources for this Chipeta CRA include: U.S. Forest Service. 2011. Pike-San Isabel National Forest Roadless Area Profiles, Colorado Roadless Rule, pp. 15-16; and Colorado Parks and Wildlife, 2017, Wildlife species GIS map data.

The 6,000-acre Sangre de Cristo: Silverheels Gulch to Hunts Creek CRA also possesses incredible habitat for many species, including the Federally threatened Canada lynx and Forest Service Region 2 sensitive species, including Townsend's big-eared bat, goshawk and hog-nosed skunk. The CRA is an elk production area, winter concentration area, and severe winter range and a mule deer winter concentration area. Additionally, evidence of prehistoric Native American activity is present in the CRA. Data sources for the Sangre de Cristo: Silverheels Gulch to Hunts Creek CRA include: U.S. Forest Service. 2011. Pike-San Isabel National Forest Roadless Area Profiles, Colorado Roadless Rule, p. 71; and Colorado Parks and Wildlife, 2017, Wildlife species GIS map data.

It is imperative that the Agencies adjust the corridor to avoid these Roadless Areas. The corridor abstract notes that the "corridor intersects Colorado Roadless Areas in the San Isabel National Forest and may present challenges for future development. However, the intersection is small and there is an opportunity to consider realigning or reducing the width of the corridor to avoid the Colorado Roadless Areas." Corridor Abstract 87-277 at 20. The Agencies corridor mapping tool shows that the corridor glances the edges of these CRAs. We urge the Agencies to commit to following the recommendations in the abstract and either realign the corridor or reduce the width of the corridor to avoid these CRAs, and to ultimately include recommendations to eliminate the intersection in the Regional Review Report. The Agencies must also do so for any other intersections with USFS wilderness quality lands.

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10135]
**Date:** Friday, February 23, 2018 1:02:25 PM
**Attachments:** ID_10135_GunnisonCountyComments22318.pdf

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Thank you for your input, David Baumgarten.

The comment tracking number that has been assigned to your comment is **10135**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 13:01:54 CST

**First Name:** David
**Last Name:** Baumgarten
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Board of County Commissioners of the County of Gunnison, Colorado

**Topics**
Energy Planning Opportunities
Energy Planning Issues
Physical barrier
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Air quality
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Livestock grazing
Paleontology
Public access and recreation
Soils/erosion
Specially designated areas
Visual resources
Interagency Operating Procedures

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

87-277 [blank, blank]

**Input**

Attached please find Section 368 Stakeholder Input comments regarding Corridor 87-277 submitted by the Board of County Commissioners of the County of Gunnison, Colorado.

**Attachments**

Gunnison County Comments 2-23-18.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Gunnison County Board of County Commissioners
Phone: (970) 641–0248 • Fax: (970) 641–3061
Email: bocc@gunnisoncounty.org • www.GunnisonCounty.org

February 23, 2018

U.S. Department of Energy
U.S. Department of Interior
U.S. Forest Service

Re: West-Wide Energy Corridors Regional Review; Section 368 Stakeholder Input

Dear Agencies:

The Board of County Commissioners of the County of Gunnison, Colorado ("Gunnison County Commissioners") submit the following "Section 368 Stakeholder Input" regarding Corridor 87-277, and in particular, the "*Western Portion of Corridor 87-277*". The Gunnison County Commissioners commit to participate in this Stakeholder Input Process and Resultant Processes, and reserve their right to make further comments and to participate fully in each available component of the processes of the U.S. Department of Energy, the U.S. Department of the Interior and the U.S. Forest Service regarding these matters.

The Gunnison County Commissioners have a unique perspective that informs their comments:

A. First, the Gunnison County Commissioners have the authority to protect and promote the public health, safety and welfare of the people of Gunnison County, and the authority to regulate land use planning and environmental quality and protection (including site selection and construction of major facilities of public utilities) in Gunnison County, Colorado. Pursuant to these authorities, the Gunnison County Commissioners have duly adopted policies and regulations including the review, approval, conditioning or denial of proposed activities and uses of land and natural resources that reasonably may be implicated by the *Western Portion of Corridor 87-277*. In particular, C.R.S. § 24-65.1-101 *et seq.*, the Areas and Activities of State Interest Act ("AAASIA" or "HB 1041"), authorizes Gunnison County to designate and then regulate certain activities or areas of state interest through a permitting process established by the County. These areas include "site selection and construction of major public utility facilities", which is defined as central office buildings of telephone utilities; transmission lines, power plants, and substations of electrical activities; and pipelines and storage areas of utilities providing natural gas or other petroleum derivatives." *See* C.R.S. §24-65.1-104(8). Gunnison County has designated these matters of state interest and instituted a permitting system, which would necessarily include any such public utility facilities in Corridor 87-277 passing through Gunnison County.



200 East Virginia Avenue, Gunnison, CO 81230

B. Second, the Gunnison County Commissioners consistently have provided personnel, facilities and finances to implement their authorities.

C. Third, the decisions of the U.S. Department of Energy, the U.S. Department of the Interior and the U.S. Forest Service regarding the *Western Portion of Corridor 87-277* will be consequential to the citizenship and the social, economic and environmental fabric and future of the Gunnison County community, in qualities and impacts that are unique to the Gunnison County community.

For your consideration, please find the following comments regarding the *Western Portion of Corridor 87-277:*

1. Figure 1b. Page 2: The area labeled as "Chaffee County" is actually Gunnison County.

2. Figure 2b. Page 5, "Source" column: The area labeled as the "Royal Gorge Field Office" is actually within the administrative boundary of the Gunnison Field Office of BLM.

3. Table, Page 10: Poncha Springs is north of Poncha Pass. La Veta Pass is on the southeast side of the San Luis Valley. We assume you are referring to Poncha Pass not La Veta Pass.

4. Table, Page 13, "Agency Review and Analysis" column: There are no Greater sage-grouse in the Gunnison Basin (here specifically MP 77 to MP86). We assume you are referring to Gunnison sage-grouse (GuSG) critical habitat. We also note that in the area noted (MP 77 to MP 86) the only direction a corridor shift would accomplish avoidance of GuSG critical habitat would be a northward shift.

5. Table, Page 14, "Agency Review and Analysis" column: We recognize that the entire corridor within the Gunnison Basin is located within U.S. Fish and Wildlife Service's designated GuSG critical habitat. We also note that the existing transmission line within this corridor has been identified as adversely impacting GuSG. In addition to the impacts of the towers and lines themselves, corridor maintenance practices/results have been identified as fragmenting GuSG habitat. Gunnison County recommends a review of all maintenance and repair practices to reduce impacts. We also believe that conformance with the Gunnison Basin Gunnison sage-grouse Conservation Agreement on Federal Lands is a mandatory part of all corridor practices in the Gunnison Basin.

6. Table, Page 14, "Agency Review and Analysis" column: We note that the USFS GMUG National Forest is in the process of a Forest Plan Revision which may impact this corridor. Also, the BLM GuSG Draft RMP amendment is still under consideration and once finalized, may also impact this corridor. The "exclusion" of Section 368 energy corridors from ROW exclusion areas is by no means a "done deal".

7. The corridor passes directly over the historic Aberdeen quarry (granite used in State Capitol building), which is a locally designated landmark. http://gunnisoncounty.org/785/Historic-Sites#Aberdeen

8. The corridor analysis document on page 20 states that the corridor does not cross the North Branch of the Old Spanish Trail (National designated historic trail), but on page 22 the analysis document states that the corridor does cross the Trail. We believe it does cross the Trail at least 2 times in Gunnison County but not on federal land.

9. The *Western Portion of Corridor 87-277* crosses significant water bodies including Tomichi Creek and Cochetopa Creek. Particular attention is required to avoid immediate, on-site consequences to these water bodies and their tributaries, as well as downstream impacts to the waters in the Curecanti National Recreation Area and Black Canyon of the Gunnison River.

10. The "Corridor Rationale" states that "(a)ny new pipelines would likely follow along U.S. Highway 50; there is one existing gas pipeline that roughly follows U.S. Highway 50 east of Gunnison." Adoption of this rationale ought not to be assumed to be an accomplished fact without considerable evaluation of the impacts to private properties, lands subject to conservation easements, water bodies, agricultural and cultural lands adjacent to Highway 50, the Gunnison County Landfill, a Federal Uranium Mill Tailings Radiation Control Act disposal and long-term stabilization site, and the Coldharbour Institute, a community supported nonprofit that facilitates education, incubation and demonstration of responsible personal, community and land practices, located near the intersection of Highway 50 and Highway 114, where a substantial federal wetland reserve is located.

We appreciate your consideration.

Thank you.

Respectfully submitted,

THE BOARD OF COUNTY COMMISSIONERS
OF THE COUNTY OF GUNNISON, COLORADO

By: David Baumgarten

David Baumgarten,
Gunnison County Attorney

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10136]
**Date:** Friday, February 23, 2018 2:07:06 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10136**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:05:49 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Threatened and endangered species, their habitats, and designated critical habitats may occur along all energy corridors in Utah. Projects taking place in these corridors may require Endangered Species Act (ESA) section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts. We also recommend the implementation of conservation efforts to offset unavoidable impacts. In some cases, the establishment or use of conservation easements or conservation banks could be a beneficial way to offset the impacts of multiple projects on listed species.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10137] |
| **Date:** | Friday, February 23, 2018 2:08:34 PM |

Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10137**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:07:59 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

44-239 [blank, blank]

**Input**

Threatened and endangered species that may occur along this corridor include Ute ladies'-tresses and western yellow-billed cuckoo. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10138]
**Date:** Friday, February 23, 2018 2:10:04 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10138**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:09:21 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

66-209 [blank, blank]

**Input**

Threatened and endangered species that may occur along this corridor include Ute ladies'-tresses, western yellow-billed cuckoo, clay phacelia, and June sucker. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts. We recommend that the corridor be relocated at least 650 feet from occupied and suitable habitat for clay phacelia. Occupied and suitable habitat for clay phacelia occurs between mileposts zero and three. Contact our office at (801) 975-3330 for a polygon of clay phacelia occupied and suitable habitat. Habitat for Deseret milkvetch and Jones cycladenia is located approximately three miles south of this corridor and could be impacted if the corridor is rerouted. Southern leatherside chub is a state sensitive conservation agreement species that occurs along this corridor. The Bureau of Land Management (BLM) and U.S. Forest Service are signatories to this conservation agreement. We recommend that you work with the State of Utah to avoid or minimize impacts to southern leatherside chub.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10139]
**Date:** Friday, February 23, 2018 2:13:13 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10139**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:12:42 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

66-212 [blank, blank]

**Input**

Threatened and endangered species that may occur along this corridor include California condor, Mexican spotted owl, southwestern willow flycatcher, western yellow-billed cuckoo, Jones cycladenia, San Rafael cactus, Gunnison sage-grouse, clay phacelia, and Colorado River fish (bonytail chub, Colorado pikeminnow, humpback chub, and razorback sucker) as well as critical habitat for Colorado pikeminow, razorback sucker, Gunnison sage-grouse, and Mexican spotted owl. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts. We recommend that the corridor be relocated at least 650 feet from occupied and suitable habitat for clay phacelia. Occupied and suitable habitat for clay phacelia occurs between mileposts zero and ten. Contact our office at (801) 975-3330 for a polygon of clay phacelia occupied and suitable habitat. The Green, Colorado, and Price Rivers are all occupied habitat for Colorado River fishes. Projects should evaluate impacts, including water depletions, to the species and their critical habitats, particularly at stream crossings. Cisco milkvetch and Isley milkvetch are petitioned for listing under the Endangered Species Act, and occur along this corridor. There is approximately 100 percent overlap between the corridor (between mileposts 130 and 136) and occupied habitat for one variety of Cisco milkvetch, vehiculus, which may be a separate species with one population. There is approximately 75 percent overlap between the corridor (between mileposts 157 and 170) and occupied habitat for Isley milkvetch. We recommend you relocate the corridor to avoid occupied habitat for Cisco milkvetch and Isley milkvetch. Contact our office at (801) 975-3330 for polygons of

occupied and suitable habitat for these species. In addition to relocating the corridor to avoid occupied habitat, we recommend that surveys for Cisco milkvetch and Isley milkvetch are performed in suitable habitat for the species prior to initiating projects in this corridor. Suitable habitat models for Cisco milkvetch and Isley milkvetch can be obtained by contacting our office.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10140]
**Date:** Friday, February 23, 2018 2:16:44 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10140**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:16:11 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

66-259 [blank, blank]

**Input**

66_259: Willow Creek Corridor: Threatened and endangered species that may occur along this corridor include western yellow-billed cuckoo, clay phacelia, and Ute ladies'-tresses. Colorado River fishes may also be impacted by direct impacts from stream crossings and water depletions. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts. We recommend that the corridor be relocated at least 650 feet from occupied and suitable habitat for clay phacelia. Occupied and suitable habitat for clay phacelia occurs between mileposts zero and four. Contact our office at (801) 975-3330 for a polygon of clay phacelia occupied and suitable habitat.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10141] |
| **Date:** | Friday, February 23, 2018 2:17:36 PM |

Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10141**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:16:59 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

68-116 [blank, blank]

**Input**

68_116: Page Corridor Threatened and endangered species that may occur along this corridor include California condor, Mexican spotted owl, southwestern willow flycatcher, western yellow-billed cuckoo, Jones cycladenia, and Siler pincushion cactus. Welsh's milkweed occurs approximately 5 miles from the corridor and may be a concern if corridor is relocated. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats and measures are incorporated to avoid, minimize, and mitigate impacts.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10142]
**Date:** Friday, February 23, 2018 2:19:18 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10142**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:18:42 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [blank, blank]

**Input**

110_114: Threatened and endangered species that may occur along this corridor include California condor and Ute ladies'-tresses. We will be making a listing decision this fiscal year for Frisco buckwheat, Frisco clover, and Ostler's peppergrass. These species occur approximately 1.2 miles from the corridor and may be a concern if the corridor is relocated to the north. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts. Least chub and spring snails are conservation agreement species that occur along this corridor. Projects along this corridor should evaluate, avoid, and minimize impacts to conservation agreement species.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10143] |
| **Date:** | Friday, February 23, 2018 2:20:09 PM |

Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10143**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:19:43 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

113-114 [blank, blank]

**Input**

113_114: Threatened and endangered species that may occur along this corridor include Utah prairie dog, California condor, Mexican spotted owl, western yellow-billed cuckoo, southwestern willow flycatcher, desert tortoise (and its critical habitat), Jones cycladenia, Shivwits milkvetch, Holmgren milkvetch, dwarf bear-poppy, Siler pincushion cactus, and the petitioned Virgin spinedace. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts This corridor crosses the only high-quality desert tortoise connectivity corridor in Utah between two tortoise conservation areas - the Upper Virgin River Recovery Unit and Beaver Dam Slope in the Northeastern Mojave Desert Recovery Unit (Nussear et al. 2009 habitat model). This linkage area is identified as the least cost corridor between these two conservation areas (modeled as the highest habitat potential with least "cost" for tortoises to travel between two places). Connectivity between these conservation areas is therefore necessary for species recovery. Projects that cross this connectivity corridor should include measures to avoid, minimize, and mitigate impacts that may reduce habitat and connectivity for desert tortoises. This energy corridor bisects the desert tortoise connectivity area between mileposts 29 and 25.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10144]
**Date:** Friday, February 23, 2018 2:22:34 PM

Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10144**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:21:57 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

113-116 [blank, blank]

**Input**

113_116: Threatened and endangered species that may occur along this corridor include California condor, Mexican spotted owl, southwestern willow flycatcher, western yellow-billed cuckoo, desert tortoise, Virgin river fishes (woundfin, virgin river chub, and virgin spinedace), Dwarf bear-poppy, Siler pincushion cactus, Gierisch mallow, Holmgren milkvetch as well as designated critical habitat for desert tortoise, Gierisch mallow, Holmgren milkvetch, southwestern willow flycatcher, virgin river chub, woundfin, and proposed critical habitat for western yellow-billed cuckoo. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10145]
**Date:** Friday, February 23, 2018 2:23:22 PM

Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10145**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:22:57 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

114-241 [blank, blank]

**Input**

114_241: Threatened and endangered species that may occur along this corridor include California condor, western yellow-billed cuckoo, and Ute ladies'-tresses. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts. Projects along this corridor should evaluate, avoid, and minimize impacts to least chub, a conservation agreement species that occurs along this corridor.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10146] |
| **Date:** | Friday, February 23, 2018 2:24:58 PM |

Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10146**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:24:30 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

116-206 [blank, blank]

**Input**

116_206: Threatened and endangered species that may occur along this corridor include Utah Prairie dog, California condor, Mexican spotted owl, southwestern willow flycatcher, western yellow-billed cuckoo, autumn buttercup, Jones cycladenia, Siler pincushion cactus, and Ute ladies'-tresses. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts. This corridor crosses the Panguitch Priority Habitat Management Area (PHMA) between milepost 55 and milepost 89. We recommend full avoidance of the Panguitch PHMA for greater sage-grouse (sage-grouse) when possible. Where complete avoidance may be infeasible, we recommend that you properly site and design transmission lines to prevent negative impacts to sage-grouse and their habitats. Transmission lines which cannot avoid PHMA should be buried, if technically feasible, and disturbed habitat should be restored. If avoidance is not possible, new infrastructure should be co-located with existing features to minimize the cumulative impacts. When considering your reroute, we recommend that you avoid occupied and suitable habitat for the endangered autumn buttercup that occurs approximately one to five miles east of the current corridor location between state route 153 and the town of Panguitch (mileposts 101 to 66). Our IPAC system is up to date for this species and can be used to evaluate alignment adjustments. Welsh's milkweed is approximately 3 miles away from the proposed corridor and may be a concern if the corridor is relocated. Least chub, spring snails, and Bonneville cutthroat trout are conservation agreement species that occur along this corridor. Projects along this corridor should evaluate,

avoid, and minimize impacts to conservation agreement species.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10147]
**Date:** Friday, February 23, 2018 2:25:47 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10147**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:25:20 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

126-133 [blank, blank]

**Input**

126_133: Threatened and endangered species that may occur along this corridor include black-footed ferret, Mexican spotted owl, Colorado River fishes (Bonytail Chub, Colorado Pikeminnow, Humpback Chub, and Razorback Sucker), and Ute ladies'-tresses. Colorado River fishes may be impacted by direct impacts from stream crossings and water depletions. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10148]
**Date:** Friday, February 23, 2018 2:26:29 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10148**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:26:03 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

126-218 [blank, blank]

**Input**

126_218: Threatened and endangered species that may occur along this corridor include black-footed ferret, Mexican spotted owl, western yellow-billed cuckoo, Colorado River fishes (Bonytail Chub, Colorado Pikeminnow, Humpback Chub, and Razorback Sucker), and Ute ladies'-tresses. Colorado River fishes may be impacted by direct impacts from stream crossings and water depletions. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10149] |
| **Date:** | Friday, February 23, 2018 2:27:49 PM |

Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10149**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:27:14 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

126-258 [blank, blank]

**Input**

126_258: Threatened and endangered species that may occur along this corridor include black-footed ferret, western yellow-billed cuckoo, Colorado River fishes (Bonytail Chub, Colorado Pikeminnow, Humpback Chub, and Razorback Sucker), and Ute ladies'-tresses as well as designated critical habitat for Colorado Pikeminnow and Razorback Sucker and proposed critical habitat for western yellow-billed cuckoo . Colorado River fishes may be impacted by direct impacts from stream crossings and water depletions. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10150]
**Date:** Friday, February 23, 2018 2:28:18 PM

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Thank you for your input, Joseph Moore.

The comment tracking number that has been assigned to your comment is **10150**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:27:55 CST

**First Name:** Joseph
**Last Name:** Moore
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** U.S. Fish and Wildlife Service Utah Field Office

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

256-257 [blank, blank]

**Input**

256_257: Threatened and endangered species that may occur along this corridor include western yellow-billed cuckoo and Ute ladies'-tresses. Projects taking place in this corridor may require ESA section 7 consultation with the USFWS. We recommend that projects within this corridor are evaluated for impacts to listed species and their habitats, and measures are included to avoid, minimize, and mitigate impacts.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10151]
**Date:** Friday, February 23, 2018 2:56:11 PM

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Thank you for your input, Ron Kellermueller.

The comment tracking number that has been assigned to your comment is **10151**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:55:42 CST

**First Name:** Ron
**Last Name:** Kellermueller
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** New Mexico Dept. of Game and Fish, Mining and Energy Habitat Specialist

**Topics**
Ecological resources

**Geographic Area**
Area selected via Corridor Mapping Tool

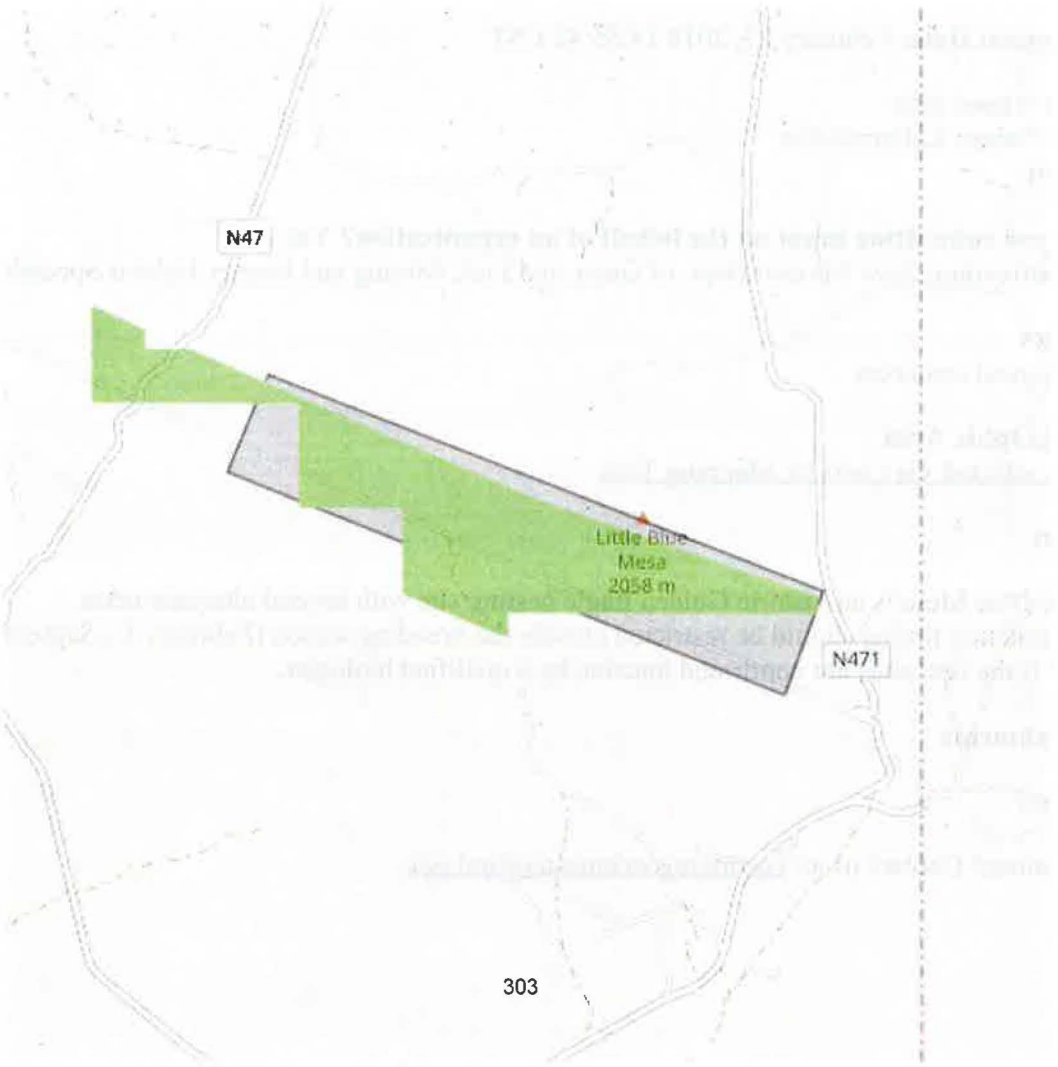
**Input**

Little Blue Mesa is an historic Golden Eagle nesting site with several alternate nests. Construction timing should be restricted outside the breeding season (February 1 - September 1) or if the nest sites are confirmed inactive by a qualified biologist.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov


N47
Little Blue
Mesa
2058 m
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| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10152] |
| **Date:** | Friday, February 23, 2018 3:00:16 PM |
| **Attachments:** | ID_10152_CarbonCountyUtahsSection368ReviewofJanuary2018DraftAbstractforCorridor66212.pdf<br>ID_10152_UtahCode63J8105.7GreenRiverEnergyZone.pdf |

Thank you for your input, Todd Thorne.

The comment tracking number that has been assigned to your comment is **10152**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 14:59:44 CST

**First Name:** Todd
**Last Name:** Thorne
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Carbon County

**Topics**
Energy Planning Opportunities
Energy Planning Issues
Physical barrier
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Lands and realty
Lands with wilderness characteristics
Livestock grazing
Public access and recreation
Specially designated areas

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

66-212 [blank, blank]

**Input**

[Blank]

**Attachments**

Carbon County, Utah's Section 368 Review of January 2018 Draft Abstract for Corridor 66-212.pdf, Utah Code 63J-8-105.7 Green River Energy Zone.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# Carbon County, Utah's Section 368 Stakeholder Review of January 2018 Draft Abstract for Corridor 66-212

Carbon County, Utah appreciates this opportunity to review and comment on the above-referenced draft abstract for Corridor 66-212.

The Greater Sage Grouse Resource Management Plan Amendment - Carbon County's Objection to Removal of the Five-Mile Segment from Corridor 66-212

The introduction of the abstract states in part:

> *A five-mile segment of the corridor was removed in the Utah Greater Sage Grouse Approved Resource Management Plan Amendment and is depicted in orange in Figures 1 a, b and 2 a, b.*

Figure 1a of the abstract shows the corresponding five-mile stretch color coded orange.

Carbon County objects to and opposes the Utah Greater Sage Grouse Approved Resource Management Plan Amendment (Sage Grouse RMP Amendment). Litigation challenging the Sage Grouse RMP Amendment is pending. Congressional funding for carrying out and executing the Sage Grouse RMP Amendment is in effect. Plans have been announced by the Dept of Interior and USDA to revise the Sage Grouse RMP Amendment.

Therefore, Carbon County objects to and opposes removing of the referenced five-mile stretch from Corridor 66-212. Given all the controversy and opposition to the Sage Grouse RMP Amendment it is premature and not wise planning to omit that five-mile stretch from the 66-212 Corridor. Even if some kind of Sage Grouse RMP Amendment emerges from the present controversy, Carbon County still objects that management for the Greater Sage Grouse requires removal of any segment from the 66-212 Corridor.

Corridor of Concern Status
Carbon County's Objection To Reference "Utah Proposed Wilderness" and Request to Include Reference to the Green River Energy Zone Codified in Utah Law

The following language is set forth at page 6 of the draft abstract:

> *Corridor of Concern Status*
> *This corridor was identified in the Settlement Agreement as a corridor of concern. Concerns regarding access to a coal plant, impacts on National Register of Historic Places, America's Byways, Old Spanish National Historic Trail, BLM Wilderness Study Area,* ***Utah-proposed Wilderness****, critical habitat, and Arches National Park were identified in Exhibit A of the Settlement Agreement. These issues are highlighted in yellow in the Corridor Analysis table.*

References to something that is "proposed" have no place in this document. The notion that something "proposed" much-less proposed by non-governmental organizations whose values and goals are repugnant to Carbon County's, and on which neither the Congress nor White House, nor the BLM nor the Forest Service have ever acted, is objected to Carbon County and the State of Utah. Moreover Carbon County and the State of Utah objects to the designation of any wilderness within Carbon County, as well as object to any defecto wilderness management regime. Therefore this reference Utah Proposed Wilderness should be removed.

What makes all of this worse is the fact that the draft abstract for Corridor 66-212 makes no reference to the Green River Energy Zone codified in Utah law, yet gives express mention to a mere citizens proposed wilderness idea. This is backwards. For the Utah Code citations to the Green River Energy Zone, please see Utah Code Sections 63J-8-105.7, 63J-8-102(8) and the appropriate map referenced in Section 63J-8-105. The Corridor of Concern Status should make express reference to the Green River Energy Zone.

Analysis Table - Lands With Wilderness Characteristics - Entry 66-212.047
Carbon County's Objection Reference to Wilderness Characteristics Lands Not Deemed Worthy of Wilderness Characteristics Management

The above-referenced section sets forth the following language:

> Several of the lands with wilderness characteristics units identified were analyzed and are not managed to protect wilderness characteristics as stated in the RMPs. There are potential alignment scenarios that can avoid the lands with wilderness characteristics.
> If development were to occur as the corridor is currently configured, the, BLM would update the inventory for the unit and the boundary of the lands with wilderness characteristics unit would need to be amended accordingly.
> The Price and Moab RMPs consider natural areas to be avoidance areas where ROW leases and easements will be strongly discouraged.

This language, like the Utah Proposed Wilderness language referenced above, has no place in this abstract for the reasons stated above. The BLM has identified which lands with alleged wilderness characteristics it was not to be managed to protect wilderness characteristics, and that is the end of the matter. Dealing with situational "what-if's" is inappropriate and belies an improper agency bias in favor of honoring the so-called citizens wilderness proposal. That is completely unacceptable and grounds for an Administrative Procedures Act "arbitrary and capricious" challenge. The people of Utah have spoken through their elected leaders, and one of the results is the above-referenced Green River Energy zone. Whoever the unelected, non-representational private groups are that proposed more wilderness or de-facto in Carbon County, and who keep pushing the BLM to manage more and more lands as de facto wilderness, they do not represent the people of Carbon County. Carbon County's elected leaders do. Carbon County is the elected representative for cooperating agency review purposes. State of Utah and Carbon County. And Carbon County's position is that all references that honor or otherwise impliedly grant status to some private group's proposal should be expunged from the draft abstract.

Respectfully submitted this 23rd day of February, 2018.

CARBON COUNTY, UTAH

By: Carbon County Board of Commissioners Jake Mellor, Casey Hopes and Jae Potter

Todd Thorne, Carbon County Director of Planning and Public Lands
Mark Ward, Balance Resources, consultant to Carbon County

***Effective 5/13/2014***

**63J-8-105.7 Green River Energy Zone established -- Findings -- Management and land use priorities.**

(1) There is established the Green River Energy Zone in Carbon and Emery Counties for the purpose of maximizing efficient and responsible development of energy and mineral resources.

(2) The land area and boundaries of the Green River Energy Zone are described in Subsection 63J-8-102(8) and illustrated on the maps described in Section 63J-8-105.

(3) The state finds that:

(a) the lands comprising the Green River Energy Zone contain abundant world-class deposits of energy and mineral resources, including oil, natural gas, oil shale, oil sands, gilsonite, coal, phosphate, gold, uranium, and copper, as well as areas with high wind and solar energy potential;

(b) for lands within the Carbon County portion of the Green River Energy Zone, the highest management priority is the responsible management, development, and extraction of existing energy and mineral resources in order to provide long-term domestic energy and supplies for Utah and the United States; and

(c) for lands within the Emery County portion of the Green River Energy Zone:

(i) the responsible management and development of existing energy and mineral resources in order to provide long-term domestic energy and supplies for Utah and the United States is a high management priority; and

(ii) the management priority described in Subsection (3)(c)(i) should be balanced with the following high management priorities:

(A) watershed health;

(B) water storage and water delivery systems;

(C) Emery County Heritage Sites;

(D) facilities and resources associated with the domestic livestock industry;

(E) wildlife and wildlife habitat; and

(F) recreation opportunities.

(4) The state supports:

(a) efficient and responsible full development of all existing energy and mineral resources located within the Green River Energy Zone, including oil, oil shale, natural gas, oil sands, gilsonite, coal, phosphate, gold, uranium, copper, solar, and wind resources; and

(b) a cooperative management approach by federal agencies, the state of Utah, and local governments to achieve broadly supported management plans for the full development of all energy and mineral resources within the Green River Energy Zone.

(5) The state requests that the federal agencies that administer lands within the Green River Energy Zone:

(a) fully cooperate and coordinate with the state of Utah and with Carbon and Emery Counties to develop, amend, and implement land and resource management plans and to implement management decisions that are consistent with the purposes, goals, and policies described in this section to the maximum extent allowed under federal law;

(b) expedite the processing, granting, and streamlining of mineral and energy leases and applications to drill, extract, and otherwise develop all existing energy and mineral resources located within the Green River Energy Zone, including oil, natural gas, oil shale, oil sands, gilsonite, coal, phosphate, gold, uranium, copper, solar, and wind resources;

(c) allow continued maintenance and increased development of roads, power lines, pipeline infrastructure, and other utilities necessary to achieve the goals, purposes, and policies described in this section;

(d) refrain from any planning decisions and management actions that will undermine, restrict, or diminish the goals, purposes, and policies for the Green River Energy Zone as stated in this section; and

(e) refrain from implementing a policy that is contrary to the goals and purposes within this section.

(6) The state calls upon Congress to establish an intergovernmental standing commission, with membership consisting of representatives from the United States government, the state of Utah, and local governments to guide and control planning and management actions in the Green River Energy Zone in order to achieve and maintain the goals, purposes, and policies described in this section.

(7) Notwithstanding the provisions of this section, the state's grazing and livestock policies and plans on land within the Green River Energy Zone shall continue to be governed by Sections 63J-4-401 and 63J-8-104.

Amended by Chapter 321, 2014 General Session

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10153]
**Date:** Friday, February 23, 2018 3:13:01 PM

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Thank you for your input, Ron Kellermueller.

The comment tracking number that has been assigned to your comment is **10153**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 15:12:33 CST

**First Name:** Ron
**Last Name:** Kellermueller
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** New Mexico Dept. of Game and Fish, Mining and Energy Habitat Specialist

**Topics**
Ecological resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

Corridor should avoid crossing the Lordsburg Playa. When the playas have water in them during the spring and fall avian migration periods, the transmission lines will create a collision hazard to water birds that fly in and out of the playa area. Recommend that the corridor be moved north around the playas which is what the Southline Transmission Project opted to do.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Peloncillo
Mountains
Wilderness
Study Area
I 10
Arizona
New Mexico
390
204

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10154] |
| **Date:** | Friday, February 23, 2018 3:51:00 PM |
| **Attachments:** | ID_10154_180223WWECComments.pdf |

Thank you for your input, Luke Danielson.

The comment tracking number that has been assigned to your comment is **10154**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 15:48:59 CST

**First Name:** Luke
**Last Name:** Danielson
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Sustainable Development Strategies Group

**Topics**
Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Lands with wilderness characteristics
Public access and recreation
Specially designated areas
Visual resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

87-277 [blank, blank]

**Input**

Please see attached document.

**Attachments**

18 02 23 WWEC Comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

SDSG
Sustainable Development Strategies Group

Georgeann Smale
Bureau of Land Management
(202) 912-7319
gsmale@blm.gov

Reggie Woodruff
U.S. Forest Service
(202) 205-1196
rwoodruff@fs.fed.us

Brian Mills
Department of Energy
(202) 586-8267
brian.mills@ch.doe.gov

February 23, 2018

**Comments on Gunnison County Portion of Corridor 87-277**

Dear Messrs. Smale, Woodruff, and Mills:

I am President of Sustainable Development Strategies Group, a nonprofit tax exempt research organization that is focused on improving the management of natural resources worldwide. Our organizational headquarters is in Gunnison County, Colorado.

We are writing this letter on our own behalf and on behalf of the many other citizens here who care deeply about the quality of our outstanding natural environment, our cultural heritage, and the condition of our communities.

Our comments are with regard to Corridor 87-277, and in particular, the "Western Portion of Corridor 87-277." Our comments are organized into three sections. The first section deals with some specific issues along the proposed Energy Corridor route through Gunnison County, Colorado. The second deals with more general concerns about any future development of energy transportation infrastructure in the Corridor. Finally, we share some concerns about what we see as the inadequacy of the process by which this consideration is occurring.

PHONE: +1 (970) 641-4605 FAX: +1 (970) 641-4459 EMAIL: danielson@sdsg.org · www.sdsg.org
116 North Taylor Street · Gunnison, CO 81230 USA

1. SPECIFIC CONCERNS RELATED TO THE ENERGY CORRIDOR ROUTE IN GUNNISON COUNTY, COLORADO

- A majority of the corridor that spans Gunnison County has been identified as a "Section 368 Corridor of Concern" (as defined in the settlement agreement of the previous lawsuit) due to the county's important ecological and environmental qualities. As such, the stretch of corridor through Gunnison County, if constructed, will require extensive mitigation efforts, completion of an EIS, and or alternative corridor consideration.

- The WWEC runs directly through land that is designated as Critical Habitat for the Gunnison Sage Grouse under the Endangered Species Act (ESA), especially along MP 84.3 -127.3. There is already existing energy infrastructure that has been identified as having an adverse impact on the Gunnison Sage Grouse and development of the WWEC through this area further jeopardizes the vitality of an already at-risk species. *We also believe that conformance with the Gunnison Basin Gunnison sage-grouse Conservation Agreement on Federal Lands is a mandatory part of all corridor practices in the Gunnison Basin.*

- Gunnison County contains an abundance of important cultural/historical sites. There is a direct corridor overlap with The historic Aberdeen Quarry site near MP 108. Originally discovered in 1888, this quarry was found to have exceptionally high-quality granite; a small town soon blossomed near the quarry (Aberdeen, CO). Aberdeen had a schoolhouse, Post Office, and a spur of the Denver & Rio Grande Railroad which was used to transport this exceptional granite to Denver where it was used for the construction of the State Capitol building. As the proposed route runs directly through the Aberdeen Quarry, considerations should be made for the possibility of encountering historic artifacts in this area (e.g., equipment, remains).

- The WWEC passes through BLM Wilderness Study Areas. As The Wilderness Society has suggested, "Because all wilderness-quality lands are inappropriate for infrastructure development, the Agencies should use a consistent approach to addressing intersections with wilderness-quality lands that commits to avoiding intersections, identifies a path to making needed revisions to corridors and requires the use of mitigation measures where unavoidable impact occurs." Two BLM Wilderness Study areas intersect the corridor:
    - Stubbs Gulch MP 103-108, approximately 835 acres of overlap
    - Sugar Creek MP 113-114, approximately 260 acres of overlap

- The Corridor crosses the North Branch of the Old Spanish Trail, (a National designated historic trail), at least two times on private property in Gunnison County.

- The WWEC is in close proximity to the Waunita Hot Springs. Comparing the provided interactive mapping tool to Google Earth, the WWEC appears to run through the Waunita Hot Springs area; a zone which is defined as having *moderate to high scenic integrity*

*objectives*. As Waunita is both a tourist attraction and a known geothermal energy resource area, concerns about it should not be ignored.

There has been an active proposal for building a geothermal plant at this site. It appears at least on the surface that additional electrical transmission infrastructure might actually facilitate that plant.

On the other hand, one of the best known leks of the Gunnison Sage Grouse is very close to this location and will merit a great deal of consideration in any decision making.

- The "Corridor Rationale" states that "(a)ny new pipelines would likely follow along U.S. Highway 50; there is one existing gas pipeline that roughly follows U.S. Highway 50 east of Gunnison."

  We are very concerned about this idea. It is to us astonishing that your agencies would be putting everyone to some much trouble to analyze a corridor, then flippantly say that the corridor has no meaning and will not be used.

  The "Highway 50 Route" ought not to be assumed to be an accomplished fact. It would entail considerable evaluation of the impacts to many private properties, including important wetlands, areas subject to conservation easements, water bodies, agricultural and cultural sites adjacent to Highway 50.

  None of these people have been notified. And many of them have been lulled into inaction by the idea that the WWEC does not cross their lands. Now we are being told that even though the WWEC does not cross their lands, any pipeline that is built will in fact cross their lands because any pipeline will not follow the WWEC.

  A "Highway 50" route could also impact the Gunnison County landfill.

  And it would pass near a storage site for radioactive materials. There is a federal Uranium Mill Tailings Radiation Control Act disposal and long-term stabilization site nearby.

  Near the intersection of Highway 50 and Highway 114—of the Coldharbour Institute, a community supported nonprofit that facilitates education, incubation and demonstration of responsible personal, community and land practices. It also is the site of one of the most important wetlands in the valley, which is a designated Federal Wetland Reserve.

  The "existing pipeline" route down the center of the Valley, that would impact so many private ranches, was selected not based on any sound planning or route location criteria but because it was the right of way of an old railroad that went out of business in the 1940s and was thus cheap to acquire. That is not a sound basis for a modern energy corridor process.

2. GENERAL CONCERNS THAT MUST BE ADDRESSED BEFORE DEVELOPMENT OF ANY INFRASTRUCTURE IN THE CORRIDOR

- We understand that this is a general, programmatic review. However, site-specific concerns cannot be resolved or avoided by the large-scale, corridor level planning

currently underway. Because there is no actual policy/mandate for the construction of the corridor, we assume there will be an additional thorough potential impact review and opportunity for stakeholder involvement prior to actual construction. If construction were to proceed, some points to consider may include:

- Local community impacts: economic boom/bust, employee housing, traffic
- Construction impacts such as sediment transfer and erosion
- Impacts of land clearing on drainages and wetlands
    - *For example, "The Western Portion of Corridor 87-277 crosses significant water bodies including Tomichi Creek and Cochetopa Creek, and important wetland areas. Particular attention is required to avoid immediate, on-site consequences to these water bodies and their tributaries, as well as downstream impacts to the waters in the Curecanti National Recreation Area and Black Canyon of the Gunnison River.*
- Disruption to wildlife corridors, such as the big game winter range in east Gunnison County
- Reclamation requirements

## 3. CONCERNS REGARDING THE CONSULTATIVE PROCESS

The goal of the review process is to ensure that the corridor location best satisfies the requirements of the siting principles. The current review process has not been 'publicized' to the extent necessary to elicit an appropriate level of meaningful and substantial stakeholder involvement for thorough evaluation of the corridor siting.

We were stunned how few of the interested local government bodies, landowners and others in our County had any idea that this process was going on. There was something fundamentally wrong with the notice provisions.

The development of the WWEC is a major project with the potential for significant, landscape-scale impacts and the fact that the review process has not been well publicized is deeply concerning. To us.

Thank you for taking our comments into account.

Sincerely,

Luke Danielson
President

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10155]
**Date:** Friday, February 23, 2018 4:29:34 PM
**Attachments:** ID_10155_NewMexicoComments.pdf
ID_10155_NewMexicoEnergyPolicy2015.pdf
ID_10155_NewMexicoEnergyRoadmap.pdf
ID_10155_NewMexicoEnergyRoadmapScenariosandBaseline.pdf

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Thank you for your input, Jeremy Lewis.

The comment tracking number that has been assigned to your comment is **10155**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 16:29:06 CST

**First Name:** Jeremy
**Last Name:** Lewis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** New Mexico Energy, Minerals and Natural Resources Department

**Topics**
Energy Planning Opportunities

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Dear West-wide Energy Corridor Reviewers: The State of New Mexico has new information and resources relevant to the West-wide Energy Corridor Review in Region 2. There are four attachments as follows: 1. New Mexico Comment Letter 2. New Mexico Energy Policy 3. New Mexico Energy Roadmap Report 4. New Mexico Energy Roadmap Scenarios and Baseline Report Thanks you for considering these materials as you review and work to improve the corridors. Sincerely, Jeremy Lewis State of New Mexico Energy, Minerals and Natural Resources Department

**Attachments**

NewMexicoComments.pdf, NewMexicoEnergyPolicy2015.pdf, NewMexicoEnergyRoadmap.pdf, NewMexicoEnergyRoadmapScenariosandBaseline.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

State of New Mexico
Energy, Minerals and Natural Resources Department

**Susana Martinez**
Governor

**Ken McQueen**
Cabinet Secretary

**Matthias Sayer**
Deputy Cabinet Secretary

**Louise N. Martinez, Division Director**
**Energy Conservation and**
**Management Division**

February 23, 2018

Dear West-wide Energy Corridor Reviewers:

The State of New Mexico has new information and resources relevant to the West-wide Energy Corridor Review in Region 2. Please consider these new items as you review and improve the corridors.

**New Mexico Energy Policy and Implementation Plan**

New Mexico's Energy Policy, updated in 2015, identifies an *all the above* and *energy abundance* approach to stewarding the state's natural resources and energy economy.[1] Growing New Mexico's economy via the energy sector is the core tenet of the policy. The state has an abundance of energy resources, both fossil-based and renewable, with an abundance of energy ingenuity in its companies, universities, and national laboratories. New Mexico's dependence on the future of the energy marketplace is intrinsically linked with successful and wise implementation of energy and fuel transport. The energy corridors stewarded by the federal government are essential to economic vitality in New Mexico.

Nearly every possible energy source exists in New Mexico in relative abundance: coal, oil, natural gas, uranium, solar, wind, biomass and geothermal resources are found across the state's geography. One of the state's greatest assets, the energy sector provides revenue that funds schools, hospitals, and state government and lessens the tax burden on New Mexico's citizens. This wealth of energy resources also creates economic development opportunities for New Mexico, from attracting manufacturing, to using energy in more productive and efficient ways, to additional opportunities for energy export.

Energy resources and opportunities exist in all of New Mexico's 33 counties. There are rich natural gas deposits in the northwestern (San Juan, Sandoval, and Rio Arriba Counties) and southeastern (Lea, Eddy, and Chaves Counties) corners of New Mexico. The Permian Basin in the southeast is a principal oil producing region of the United States. Coal is most abundant in the San Juan Basin, and uranium deposits also cluster in northwestern New Mexico (Cibola and McKinley Counties); both are geologically shared with the Navajo Nation. The eastern half of New Mexico has some of the best wind resources in the country, while solar energy statewide has the third highest state resource potential in the nation. Geothermal resources also underlie the southwestern and north-central portions of New Mexico. Active management of New Mexico's forest biomass resources that are now at risk for wildfire and insect disease provide economic incentives and improved watershed ecosystem health.

Energy infrastructure includes the network of pipelines and transmission lines that transport energy to consumers and facilities that turn raw energy resources into useful products. Transportation corridors such as roads and railways are critical energy infrastructure networks as well. Record oil production and increased activity has stressed road and rail infrastructure networks in New Mexico's oil and gas producing regions. Balancing pipelines with road and railway transport is important to consider.

[1] Available at http://www.emnrd.state.nm.us/EnergyPolicy/documents/EMNRD_EnergyPolicy.pdf

1220 South St. Francis Drive • Santa Fe, New Mexico 87505
Phone (505) 476-3315 • Fax (505) 476-3322 • www.CleanEnergyNM.org

Electricity transmission lines in New Mexico were built mostly in the 1960s and 1970s, with some system improvements made since that time. Inadequate transmission access has long been cited as the primary hindrance to New Mexico renewable energy development. Some of the best wind resources are located far away from electricity markets; only new transmission infrastructure can bridge these divides. There are about ten electricity transmission projects on the drawing board in New Mexico, though planning times are lengthy and it is unclear how many projects will be built. Two high voltage lines in central and southern New Mexico are on deck to commence construction within a year, their success will provide much needed improvement to transmission capacity in New Mexico and substantial economic development to the impacted counties.

The Energy Policy prioritizes the streamlining of right-of-way permitting processes on state land and assisting relevant agencies with right-of-way processing on federal and tribal lands. A deficiency of energy infrastructure limits New Mexico's economic development potential.

For electricity delivery, there are many reasons to update and expand electricity transmission infrastructure in New Mexico: the state can take advantage of economic development opportunities that require additional power, utilities can continue to provide reliable service to existing homes and industries, and updated transmission (and distribution) infrastructure helps increase the penetration of renewable energy on the grid. The Energy Policy recommends improving state-controlled aspects of transmission siting and permitting while supporting utilities to make transmission infrastructure investments.

**New Mexico Energy Roadmap**

Following the release of the 2015 New Mexico State Energy Policy, staff at the Energy Minerals and Natural Resources Department began to look for ways to enact specific objectives called out in the plan. However, the 2015 plan required development of clear strategies and direction for reaching the desired objectives. Therefore, in 2016, the New Mexico applied for and received financial support from the U.S. Department of Energy to fund the development of an Energy Roadmap that defines a direction and sequence of strategies required to strengthen and diversify a New Mexico energy economy that is resilient to global changes.

To create such a roadmap, the state assembled a steering committee made up of energy stakeholders representing energy producers, large energy users, regulators, transportation interests, local and regional governments and energy advocates. In all, more than 50 energy stakeholders, each bringing with them expertise in specific energy disciplines, engaged in networking, information sharing, debate and compromise to develop the New Mexico Energy Roadmap. Now in 2018 the Roadmap is available online. With it are a diverse set of scenarios and baseline resources.[2]

Development of the Energy Roadmap is only the beginning of an anticipated decade long process of implementing changes to energy policies and practices at both the public and private level. The strategies and goals of the Energy Roadmap recognize and aim to address one common reality; the way the state produces and uses energy must preemptively adapt to global energy developments. Thus, the Energy Roadmap strives to increase renewable energy deployment, engage energy efficiency, deploy alternative transportation solutions, support energy education and grow the workforce. This will be in concert with support for new opportunities for the state's vast conventional energy sectors.

Stakeholders participating in the New Mexico Energy Roadmap identified multiple goals and strategies related to electricity transmission and pipeline needs:

**Goal**: Advance strategies to strengthen New Mexico's overall energy economy by 2027.

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[2] Available at http://www.emnrd.state.nm.us/ECMD/energyroadmap.html and http://www.emnrd.state.nm.us/ECMD/documents/FINALPublicEnergyRoadmapReport_004.pdf.

- **Strategy**: Create a workable mechanism to bring state, federal, tribal, and local authorities together to streamline implementation of energy investments within New Mexico.

**Goal**: Optimize New Mexico's electricity transmission systems

- **Strategy**: Conduct analysis for future transmission assets under various resource development and policy scenarios.
- **Strategy**: Identify regulatory barriers to construction and cost recovery of new transmission assets.
- **Strategy**: Streamline regulatory structure for transmission permitting and approval.

**Goal**: Increase New Mexico's permitted natural gas processing capacity by 15% by 2027

- **Strategy:** Identify opportunities to build new or enhance processing facilities and associated pipelines.
- **Strategy:** Develop public awareness campaign about relative advantages and disadvantages of pipelines versus over the road trucking of hydrocarbons and ancillary products.
- **Strategy:** Explore the expansion of natural gas commodity exports from NM to other states and countries.

To engage with the implementation and track the progress of New Mexico's Energy Roadmap please visit www.CleanEnergyNM.org.

As your review of the West-wide Energy Corridors continues, New Mexico respectfully requests your diligence in working to increase connectivity for a more robust energy corridor system. Results from such work will increase economic growth in New Mexico, facilitate a more diverse energy mix and lowest cost electricity, create a more modern and flexible energy delivery system, and strengthen both energy resiliency and energy reliability.

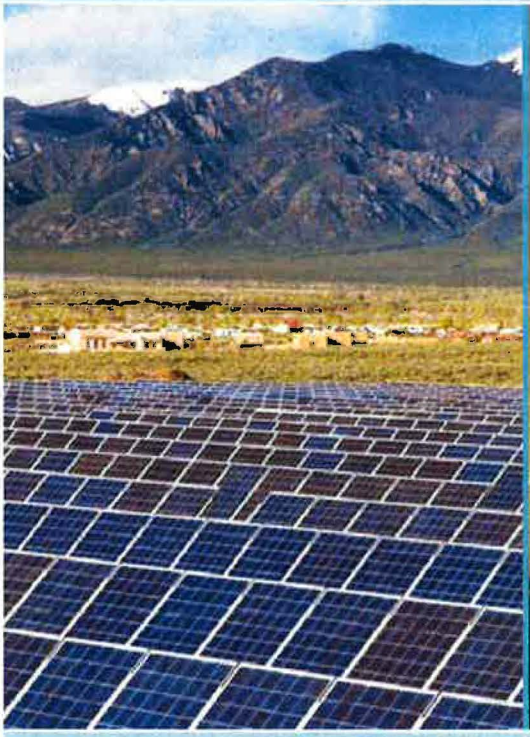
Respectfully,

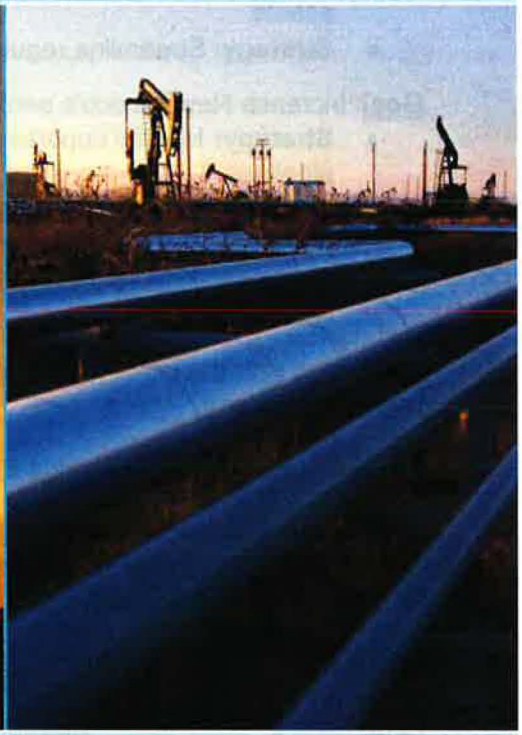
Jeremy Lewis
Energy Program and Planning Bureau Chief

New Mexico Energy Minerals and Natural Resources Department
Energy Conservation and Management Division
1220 South Saint Francis Drive
Santa Fe, NM 87505

(505) 476-3319
Jeremy.Lewis@state.nm.us

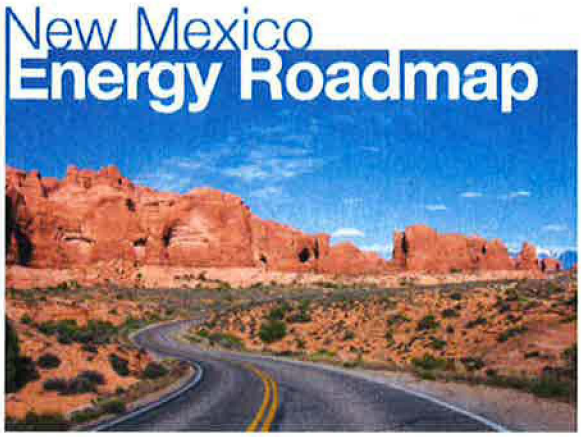
# Seizing our Energy Potential: Creating a More Diverse Economy in New Mexico





# New Mexico Energy Policy & Implementation Plan

2015




**FINAL REPORT: New Mexico Energy Roadmap**

- Goals and strategies to achieve a more resilient energy economy
- Results of the deliberations of the New Mexico Energy Roadmap Steering Committee
- Metrics to guide implementation of the Roadmap

**CONVENER**
New Mexico Energy Minerals and Natural Resources Department (EMNRD)

**RESEARCH AND FACILITATION**
New Mexico First

Energy Conservation & Management Division

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NEW MEXICO emnrd
Energy, Minerals and Natural Resources Department

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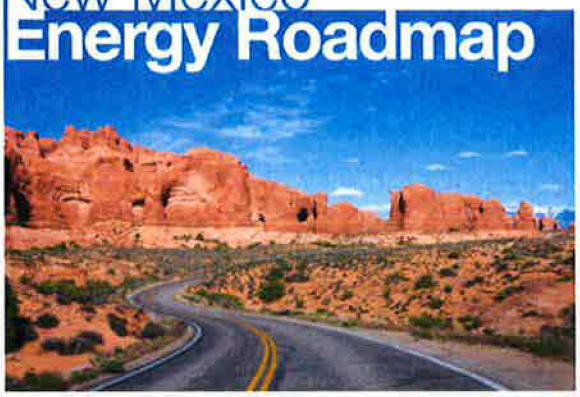
# New Mexico Energy Roadmap



## SCENARIOS & BASELINE REPORT

- Four hypothetical scenarios about New Mexico's energy and economic future
- Baseline data on energy production, state economics, environmental conditions and workforce development
- A foundation for discussions of the Energy Roadmap steering committee

**CONVENER**
New Mexico Energy Minerals and Natural Resources Department (EMNRD)

**RESEARCH AND FACILITATION**
New Mexico First

Energy Conservation & Management Division

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Energy, Minerals and Natural Resources Department

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**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10156]
**Date:** Friday, February 23, 2018 4:43:30 PM

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Thank you for your input, Ron Kellermueller.

The comment tracking number that has been assigned to your comment is **10156**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 16:43:06 CST

**First Name:** Ron
**Last Name:** Kellermueller
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** New Mexico Dept. of Game and Fish, Mining and Energy Habitat Specialist

**Topics**
Ecological resources

**Geographic Area**
Area selected via Corridor Mapping Tool

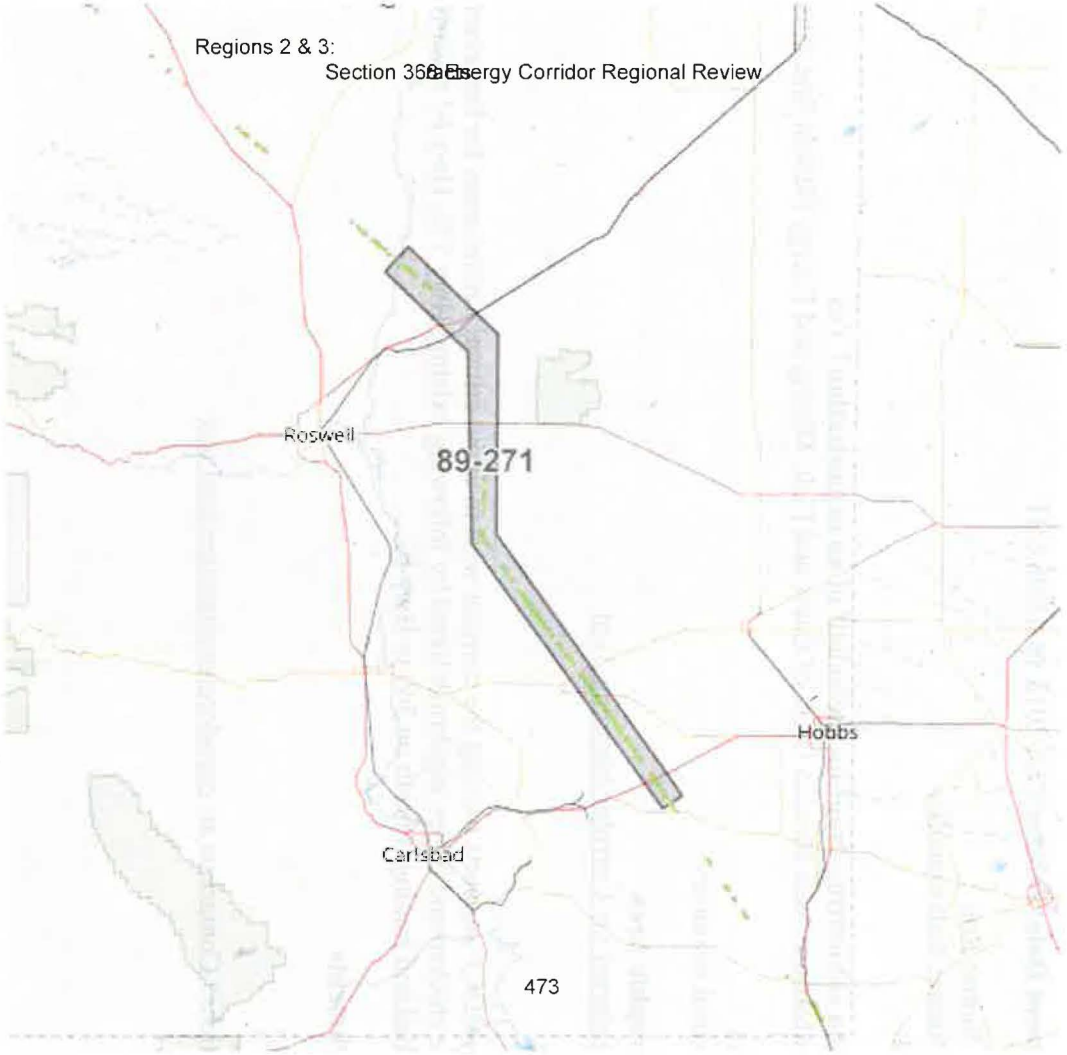
**Input**

The NMDGF supports moving the corridor west to avoid critical habitat areas for the lesser prairie chicken and dunes sagebrush lizard by following existing Hwy 176, Hwy 62 towards Carlsbad and routing it north on 360 to Hwy 82.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov


Regions 2 & 3:
Section 368 Energy Corridor Regional Review
Roswell
89-271
Hobbs
Carlsbad
473

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10157]
**Date:** Friday, February 23, 2018 4:48:40 PM
**Attachments:** ID_10157_L_GSmaleRWoodruffBMills_CommentsfromCRITonSection368EnergyCorridorsR23_022318.pdf

Thank you for your input, Sara Clark.

The comment tracking number that has been assigned to your comment is **10157**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 16:48:17 CST

**First Name:** Sara
**Last Name:** Clark
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Colorado River Indian Tribes

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Lands and realty
Tribal concerns
Visual resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

[Blank]

**Attachments**

L_GSmale RWoodruff BMills_Comments from CRIT on Section 368 Energy Corridors R23_022318.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# COLORADO RIVER INDIAN TRIBES

*Colorado River Indian Reservation*

26600 MOHAVE RD.
PARKER, ARIZONA 85344
TELEPHONE (928) 669-9211
FAX (928) 669-1216


February 23, 2018

***Sent Via E-mail and Website Submission***

Georgeann Smale
Bureau of Land Management
(202) 912-7319
gsmale@blm.gov

Reggie Woodruff
U.S. Forest Service
(202) 205-1196
rwoodruff@fs.fed.us

Brian Mills
Department of Energy
(202) 586-8267
brian.mills@eh.doe.gov

Re: **Comments of the Colorado River Indian Tribes regarding Section 368 Energy Corridors, Regions 2 and 3.**

To Whom It May Concern,

The Colorado River Indian Tribes ("CRIT" or "the Tribes") submits the following comments on the Section 368 Energy Corridor reviews for Regions 2 and 3. CRIT provides these comments as a supplement to its comments on Corridor 30-52 in the Region 1 Review.

As a preliminary matter, the Colorado River Indian Tribes are a federally recognized Indian tribe comprised of over 4,440 members belonging to the Mohave, Chemehuevi, Hopi and Navajo Tribes. The almost 300,000-acre Colorado River Indian Reservation sits astride the Colorado River between Blythe, California and Parker, Arizona. The ancestral homelands of the Tribes' members, however, extend far beyond the Reservation boundaries. Significant portions of public and private lands in California, Arizona, and Nevada were occupied by the ancestors of the Tribes' Mohave and Chemehuevi members since time immemorial. These landscapes remain imbued with substantial cultural, spiritual, and religious significance for the Tribes' current members and future generations. For this reason, we have a strong interest in ensuring that

potential cultural resource and other environmental impacts associated with transmission lines, pipelines, and other infrastructure proposed for Section 368 Corridors are adequately considered and mitigated.

We submit the following comments for consideration:

- **Tribal Involvement in Ethnographic Studies and Archaeological Surveys.** The Tribes urge the agencies to ensure that Class III surveys and ethnographic studies are conducted *before* approval of any project proposed within the designated corridors. The Bureau of Land Management is currently contemplating approval of the Ten West Link Transmission Line Project prior to completion of critical Class III surveys. This cart-before-the-horse approach may make it difficult for the company to avoid sensitive cultural resources as the project is developed in the future.

  Moreover, whenever development projects are proposed for corridors within the ancestral homeland of tribal members, the Tribes must be involved early in the preparation and review of ethnographic studies and archaeological survey work. All such survey work should involve the use of CRIT's tribal monitors, and the Tribes should have the opportunity to review and comment upon all plans and studies that result from these efforts.

- **Avoidance of Cultural Resources and Reburial of Artifacts.** For the preservation of our footprint on the land, the Tribes advocate for avoidance of cultural resources during ground disturbing activities, and if avoidance is infeasible, in-situ reburial of artifacts. This approach is especially important because the Tribes' Mohave members strongly associate artifacts with the ancestors who used them; consequently, any disturbance of these artifacts is considered taboo. After construction of the Devers Palo Verde Transmission Line in California resulted in permanent damage to a prehistoric rock ring circle, the Tribe has become painfully aware that heavy equipment operation associated with transmission lines and energy corridors can cause irreversible damage to sensitive and priceless cultural resources during construction activities. For this reason, we continue to request that avoidance and reburial are incorporated into the mitigation measures imposed on any particular development project within the designated corridors.

- **Corridor 30-52.** The abstract for Corridor 30-52 indicates that the "corridor is being considered for the Ten West Link project." Given that the purpose of this corridor appears to be to accommodate this particular project, CRIT hereby incorporates by reference its extensive comments on that project (which have been submitted to BLM beginning in August 2017) into the review of Corridor 30-52.

Please copy the Tribes' Attorney General, Rebecca A. Loudbear, at rloudbear@critdoj.com, and Acting THPO Director Bryan Etsitty, at betsitty@crit-nsn.gov, on all correspondence to the Tribes. Thank you for your consideration of our comments.

Respectfully,

COLORADO RIVER INDIAN TRIBES
Dennis Patch
Chairman

Cc: Tribal Council of the Colorado River Indian Tribes
Bryan Etsitty, Acting THPO Director
Rebecca A. Loudbear, Attorney General, Colorado River Indian Tribes

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10158]
**Date:** Friday, February 23, 2018 5:05:05 PM
**Attachments:** ID_10158_Regions23WWECCorridorAbstractsCommentsTWSandpartners22318.pdf

Thank you for your input, Alex Daue.

The comment tracking number that has been assigned to your comment is **10158**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 17:04:40 CST

**First Name:** Alex
**Last Name:** Daue
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Lands with wilderness characteristics
Specially designated areas
Interagency Operating Procedures

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Please accept the attached comments.

**Attachments**

Regions 2-3 WWEC Corridor Abstracts Comments (TWS and partners 2-23-18).pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

February 23, 2018

Tim Spisak
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Brian Mills
Senior Planning Advisor
Department of Energy

Via: blm_wo_368corridors@blm.gov and the web form at http://corridoreis.anl.gov/involve/stakeholder-input/

Re: Comments on Corridor Abstracts for Section 368 West-wide Energy Corridors Regions 2-3 Regional Review

Dear Mr. Spisak, Mr. Woodruff and Mr. Mills,

Please accept the comments of The Wilderness Society, Arizona Wilderness Coalition, Great Old Broads for Wilderness, High Country Conservation Advocates, Idaho Conservation League, National Parks Conservation Association, Natural Resources Defense Council, New Mexico Wilderness Alliance, Oregon Natural Desert Association, San Luis Valley Ecosystem Council, Sheep Mountain Alliance, Sierra Club – Grand Canyon Chapter, Sierra Club Utah, Sonoran Institute, Southern Utah Wilderness Alliance, Wildlands Network and Wild Utah Project on the Corridor Abstracts for Regions 2-3 of the Section 368 West-wide Energy Corridors (WWEC). We support the ongoing commitment shown by the BLM, the U.S. Forest Service, and the Department of Energy (the Agencies) to improving the siting and functionality of the WWEC to meet the terms of the Settlement Agreement reached by the Agencies and The Wilderness Society and other plaintiffs in 2012, including through the Regional Reviews. The comments we submitted on the 2014 WWEC Request for Information[1] and the 2016 initiation of the Region 1 Review[2] are incorporated by reference.

These comments are focused on the need for the Agencies to address three primary issues to meet the terms of the Settlement Agreement and help ensure that future changes to corridors comply with the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), and Section 368 of the Energy Policy Act of 2005 (EPAct): 1) making additional improvements to the way that environmental concerns are

[1] Available at:
https://wilderness.org/sites/default/files/WWEC%20RFI%20Comments%20%28TWS%20and%20Partners%205-27-14%20-%20with%20attachments%29.pdf
[2] Available at:
https://wilderness.org/sites/default/files/Region%201%20WWEC%20Review%20Comments%20%28TWS%20and%20Partners%29%2010-24-16_0.pdf

addressed in this process; 2) addressing intersections between WWEC and wilderness-quality lands (including Citizens' Wilderness Proposal Areas and Lands with Wilderness Characteristics on BLM lands and Inventoried Roadless Areas, Colorado Roadless Areas and potential wilderness areas on FS lands); and 3) addressing impacts to National Park Service lands. We also recommend improvements to other elements of the Agencies methods, summarized below. Other organizations are submitting comments focused on other important issues including addressing impacts to wildlife habitat and improving access to renewable energy development.

We acknowledge and appreciate that the Agencies have made significant improvements to some of their methods between the start of the Region 1 Review and the start of the Regions 2-3 Review, including to issues that were of major focus in our October 2016 comments. The Agencies significantly improved the way environmental concerns are addressed in the corridor abstracts by moving away from the binary "this is a constraint/this is not a constraint" approach used in the Region 1 corridor abstracts, as well as by clearly indicating in some cases that there are issues that need to be addressed through the Regional Reviews. In addition, the increased information available in the Mapping Tool and corridor abstracts is very helpful in supporting effective and informed stakeholder engagement.

That said, the Agencies need to make significant additional improvements to the way environmental impacts are addressed to ensure a consistent and appropriate approach. In addition, the Agencies have not yet published regional Energy Planning Reports (we understand the Agencies are working on a report) or recommended adjustments to Interagency Operating Procedures (which we understand will be included in the Regional Review Reports). It remains to be seen whether the Agencies are focusing and prioritizing efforts on key corridors; we strongly recommend that the Agencies do so as they complete additional steps in the process for the Regional Reviews.

The WWEC Regional Reviews are a major opportunity to re-evaluate and improve the WWEC throughout the West, with the promise of supporting the fundamental concepts of guided development and landscape-scale planning that the WWEC should ultimately embody. Successes such as the Dry Lake Solar Energy Zone in Nevada show that a 'smart from the start' approach has the potential to not only protect sensitive wildlands and wildlife habitat by driving development to low-conflict places but can also provide important benefits to developers with regards to permitting efficiency and predictability for mitigation costs and obligations, helping achieve the nation's infrastructure needs in a responsible way. In the coming years, we hope to help the Agencies build off these successes on our public lands by applying similar principles to the WWEC.

To achieve these goals, the Agencies must gather and synthesize information in a way that helps make corridors attractive and functional for appropriate transmission development to support renewable energy, and effectively limits impacts to wildlands and wildlife, cultural resources, local communities, and other resources.

We strongly encourage the Agencies to continue to use the Regional Reviews process to learn and adapt, both for Regions 2-3 and subsequent regions.

The detailed recommendations in this letter are summarized as follows:

- **The Agencies must further improve their methods for considering and addressing environmental concerns in the corridor abstracts and through the Regional Reviews, including by acknowledging and addressing intersections with wilderness-quality lands**

We acknowledge and appreciate that the Agencies have moved away from the binary "this is a constraint/this is not a constraint" approach used in the Region 1 corridor abstracts. The new approach used in the Regions 2-3 corridor abstracts is a major improvement because it describes a variety of considerations in the column labeled "Agency Review and Analysis." With regards to wilderness-quality lands and Areas of Critical Environmental Concerns (ACECs), there are numerous cases in the Regions 2-3 corridor abstracts where the Agency Review and Analysis acknowledges that there are resource conflict issues. However, additional significant improvements are needed because the corridor abstracts are still quite inconsistent in how intersections with wilderness-quality lands are addressed; in many cases the way the intersections are addressed is inadequate to address the resource conflicts that are present; and many intersections with wilderness-quality lands are not acknowledged. **Because all wilderness-quality lands are inappropriate for infrastructure development, the Agencies should use a consistent approach to addressing intersections with wilderness-quality lands that commits to avoiding intersections, identifies a path to making needed revisions to corridors and requires the use of mitigation measures where unavoidable impacts occur.**

- **The Agencies should make additional improvements to the Mapping Tool and corridor abstracts**

The Agencies have made significant improvements to the Mapping Tool and corridor abstracts, many of which address recommendations we made in our October 2016 comments. These include adding details on existing infrastructure (including the locations of existing transmission lines, pipelines and other infrastructure in the Mapping Tool, which is extremely helpful); additional data layers showing areas of environmental concern; and the conflict rating from the Conflicts Assessment Table. The agencies should make additional improvements, including ensuring the Mapping Tool includes all existing inventories of BLM wilderness-quality lands and addressing future updates; addressing updates to inventories of FS wilderness-quality lands; consistently incorporating data across agency planning areas; including all the resources and designations in the Conflicts Assessment Table; and including more information on siting opportunities and challenges on non-federal lands.

- **The Agencies must better address impacts to National Park Service lands**

The Agencies should use a more thorough and consistent approach to addressing impacts to NPS lands that includes close coordination with the NPS and commits to avoiding intersections, identifies a path to making needed revisions to corridors where there are direct and indirect impacts on park resources and visitors, and requires the use of mitigation measures where unavoidable impacts occur.

- **The Agencies should maintain a strong public engagement process for the Regional Reviews**

A strong public engagement process is crucial for meeting the terms of the Settlement Agreement and for achieving the Agencies' goals for improving the WWEC. The Agencies should maintain the process they have established, which provides multiple opportunities for public engagement in a variety of formats during each Regional Review.

We also direct the Agencies' attention to our October 2016 comments (incorporated by reference) for full details on the following recommendations:

- Given the dynamic nature of regional energy and transmission planning and the importance of these considerations to the appropriate and useful location of WWEC, the Agencies should complete and provide to the public the Region 1 Energy Planning Report (described in the inter-agency MOU and workplan for the Regional Reviews) as soon as possible and should ensure that these Energy Planning Reports are available at the start of Regional Reviews for Regions 2-6.

- The Agencies should adjust the Interagency Operating Procedures to reflect the Agencies' recognition of the need to improve mitigation approaches and outcomes. Updated IOPs should be consistent with applicable law and practice requiring use of the entire mitigation hierarchy (avoid, minimize, offset), evaluating mitigation alternatives and seeking ways to protect other resources and uses to the maximum extent practicable. The Agencies should also incorporate the excellent Design Features from the Solar Programmatic Environmental Impact Statement into the IOPs.

**I. The Agencies must further improve their methods for considering and addressing environmental concerns in the corridor abstracts and through the Regional Reviews to meet the terms of the Settlement Agreement and ensure that future changes to corridors comply with the Settlement Agreement and other relevant laws and agency policies**

The Settlement Agreement directs the Agencies to conduct Regional Reviews, and to do so in a way that improves WWEC through future revision, deletion, or addition to the system. As stated in the Settlement Agreement, "The objectives of these settlement provisions are to ensure that future revision, deletion, or addition to the system of corridors designated pursuant to section 368 of EPAct consider the following general principles: location of corridors in favorable landscapes, facilitation of renewable energy projects where feasible, avoidance of environmentally sensitive areas to the *maximum* extent practicable, diminution of the proliferation of dispersed rights-of-way ("ROWs") crossing the landscape, and improvement of the long-term benefits of reliable and safe energy transmission." Settlement Agreement at II A, emphasis added.

Likewise, the Settlement Agreement establishes four siting principles, which includes that "Section 368 corridors are thoughtfully sited to provide maximum utility and *minimum impact to the environment*." Settlement Agreement at II A.1.c, emphasis added.

While the Agencies have significantly improved their approach to addressing environmental concerns, they must further improve their approach to meet the terms of the Settlement Agreement. Doing so is also crucial to help ensure that future changes to corridors comply with the Settlement Agreement, FLPMA, NEPA and Section 368 of EPAct. We also note that while the Settlement Agreement highlights specific issues of concern for the Corridors of Concern, it requires the agencies to address environmental and other issues for *all* of the corridors.

**a. The Agencies should maintain the improvements they have made to methods for addressing environmental concerns in the corridor abstracts and through the Regional Reviews (while making additional improvements going forward)**

We acknowledge and appreciate that the Agencies have moved away from the binary "this is a constraint/this is not a constraint" approach used in the Region 1 corridor abstracts. As detailed in our October 2016 comments, this approach was highly problematic because it did not allow for *any* environmental concerns to qualify as "constraints" and thus to receive recommendations for improvements, which did not meet the terms of the Settlement Agreement.

The new approach used in the Regions 2-3 corridor abstracts is a major improvement because it describes a variety of considerations in the column labeled "Agency Review and Analysis." According to the Agencies' webpage describing the Regions 2-3 corridor abstracts, the intent of the analysis in this column is to:

- Confirm the existing corridor best meets the siting principles (e.g., the corridor is located in the best place given the siting principles - maximum utility, minimum environmental impact);
- Identify opportunities to improve corridor placement or interagency operating procedures (IOPs) (e.g., shift a corridor segment, widen or narrow the corridor, remove a corridor, or add a new corridor elsewhere) or to add new or revise existing IOPs; or
- Acknowledge the concern is not easily resolved or avoided through corridor-level planning (Note that review of these issues will continue after the abstracts are finalized.[3]

With regards to wilderness-quality lands and ACECs, there are numerous cases in the Regions 2-3 corridor abstracts where the Agency Review and Analysis acknowledges that there are resource conflict issues. There are also several cases where the Agency Review and Analysis identifies opportunities to address those issues. As detailed below, the agencies must further improve their approach to ensure that these resource conflicts are consistently and appropriately addressed, and that the basis for any conclusion that impacts are unavoidable is clearly documented and justified by showing, at minimum, that less environmentally harmful alternatives routes or route modifications are infeasible.

**b. The Agencies must further improve their methods for addressing environmental concerns in the corridor abstracts and through the Regional Reviews**

While these comments are focused on intersections with wilderness-quality lands, ACECs and NPS lands, our recommendations that the Agencies use a consistent and appropriate approach to addressing these particular environmental concerns may also be applicable for addressing other WWEC siting concerns.

As detailed in Section II of these comments, the Agencies must acknowledge and address intersections with wilderness-quality lands. Although the Regions 2-3 corridor abstracts do have significant improvements (including acknowledging some environmental resource conflicts and identifying some opportunities to address them), they are still quite inconsistent in how intersections with wilderness-quality lands are addressed, and in many cases the way the intersections are addressed is inadequate to address the resource conflicts that are present. The Agencies must also address *all* intersections with wilderness-quality lands; as detailed in Section II, there are many more intersections with wilderness-quality lands than are currently reflected in the corridor abstracts.

[3] *Available at:* http://corridoreis.anl.gov/regional-reviews/regions-2-3/

### i. The current approach for addressing intersections with wilderness-quality lands is inconsistent and inadequate

Although wilderness-quality lands are identified and managed by the Agencies in different ways (including inventoried and managed Lands with Wilderness Characteristics on BLM lands and Inventoried Roadless Areas, Colorado Roadless Areas and potential wilderness areas on FS lands), they are all inappropriate for infrastructure development (as detailed in Section II) and should be excluded from the WWEC. Citizen-inventoried wilderness-quality lands and citizen wilderness proposals are also inappropriate for infrastructure development and should be excluded from the WWEC. **For this reason, the Agencies should use a consistent approach to addressing intersections with wilderness-quality lands that commits to avoiding intersections, identifies a path to making needed revisions to corridors and requires the use of mitigation measures where unavoidable impacts occur.**

The Regions 2-3 corridor abstracts currently contain a variety of different approaches to addressing intersections with wilderness-quality lands. They are listed below and are *roughly* in order from the least adequate/appropriate to the most adequate/appropriate, though **none of them includes *all* the necessary elements to ensure wilderness characteristics are safeguarded**. Some corridor abstracts include multiple intersections with different types of wilderness-quality lands, so they may be listed in multiple sections below.

1. States that Citizens' Proposed Wilderness is not a consideration at the time of this review

The corridor abstracts dismiss all intersections with Citizens' Proposed Wilderness areas with statements like, "This citizens' proposed wilderness is not in the RMP management prescriptions and is therefore not a consideration at the time of this review." Corridor abstract 144-275 p. 12. This approach is also used for corridor abstracts 110-114 (p. 14), 62-111 (p. 14), 66-212 (p. 19), 126-218 (p. 11), 81-272 (p.10), and 87-277 (p. 10). This approach is wholly inappropriate and inadequate; the Agencies must address conflicts with proposed wilderness for reasons described later in these comments.

2. States that Lands with Wilderness Characteristics Unit is not being managed for protection

Corridor abstract 66-212 notes that the lands with wilderness characteristics unit intersected by the corridor is not being managed for protection: "These units were analyzed in the 2008 Price RMP and are not managed to protect wilderness characteristics." Corridor abstract 66-212 p. 18. The Agency Review and Analysis does not elaborate beyond this, leaving it unclear whether the intersection will be addressed through the Regional Review. Inventoried lands with wilderness characteristics are a public lands resource that must be addressed in plans and projects, regardless of management status, and therefore this approach is inadequate.

3. States that Lands with Wilderness Characteristics management decisions will be made through future land use planning

Two corridor abstracts include statements about management decisions being made through land use planning, leaving it unclear whether the intersection will be addressed through the Regional Review. For example, "Future development in this corridor may affect the wilderness characteristics of this unit. Management decisions for lands with wilderness characteristics are made through a land use planning effort. Lands with wilderness characteristics in Sierra, Otero, and Dona Ana Counties are being evaluated in the Tri-County RMP which is currently in draft." Corridor abstract 87-277 p. 10. This is also the case for corridor abstract 113-117 (p. 11). As described above, inventoried lands with wilderness characteristics are a public lands resource that must be

addressed in plans and projects, regardless of management status. The Agencies must address those conflicts in the Regional Review even where a land use plan is ongoing.

4. Doesn't elaborate beyond acknowledging intersection

Corridor abstract 126-218 acknowledges that the corridor intersects several lands with wilderness characteristics units, but it doesn't elaborate very much beyond this, making it unclear whether the intersection will be addressed through the Regional Review. "Corridor 126-218 intersects the Cold Spring Mountain, Lower Flaming Gorge, Dead Horse Pass, and Mountain Home lands with wilderness characteristics units. These units were designated as natural areas in the 2008 Vernal RMP, are managed to maintain their wilderness character, and are considered avoidance areas for rights-of-way." Corridor abstract 126-218 p. 11. The Agencies should clarify how the Regional Review intends to address these conflicts.

5. Directs consideration of addition of an Interagency Operating Procedure

Corridor abstract 66-212 states, "Consider the addition of an Agency Coordination IOP related to Roadless Areas. The corridor is not located in the IRA and development and management inside of the corridor would not be affected. Because the IRA is adjacent to the corridor, the opportunity to expand or shift the corridor is limited." Corridor abstract 66-212 p. 22. This is a good first step, but the Agencies should specify potential IOPs to address the conflict.

6. Notes requirement for BLM to inventory for wilderness characteristics

Several corridor abstracts reference BLM's requirements that the agency follow its inventory guidance but doesn't elaborate beyond this, making it unclear whether the intersection will be addressed through the Regional Review. For example, "Prior to designating new corridors or prior to conducting surface-disturbing activities in areas of designated corridors or areas proposed for corridor revisions, the BLM will be required to follow the procedures as outlined in BLM Manual 6310 (Conducting Wilderness Characteristics Inventory on BLM Lands [Public])." Corridor abstract 113-116 p. 13. This is also the case for corridor abstracts 126-218 (p. 12) and 126-258 (p. 9). We appreciate that BLM is reinforcing its obligation to ensure its lands with wilderness characteristics inventory is up-to-date prior to designating corridors or authorizing development. However, it is unclear to us why this obligation is only specified for certain corridors. If there are corridors for which the Agencies know that updated wilderness inventory is necessary, the corridor abstracts should clarify that by stating: "The wilderness characteristics inventory is in need of updating for this corridor. BLM will complete its inventory obligation under FLPMA and address conflicts with lands with wilderness characteristics by eliminating or mitigating the corridor where wilderness characteristics are identified."

7. States that there are opportunities to consider revisions to avoid the intersection

Several corridor abstracts note opportunities to consider revisions with statements like, "There is an opportunity to consider revision (corridor narrowed or moved) between MP 41 to MP 48 to avoid lands with wilderness characteristics." Corridor abstract 87-277 p. 18.

"The corridor intersects Colorado Roadless Areas in the San Isabel National Forest and may present challenges for future development. However, the intersection is small and there is an opportunity to consider realigning or reducing the width of the corridor to avoid the Colorado Roadless Areas." Corridor abstract 87-277 p. 20.

"There are potential alignment scenarios that can avoid the lands with wilderness characteristics." Corridor abstract 66-212 p. 18

While these are important statements of opportunities to consider revisions to avoid the intersection, these corridor abstracts do not contain statements that the Agencies *will* resolve the conflicts.

8. States that there is a conflict that will need to be resolved

Corridor abstracts 144-275 states, "Agency Input: Bard Creek Colorado Roadless Area contains Upper Tier Roadless Area. Per 36 CFR 294.44 (a) a linear construction zone is not allowed to construct a power line within Upper Tier. All construction would have to be completed by aircraft. Per Roadless Characteristics, 36 CFR 294.41, a power line would be in conflict with characteristic (7), Natural appearing landscapes with high scenic quality. The corridor is in an inventoried roadless area for a short distance. Although, the Arapaho and Roosevelt National Forests LRMP has no ROW exclusions or avoidance prescriptions for utility corridors in Colorado Roadless Area, there is a conflict that will need to be resolved." Corridor abstract 144-275 p. 12

While this is a strong statement for the need to resolve the conflict, the corridor abstract does not identify potential revisions to the corridor to resolve the conflict.

**ii. The Agencies must use a consistent approach that makes clear commitments to addressing intersections with wilderness-quality lands *and* provides details on opportunities to do so through corridor revisions**

To meet the terms of the Settlement Agreement, the Agencies must use an approach that is a hybrid of the approaches described in examples 7 and 8 in the section above: 1) making a clear commitment to addressing any intersections with wilderness-quality lands by revising corridors to eliminate the intersections; and 2) providing details on opportunities to do so through corridor revisions whenever possible. There may be some situations where the agencies do not yet have enough information to provide details on possible corridor revisions; if that is the case, the agencies should commit to developing that information through the Regional Review process and ultimately including recommendations for revisions in the Regional Review Report.

In some rare instances it may not be possible to revise corridors to eliminate intersections with wilderness-quality lands. In these cases, the Agencies should commit to adding Interagency Operating Procedures that would require mitigation to minimize and offset unavoidable impacts.

The Agencies must carry these commitments through the entire Regional Review process and include them in their recommendations for corridor revisions in the Regional Review Report.

**iii. The Agencies must use a consistent approach that makes clear commitments to addressing intersections with ACECs and other special designations *and* provides details on opportunities to do so through corridor revisions**

The corridor abstracts also include inconsistent approaches to addressing intersections with ACECs and other special designations. This includes approaches like: noting the ACEC is an avoidance area but saying this is an issue that is not easily resolved in the regional review (corridor abstract 126-128 p. 13); noting that there is a

conflict for the ACEC and the corridor with the existing RMP which has a requirement to "exclude the authorization of right-of-way and leases within the ACEC" (corridor abstract 81-272 p. 12); noting that in the ACEC "ROW will be authorized on a case-by-case basis when exclusion and avoidance criteria are satisfied and protective stipulations are in place" (corridor abstract 87-277 p. 21); and stating that "The Beaver Dam Wash NCA RMP (2016) identifies the majority of the Beaver Dam NCA as a ROW exclusion area." (corridor abstract 113-114 p. 14.

To meet the terms of the Settlement Agreement, the Agencies must use an approach that is a hybrid of the approaches described in examples 7 and 8 in the section above: 1) making a clear commitment to addressing any intersections with ACECs, NCAs and other special designations by revising corridors to eliminate the intersections; and 2) providing details on opportunities to do so through corridor revisions whenever possible. There may be some situations where the agencies do not yet have enough information to provide details on possible corridor revisions; if that is the case, the agencies should commit to developing that information through the Regional Review process and ultimately including recommendations for revisions in the Regional Review Report.

In some rare instances it may not be possible to revise corridors to eliminate intersections with ACECs, NCAs and other special designations. In these cases, the Agencies should commit to adding Interagency Operating Procedures that would require mitigation to minimize and offset unavoidable impacts.

The Agencies must carry these commitments through the entire Regional Review process and include them in their recommendations for corridor revisions in the Regional Review Report.

**c. The Agencies should revise the Conflicts Assessment Table and associated mapping by appropriately including several additional resources and designations as "High Potential Conflict Areas;" the Agencies should recommend excluding these areas from the corridors in their Regional Review Report**

We appreciate the Agencies developing a resource conflict assessment and associated mapping (included in the Mapping Tool and corridor abstracts) to help identify the corridors' proximity to environmentally sensitive areas.[4] The Agencies should revise the Conflict Assessment Criteria Table to include the following resources and designations as "High Potential Conflict Areas" (note that some of these areas are currently listed as "Medium Potential Conflict Areas":

1. All areas that have been proposed for conservation designation in pending legislation;
2. Areas of Critical Environmental Concern (ACECs);
3. Threatened, endangered and sensitive species habitat;
4. Other critical cores and linkages for wildlife habitat, such as that identified by state wildlife agencies through State Comprehensive Wildlife Conservation Strategies;[5]

[4] *See the Agencies' table and description at: http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf*
[5] For example, the Arizona Game and Fish Department has identified the Kaibab-Paunsagunt wildlife corridor as a critical linkage for migrating mule deer between southern Utah and northern Arizona's Kaibab Plateau. See: Carrel, William K., Richard A. Ockenfels, and Raymond E. Schweinsburg. 1999. An Evaluation of Annual Migration Patterns of the Paunsaugunt Mule Deer Herd Between Utah and Arizona. Arizona Game and Fish Department Technical Report 29. Phoenix. 44 pages

5. BLM Citizen Proposed Wilderness Areas;
6. Other lands with wilderness characteristics identified or inventoried by the land management agencies or the public;
7. Forest Service Recommended Wilderness Areas and Wilderness Study Areas;
8. Designated conservation areas (administrative) including, but not limited to, Special Interest Areas and Research Natural Areas;
9. Potential wilderness area pursuant to Forest Service Handbook 1909.12, Ch. 70, § Ch. 71;
10. Forest Service Citizen Proposed Wilderness Areas;
11. Areas with high scenic integrity in land management plans;
12. Forest Service Primitive and Semi-Primitive Non-Motorized areas as identified in the Recreation Opportunity Spectrum;
13. Identified and managed wildlife corridors;
14. Greater sage-grouse priority habitat management areas; and
15. Sagebrush Focal Areas.

The Agencies should also recommend excluding all these areas and the areas already listed as High Potential Conflict Areas from the corridors in the Regional Review Report.

## II. The Agencies must acknowledge and address intersections with wilderness-quality lands

### a. BLM wilderness-quality lands

#### i. Wilderness-quality lands are inappropriate for transmission and other energy infrastructure.

Wilderness-quality lands managed by BLM, which include BLM-inventoried lands with wilderness characteristics, citizen-inventoried lands with wilderness characteristics and citizen wilderness proposals, are a valuable public lands resource that is irreparably damaged or destroyed by transmission lines and pipelines. Wilderness resources on our public lands are finite and they contribute critically to the agency's ability to meet its multiple use and sustained yield mandate, so BLM should not designate WWEC in any wilderness-quality lands. Further, BLM should recommend adjustments to the WWEC through the Regional Reviews to eliminate any intersections between the existing WWEC and wilderness-quality lands.

FLPMA requires BLM to inventory and consider lands with wilderness characteristics on the public lands. 43 U.S.C. § 1711(a); *see also Ore. Natural Desert Ass'n v. BLM,* 625 F.3d 1092, 1122 (9th Cir. 2008). BLM is obligated to address wilderness resources during land use planning and project-level NEPA, and therefore this review process must give special consideration to wilderness-quality lands. FLPMA also recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" and provides for BLM to exclude or limit certain uses of the public lands. *See*, 43 U.S.C. § 1712(e). Excluding energy corridors from wilderness-quality public lands is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness character and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(c).

Furthermore, there is a wide range of values associated with lands with wilderness characteristics that supplement and benefit other resources that FLPMA requires the agency to manage. These include scenic resources, outdoor recreation, wildlife habitat, and cultural resources. *See* 43 U.S.C. § 1711(a); 43 U.S.C. § 1702(c). These multiple resources and uses of public lands are found in wilderness-quality lands – in fact, many are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife habitat). Therefore, excluding energy infrastructure from wilderness-quality lands allows BLM to better manage many resources the agency must steward under FLPMA.

It is imperative that BLM exclude energy corridors from all wilderness-quality lands, including BLM-inventoried lands with wilderness characteristics, citizen-inventoried lands with wilderness characteristics and citizen wilderness proposals. Citizen-inventoried lands with wilderness characteristics and wilderness proposals are areas that are highly valued by communities on a state and local level. These places have constituencies advocating for their protection and therefore transmission or pipeline development within them would be highly controversial and an inappropriate use of public resources. Citizen wilderness proposals typically have proposed legislation associated with them and have been heavily vetted and found to be extraordinarily and comparatively high value wildlands. Additionally, BLM is required to respond to citizen-inventoried lands with wilderness characteristics, and so the agency has an obligation regarding those lands and they cannot be simply ignored.

**ii. BLM must update the Energy Corridor Abstracts to acknowledge all corridors that conflict with wilderness-quality lands.**

We appreciate that BLM acknowledges conflicts with some wilderness-quality lands in the corridor abstracts for Regions 2 and 3, as discussed above. However, the majority of these conflicts are not recognized in the corridor abstracts. Attached to these comments is a spreadsheet detailing the specific corridors and mileage posts that intersect BLM wilderness-quality lands (Attachment 1). BLM should update the corridor abstracts to include this information and ensure the agency is accurately describing conflicts with wilderness resources on public lands.

Additionally, BLM currently has ongoing inventory efforts underway in some of the field offices in Regions 2 and 3, such as the Las Cruces and Ely Districts. The Agencies should ensure that the corridor abstracts indicate that inventory work is ongoing in these circumstances. This will better inform stakeholders and developers when considering potential resource conflicts at the time of development.

**iii. BLM must commit to addressing conflict in all corridors that intersect wilderness-quality lands.**

As stated previously in these comments, BLM must include actual commitments to addressing conflicts with wilderness resources wherever those conflicts exist; simply stating the conflict is inadequate. BLM should use an approach that is a hybrid of the approaches described in examples 7 and 8 in the section above: 1) making a clear commitment to addressing any intersections with wilderness-quality lands by revising corridors to eliminate the intersections; and 2) providing details on opportunities to do so through corridor revisions whenever possible. Where BLM has enough information to put forward alternative routes that would eliminate conflicts with wilderness resources, the agency should do so in the corridor abstracts. Where this information is lacking, the corridor abstracts should commit that BLM will determine alternatives to eliminate the conflict at

the next land use planning opportunity.

**iv. Inventoried lands with wilderness characteristics lacking management decisions**

BLM should note in the corridor abstracts areas which the agency has inventoried and found to have wilderness characteristics but have not undergone land use planning. These areas merit special consideration in future RMP revisions and amendments to adjust or delete corridors if management decisions are made to protect wilderness characteristics.

**v. Examples of specific corridors that have egregious impacts on BLM wilderness-quality lands which should be adjusted or deleted**

These examples of conflicts with WWEC and BLM wilderness-quality lands illustrate why all intersections with wilderness-quality lands must be eliminated by revising the corridors.

**Nevada**

Corridor 232-233 E (mileposts 5-14 and 25-42): While the western arm of Corridor 232-233 follows a highway and existing transmission line, the eastern arm (232-233 (E)) inexplicably takes a detour from the main corridor and cuts through BLM-inventoried lands with wilderness characteristics in a large wildlands complex. This area includes several large BLM Wilderness Areas as well as many contiguous and adjacent lands with wilderness characteristics. Driving energy infrastructure to this area through WWEC designation has unacceptable impacts on wilderness resources and does not access a population center or provide apparent benefits. Specifically, 232-233 (E) navigates a narrow corridor between the Delamar Mountains Wilderness and Meadow Valley Range Wilderness, a corridor which BLM has found contains wilderness characteristics (NV-040-156-4-2012) and is contiguous with the Meadow Valley Range Wilderness. Heading north from there, the eastern corridor's return route to the western arm cuts directly through a large BLM-inventoried lands with wilderness characteristics unit (NV-040-145a-2012) that encompasses the northern Delamar Mountains and Big Lime Mountains. BLM's LWC inventory area for this area documents its "excellent hunting, hiking, camping, rock hounding, and scenic opportunities" owing to its many draws, canyons, mountains and washes. This large and wild area would be bisected by the energy corridor. BLM should delete the eastern arm of this corridor to eliminate unnecessary impacts to wilderness resources.

**New Mexico**

Corridor 81-272 (mileposts 85-91): Our analysis found that corridor 81-272 intersects with the Magdalena Mountains Citizen-Inventoried Lands with Wilderness Characteristics unit. The Magdalena Mountains unit is important habitat for pronghorn, mule deer, black bear, coyote, both red and gray fox, mountain lion and bobcat. The area consists of rolling volcanic hills, isolated mesas, and foothills dotted with pinyon pine, juniper and oak, with significant canyons leading to the heart of the range. Bird species include bald and golden eagle; prairie falcon, kestrel, Merriam turkey; Gambel, scaled, and Mearn's quail; and many species of hawks and owls. The agencies must revise the corridor to eliminate this intersection.

Corridor 89-271 (mileposts 77-78): Our analysis found that corridor 89-271 intersects with the Mescalero Sands Citizen-Inventoried Lands with Wilderness Characteristics unit. The Mescalero Sands unit is some of the last

habitat for the Dunes Sagebrush Lizard and is comprised of unique rolling red sand dunes, which are not represented in any other wilderness inventory unit. This landscape provides an important opportunity to study shinnery oak and lizard habitat, as well as other conduct other biological studies, photography and other types of primitive recreation. This area is also a rest stop for many migratory birds and should be protected. The agencies must revise the corridor to eliminate this intersection.

**Utah**

Corridor 116-206 (mileposts 17-24): Corridor 116-206 bisects two BLM-identified wilderness characteristics (LWC) units, known as Upper Kanab Creek and Vermilion Cliffs. These areas are also included as part of the Utah Wilderness Coalition's wilderness proposal. America's Red Rock Wilderness Act (ARRWA). S. 948, H.R. 2044 (115th Congress). Described by BLM as "exceptionally scenic," the Upper Kanab Creek LWC unit is located to the east of Zion National Park and abuts the western boundary of Grand Staircase-Escalante National Monument. BLM, Utah Wilderness Inventory (1999), 36-36M. The unit also "provides critical winter range for the important Paunsaugunt deer herd." *Id.* In its path through the Upper Kanab Creek LWC unit, the corridor bisects directly through a natural, undeveloped wilderness landscape. Further south, the corridor clips the eastern boundary of the Vermilion Cliffs LWC unit—identified by the Kanab BLM as part of its 2008 Resource Management Plan revision—and is located in close proximity to the western boundary of Grand Staircase-Escalante National Monument, as designated by President Clinton in Proclamation No. 6920, 61 Fed. Reg. 50223 (Sept. 18, 1996). Importantly, **the corridor follows no existing disturbance** through either of these wilderness-quality landscapes and would therefore result in a significant and unacceptable loss of wilderness characteristics throughout the LWC units. It is imperative that the Agencies adjust the corridor to avoid these wilderness-quality lands and all others. If the Agencies are not able to adjust the corridor to avoid these impacts, they should consider eliminating the corridor.

Corridor 110-114 (mileposts 123-130 and 98-101): Corridor 110-114 runs through Utah's West Desert, a vast and undeveloped Great Basin landscape of expansive valleys and rising mountain ranges. While, on paper, the corridor follows an existing right-of-way corridor, an on-the-ground review of the corridor illustrates the significant impact that any development would have on the area's remote and wild nature. The corridor would directly impact wilderness characteristics within the BLM-identified Central Wah Wah Mountains LWC unit, a 58,400-acre landscape that is also proposed for wilderness designation in ARRWA. As described by BLM, the Central Wah Wah Mountains LWC unit "provide[s] beautiful views of rugged mountain topography" with "spectacular scenic vistas in all directions from the higher elevations." BLM, Utah Wilderness Inventory (1999), 19-19M. The corridor also intersects the southern boundary of the North Wah Wah Mountains LWC unit, which is contiguous and in close proximity to the Wah Wah Mountains Wilderness Study Area (WSA). *Id.* at 19-19M. Due to the vast viewsheds and lack of development throughout the larger project area, the corridor would result in adverse impacts to wilderness values. Continuing west, the corridor cuts into the northern portion of Mountain Home Range North, a proposed wilderness unit in ARRWA. In total, in a landscape known for its remoteness, lack of development, pristine viewsheds, and dark night skies, corridor siting and development will undoubtedly result in undesired, adverse impacts to these wilderness-quality lands. It is imperative that the Agencies adjust the corridor to avoid these wilderness-quality lands and all others. If the Agencies are not able to adjust the corridor to avoid these impacts, they should consider eliminating the corridor.

Corridor 68-116 (mileposts 20-40): Corridor 68-116 intersects the southern portion of Grand Staircase-Escalante National Monument, as designated by President Clinton in Proclamation No. 6920, 61 Fed. Reg. 50223 (Sept. 18, 1996). It also impacts the Pine Hollow citizen-proposed wilderness. While this corridor has existing transmission within it, additional transmission or other energy infrastructure should not be sited in the Monument or proposed wilderness, and therefore corridor designation is inappropriate.[6] BLM should recognize the conflict with Grand Staircase-Escalante National Monument and the Pine Hollow proposed wilderness in the corridor abstract and recommend de-designation of the corridor.

#### vi. Addressing unavoidable impacts to wilderness-quality lands

We expect the Agencies to resolve all conflicts with BLM wilderness-quality lands. If impacts to wilderness-quality lands can't be avoided through changes to corridor designations, BLM must commit to mitigation in the Interagency Operating Procedures to minimize and offset unavoidable impacts. BLM is subject to a broad range of authorities supporting mitigation measures to minimize and offset unavoidable impacts. FLPMA requires the BLM to manage for multiple use and sustained yield, and to avoid unnecessary or undue degradation of resources and values.[7] NEPA and associated Council on Environmental Quality (CEQ) regulations require the BLM to analyze potential impacts and consider ways to avoid, minimize and mitigate impacts,[8] and the government has recognized previously that such analysis should comport with the mitigation hierarchy. The mitigation hierarchy aims to achieve the maximum benefit to the impacted resource. First and foremost, BLM must seek to avoid impacts by eliminating energy corridors from wilderness-quality lands as discussed throughout these comments. The next steps in the hierarchy are to minimize impacts (e.g., through project modifications, permit conditions, interim and final reclamation, etc.); and, generally, only if those approaches are insufficient to fully mitigate the impacts, will the BLM seek to require compensation for some or all of the remaining impacts (i.e., residual effects). The Interagency Operating Procedures should follow the mitigation hierarchy for impacts to lands with wilderness characteristics, including unavoidable impacts.

### b. Forest Service wilderness-quality lands

#### i. USFS Roadless Areas and Forest Service potential wilderness areas are inappropriate for transmission and other energy infrastructure.

Inventoried Roadless Areas (IRAs): IRAs refer to those areas identified and mapped in accordance with the Roadless Area Conservation Final Rule (the '2001 Roadless Rule'). Reference 36 Code of Federal Regulations,

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[6] President Clinton designated Grand Staircase-Escalante National Monument under Proclamation No. 6920, 61 Fed. Reg. 50223 (Sept. 18, 1996) for the explicit purpose of protecting and preserving identified historic and scientific objects. We maintain that Proclamation No. 9682 (Dec. 4, 2017) attempting to reduce the size of Grand Staircase-Escalante National Monument is an unlawful revocation of the existing monument and will be overturned in a court of law. The president only has the authority to create a national monument under the Antiquities Act of 1906 (16 U.S.C. §§ 431-433). Only Congress can revoke or reduce a national monument. President Trump's illegal proclamation is already being challenged in court by a multitude of plaintiffs. An attempt to site energy infrastructure within the original boundaries of the Monument would certainly lead to protracted conflict, and therefore this conflict must be identified in this review process and BLM should take this opportunity to commit to de-designating the corridor and eliminating the conflict.

[7] *See* 43 C.F.R. §§ 1701, 1732(b).

[8] 40 C.F.R. §§ 1508.8, 1502.14, 1502.16.

Part 294 and 66 Federal Register 3244-3272 (Jan. 12, 2001). The 2001 Roadless Rule defines inventoried roadless areas as "Areas identified in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000, which are held at the National headquarters office of the Forest Service, or any subsequent update or revision of those maps." The definition of a roadless area for the 2001 Roadless Rule included: undeveloped areas typically exceeding 5,000 acres that met the minimum criteria for wilderness consideration under the Wilderness Act and that were inventoried during the Forest Service's Roadless Area Review and Evaluation (RARE II) process, subsequent assessments, or forest planning. The rule protects roadless lands by placing them off limits to logging and road construction, with limited exceptions such as logging to reduce the risk to public safety of unnaturally intense fires.

Colorado Roadless Areas (CRAs): CRAs refer to those areas identified and mapped in accordance with the Colorado Roadless Rule, which was adopted in July 2012 and overrides the national 2001 Roadless Rule and standards as applied to national forests in Colorado. The Colorado Roadless Rule added new areas to those identified under the 2001 national rule and removed others. CRAs are divided into two tiers, with upper tier areas receiving elevated management direction above areas in the 2001 roadless areas. We collectively refer to CRAs and national IRAs as Roadless Areas in this letter.

Forest Service Potential Wilderness Areas: As national forests revise their land management plans, Chapter 70 of the Forest Service Handbook 1909.12 sets out a four-step process for the agency to satisfy its obligation to "[i]dentify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System [NWPS] and determine whether to recommend any such lands for wilderness designation" through a plan revision. 36 C.F.R. § 219.7(c)(2)(v). The agency must: (1) inventory all lands that may be suitable for inclusion in the NWPS; (2) evaluate the wilderness characteristics of each inventoried area using the criteria in section 2(c) of the Wilderness Act of 1964; (3) analyze some or all of the evaluated areas in the applicable NEPA document; and (4) decide which areas to recommend for inclusion in the NWPS. In terms of Step 1 of this process, the absence of roads and other substantially noticeable development is a driving factor in the Forest Service's inventory of lands that may be suitable for wilderness. Step 1 of the four-step process culminates with the release of a final Forest Service wilderness inventory map. We highlight these inventory areas because they indicate where the Forest Service is currently revising a forest plan and may recommend areas for wilderness in the final plan. For the purposes of this letter, we refer to these inventory areas as USFS potential wilderness areas.

Forest Service roadless lands are heralded for their conservation values. Those values are described at length in the preamble of the 2001 Roadless Rule[9] and in the Final Environmental Impact Statement for the Rule.[10] They include: high quality or undisturbed soil, water, and air; sources of public drinking water; diverse plant and animal communities; habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land; primitive, semi-primitive non- motorized, and semi-primitive motorized classes of dispersed recreation; reference landscapes; natural appearing landscapes with high scenic quality; traditional cultural properties and sacred sites; and other locally identified unique characteristics (e.g., uncommon geological formations, unique wetland complexes, exceptional hunting and

[9] 66 Fed. Reg. at 3245-47.
[10] Final Environmental Impact Statement, Vol. 1, 3–3 to 3–7, *available at* http://www.fs.usda.gov/roaddocument/roadless/2001roadlessrule/finalruledocuments.

fishing opportunities). As noted above, USFS potential wilderness areas are defined by their absence of roads and other substantially noticeable development. The values for USFS Roadless Areas are therefore applicable to USFS potential wilderness areas. USFS Roadless Areas are inappropriate for transmission and other energy infrastructure because of the regulatory hurdle that limits road construction and the many conservation values they possess. USFS potential wilderness areas are inappropriate for energy infrastructure because of the many conservation values they possess and because the land planning process for which the inventory was created has not been finalized.

**ii. The Agencies must update Energy Corridor Abstracts to acknowledge all corridors that conflict with USFS wilderness quality lands**

Attached you will find a spreadsheet with specific corridors and mile posts that intersect with USFS Roadless Areas and USFS potential wilderness areas (Attachment 2). For all intersections with Roadless Areas, the Agencies abstracts acknowledge the conflict, which we appreciate. The Agencies failed to acknowledge the intersection with USFS potential wilderness areas; we request that the abstracts acknowledge this intersection.

**iii. The Agencies must commit to addressing conflict in all corridors that intersect with USFS wilderness quality lands and provide details on opportunities to do so through corridor revisions**

The Agencies must commit to addressing conflict in corridors with wilderness quality lands through corridor revisions. Where conflicts with USFS Roadless Areas exist, the abstracts acknowledge the need to resolve the conflict, which we appreciate. (*E.g. see* Abstract for Corridor # 144-275 at 12 for the Bard Creek CRA: "The corridor is in an inventoried roadless area for a short distance. Although, the Arapaho and Roosevelt National Forests LRMP has no ROW exclusions or avoidance prescriptions for utility corridors in Colorado Roadless Area, there is a conflict that will need to be resolved.") We support the inclusion of statements that address the need to resolve the conflict with Roadless Areas, so long as the approach for resolving the conflict results in realigning the corridor or reducing the corridor width to avoid the Roadless Area. In addition to Roadless Areas, we request that the Agencies also include statements that address conflict with USFS potential wilderness areas. Lastly, we recommend that the abstract go one step further and identify potential revisions to the corridor to resolve the conflict with Roadless Areas and potential wilderness areas.

**iv. The Agencies should note in the final reports areas which have been inventoried and found to have wilderness characteristics but have not completed land use planning**

Of the national forests that are revising their forest plans, there is significant overlap between the Tonto National Forest's (AZ) potential wilderness areas and corridor 62-211. These potential wilderness areas merit special consideration in the forest plan revision to adjust or delete corridors if management decisions are made to protect wilderness character.

**v. Examples of specific corridors that conflict with Roadless Areas which should be adjusted or deleted**

Corridor 87-277 (mileposts 52-53 and 68-69): Two examples of conflicts with Roadless Areas that illustrate why all intersections with USFS wilderness quality lands must be eliminated by revising the corridors are the Chipeta

and Sangre de Cristo: Silverheels Gulch to Hunts Creek CRAs. Our analysis found that corridor 87-277 intersects with the Chipeta CRA and the Sangre de Cristo: Silverheels Gulch to Hunts Creek CRA.

The 28,686-acre Chipeta CRA is remarkable habitat for many species, including the Federally endangered Uncompahgre fritillary butterfly; the Federally threatened Canada lynx and part of an important Poncha Pass lynx linkage area; and several Forest Service Region 2 sensitive species including bighorn sheep, Townsend's big-eared bat, boreal toad and goshawk. The CRA also contains some lands within the Colorado Natural Heritage Program Pahlone Slopes Potential Conservation Area, which was identified for its very high biodiversity significance due to the presence of globally imperiled Crandall's rock-cress (*Boechera crandallii*). The Chipeta CRA is a Bighorn Sheep production area, winter concentration area and is considered severe winter range. The CRA is also an elk production area and winter concentration area as well as Mule Deer winter concentration area. The Continental Divide National Scenic Trail also traverses this CRA.[11]

The 6,000-acre Sangre de Cristo: Silverheels Gulch to Hunts Creek CRA also possesses incredible habitat for many species, including the Federally threatened Canada lynx and Forest Service Region 2 sensitive species, including Townsend's big-eared bat, goshawk and hog-nosed skunk. The CRA is an elk production area, winter concentration area, and severe winter range and a mule deer winter concentration area. Additionally, evidence of prehistoric Native American activity is present in the CRA.[12]

It is imperative that the Agencies adjust the corridor to avoid these Roadless Areas. The corridor abstract notes that the "corridor intersects Colorado Roadless Areas in the San Isabel National Forest and may present challenges for future development. However, the intersection is small and there is an opportunity to consider realigning or reducing the width of the corridor to avoid the Colorado Roadless Areas." Corridor Abstract 87-277 at 20. The Agencies corridor mapping tool shows that the corridor glances the edges of these CRAs. We urge the Agencies to commit to following the recommendations in the abstract and either realign the corridor or reduce the width of the corridor to avoid these CRAs, and to ultimately include recommendations to eliminate the intersection in the Regional Review Report. The Agencies must also do so for any other intersections with USFS wilderness quality lands.

### vi. Addressing unavoidable impacts to USFS wilderness-quality lands

We expect the Agencies to resolve all conflicts with USFS wilderness-quality lands, particularly Roadless Areas. If impacts to USFS wilderness-quality lands can't be avoided through changes to corridor designations, the FS must commit to mitigation in the Interagency Operating Procedures to minimize and offset unavoidable impacts. The FS is subject to a broad range of authorities supporting mitigation measures to minimize and offset unavoidable impacts. NEPA and associated Council on Environmental Quality (CEQ) regulations require the FS to analyze potential impacts and consider ways to avoid, minimize and mitigate impacts,[13] and such analysis should be in accordance with the mitigation hierarchy. The mitigation hierarchy aims to achieve the maximum benefit to the

[11] Data sources for this Chipeta CRA include: U.S. Forest Service. 2011. Pike-San Isabel National Forest Roadless Area Profiles, Colorado Roadless Rule, pp. 15-16; and Colorado Parks and Wildlife, 2017, Wildlife species GIS map data.
[12] Data sources for the Sangre de Cristo: Silverheels Gulch to Hunts Creek CRA include: U.S. Forest Service. 2011. Pike-San Isabel National Forest Roadless Area Profiles, Colorado Roadless Rule, p. 71; and Colorado Parks and Wildlife, 2017, Wildlife species GIS map data.
[13] 40 C.F.R. §§ 1508.8, 1502.14, 1502.16.

impacted resource. First and foremost, the FS must seek to avoid impacts by eliminating energy corridors from wilderness-quality lands as discussed throughout these comments. The next steps in the hierarchy are to minimize impacts (e.g., through project modifications, permit conditions, interim and final reclamation, etc.); and, generally, only if those approaches are insufficient to fully mitigate the impacts, will the FS seek to require compensation for some or all of the remaining impacts (i.e., residual effects). The Interagency Operating Procedures should follow the mitigation hierarchy for impacts to USFS wilderness-quality lands, including unavoidable impacts.

## III. The Agencies must better address impacts to National Park Service lands

The Agencies must significantly improve their approach to addressing impacts to NPS lands. They should use a more thorough and consistent approach that includes close coordination with the NPS and commits to avoiding intersections, identifies a path to making needed revisions to corridors where there are direct and indirect impacts on park resources and the experiences of visitors, and requires the use of mitigation measures where unavoidable impacts occur.

Dinosaur National Monument

While some corridor abstracts do note potential impacts to NPS lands, the references are vague and need significant improvements. For example, corridor 126-218 runs along the boundary of Dinosaur National Monument, and the corridor abstract notes that it falls within 0.1 miles of the monument boundary. Despite the proximity, however, the Agency Review and Analysis column only states, "The corridor is not in the National Monument. Coordination with the NPS is needed to identify impacts of corridor development on the Monument and its visitors." Corridor abstract 126-218 p. 7. The abstract does not specify whether and how coordination with the NPS is occurring, identify more specific impacts to NPS lands and the experiences of park visitors, or identify a path to making needed revisions to the corridor to address potential impacts.

In addition to potential impacts to Dinosaur National Monument, much of corridor 126-218 is within areas deemed as high potential conflict for other reasons. These additional conflicts include paleontological resources, and areas with wilderness characteristics. We also note that the Utah ARMPA for the greater sage-grouse amended the corridor to make it underground-only along almost its entire length because it intersects Priority Habitat Management Areas. Given the high potential for conflict along this corridor, the Agencies should specify how impacts to Dinosaur National Monument and other protected or sensitive resources will be addressed. If they cannot adequately address these conflicts, the Agencies should consider eliminating the corridor altogether

We also recommend that the Agencies improve their analysis and treatment of potential impacts to Dinosaur National Monument from corridor 126-133. The corridor abstract states, "Development within the corridor could create visual impacts near the Dinosaur National Monument entrance and along the entrance road." Corridor abstract 126-133 p. 6. The Agencies should provide more details on potential impacts and commit to addressing them through the Regional Reviews.

Curecanti National Recreation Area and Black Canyon of the Gunnison National Park

The corridor abstract for corridor 87-277 acknowledges that it crosses the boundary of the Curecanti National Recreation Area, and abuts private lands identified as Lands of Conservation Opportunity, which have natural, cultural, or scenic resource values related to the recreation area, or Black Canyon of the Gunnison National Park,

adjacent to the recreation area. Additionally, this corridor "cuts through the most important remaining Gunnison Sage-grouse habitat in the Gunnison Basin," (Abstract, p. 8), presenting a high likelihood of impacts to cooperative protection efforts by the NPS and other agencies. The abstract recommends that project proponents should reach out to the NRA personnel early, which is appropriate. However, it should further specify the process for comprehensively assessing conflicts in close consultation with the NPS (and other affected agencies) and should make explicit available options for resolving conflicts to NPS-managed lands within the NRA, as well as adjacent lands containing sensitive, protected resources. These details should be incorporated into the Regional Review. As noted above, the consultative process should be thorough, and consistent across corridors.

Example of addressing specially designated areas that includes some elements that the Agencies should use to address impacts to NPS Units and other Sensitive Protected Lands

There is at least one example of how the Agencies have addressed areas with protective designations in the corridor abstracts, which illustrates some of the elements that the Agencies should use to address impacts to other protected areas, including NPS lands, within the WWEC. In the example, the Roubideaux Special Management Area in Colorado, the corridor abstract states:

"Agency Input: The Roubideau SMA was designated in 1993 to be managed to protect its wilderness character. This area is a canyon below the elevation of the corridor. The corridor parallels much of the eastern edge of the Roubideau SMA. The area was designated after the 1D utility corridor management prescription was established and after the Transcolorado pipeline was constructed.

A very small portion of the SMA extends into the corridor. There is an opportunity to consider revision of the corridor, perhaps designating the corridor as underground-only, since an above-ground transmission line in close proximity to the Roubideau SMA has the potential to conflict with its wilderness character and visual resources. The only existing infrastructure in the corridor are pipelines, and there is another nearby corridor designated for above-ground electrical transmission." (Corridor abstract 134-136 p. 7)

We strongly encourage the Agencies to apply a similar level of consideration and detail when accounting for solutions to potential conflicts related to NPS-managed lands and resources, and other lands with protected designations or that house sensitive, protected resources.

## IV. The Agencies should make additional improvements to the Mapping Tool and corridor abstracts

The Agencies have made significant improvements to the Mapping Tool and corridor abstracts, many of which address recommendations we made in our October 2016 comments. For example, these include adding details on existing infrastructure (including the locations of existing transmission lines, pipelines and other infrastructure in the Mapping Tool, which is extremely helpful); additional data layers showing areas of environmental concern; and the conflict rating from the Conflicts Assessment Table. The agencies should make additional improvements, as detailed below.

### a. Include all existing inventories of BLM wilderness-quality lands and address future updates

The Mapping Tool should include all BLM-inventoried lands with wilderness characteristics, including areas being managed for protection in a land use plan and other inventory units. The Mapping Tool at this point is not comprehensive or accurate regarding this data. The Agencies should ensure the complete portfolio of BLM-inventoried lands with wilderness characteristics is encompassed in the Mapping Tool as soon as possible. Furthermore, FLPMA obligates BLM to maintain and update its inventory of lands with wilderness characteristics, and so inventory efforts are ongoing on a continuous basis. Since this Mapping Tool will inform future land use plan revisions and proposed projects, it is critical that lands with wilderness characteristics data is continually updated and reflected in the Mapping Tool. If overlap is found between updated lands with wilderness characteristics inventory and WWEC when developing corridor abstracts, the Agencies should identify the intersections in the corridor abstracts and ensure that their recommendations for corridor revisions address them by adjusting the corridors to eliminate the intersection.

**b. Address updates to inventories of FS wilderness-quality lands**

There are multiple national forests across the west where both Forest Service and citizen wilderness inventories are underway to inform land management planning processes. Since this mapping tool will inform land use plan revisions and proposed projects, it is critical that all Forest Service lands with wilderness character (i.e., Forest Service and citizen wilderness inventories) are continually updated and reflected in the Mapping Tool. If overlap is found between updated lands that possess wilderness character and WWEC when developing corridor abstracts, the Agencies should identify the intersections in the corridor abstracts and ensure that their recommendations for corridor revisions address them by adjusting the corridors to eliminate the intersection. Additionally, if the Forest Service is actively revising a land management plan and conducting a wilderness inventory for a national forest when the Agencies are creating corridor abstracts, the Agencies should ensure that the corridor abstracts note that final wilderness recommendations have not yet been made. This will better inform stakeholders and developers when considering potential resource conflicts at the time of development.

**c. Consistently incorporate data across agency planning areas into the Mapping Tool**

The Mapping Tool includes Recreation Opportunity Spectrum, Scenic Integrity, and Visual Quality data for only some national forests. We request that the Agencies ensure that they include this information for all national forests that intersect with a corridor.

**d. Include all the resources and designations in the Conflicts Assessment Table in the Mapping Tool**

We acknowledge and appreciate that the Agencies have improved the Mapping Tool by adding more data layers on environmental concerns. The Agencies should ensure that all of the resources and designations in the Conflicts Assessment Table are also included in the Mapping Tool, including the additional areas listed in Section I.c. of these comments.

**e. Include more information on siting opportunities and challenges on non-federal lands**

For the WWEC to be truly functional, there must be a reasonable basis to assume that all segments of the WWEC, including likely connections across non-federal lands, avoid environmentally sensitive areas to the

maximum extent practicable. While the Agencies do not have the authority to designate WWEC on non-federal lands, they do have the capacity to extend environmental assessments done on federal lands to non-federal lands. In other words, they Agencies can and should analyze whether potential environmental impacts on non-federal lands could be avoided by alternative routes for the WWEC as part of reviewing whether the routes minimize environmental harm. The Restoration Design Energy Project planning process conducted by the Arizona BLM serves as an important precedent and example of how such an assessment can be extended to non-federal lands. The Regions 2-3 corridor abstracts do contain some information on non-federal lands, which we appreciate, but we recommend that the Agencies add more information on potential concerns or conflicts with county land use plans, conservation resources on private lands, and other important considerations on non-federal lands.

## V. The Agencies should maintain a strong public engagement process for the Regional Reviews

A strong public engagement process is crucial for meeting the terms of the Settlement Agreement and for achieving the Agencies' goals for improving the WWEC. The Agencies should maintain the process they have established, which provides multiple opportunities for public engagement in a variety of formats during each Regional Review.[14] This includes maintaining a website with a large amount of information and resources, sending emails with project updates, hosting webinars, providing comment periods on corridor abstracts and Draft Regional Review Reports, and hosting public workshops to gather input on potential corridor revisions.

We appreciate the opportunity to comment and look forward to following up with you.

Sincerely,

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[14] *See the Agencies' website: http://corridoreis.anl.gov/regional-reviews/regions-2-3/*

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**Attachments:**

- Attachment 1: Results of GIS analysis of intersections of WWEC with BLM wilderness-quality lands
- Attachment 2: Results of GIS analysis of intersections of WWEC with USFS wilderness-quality lands

Cc: Jeremy Bluma
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# Attachment 1

| State | Field / District Office | LWC Unit ID | Name | BLM / Citizen / CWP | WWEC Zone ID | Mile posts | New or Previously Designated Corridor | Corridor Width (feet) | Area of overlap (acres) |
|---|---|---|---|---|---|---|---|---|---|
| Arizona | Arizona Strip | NA | Beaver Dam 1 | BLM | 113-116 | 18 - 21 | Previously Designated | 5,280 | 396 |
| Arizona | Arizona Strip | NA | Mokaac Fault | BLM | 113-116 | 44 | Previously Designated | 5,280 | 17 |
| Arizona | Arizona Strip | NA | East Mesa | BLM | 113-116 | 49 - 54 | Previously Designated | 5,280 | 1,305 |
| Arizona | Arizona Strip | NA | Hurricane Cliffs | BLM | 113-116 | 55 | Previously Designated | 5,280 | 182 |
| Arizona | Arizona Strip | NA | Rock Canyon | BLM | 113-116 | 55 - 58 | Previously Designated | 5,280 | 957 |
| Arizona | Lower Sonoran | NA | Yellow Medicine Butte | CWP | 115-238 | 15 | New | 3,500 | 334 |
| Arizona | Lower Sonoran | NA | Face Mountain | CWP | 115-238 | 16 - 21 | New | 3,500 | 1,897 |
| Arizona | Lower Sonoran | NA | Dixie Peak | CWP | 115-238 | 8 - 14 | New | 3,500 | 2,398 |
| Arizona | Tuscon | NA | Tumacacori | CWP | 234-235 | 0 - 11 | New | 3,500 | 1,488 |
| Arizona | Hassayampa | NA | Harquahala WA Addition | CWP | 46-269 | 61 - 64 | Previously Designated | 10,560 | 1,162 |
| Arizona | Hassayampa | NA | Black Butte West | CWP | 46-269 | 77 - 80 | Previously Designated | 10,560 | 1,103 |
| Arizona | Hassayampa | NA | Black Butte East | CWP | 46-269 | 81 | Previously Designated | 10,560 | 223 |
| Arizona | Hassayampa | NA | West Belmont Mountains | CWP | 46-269 | 81 - 85 | Previously Designated | 10,560 | 2,150 |
| Arizona | Hassayampa | NA | East Belmont Mountains | CWP | 46-269 | 91 - 93 | Previously Designated | 10,560 | 1,117 |
| Arizona | Hassayampa | NA | Castle Creek Additions | CWP | 61-207 | 7 -9 | Previously Designated | Variable | 286 |
| Arizona | Hassayampa | NA | Mazatzal additions | CWP | 62-211 | 10 - 13 | Previously Designated | 3,500 | 1,201 |
| Arizona | Safford | NA | Mazatzal Additions | CWP | 62-211 | 27 - 30 | Previously Designated | 3,500 | 11,037 |
| Arizona | Hassayampa | NA | Mazatzal additions | CWP | 62-211 | 28 - 30 | Previously Designated | 3,500 | 294 |
| Arizona | Safford | NA | Hellsgate Additions | CWP | 62-212 | 45 - 49 | Previously Designated | 3,500 | 9,696 |
| Arizona | Safford | AZ-04-063 | Pack Trail | BLM | 81-213 | 142 - 145 | Previously Designated | 3,500 | 1,221 |
| Colorado | White River | CON-050-022 | Coal Oil Gulch | BLM | 126-133 | 13 - 15 | Previously Designated | Variable | 184 |
| Colorado | White River | CON-050-025 | Lower Wolf Creek | BLM | 126-133 | 30 - 38 | Previously Designated | Variable | 2,111 |
| Colorado | White River | CON-050-008 | Ernie Howard Gulch | BLM | 132-133 | 60 - 63 | Previously Designated | Variable | 831 |
| Colorado | White River | CON-050-013 | Blair Mtn/Greasewood | BLM | 132-133 | 72 - 76 | Previously Designated | Variable | 360 |
| Colorado | Little Snake | CON-010-041 | Crooked Wash | BLM | 132-133 | 84 - 93 | New | Variable | 1,655 |
| Colorado | Grand Junction | CON-030-026 | South Shale Ridge | BLM | 132-133 | 6 - 8 | Previously Designated | 26,400 | 623 |
| Colorado | Grand Junction | NA | Little Horsethief Creek | Citizen | 132-136 | 0 - 5 | Previously Designated | 26,400 | 3,933 |
| Colorado | Grand Junction | NA | The Blowout (Palisade) | Citizen | 132-136 | 11 - 17 | Previously Designated | 26,400 | 5,059 |
| Colorado | Grand Junction | NA | Book Cliffs | Citizen | 132-136 | 2 - 3 | Previously Designated | 26,400 | 21 |
| Colorado | Grand Junction | CON-030-026 | South Shale Ridge | BLM | 132-136 | 6 - 8 | Previously Designated | 5,280 | 3 |
| Colorado | Colorado River Valley | NA | Hogback East | Citizen | 132-276 | 42 - 43 | New | 3500 | 19 |
| Colorado | Colorado River Valley | CO-070 | Roan C Northeast Cliffs | BLM | 132-276 | 53 - 54 | New | 3500 | 226 |
| Colorado | Little Snake | CON-010-045 | Little Yampa Canyon | BLM | 133-142 | 7 - 13 | Previously Designated | 3,500 | 300 |
| Colorado | Little Snake | CON-010-047 | Cherokee Draw | BLM | 73-133 | 46 - 47 | Previously Designated | 3,500 | 395 |
| Colorado | Little Snake | CON-010-048 | Big Hole | BLM | 73-133 | 48 - 52 | Previously Designated | 3,500 | 385 |
| Colorado | Little Snake | CON-010-049 | Greasewood Gulch | BLM | 73-133 | 55 - 57 | Previously Designated | 3,500 | 280 |
| Colorado | Gunnison | COS-060-031 | Stubbs Gulch | BLM | 87-277 | 103 - 108 | Previously Designated | 5,280 | 835 |
| Colorado | Gunnison | COS-060-029 | Sugar Creek | BLM | 87-277 | 113 - 114 | Previously Designated | 5,280 | 260 |
| Nevada | Ely | 092-2012 | NA | BLM | 110-114 | 45 | New | 3500 | 451 |
| Nevada | Ely | 01R-12-1-2011 | NA | BLM | 110-233 | 125 - 126 | Previously Designated | 2640 | 916 |
| Nevada | Ely | 0136-1-2011 | NA | BLM | 110-233 | 148 - 152 | Previously Designated | 2640 | 957 |
| Nevada | Ely | NV-040-166-3 | NA | BLM | 110-233 | 61 - 68 | Previously Designated | 2640 | 1043 |
| Nevada | Ely | NV-040-145a-2012 | NA | BLM | 232-233 (E) | 25 - 42 | New | 3500 | 5253 |
| Nevada | Ely | 01R-16-3a-2012 | NA | BLM | 232-233 (E) | 4 | New | 3500 | 108 |
| Nevada | Ely | NV-040-156-4-2012 | NA | BLM | 232-233 (E) | 5 - 14 | New | 3500 | 3258 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Nevada | Ely | 0177-2-2012 | NA | BLM | 232-233 (W) | 15 | Previously Designated | 2640 | 99 |
| Nevada | Ely | 0177-1-2012 | NA | BLM | 232-233 (W) | 15 | Previously Designated | 2640 | 176 |
| Nevada | Ely | 0155-2011 | NA | BLM | 232-233 (W) | 16 - 26 | New | 2640 | 2929 |
| New Mexico | Las Cruces | NA | Point of Rocks | Citizen | 81-272 | 0 - 2 | New | 3500 | 478 |
| New Mexico | Las Cruces | NA | Lordsburg Playas North | CWP | 81-213 | 128 - 132 | New | 3500 | 1,744 |
| New Mexico | Socorro | NA | Magdalena Mountains 1 | CWP | 81-272 | 85 - 91 | New | 3500 | 1,029 |
| New Mexico | Socorro | NA | Chupadera Wilderness Addition | CWP | 81-272 | 85 | New | 3500 | 102 |
| New Mexico | Socorro | NA | Povadera Mountain | CWP | 81-272 | 105 - 108 | New | 3500 | 177 |
| New Mexico | Carlsbad | NA | Mescalero Sands | Citizen | 89-271 | 77 - 78 | New | 3500 | 24 |
| Utah | Cedar City | NA | Central Wah Wah Mtns | Citizen | 110-114 | 123 - 130 | New | 3500 | 2,741 |
| Utah | Cedar City | NA | Central Wah Wah | BLM | 110-114 | 126 - 129 | New | 3500 | 2,153 |
| Utah | Cedar City | NA | North Wah Wah Mtns. | Citizen | 110-114 | 127 - 128 | New | 3500 | 13 |
| Utah | Cedar City | NA | North Wah Wah | BLM | 110-114 | 127 - 129 | New | 3500 | 6 |
| Utah | Fillmore | NA | Mtn. Home Range N. | Citizen | 110-114 | 98 - 101 | New | 3500 | 1,299 |
| Utah | St George | NA | Zion-Hot Desert | BLM | 113-114 | 27 - 28 | Previously Designated | 3500 | 81 |
| Utah | Cedar City | NA | Antelope Range | Citizen | 113-114 | 73 | Previously Designated | 3500 | 0 |
| Utah | St George | NA | Joshua Tree | BLM | 113-116 | 21 - 26 | Previously Designated | 5280 | 852 |
| Utah | Fillmore | NA | Cat Canyon | Citizen | 114-241 | 27 - 28 | New | 3500 | 85 |
| Utah | Fillmore | NA | Little Sage Valley | Citizen | 114-241 | 33 - 37 | New | 3500 | 157 |
| Utah | Fillmore | NA | Cricket Mtn. | Citizen | 114-241 | 48 - 51 | New | 3500 | 322 |
| Utah | Kanab | NA | Upper Kanab Creek | Citizen | 116-206 | 17 - 24 | New | 3500 | 1,580 |
| Utah | Kanab | NA | Upper Kanab Creek | BLM | 116-206 | 17 - 24 | New | 3500 | 1,581 |
| Utah | Kanab | NA | Vermilion Cliffs | BLM | 116-206 | 8 - 12 | New | 3500 | 402 |
| Utah | Kanab | NA | Vermilion Cliffs | Citizen | 116-206 | 8 - 12 | New | 3500 | 409 |
| Utah | Vernal | NA | Split Mtn Benches S. | Citizen | 126-218 | 16 | New | 3500 | 99 |
| Utah | Vernal | NA | Split Mtn. Benches | Citizen | 126-218 | 16 - 19 | New | 3500 | 521 |
| Utah | Vernal | NA | Lower Flaming Gorge | Citizen | 126-218 | 41 - 42 | New | 3500 | 17 |
| Utah | Vernal | NA | Dead Horse Pass | Citizen | 126-218 | 43 - 44 | New | 3500 | 63 |
| Utah | Vernal | NA | Dead Horse Pass | Citizen | 126-218 | 45 - 48 | New | 3500 | 168 |
| Utah | Vernal | NA | Lower Flaming Gorge | Citizen | 126-218 | 46 - 51 | New | 3500 | 336 |
| Utah | Vernal | NA | The Rim Rock | BLM | 126-218 | 5 | New | 3500 | 588 |
| Utah | Vernal | NA | O-Wi-Yu-Kuts | Citizen | 126-218 | 53 - 59 | New | 3500 | 431 |
| Utah | Vernal | NA | Red Creek Badlands | Citizen | 126-218 | 59 - 60 | New | 3500 | 124 |
| Utah | Vernal | NA | Mountain Home | Citizen | 126-218 | 59 - 63 | New | 3500 | 371 |
| Utah | Vernal | NA | Goslin Mountain | Citizen | 126-218 | 64 - 67 | New | 3500 | 415 |
| Utah | Vernal | NA | Goslin Mountain | Citizen | 126-218 | 64 - 67 | New | 3500 | 415 |
| Utah | Moab | NA | Duma Point | Citizen | 66-212 | 117 - 120 | New | Variable | 999 |
| Utah | Moab | NA | Arches Adj 6 | Citizen | 66-212 | 138 | New | Variable | 43 |
| Utah | Moab | NA | Arches | BLM | 66-212 | 138 | New | Variable | 43 |
| Utah | Moab | NA | Goldbar Canyon | Citizen | 66-212 | 141 - 144 | New | Variable | 759 |
| Utah | Moab | NA | Goldbar Canyon | Citizen | 66-212 | 141 - 144 | New | Variable | 759 |
| Utah | Moab | NA | Arches Adj. 7 | Citizen | 66-212 | 142 | New | Variable | 35 |
| Utah | Moab | NA | Goldbar Canyon | BLM | 66-212 | 143 | New | Variable | 40 |
| Utah | Moab | NA | Behind the Rocks | Citizen | 66-212 | 147 - 154 | New | Variable | 532 |
| Utah | Moab | NA | Behind the Rocks | BLM | 66-212 | 148 - 159 | New | Variable | 1,411 |
| Utah | Moab | NA | Mill Creek | Citizen | 66-212 | 149 - 152 | New | Variable | 150 |
| Utah | Moab | NA | Mill Creek Canyon | BLM | 66-212 | 150 - 152 | New | Variable | 69 |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Utah | Moab | NA | Behind the Rocks | Citizen | 66-212 | 154 - 159 | New | Variable | 809 |
| Utah | Moab | NA | Behind the Rocks | Citizen | 66-212 | 154 - 159 | New | Variable | 809 |
| Utah | Moab | NA | Hatch\Lockhart\Hart | Citizen | 66-212 | 165 - 168 | New | Variable | 855 |
| Utah | Price | NA | Price River | BLM | 66-212 | 69 | New | 3500 | 25 |
| Utah | Price | NA | Price River | Citizen | 66-212 | 69 - 80 | New | 3500 | 259 |
| Utah | Price | NA | Price River | Citizen | 66-212 | 69 - 80 | New | 3500 | 259 |
| Utah | Price | NA | Never Sweat Wash | BLM | 66-212 | 79 - 80 | New | 3500 | 93 |
| Utah | Moab | NA | Desolation Canyon | Citizen | 66-212 | 80 - 94 | New | 3500 | 515 |
| Utah | Moab | NA | Desolation Canyon | BLM | 66-212 | 81 - 94 | New | 3500 | 592 |
| Utah | Moab | NA | Lost Spring Canyon | BLM | 66-212 | 89 | New | 3500 | 7 |
| Utah | Price | NA | Lost Spring Wash | Citizen | 66-212 | 89 - 91 | New | 3500 | 46 |
| Utah | Kanab | NA | Paria Canyon Exp. 2 | Citizen | 68-116 | 20 | New | 3500 | 5 |
| Utah | Kanab | NA | Pine Hollow | Citizen | 68-116 | 27 | New | 3500 | 0 |
| Utah | Kanab | NA | Pine Hollow | Citizen | 68-116 | 31 - 37 | New | 3500 | 532 |

# Attachment 2

| State | Forest | Unit ID | Name | Unit Type | WWEC Zone ID | Mile posts | New or Previously Designated Corridor | Corridor Width (feet) | Area of overlap (acres) |
|---|---|---|---|---|---|---|---|---|---|
| Colorado | Arapahoe & Roosevelt | NA | Bard Creek | Colorado Roadless Area | 144-275 | 3 - 4 | New | 500 | 4 |
| Colorado | Arapahoe & Roosevelt | NA | Byers Peak | Colorado Roadless Area | 144-275 | 12 - 14 | New | 900 | 11 |
| Colorado | Pike San Isabel | NA | Sangre de Cristo: Silverheels Gulch to Hunts Creek | Colorado Roadless Area | 87-277 | 52 - 53 | Previously Designated | 3500 | 37 |
| Colorado | Pike San Isabel | NA | Chipeta | Colorado Roadless Area | 87-277 | 68 - 69 | New | 3500 | 144 |
| Arizona | Tonto | 68 | NA | Chapter 70 Wilderness Inventory | 62-211 | 5 - 8 | Previously Designated | 3500 | 596 |
| Arizona | Tonto | 75 | NA | Chapter 70 Wilderness Inventory | 62-211 | 4 - 8 | Previously Designated | 3500 | 829 |
| Arizona | Tonto | 86 | NA | Chapter 70 Wilderness Inventory | 62-211 | 10 - 20 | Previously Designated | 3500 | 3,243 |
| Arizona | Tonto | 92 | NA | Chapter 70 Wilderness Inventory | 62-211 | 26 | Previously Designated | 3500 | 25 |
| Arizona | Tonto | 96 | NA | Chapter 70 Wilderness Inventory | 62-211 | 9 - 14 | Previously Designated | 3500 | 1,367 |
| Arizona | Tonto | 97 | NA | Chapter 70 Wilderness Inventory | 62-211 | 21 - 30 | Previously Designated | 3500 | 967 |
| Arizona | Tonto | 102 | NA | Chapter 70 Wilderness Inventory | 62-211 | 36 | Previously Designated | 3500 | 198 |
| Arizona | Tonto | 104 | NA | Chapter 70 Wilderness Inventory | 62-211 | 28 - 30 | Previously Designated | 3500 | 298 |
| Arizona | Tonto | 112 | NA | Chapter 70 Wilderness Inventory | 62-211 | 36 - 49 | Previously Designated | 3500 | 1,454 |
| Arizona | Tonto | 113 | NA | Chapter 70 Wilderness Inventory | 62-211 | 41 - 49 | Previously Designated | 3500 | 1,045 |
| Arizona | Tonto | 127 | NA | Chapter 70 Wilderness Inventory | 62-211 | 58 - 60 | Previously Designated | 3500 | 56 |
| Arizona | Tonto | 134 | NA | Chapter 70 Wilderness Inventory | 62-211 | 57 - 60 | Previously Designated | 3500 | 639 |
| Utah | Uinta | 418017 | NA | Inventoried Roadless Area (IRA) | 62-259 | 1 - 5 | New | Variable | 1 |

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10159]
**Date:** Friday, February 23, 2018 5:21:18 PM

Thank you for your input, George Dennis.

The comment tracking number that has been assigned to your comment is **10159**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 17:21:07 CST

**First Name:** George
**Last Name:** Dennis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** US Fish and Wildlife Service - New Mexico Field Office

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

81-213 [blank, blank]

**Input**

Please include the Chihuahua scurfpea in the species analysis.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10160]
**Date:** Friday, February 23, 2018 5:33:29 PM

---

Thank you for your input, George Dennis.

The comment tracking number that has been assigned to your comment is **10160**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 17:33:03 CST

**First Name:** George
**Last Name:** Dennis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** US Fish and Wildlife Service - New Mexico Field Office

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

For corridors in New Mexico please use our IPAC system https://ecos.fws.gov/ipac/ to obtain a complete list of federally listed species for environmental review.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10161]
**Date:** Friday, February 23, 2018 5:35:11 PM

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Thank you for your input, George Dennis.

The comment tracking number that has been assigned to your comment is **10161**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 17:34:48 CST

**First Name:** George
**Last Name:** Dennis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** US Fish and Wildlife Service - New Mexico Field Office

**Topics**
Jurisdiction

**Geographic Area**
General (not corridor-specific)

**Input**

Why is not FERC the lead Federal agency?

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10162]
**Date:** Friday, February 23, 2018 5:38:13 PM

---

Thank you for your input, George Dennis.

The comment tracking number that has been assigned to your comment is **10162**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 17:37:59 CST

**First Name:** George
**Last Name:** Dennis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** US Fish and Wildlife Service - New Mexico Field Office

**Topics**
Ecological resources

**Geographic Area**
General (not corridor-specific)

**Input**

Corridor environmental review should be done as a whole and not piecemeal as might be suggested by the segmented nature of the corridors.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10163]
**Date:** Friday, February 23, 2018 5:40:43 PM

---

Thank you for your input, George Dennis.

The comment tracking number that has been assigned to your comment is **10163**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 17:40:27 CST

**First Name:** George
**Last Name:** Dennis
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** US Fish and Wildlife Service - New Mexico Field Office

**Topics**
Ecological resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Impacts to Mexican spotted owls and to the Wright's marsh thistle should be analyzed on a finer scale in New Mexico.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10164]
**Date:** Friday, February 23, 2018 6:54:55 PM
**Attachments:** ID_10164_GMUG_368_Comment_Map.pdf

---

Thank you for your input, Jason Armbruster.

The comment tracking number that has been assigned to your comment is **10164**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 23, 2018 18:54:02 CST

**First Name:** Jason
**Last Name:** Armbruster
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Grand Mesa, Uncompahgre and Gunnison National Forests

**Topics**
Energy Planning Opportunities
Energy Planning Issues
Existing infrastructure/available space

**Geographic Area**
Regions 2 & 3 > New Region 2 & 3 Corridor Opportunities

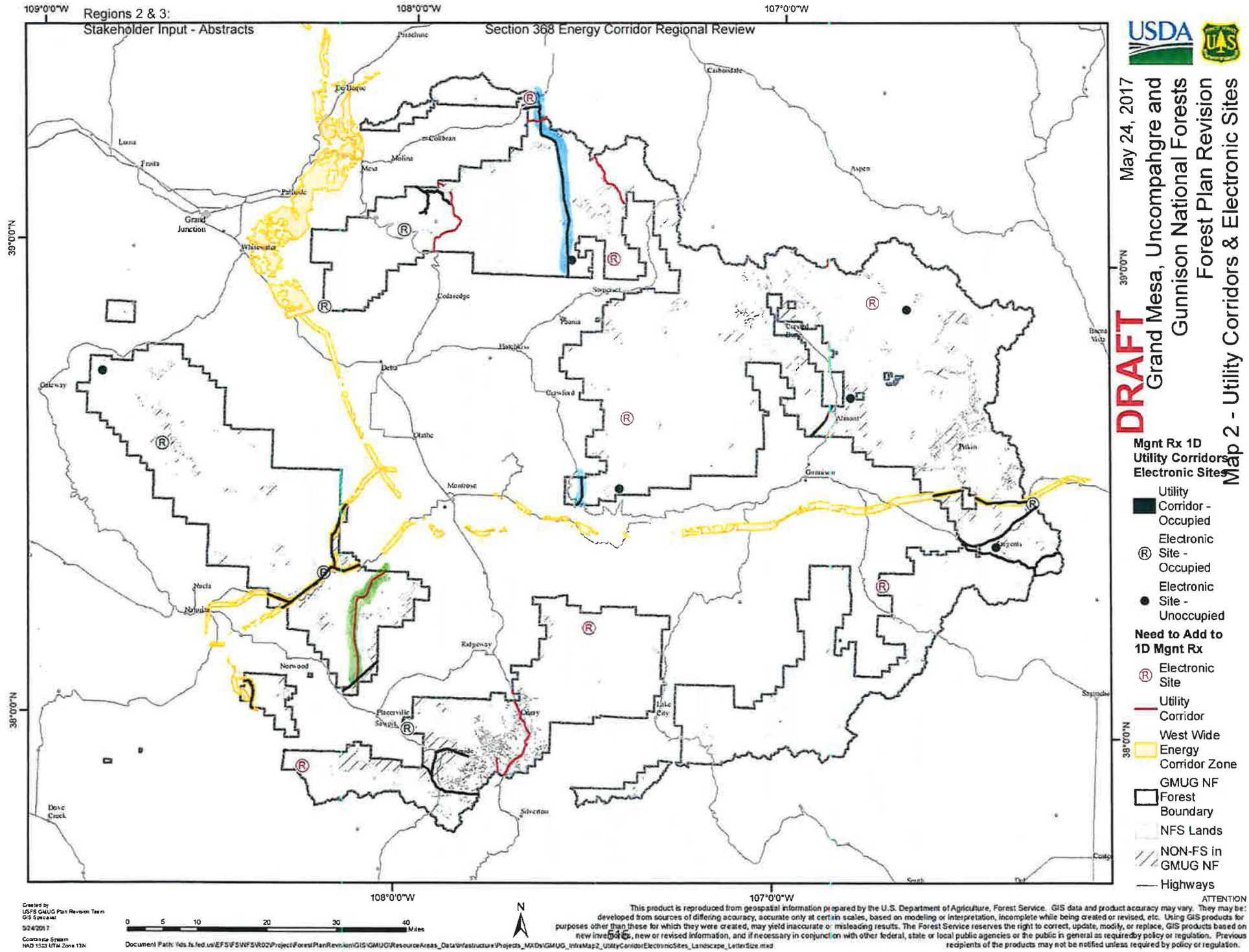
**Input**

This process should evaluate whether new sec. 368 corridors should be designated along the existing Rifle-Curecanti 230-kV line (GMUG NF sections highlighted in blue on the attached map) and along an existing WAPA 345-kV line that crosses the Uncompahgre Plateau(GMUG NF section highlighted in green on the attached map).

**Attachments**

GMUG_368_Comment_Map.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov




Created by
USFS GMUG Plan Revision Team
GIS Specialist

5/24/2017

Coordinate System
NAD 1983 UTM Zone 13N

0 5 10 20 30 40 Miles

N

Document Path: \\ds.fs.fed.us\EFS\FS\WFS\R02\Project\ForestPlanRevision\GIS\GMUG\ResourceAreas_Data\Infrastructure\Projects_MXDs\GMUG_InfraMap2_UtilityCorridorElectronicSites_Landscape_LetterSize.mxd

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| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10165] |
| **Date:** | Saturday, February 24, 2018 10:13:56 AM |
| **Attachments:** | ID_10165_20180224NTHPCommentsonR2and3abstractsforWWEC.pdf |

Thank you for your input, Brian Turner.

The comment tracking number that has been assigned to your comment is **10165**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 10:13:44 CST

**First Name:** Brian
**Last Name:** Turner
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** National Trust for Historic Preservation

**Topics**
Cultural resources
Tribal concerns
Visual resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

[Blank]

**Attachments**

2018 02 24 NTHP Comments on R2and3 abstracts for WWEC.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

National Trust *for*
Historic Preservation
*Save the past. Enrich the future.*

February 24, 2018

Tim Spisak, Acting Ass't Director
Energy, Minerals, and Realty Management
Bureau of Land Management (BLM)

Reggie Woodruff, Energy Program Manager
Washington Office Lands & Realty Management
U.S. Forest Service (USFS)

Brian Mills, Senior Planning Advisor
U.S. Department of Energy (DOE)

Via upload to: http://corridoreis.anl.gov/involve/stakeholder-input/
and email to blm_wo_368corridors@blm.gov

Re: **Comments on Corridor Abstracts for Section 368 West-wide Energy Corridors Regions 2-3 Regional Review**

Dear Mr. Spisak, Mr. Woodruff, and Mr. Mills,

Thank you for the opportunity to comment on the energy corridor abstracts for Regions 2 and 3 of the Section 368 West-wide Energy Corridors (WWEC). We support the coordination by BLM, DOE and USFS ("Agencies") on efforts to meet the terms of the 2012 Settlement Agreement with co-plaintiffs, including the National Trust for Historic Preservation. The abstracts are a critical component of stakeholder engagement in the Regional Reviews of the energy corridors. These reviews will guide the Agencies' development of recommendations for specific corridor additions, deletions, or alterations. We support the comments filed by the Wilderness Society, et al., on February 23, 2018, and we submit these additional comments to raise specific concerns regarding the potential adverse impacts of the proposed corridor designation on historic and cultural resources.

The National Trust acknowledges the important policy goals to be achieved through efficient transmission and distribution of energy, and through the advance identification of corridors where the risk of harm to sensitive resources can be reduced. However, we also acknowledge that the intensity of development expected within the designated corridors may have adverse effects on a wide variety of significant cultural and historic resources that tell the story of the American West. The examination of alternatives to harmful impacts is fundamental to the Agencies' review under the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

**The Proposed Criteria for Conflict Assessment Are Not Adequate to Ensure Compliance with the National Historic Preservation Act**

Section 106 of the NHPA requires that all federal agencies "take into account" the effects of their actions on "any historic property." 54 U.S.C. § 306108. Historic properties are specifically defined to embrace not just those listed or included on the National Register of Historic Places, but those "eligible" for the National Register as well. *Id.* § 300308; 36 C.F.R. § 800.16(*l*).

The conflict assessment criteria used by the Agencies are not consistent with these requirements under the NHPA. The table outlining the criteria cites as a "medium potential conflict" those areas where project development may adversely affect resources "listed" in the National Register of Historic Places. (*See* http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf, at

**San Francisco Field Office**
25 Taylor Street, San Francisco, CA 94102
E info@savingplaces.org P 415.947.0692 F 415.947.0699 **www.SavingPlaces.org**

p.2). None of the criteria address potential effects on resources *eligible* for the National Register.[1]

As a practical matter, the number of sites eligible for the National Register is substantially greater than the number of listed sites, and many are already documented and known to the Agencies and the State and Tribal Historic Preservation Officers, from prior survey work and project reviews. National Register listing does not reflect a higher level of significance than National Register eligibility, because the criteria are identical. In our view, the failure to include any consideration of National Register-eligible historic resources fails to satisfy the Agencies' responsibilities under the NHPA.

For example, in the abstract for Corridor 68-116, which traverses BLM's Kanab Field Office in Utah,[2] the GIS analysis indicates that National Register-eligible cultural resource sites are present within the corridor, between Mileposts 10 and 20. (Abstract at p.7.) However, the map in Figure 3 indicates "No Conflict Identified" for this segment of the corridor (*Id.* at p.5.) The agency review and analysis also contains an assumption that all of the historic properties could be "mitigated through the Section 106 Process" (*Id.* at p.7.) This assumption is unsubstantiated.

**Specific Historic Resources Identified in the Abstracts**

The Region 2 and 3 abstracts include 53 proposed energy corridors situated in Arizona, Colorado, Nevada, New Mexico, and Utah. They are a useful guide for flagging potential conflicts between corridor designation and baseline environmental conditions. And they include a wide variety of cultural resources across the region that should be considered during the agencies' forthcoming reviews under NEPA and NHPA. We appreciate the Agencies' efforts to gain input about these sites and the potential effects that might occur as a result of development within the corridors.

The following is a specific and non-exhaustive list of historic resources within the planning area that are referenced in the abstracts:

**Old Spanish National Historic Trail** (acknowledged in abstracts 113-116 and 66-212, proposed for avoidance in revised 116-206, *not acknowledged in abstract for 39-113*).

**Heritage Highway 89** in Utah (116-206). This resource is acknowledged as a "visual resource" in the abstract based on its "[s]ignificant national and regional scenic values."

**Frisco Charcoal Kilns** in Utah (110-114). The kilns, which date to 1877, are listed on the National Register of Historic Places and are within ½ mile of the corridor. The entire area is referred to in Exhibit A of Settlement as "much undisturbed." The National Register nomination for the kilns describes them as "among the few remaining charcoal kilns in the state of Utah that retain much of their visual integrity."

---

[1] We recognize that the reference to National Register-listed properties is adopted from the new BLM regulations on prioritizing applications for solar and wind energy projects, 43 C.F.R. § 2804.35(b)(4) (Dec. 19, 2016). However, that does not make it consistent with the NHPA.

[2] Corridor 68-116 was listed in Exhibit A to the 2012 Settlement Agreement as one of the "corridors identified by plaintiffs as having specific environmental issues," because of its potential adverse impact on the Grand Staircase-Escalante National Monument. Although President Trump has attempted to substantially reduce the size of the National Monument, through Proclamation No. 9682 (Dec. 4, 2017), the President's action has been challenged as unlawful in pending federal lawsuits. *See Wilderness Society v. Trump,* No. 1:17-cv-02587-TSC (D.D.C., filed Dec. 4, 2017); *Grand Staircase Escalante Monument Partners v. Trump,* No. 1:17-cv-02591-TSC (D.D.C., filed Dec. 5, 2017). In any event, the significant resources and objects within the original National Monument, such as the Hole in the Rock Trail, remain subject to potential adverse effects from the siting of infrastructure within the proposed corridor.

**Browns Bench** in Nevada (111-226). This area is near to an obsidian source and is known to have a high density of cultural resources.

**Mountain Meadows Massacre Site National Historic Landmark (NHL)** in Utah (113-114): The abstract acknowledges this potential conflict and suggests that because of existing infrastructure in the area the "corridor may not be able to accommodate additional future development." The Agencies have added responsibilities to NHLs under Section 110(f) of the National Historic Preservation Act "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark" (54 U.S.C. § 306107).

**Ute Tribe's Bear Dance site** (126-258): The site in Randlett, Utah is used annually for the Ute Tribe's Bear Dance. Section 106 at the project level stage will be critical for avoiding harmful impacts to this important cultural activity.

**Silesca Ranger Station** in Colorado (134-139): This site is listed on the National Register of Historic Places. It is a Civilian Conservation Corps-constructed facility currently in the cabin rental program in the Uncompahgre National Forest. We appreciate the Agencies' acknowledgment that there is an opportunity to consider a corridor revision to narrow the width of the corridor to avoid this property. We urge the Agencies to do so.

**Rock Creek Stage Station** in Colorado (144-275): The Rock Creek Stage Station is listed on the National Register of Historic Places. It was built in 1880 and recently underwent stabilization efforts through funding from the Colorado State Historical Fund. The Agencies refer to the Station as "likely the property referred to in Exhibit A of the Settlement Agreement." We appreciate the Agencies' acknowledgment that there is an opportunity to consider adjusting the corridor to avoid the resource. We urge this adjustment, rather than reliance on the Section 106 process at a later stage, as also suggested by the abstract.

**Sheep Mountain Range Archaeological District** in Nevada (37-232): The abstract acknowledges that the corridor is within one mile of the boundary of this site, listed on the National Register of Historic Places since 1974. It is also anticipated that in the near future the boundaries of the designation will be expanded in recognition of its significance as a Traditional Cultural Property for the Nuwuvi People (Southern Paiute Native American Tribe).

**Other Areas with High Densities of Cultural Resources**

- **BLM's Wells Field Office** in Nevada reports a high concentration of sensitive cultural resources (17-35), such as prehistoric sites and Traditional Cultural Properties. The abstract acknowledges other resources in Elko, Nevada, such as the Elko County Courthouse, the local historic Post Office, and the Ruby Valley Pony Express Station. The abstract acknowledges that conflicts are "likely," but comments that they are "outside of agency jurisdiction." However, the Agencies are required to consider reasonably foreseeable development that results from corridor designation, even if the Agencies do not have direct "jurisdiction" over the impacts. Adverse effects include "reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative." 36 C.F.R. § 800.5(a)(1). Cumulative effects include "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7.

- **Archaeology in the Coronado National Forest** (234-235), **Kaibab National Forests** (47-68), **Prescott National Forest** (61-207), and **BLM Carlsbad Field Office** (89-271). The recommendation in the abstract for corridor 89-271 should apply to other corridors with high known site densities: "The entire corridor would need a Class III cultural resources inventory to identify sites that would be impacted from future development in the corridor."

- **Traditional Cultural Properties in the Tonto National Forest** in Arizona (62-211). We appreciate the Agencies' comment that there may be an opportunity to consider shifting the corridor to the existing power line ROW that runs parallel to the corridor. If the existing ROW is not wide enough, there is an opportunity to consider shifting the designated energy corridor further to the east, rather than the west, where there are potentially fewer conflicts with cultural resources.

Thank you for the opportunity to comment, we look forward to continued engagement as the Agencies' review process for the WWEC continues.

Sincerely,

Brian R. Turner
Senior Field Officer & Public Lands Attorney

Elizabeth S. Merritt
Deputy General Counsel

cc: Nancy Brown, Chris Daniel, Chris Wilson, Tom McCulloch, and Reid Nelson, Advisory Council on Historic Preservation
Ranel Stephenson Capron, Federal Preservation Officer, BLM
Doug Stephens, Acting Federal Preservation Officer, U.S. Forest Service
Dr. Eric W. Boyle, Federal Preservation Officer, U.S. Department of Energy
Erik Hein, National Conference of State Historic Preservation Officers
Bambi Kraus, National Association of Tribal Historic Preservation Officers

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10166]
**Date:** Saturday, February 24, 2018 12:34:08 PM
**Attachments:** ID_10166_ASNFnorthernendofSection368corridor.pdf

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10166**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 12:33:43 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Opportunities
Cultural resources
Ecological resources
Hydrological resources
Lands with wilderness characteristics
Public access and recreation
Specially designated areas
Tribal concerns
Visual resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

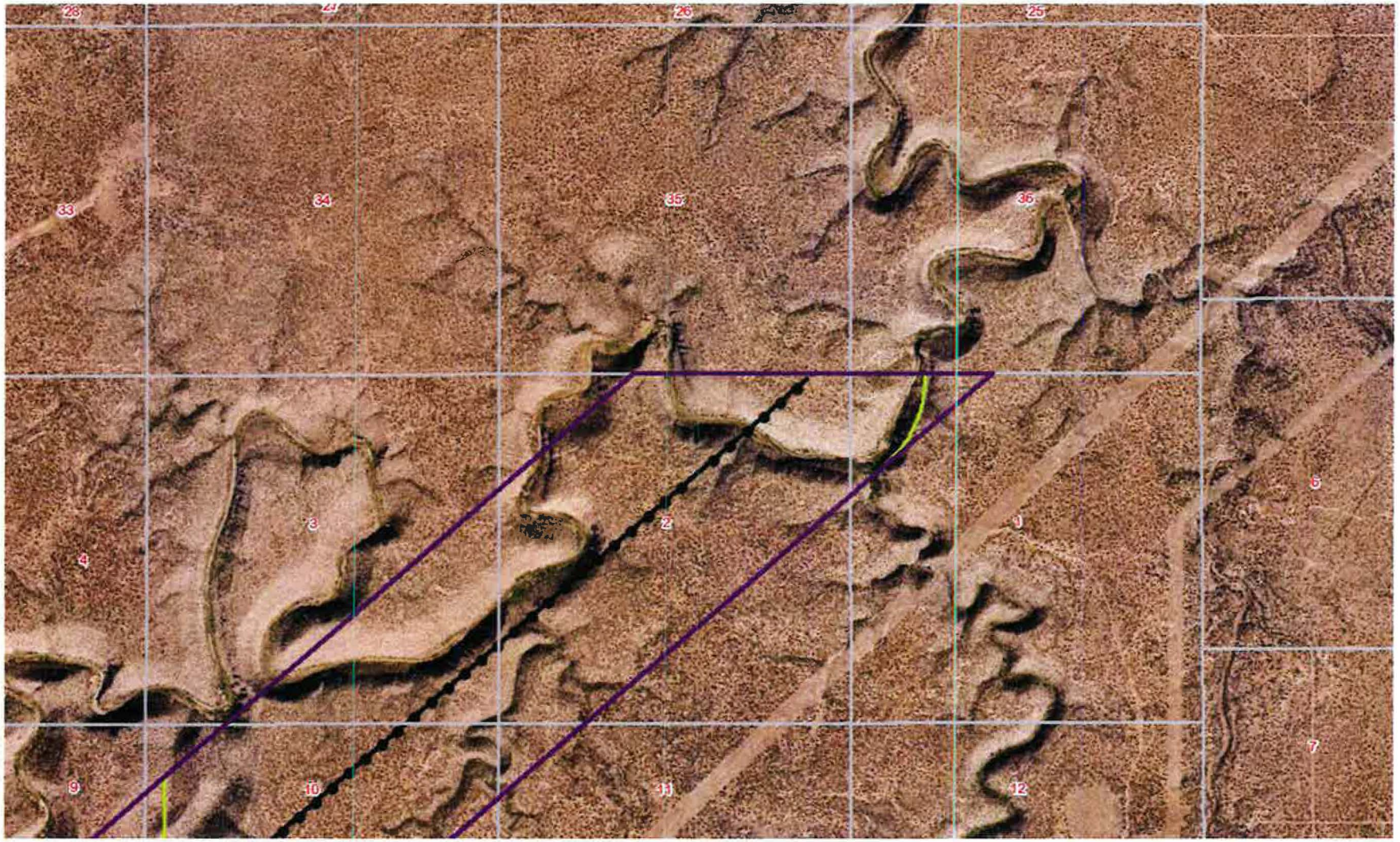
We were not given enough time to review the Section 368 Corridor 62-211 before our comments to the presented abstract were due. I am therefore taking this opportunity to make additional comments. Let's start with the northern section between MP 80 and 86.8. In reviewing the data provided on the website and comparing it with geospatial data available through the Forest Service, the existing energy corridors are misplotted on the website's maps. This may give the public the wrong impression if not corrected. Additionally, the website's geospatial data provided for this part of the corridor appears to have been a buffered line ending at the ASNF boundary and did not take into account the corridor being extended into BLM lands to the north, so part of the corridor appears to have been cut off by the buffered line. Attached is a map showing this possible error, plus the locations of the existing powerlines, and the steep canyon for which the 368 corridor passes over; I can't stress enough that you really, really need to consider following the existing corridors rather than the corridor as plotted. There are too many natural, biological, scenic, recreational, and cultural resources that will be adversely affected by constructing the corridor as plotted. I am not going to go into detail here, because the resource I manage is sensitive, but I would be happy to meet with you

and discuss options that would better address your purpose and need. Thank you. More to come.

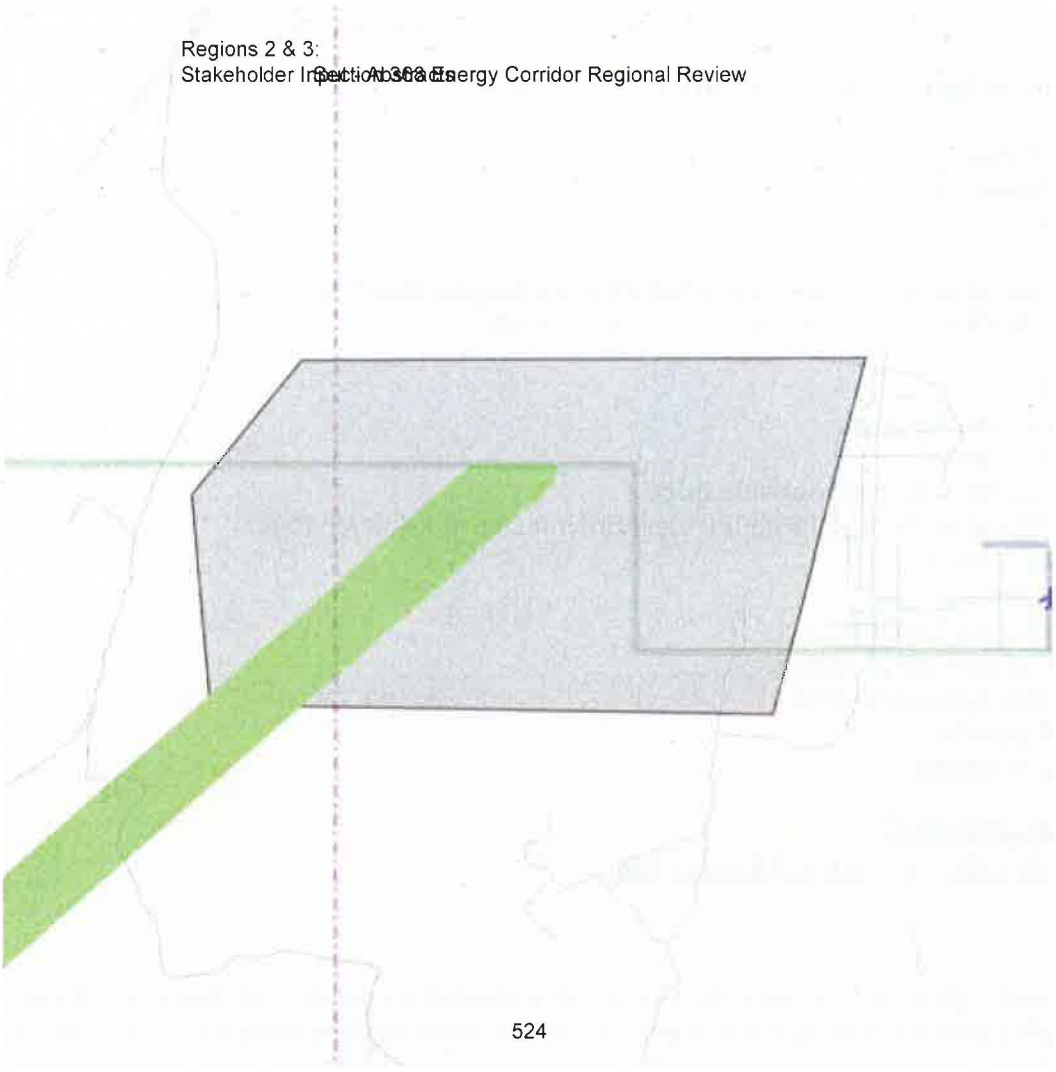
**Attachments**

ASNF northern end of Section 368 corridor.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov




ASNF northern end of Section 368 Powerline. Centerline is represented by the 'powerline' symbol; website boundary is in light green, upper right. Modified boundary by ASNF cultural resources staff is in purple. Note that the existing energy corridors on the web page do not match what shows up on NAIP imagery. Also note that the centerline of the 368 corridor is adjacent to or crosses a steep canyon in several places and the existing Cholla corridor avoids those areas. Constructing the corridor as shown in this map will have adverse effects to biological, recreational, visual, cultural, and other resources. It is highly recommended that the 368 corridor be moved to the centerline or adjacent and to the east of the existing energy corridor; otherwise construction of this corridor will be cost-prohibitive and will impact resources that could otherwise be avoided. EM 2/24/18



**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10167]
**Date:** Saturday, February 24, 2018 12:55:47 PM
**Attachments:** ID_10167_ASNFsPhoto2.pdf

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Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10167**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 12:55:25 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Physical barrier
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Public access and recreation
Specially designated areas
Tribal concerns
Visual resources

**Geographic Area**
Area selected via Corridor Mapping Tool

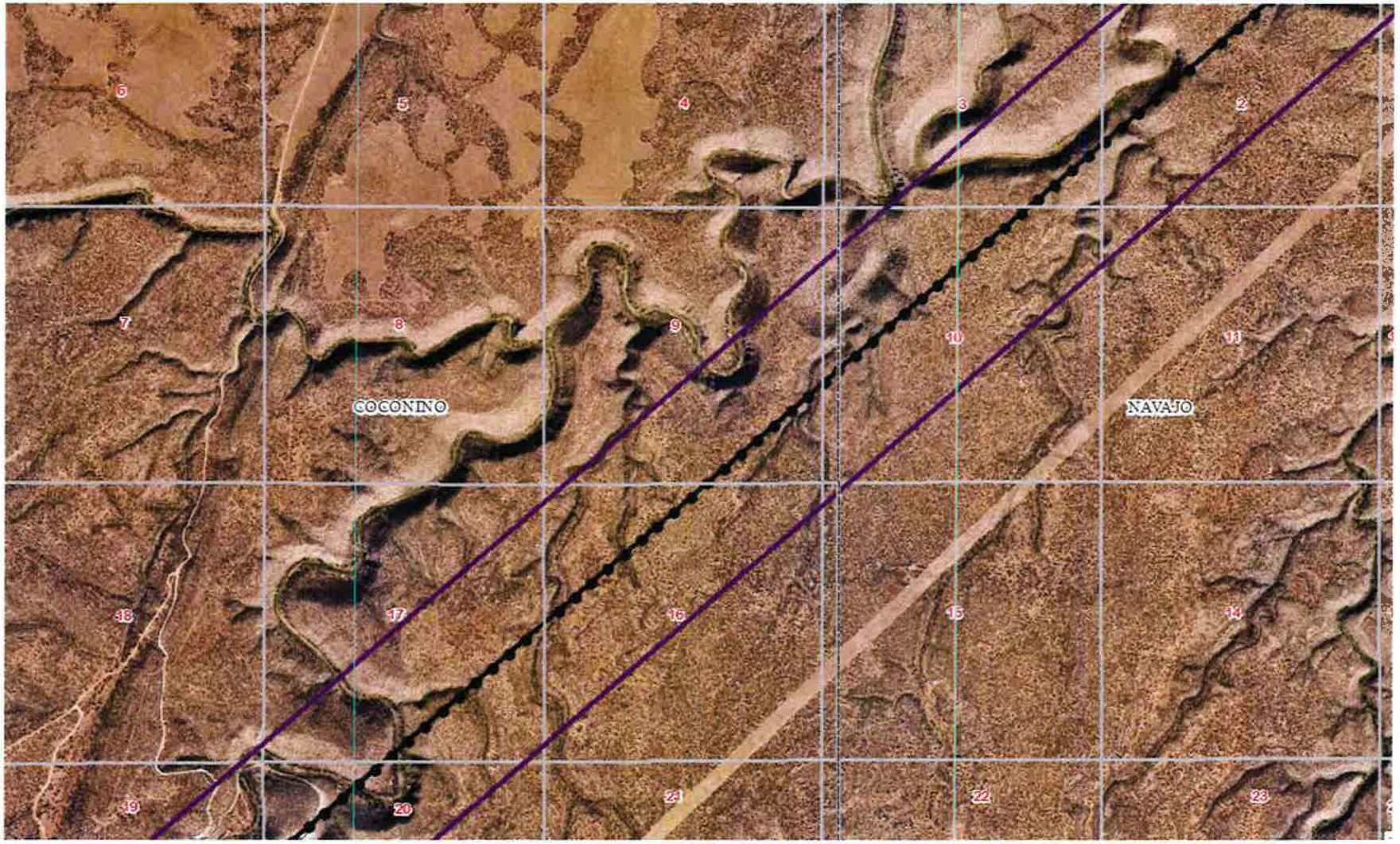
**Input**

Attached is photo 2, heading to the southwest, towards the Tonto/ASNFs boundary. I will provide photos of each section as I move to the southwest to demonstrate why the existing Cholla line should be the location of the centerline of the energy corridor instead of where it is currently digitized. Again, in this photo, the centerline of the 368 corridor is the powerline symbol; the corridor is outlined in purple. The existing Cholla line is to the south. The Coconino/Navajo county line is shown in this photo as well. As mentioned with Photo 1, the corridor is too close to Chevelon Canyon, a special place with a lot of special resources, which I would be happy to discuss over the phone or in person. Thank you.

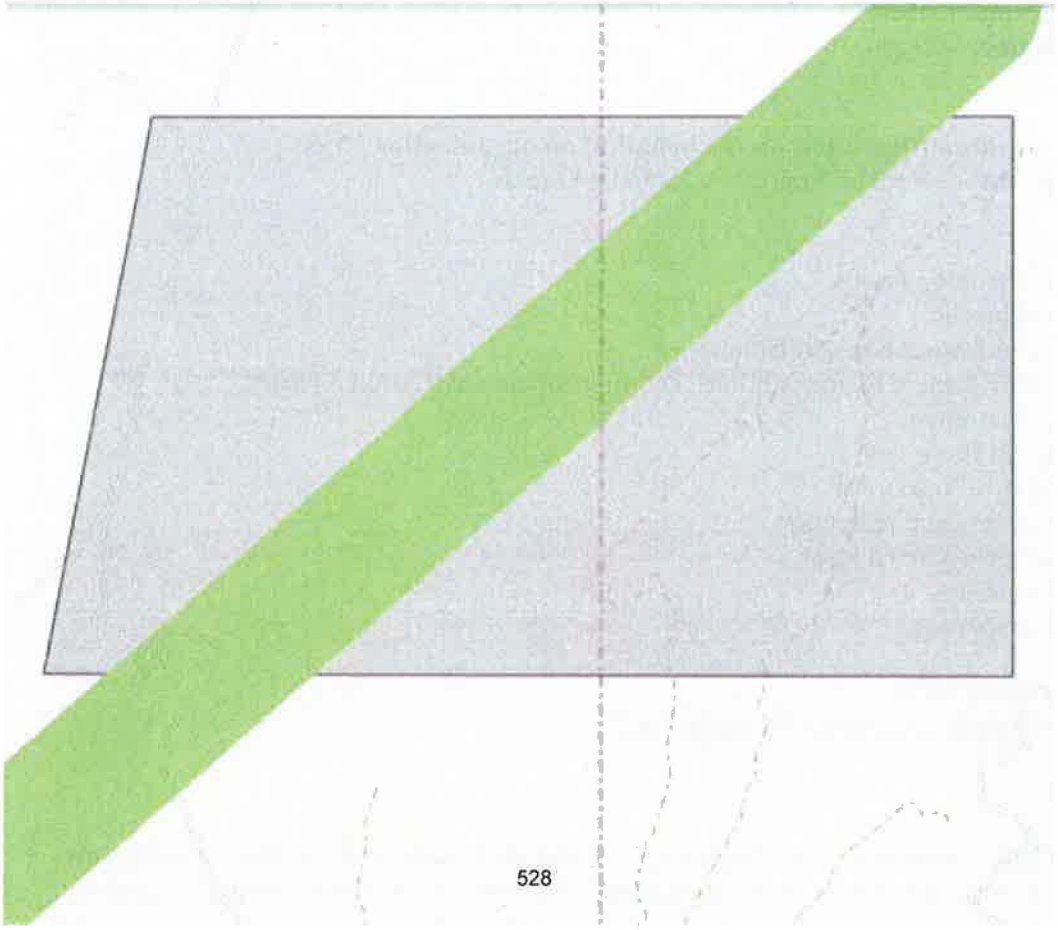
**Attachments**

ASNFs Photo 2.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov




ASNFs Photo 2 showing the location of the 368 energy corridor in relation to the existing Cholla powerline. Note that the energy corridor is again overlying a steep canyon with numerous special biological, cultural, recreational, and other resources. This is an area that is also popular recreation area. The centerline over the existing Cholla line would be a much better place to consider for the energy corridor – less impacts, and less expensive. EM 2/24/18



| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10168] |
| **Date:** | Saturday, February 24, 2018 1:16:26 PM |
| **Attachments:** | ID_10168_Photo3MP8182ChevelonCrossing.pdf |

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10168**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 13:16:12 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Physical barrier
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Public access and recreation
Specially designated areas
Tribal concerns
Visual resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

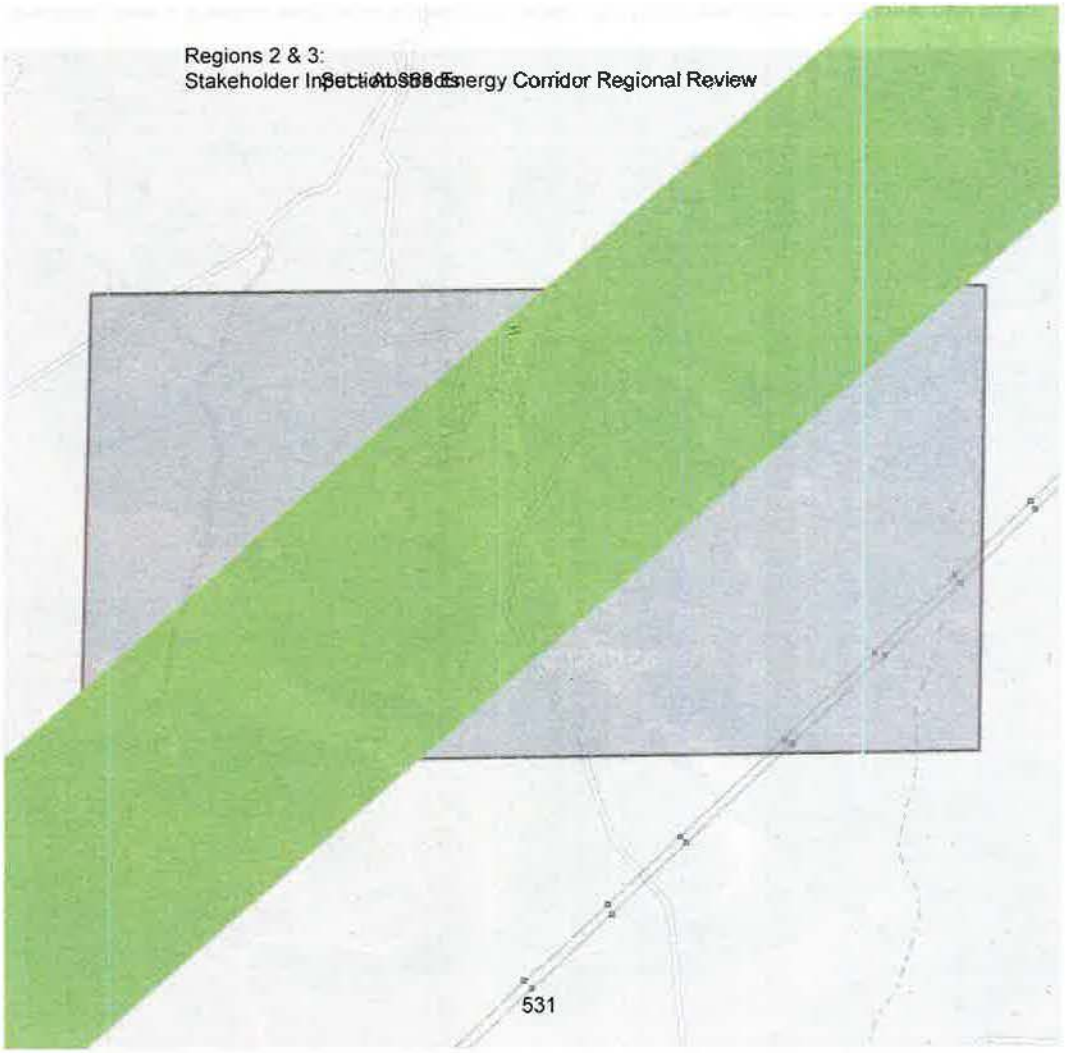
Admittedly, when I saw the 368 energy corridor digitized over Chevelon Crossing, my reaction was, "you've got to be kidding me". Seriously, Chevelon Crossing is a popular recreation area that has a popular campground and trailhead and many unique resources. Apologies for sounding unprofessional and not to or begrudge whomever was tasked to digitize the corridor during the initial NEPA process, but I have to humbly ask if any thought was put into this entire corridor, since it goes over some of the Sitgreaves' most significant and sensitive resources? Again, a better location would be along the Cholla line. Thank you.

**Attachments**

Photo 3, MP 81-82, Chevelon Crossing.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Photo 3. Chevelon Crossing area. In this photo, there is a popular trailhead at the lower left corner. The Cholla powerline is in the lower right corner. The centerline of the corridor goes directly over the 504 road, a popular road used by the public. Chevelon Crossing CG, also popular, is located within the corridor, in the NE ¼ of the NE ¼ or Section 19. Chevelon Canyon is one of the few perennial water courses on the Sitgreaves National Forest. This likely one of the reasons why the Cholla line was not constructed over the canyon.


531

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10169]
**Date:** Saturday, February 24, 2018 2:10:44 PM
**Attachments:** ID_10169_Map4betweenMileposts77and81.pdf

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Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10169**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 14:10:28 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Physical barrier
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Public access and recreation
Soils/erosion
Tribal concerns
Visual resources
Interagency Operating Procedures

**Geographic Area**
Area selected via Corridor Mapping Tool

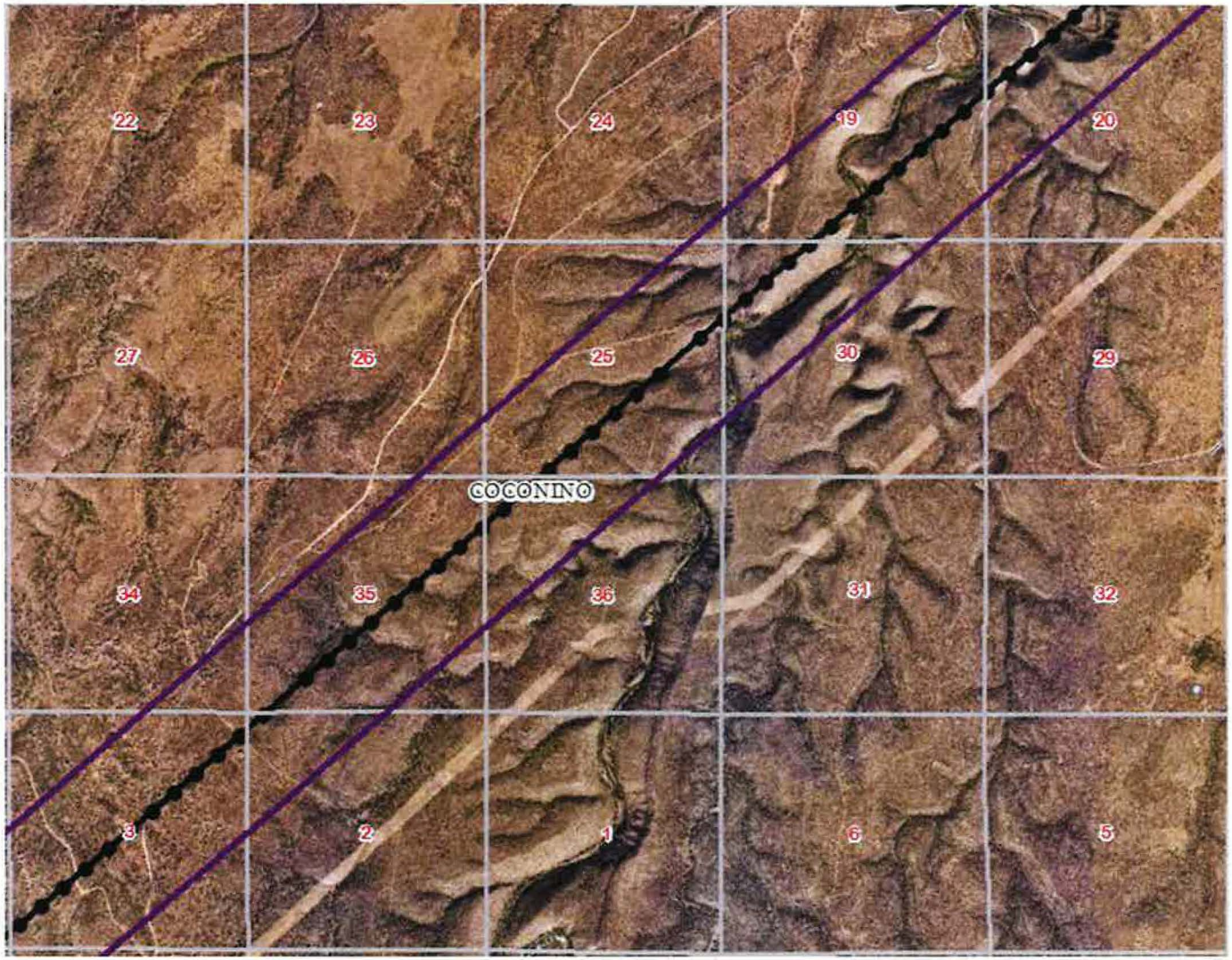
**Input**

Attached is Map 4 between Mileposts 77 and 81. This map shows where the 368 corridor crosses Chevelon Crossing (extreme northern end of map) and trends west of Chevelon Canyon. The Cholla line is on the east side. It crosses Chevelon Canyon once rather than several times. There is a mention of constructing the corridor under intermittent streams in .025 and .026 of the abstract; however, Chevelon Canyon is not an intermittent stream. Constructing the corridor over Chevelon Canyon and mitigation would be cost-prohibitive and have too many adverse effects on too many resources. Besides what I have mentioned in the previous comments, managing the timber and other resources between the two corridors will be a royal headache. Take into consideration wildfires - if we have another Rodeo-Chediski or Wallow Fire, how will we be able to affectively protect both energy corridors with an island of vegetation in-between?

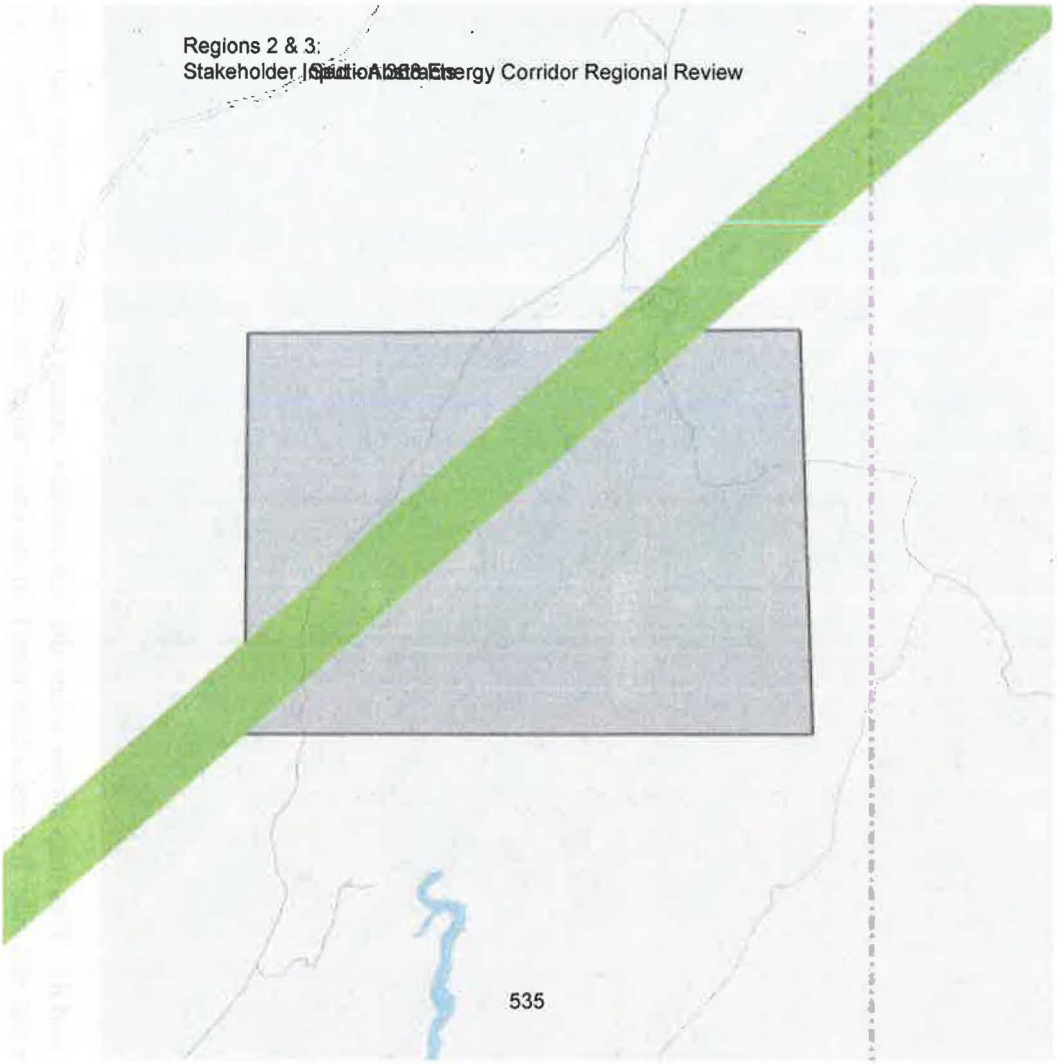
**Attachments**

Map 4 between Mileposts 77 and 81.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov




Map 4 between Mileposts 77 and 81. This map shows where the 368 corridor crosses Chevelon Crossing and trends west of Chevelon Canyon. The Cholla line is on the east side. It crosses Chevelon Canyon once rather than several times. There is a mention of constructing the corridor under intermittent streams in .025 and .026 of the abstract; however, Chevelon Canyon is not an intermittent stream. Constructing the corridor over Chevelon Canyon and mitigation would be cost-prohibitive and have too many adverse effects on too many resources.



**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10170]
**Date:** Saturday, February 24, 2018 2:26:52 PM
**Attachments:** ID_10170_Photo5MP7275.pdf

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Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10170**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 14:26:06 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Soils/erosion
Tribal concerns
Visual resources
Interagency Operating Procedures

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

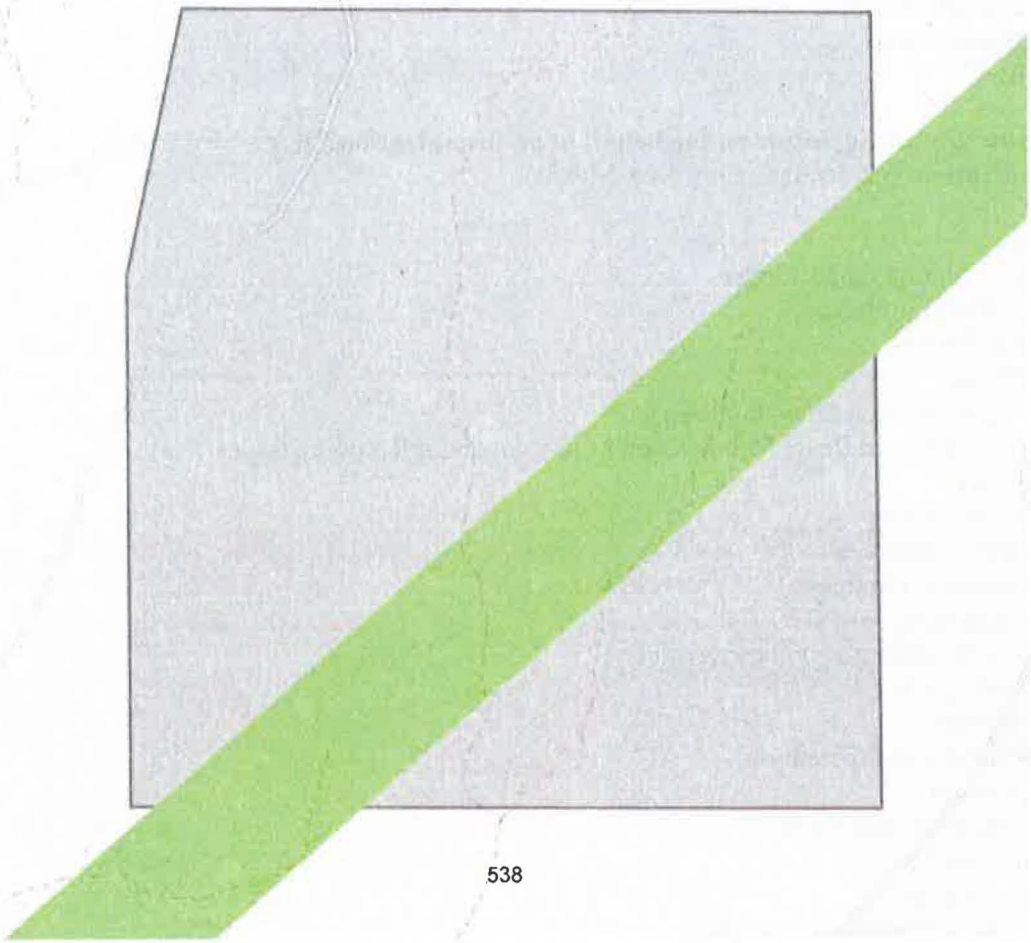
Photo 5 is of the 368 Corridor between MP 72 and 75. Private land is shown in gray in the lower left corner; the Cholla line is on the east side of the 368 corridor. Issues with karst features, hydrology, and sedimentation - among others here. If the corridor was placed at the existing Cholla corridor, the amount of impacts with the removal of less vegetation may reduce issues with sedimentation.

**Attachments**

Photo 5 MP 72-75.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Photo 5. 368 Corridor between MP 72 and 75. Private land is shown in gray in the lower left corner; the Cholla line is on the east side of the 368 corridor. Issues with karst features, hydrology, and sedimentation here.



**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10171]
**Date:** Saturday, February 24, 2018 2:48:58 PM
**Attachments:** ID_10171_WestwideEnergyCorridor.pdf

Thank you for your input, Dianne Maes.

The comment tracking number that has been assigned to your comment is **10171**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 14:48:44 CST

**First Name:** Dianne
**Last Name:** Maes
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Sandoval County New Mexico

**Topics**
Energy Planning Opportunities
Energy Planning Issues
Physical barrier
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Air quality
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Livestock grazing
Paleontology
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources
Interagency Operating Procedures

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

80-273 [blank, blank]

**Input**

[Blank]

## Attachments

Westwide Energy Corridor.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

SANDOVAL COUNTY ADMINISTRATIVE OFFICES

BOARD OF COUNTY COMMISSIONERS

DAVID J. HEIL
District 4, Chairman

F. KENNETH EICHWALD
District 5, Vice Chairman

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JAY C. BLOCK
District 2

DON G. CHAPMAN
District 3

DIANNE MAES
County Manager

February 23, 2018

Westwide Energy Corridor

Request for extension of comment period to allow more in depth comments

To Whom it May Concern,

1. Sandoval County requests an extension of the comment period to allow preparation of more in-depth comments after a thorough review by county planning, development and land use specialists.

2. Our local office of the Bureau of Land Management, the Rio Puerco Field Office, recently drafted a revision of the current Resource Management Plan (RMP), and Sandoval County filed for cooperating agency status.

3. For the RMP planning process, Sandoval County will be providing information regarding County transportation routes and other rights-of- way corridors, including the siting and location of existing, as well as potential energy corridors.

4. Based upon our quick review of the PEIS data, some of the existing pipeline corridors may be compatible with Sandoval County Planning; however, the new energy corridor, as proposed, does not take into account even existing land uses, much less proposed land uses and does not seem to consider traffic congestion, potential hazards with traffic volume, the "pinch" point problems with tribal lands, and overall public safety, etc.

5. It is Sandoval County's contention that once completed, the Rio Puerco RMP/EIS will designate transportation routes and rights-of-way corridors that may supersede the Federal energy corridors recommendation in the PEIS.
6. Based upon a quick read of the maps in the document, the black lines are not connected and do not really indicate a complete project proposal; therefore, a complete analysis of impacts to land, not in Federal ownership, has not been completed and seems rather disingenuous at best.

7. The County is concerned that the Federal Government would exercise powers of eminent domain or public utilities might exercise condemnation to place these energy corridors and "taking" of private land could be utilized without compensation.

8. There is no evidence that other land use plans have been taken into consideration, including non-Federal land use plans.

9. Because of the very brief time the County has had to review the PEIS, there has been no opportunity to present staff comments to the County Commissioners for review and consideration.

The comments listed above do not represent a full or comprehensive comment package from Sandoval County, but we believe they point out critical flaws in this planning process, which must be evaluated in greater detail. It is absolutely essential that an extension of the comment period be granted in order to have the time and opportunity to fully review the information and submit all comments and concerns.

Sincerely,

Dianne Maes, Sandoval County Manager

cc: Senator Tom Udall
Senator Martin Heinrich
Congresswoman Michel Lujan Grisham
Congressman Ben Ray Lujan

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10172]
**Date:** Saturday, February 24, 2018 4:04:30 PM
**Attachments:** ID_10172_Photo6.ASNFsbetweenMP67and71.pdf

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10172**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 16:04:12 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Soils/erosion
Tribal concerns
Visual resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

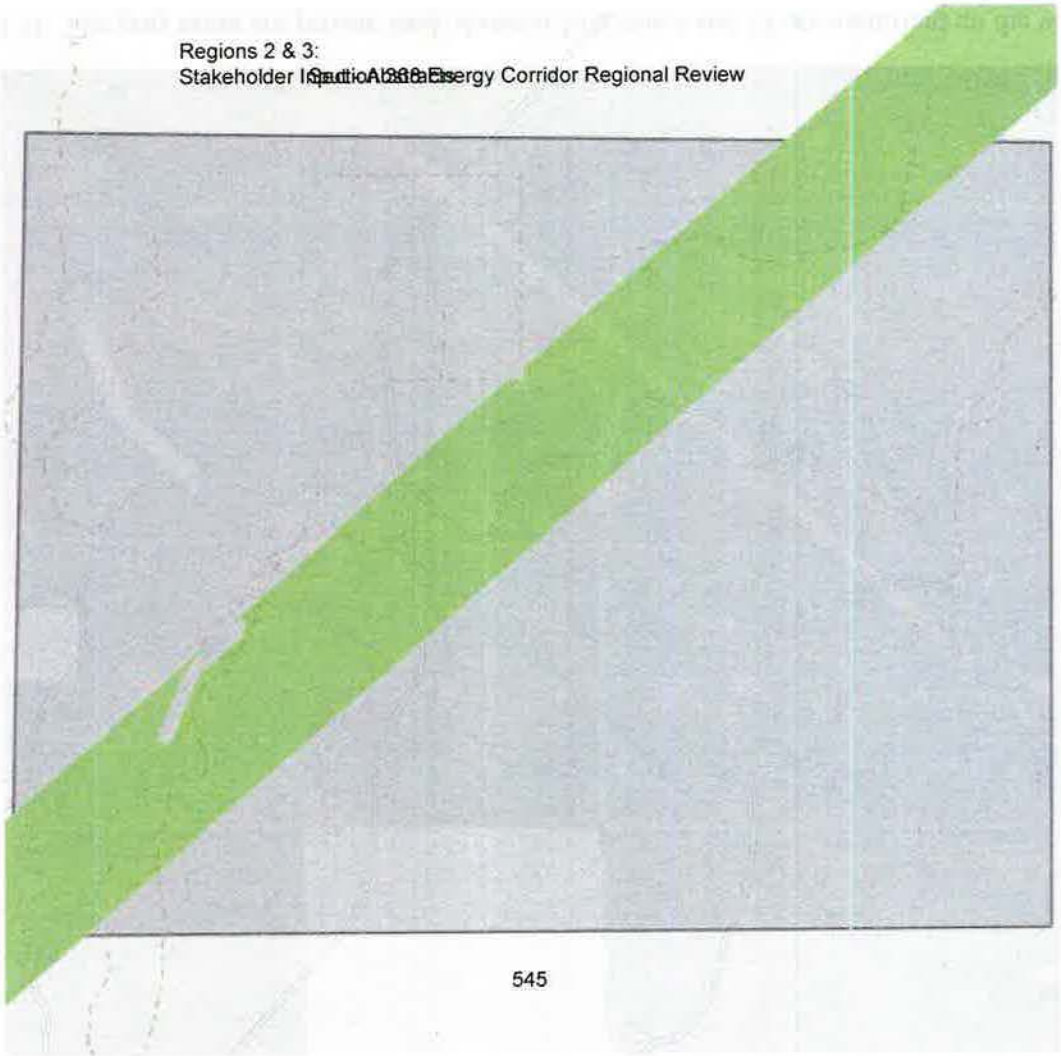
This is photo 6, between MP 67 and 71. The gray areas are private land; those in Sections 3 and 27 are identified on the website. How will the corridor be managed around the private land in Section 3? The Cholla corridor is to the east of the 368 corridor. Note that the 368 corridor is in mostly timbered stands and near the headwaters of Hart Canyon.

**Attachments**

Photo 6. ASNFs between MP 67 and 71.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Photo 6, between MP 67 and 71. The gray areas are private land; those in Sections 3 and 27 are identified on the website. How will the corridor be managed around the private land in Section 3? The Cholla corridor is to the east of the 368 corridor. Note that the 368 corridor is in mostly timbered stands and near the headwaters of Hart Canyon.



| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10173] |
| **Date:** | Saturday, February 24, 2018 4:24:30 PM |
| **Attachments:** | ID_10173_Photo7betweenMP24and67.pdf |

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10173**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 16:24:19 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Soils/erosion
Tribal concerns
Visual resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

The attached photo 7 between MP 24 and 67, Bear Canyon Crossing. The Cholla line is to the south. Note that the Cholla line has better access than the 368 corridor; accessibility to some parts of the 368 corridor will require new roads, which could potentially affect hydrological, cultural and other resources, depending on placement. Following along the existing powerline corridor is still the best option for placement of the corridor.

**Attachments**

Photo 7 between MP 24 and 67.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

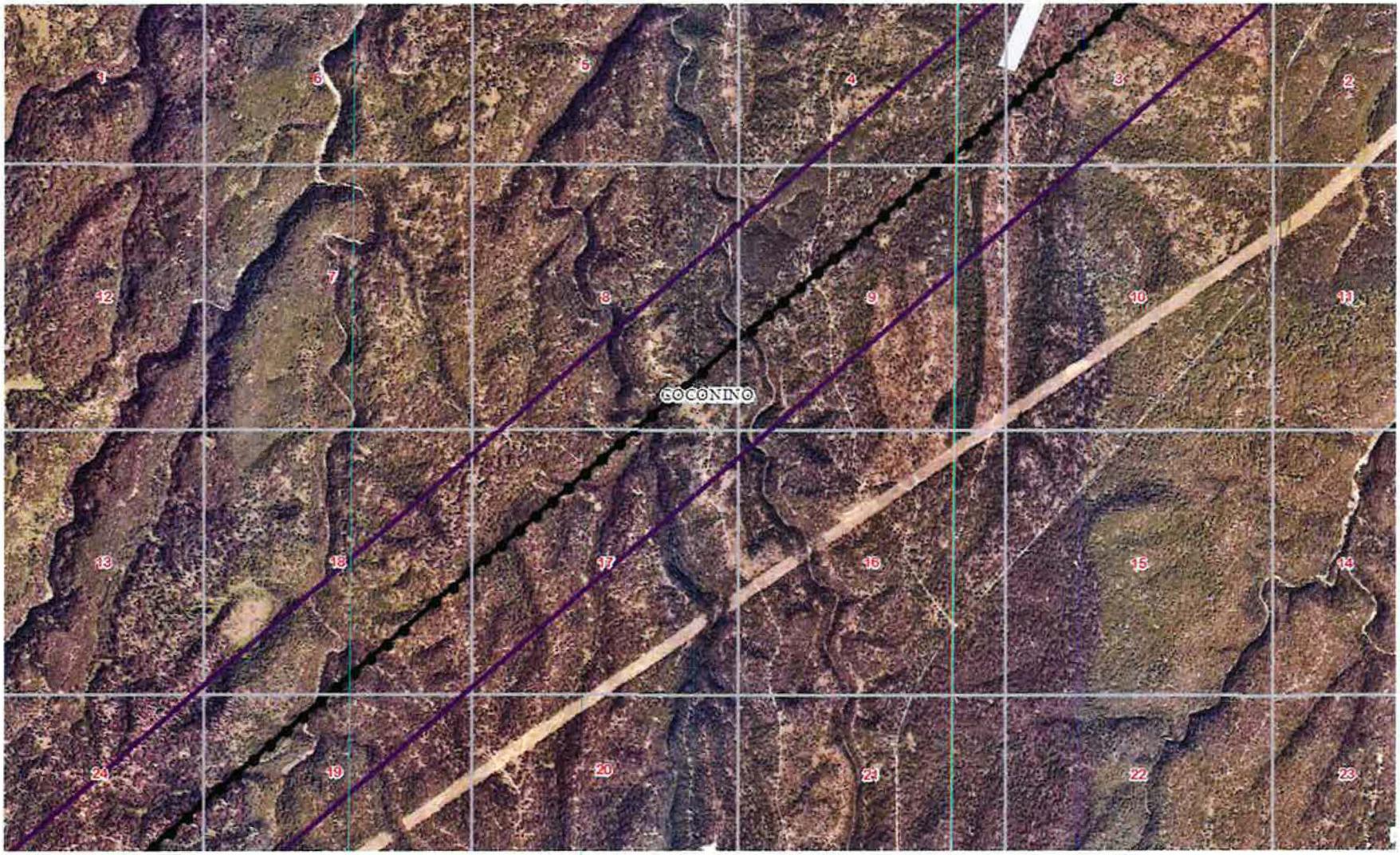
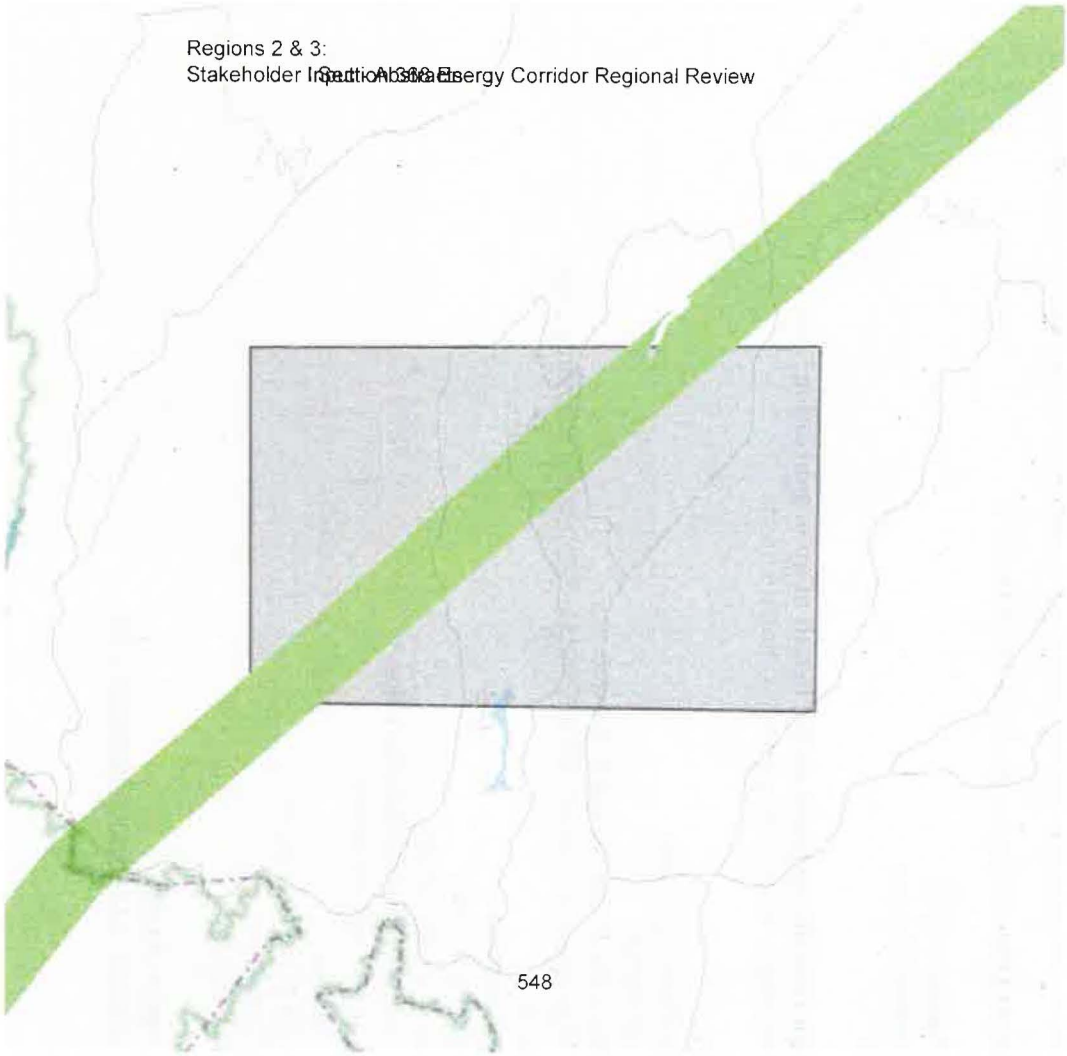



Photo 7 between MP 24 and 67, Bear Canyon Crossing. The Cholla line is to the south. Note that the Cholla line has better access than the 368 corridor; accessibility to some parts of the 368 corridor will require new roads, which could potentially affect hydrological, cultural and other resources, depending on placement.



**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10174]
**Date:** Saturday, February 24, 2018 4:49:19 PM
**Attachments:** ID_10174_Photo8ofthe368corridorbetweenMP60and64.pdf

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Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10174**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 16:49:00 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Physical barrier
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Air quality
Cultural resources
Ecological resources
Hydrological resources
Lands with wilderness characteristics
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

Attached is Photo 8 of the 368 corridor between MP 60 and 64. This is the south edge of the Apache-Sitgreaves National Forests at the edge of the Mogollon Rim. It is the only location where the Cholla and 368 corridors actually meet. It is also an area that is highly visible from the south, on the Payson Ranger District of the Tonto National Forest. The face of the Mogollon Rim is considered a natural wonder for it's majesty. Deep considerations should be made before a decision is made to place the ROW where it is currently digitized. On top of the Rim, within this area is the General George Crook National Recreation Trail (also a State Historic Trail and eligible National Historic Trail), the Rim Road, a popular recreational scenic drive, and several other unique resources. The Crook Trail was mitigated under the Cholla powerline. What will the mitigation measures be for these unique resources? The blue

polygon at the lower left corner is a fire retardant restriction zone. It is restricted because of sensitive resources. Also note, as on the north side of the corridor on the ASNFs that the polygon provided (in green) does not match the actual Forest Boundary (in purple); acreages for both the TNF and A-S are off a little as a result.

**Attachments**

Photo 8 of the 368 corridor between MP 60 and 64.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

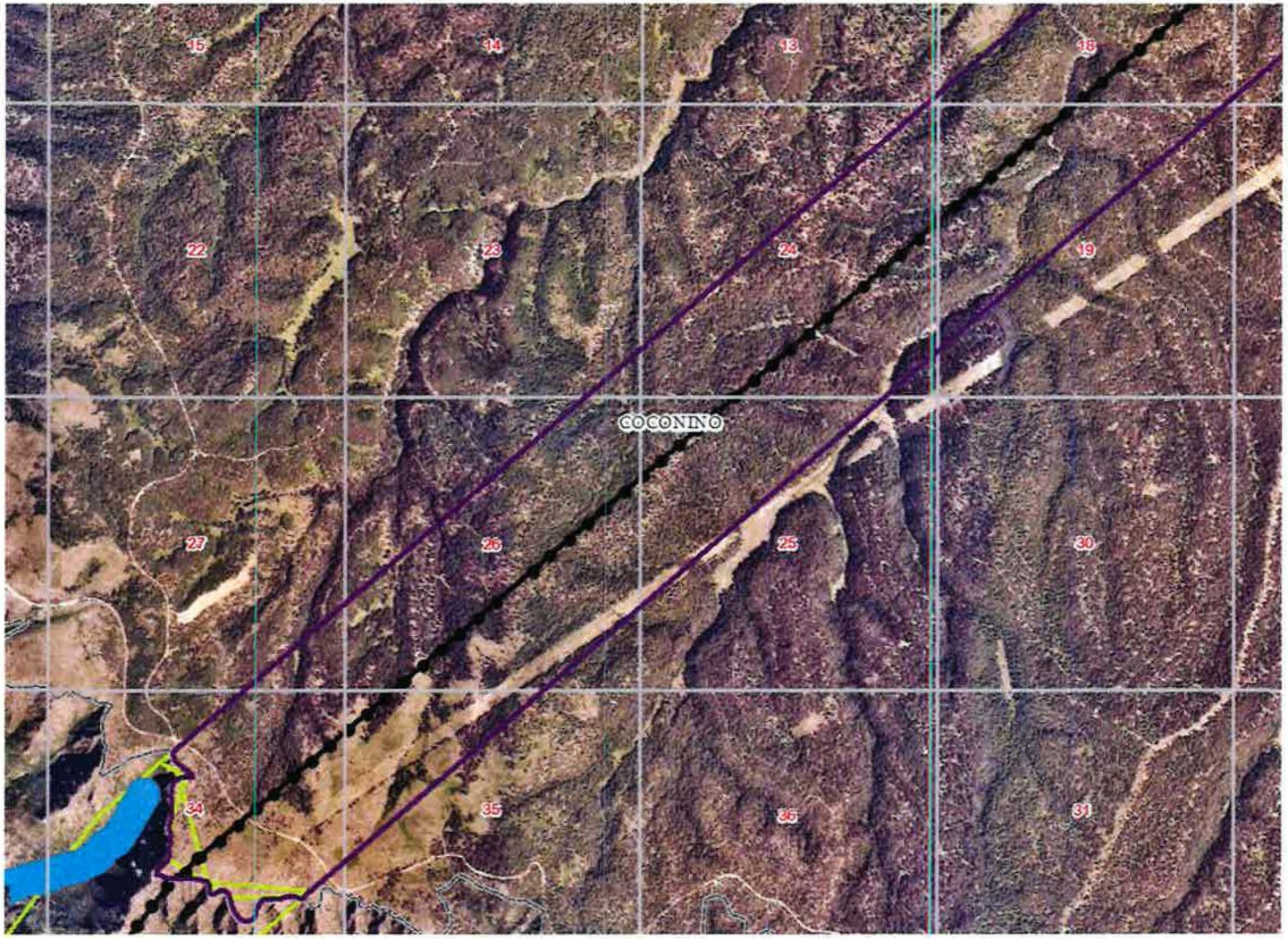
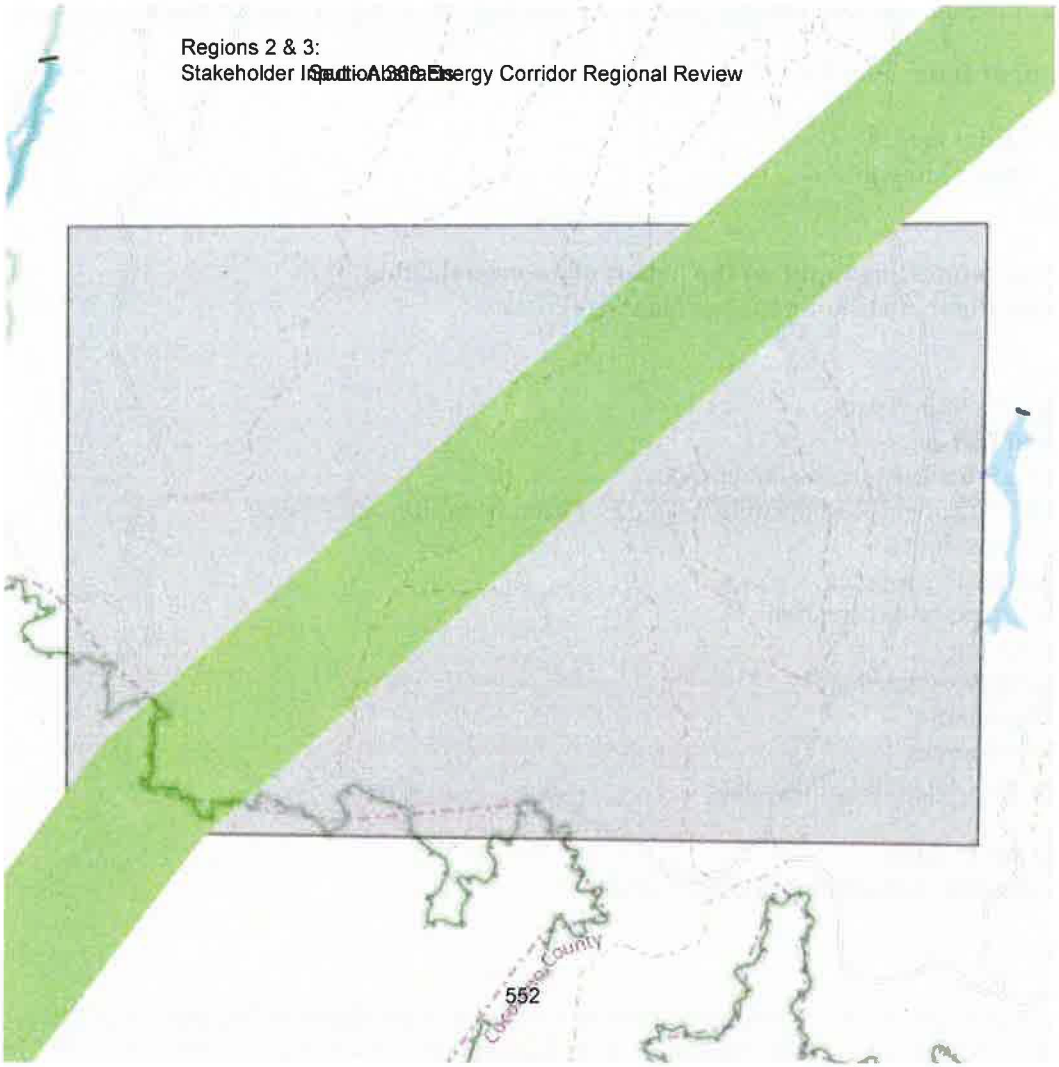



Photo 8 of the 368 corridor between MP 60 and 64. This is the south edge of the Apache-Sitgreaves National Forests at the edge of the Mogollon Rim. It is the only location where the Cholla and 368 corridors actually meet. Within this area is the General George Crook National Recreation Trail (also a State Historic Trail and eligible National Historic Trail), the Rim Road, a popular recreational scenic drive, and several other unique resources. The Crook Trail was mitigated under the Cholla powerline. What will the mitigation measures be for these unique resources? The blue polygon at the lower left corner is a fire retardant restriction zone. It is restricted because of sensitive resources. Also note, as on the north side of the corridor on the ASNFs that the polygon provided (in green) does not match the actual Forest Boundary (in purple); acreages for both the TNF and A-S are off a little as a result.


Chesapeake County

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10175]
**Date:** Saturday, February 24, 2018 6:09:47 PM
**Attachments:** ID_10175_Photo9.SouthendoftheASNF.pdf

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10175**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 18:09:33 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Physical barrier
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Hydrological resources
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources
Interagency Operating Procedures

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

The attached photo (no. 9) shows some errors relating to the digitized boundaries at the ASNFs/TNF boundary at the Mogollon Rim escarpment. This will affect the acreage for both forests. Note also the placement of the centerline of the corridor in relation to a steep ridge. I assume that the corridor is as wide as it is to allow 'wiggle room' to work around barriers and sensitive and non-renewal resources, but the Cholla corridor is probably the better location for the 368 corridor. See the attached photo and caption for more information/concerns.

**Attachments**

Photo 9. South end of the ASNF.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

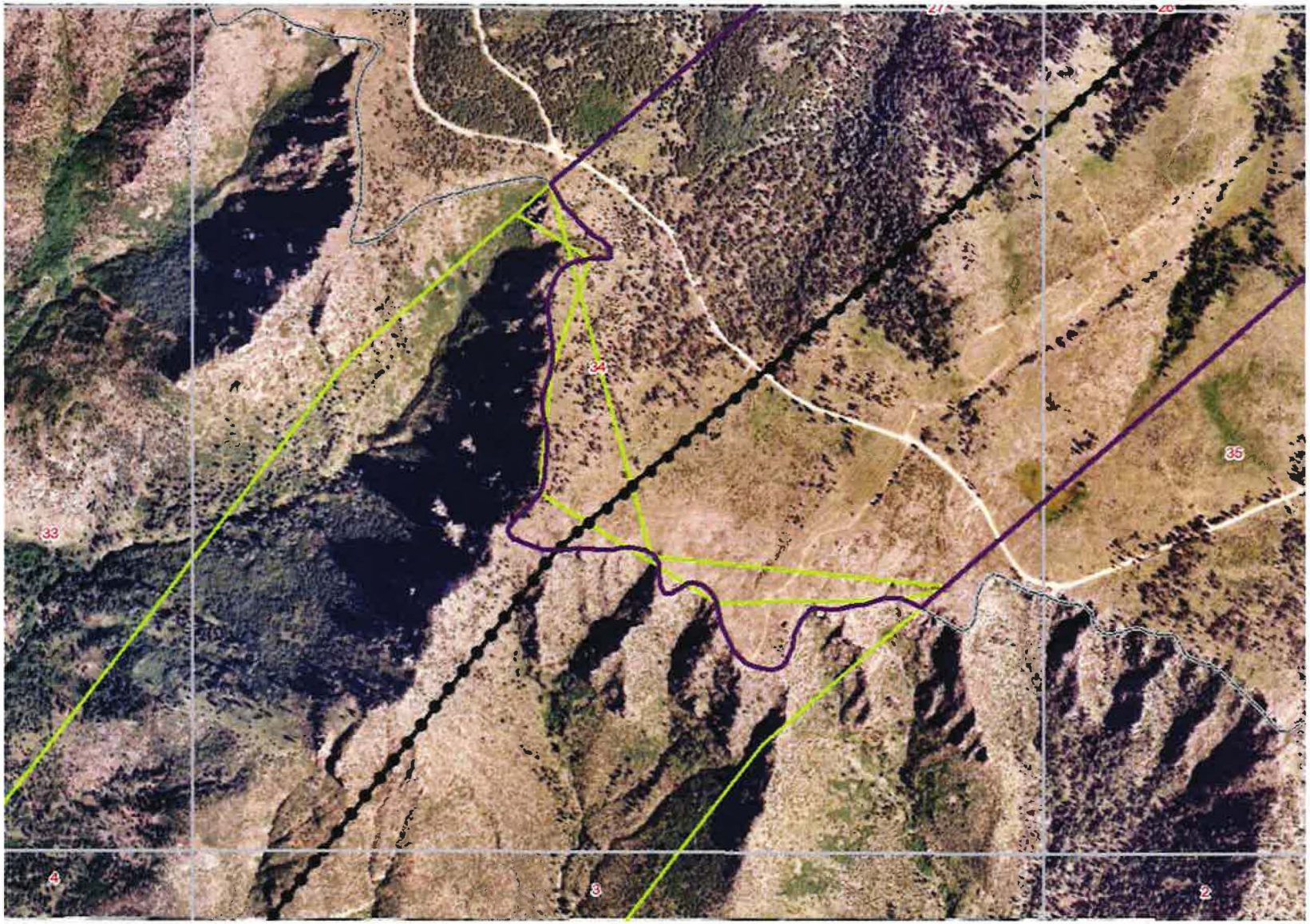
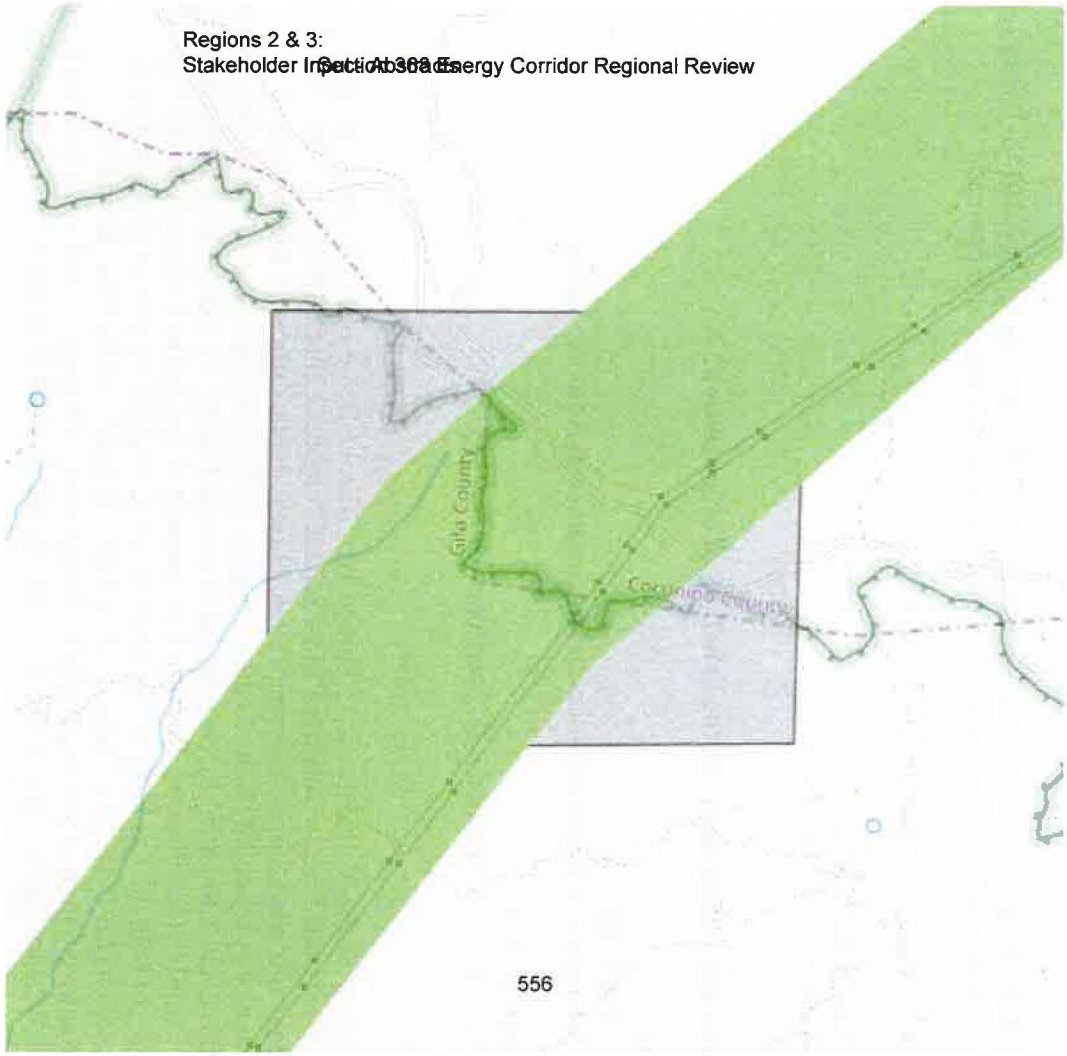



Photo 9, in Section 37 at approximately between MP 59.5 and MP 60.5. The south end of the 368 corridor as it drops over 1000 feet down on the Tonto National Forest. This is a close-up of the southern edge of the corridor, represented in purple; the bright green polygon is what is

available on the website. The south edge of the purple polygon is digitized off the Black Mesa Ranger District boundary. The Payson Ranger District of the Tonto National Forest is south of the purple line. Acreages on the TNF and ASNF are likely not accurate if the digitized polygon on the website was used. Note the Cholla corridor on the right and the centerline of the 368 corridor climbing the contour of a steep ridgeline; probably not the best location for a pipeline corridor; it would be difficult to construct in the limestone and sandstone matrix, plus it would likely create an eyesore for the public and residents in nearby Payson. Consider also the sensitive watercourse on the west of the ridge and the likelihood that an intense fire could quickly run up the chute and cause a lot of damage if retardant is restricted. As noted in Photo 8, the General Crook National Recreational Trail, the popular Rim Road, and other important resources are located within this corridor. Please consider moving this corridor to the Cholla corridor, where most of the resource damage from past construction and maintenance has already occurred. Thank you for your consideration and allowing us the opportunity to comment. EM 2/24/18


Gila County
Coconino County

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10176]
**Date:** Saturday, February 24, 2018 6:15:21 PM
**Attachments:** ID_10176_WECReg2SzokaValladares2018.pdf
ID_10176_Part_6_WWEC_Final_PEIS_Corridor_Revisions.pdf
ID_10176_PEIScommentsSzokaValladares.pdf
ID_10176_LPAComments021408_Final1.pdf
ID_10176_LetterfromJPrukop1.pdf

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Thank you for your input, Mary Rose Szoka-Valladares.

The comment tracking number that has been assigned to your comment is **10176**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 18:14:50 CST

**First Name:** Mary Rose
**Last Name:** Szoka-Valladares
**Email:**

**Are you submitting input on the behalf of an organization?** No

**Topics**
Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Mary-Rose Szoka-Valladares 5515 Spruce Tree Avenue Bethesda, MD 20814 February 24, 2018 West-wide Energy Corridor PEIS Argonne National Laboratory 9700 S. Cass Avenue Building 900, Mail Stop 4 Argonne, IL 60439 Dear Public Official, Thank you for the opportunity to comment on the Region 2 energy corridor abstracts that comprise part of the Regions 2 and 3 Regional Review for the Westwide Energy Corridors. I am a longtime (40+) year member of the Placitas, New Mexico community located in Sandoval County. I am also a member of both the Las Placitas Association (LPA) and the Eastern Sandoval Citizens Association (ES-CA). As explained in my 2008 comments on the Programmatic Environmental Impact Statement (PEIS), Designation of Energy Corridors on Federal Land in the 11 Western States, my concern about the energy corridor plan and its non-contiguous segments stems from the adverse impacts on the greater Placitas/eastern Sandoval County community that would ensue from a designated corridor in this area. The maps in section 2 of the PEIS now show three non-connected segments: 80-273, 81-272, and 89-271 in New Mexico. Ten (10) years after commenting on the Westwide Corridor PEIS, my comments of February 14, 2008 remain relevant. Therefore, I am resubmitting them as an attachment to this letter. Ten (10) years after commenting on the Westwide Corridor PEIS, the entire Placitas community has grown in population and building inventory. Moreover, there has been significant increase in residential settlement immediately adjacent to BLM land that serves as an urban interface. Thus, location of an energy corridor in the Placitas environs would wreak even greater adverse impacts on the environment. Ten (10) years after commenting on the

Westwide Corridor PEIS, the final Puerco Resource Management Plan (RMP) has been developed but awaits final consideration by the BLM in Washington. Since it has not been publicly released, we do not know whether or how it addresses the Section 368 corridors. Ten (10) years ago, this diverse community – Native American Tribes, Sandoval County government and Citizens' Associations - expressed a wide-range of concerns about the potential economic, environmental and cultural impacts of a Section 368 corridor in eastern Sandoval County. These concerns remain valid today. The three aforementioned corridor segments converge on the population center of the state, but the non-connection of these segments creates uncertainty about future activity and its impacts on Placitas, especially in view of the PEIS statement that corridors may be located in high potential conflict areas to meet EPACT requirements and the siting principles in the Settlement Agreement. However, the map in Part 6: Corridor Revisions (Changes in Section 368 Energy Corridors between Draft and final version of the PEIS) indicates segments of removed corridor (Base Map Index Area G8) in eastern Sandoval County. This is consistent with our understanding from Dr. Heather Wilson, the Congresswoman for this District in 2008, who advised us that the potential corridor for the northern part of Placitas, New Mexico was unlikely to be included in the final PEIS. This was good news for our community at the time. Today, it is fair to say that community members, organization and Government strongly support the permanent removal of these corridors from any consideration for Section 368 Corridor designation. In addition to my 2008 comments, I am also attaching the following documents: PEIS Part 6, Corridor Section 2 illustrating removed sections of Corridor within the area of Base Map Index G8; comments submitted in 2008 by former Sandoval County Manager Debbie Hays; comments submitted by Secretary Joanna Prukop of New Mexico Energy, Minerals and Natural Resources Department; comments submitted on behalf of the Las Placitas Association; and correspondence from U.S. Congresswoman Heather Wilson. Thank you very much. Sincerely, Mary-Rose Szoka-Valladares NM address: Llano del Norte Placitas, NM 87043

**Attachments**

WECReg 2 Szoka-Valladares 2018.pdf, Part_6_WWEC_Final_PEIS_Corridor_Revisions.pdf, PEIS comments Szoka-Valladares.pdf, LPAComments021408_Final[1].pdf, Letter from J Prukop[1].pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**
**Governor**

**Joanna Prukop**
Cabinet Secretary
**Reese Fullerton**
Deputy Cabinet Secretary

**Office of the Secretary**

February 28, 2008

Ms. Gina T. Constant
Rodey, Dickason, Sloan, Akin & Robb, P.A.
PO Box 1888
Albuquerque NM 87103

Re: West-wide Energy Corridors

Dear Ms. Constant:

Thank you for your comments on the proposed designation by several federal agencies of energy corridors on federal lands in the West. I have been working on this issue, too, and submitted comments on the draft Programmatic Environmental Impact Statement (PEIS). A copy of those comments is attached.

As you can see this Department supports the designation of energy corridors that would be helpful to renewable energy developers in getting their energy to market. I had hoped the process required in the Energy Policy Act of 2005 would assist in that effort. Unfortunately there are problems with the work done to date in this federal process. I share a number of the concerns you express about the process. For example, I am very concerned about the federal agencies designating links on federal lands to start a corridor without any consideration of the lands between the links. I do not believe this complies with the requirements of the National Environmental Policy Act (NEPA). I believe NEPA requires an analysis of all the effects of using the proposed corridors.

I hope a better product results from the comments submitted and that the new corridors will help establish more renewable energy projects in this state, while being sensitive to other important concerns. New renewable projects can meet local and out-of-state energy needs, address climate change goals, and be developed in a manner compatible with other environmental and local interests.

In the meantime I will be watching to see the next steps taken by the federal agencies. If the Final PEIS is not significantly improved, I expect you and I will both be filing protests.

Thank you for letting me know how you feel on this issue.

Sincerely,

Joanna Prukop
Cabinet Secretary

RDSA&R MAR 03 2008

# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**
Governor
**Joanna Prukop**
Cabinet Secretary
**Reese Fullerton**
Deputy Cabinet Secretary

February 13, 2008

West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439
Fax: (866) 542-5904

Re: Comments from the New Mexico Energy, Minerals and Natural Resources Department (EMNRD)

Dear Sirs:

Thank you for this opportunity to comment on the proposed energy corridor designations. The New Mexico Energy, Minerals and Natural Resources Department (EMNRD) supports the goals of facilitating the development of energy corridors to improve reliability, relieve congestion and enhance the capability of the national grid to deliver energy. EMNRD especially supports assisting the development of renewable resources for electricity by developing electric transmission lines that will take these "new" products to market. Unfortunately, the current Programmatic Environmental Impact Statement (PEIS) related to the corridor designations will not assist New Mexico in meeting those goals.

Briefly stated, EMNRD has the following concerns:

1. Supplemental work must be done on the PEIS to assure compliance with the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA);
2. New Mexico's renewable energy resources are not adequately considered in the proposed corridors; and
3. The cumulative impacts on environmentally sensitive areas have not been fully analyzed.

New Mexico's significant wind and solar resources are driving the need for strategically placed energy corridors to meet in-state electricity demand as well as export demand for clean energy to other states having renewable portfolio standards requirements, such as Arizona. New Mexico is ranked 1st among all states in percentage of electricity retail sales from wind power (7.3%, 2006 U.S. Department of Energy report). New Mexico wind power is already being exported to

Arizona, provided by the Aragonne Wind (Phase I) 90-MW wind farm, with the Aragonne Wind (Phase II) 110-MW wind farm soon to follow.

New Mexico now has a total of 496 MW of wind capacity producing "green power", making New Mexico the 10th–ranked state for developed wind power capacity. This capacity will continue growing, with an additional 210 MW planned for construction. The wind farms are located in the eastern half of the state where the best wind resources are located. Another boom in renewable energy development is anticipated for concentrating solar power technology, utilizing world-class solar resources available in the southwest part of the state.

The State of New Mexico from the Governor through each agency is committed to the development of New Mexico's enormous renewable energy resources and we believe it is vital that the transmission system develop the capability to deliver power from these newly developed resources to growing load centers in the Southwest. New Mexico is diligently working toward developing renewable energy resources and getting those products to the market. The creation of federally designated routes should help in meeting the State's goals, but the draft PEIS presents several problems.

NEPA and ESA concerns

The basic purpose of these laws, NEPA and the ESA, is to make certain that decisions to be made by federal agencies are based on complete information. That premise has been rejected in the approach of the federal agencies to the PEIS. Instead the PEIS contains pages and pages of rationale defending the position the corridor designation will have no direct impacts that may significantly affect the quality of the human environment. At a fundamental level that approach ignores the effect of the incentives built into a corridor designation.

These incentives include the following: coordinated right-of-way efforts among the federal agencies, uniform operating rules, one federal point-of-contact for communications, accelerated processing to avoid delays, and required changes to land use management plans of the agencies to include the designated routes. Considering only the last incentive, it is obvious no future analysis of the environmental impacts conducted during the review of a land use management plan will be able to consider a true "no action" alternative, because the change to the management plan is required by the determination of designated corridors. Therefore, since a complete analysis of cumulative impacts is not being done now in the programmatic phase it will not be done later in the process. The current designation process is pre-empting the decision-making for future actions by the agencies that will directly impact the environment.

Another major flaw in saying there is no environmental impact is that there is neither consideration of impacts on adjacent lands nor any consideration of the cumulative impacts of these energy corridors and other activities in the areas of the proposed routes. It is easy to "connect the dots" from one link in the designated corridor to the next and find that the route leads through areas that citizens of this state want to protect. The federal designations will provide the incentives that make these routes the most likely based on expense and time considerations, but do not reflect the impacts of the decisions on the surrounding areas. Citizens of this state objected to the proposed corridors at your public meeting in Albuquerque on January 24, 2008. They expressed concern for the land and other resources in the areas between corridor segments. They expressed particular concerns about the town of Placitas, the Pueblo of Santa

Ana and areas in the Organ Mountains. Ignoring these concerns at this time is likely to mean failure for the entire process. We urge you to prepare a supplement to the PEIS that considers alternative routes and analyzes foreseeable impacts, to make that available for comment, and thereafter designate corridors based on the information gathered.

Encouraging renewable energy resources

The draft PEIS incorporates some, but not all, of the corridors recommended by EMNRD in the previous Scoping Process comments (tracking number 80027). EMNRD submitted an energy corridors map with those comments showing recommended corridors. That map is attached again in support of both the earlier and current comments. EMNRD believes these recommended corridors are important for the development of renewable energy resources. We believe corridor 81-213 may be the most effective in aiding the development of new solar and wind resources in New Mexico, and that is the only route that will directly serve that purpose. Much of that corridor is also supported by regional planning efforts considering transmission facilities. Corridor 81-213 is well located to facilitate future development of solar and geothermal resources in the Southwest and South-Central regions of New Mexico and may assist the development of wind resources by providing a way to move the power west. Other corridors are needed to develop wind energy in other parts of eastern New Mexico.

The PEIS wind resource map for New Mexico (FIGURE 2.2-4) indicates too small a resource area for wind energy, which is placed only in the South-Central part of the state. The generally accepted wind resource map, produced by TrueWind Solutions for the National Renewable Energy Laboratory in 2003 (attached as EMNRD Map 1), indicates windy areas of commercial potential throughout virtually the entire eastern half of the state. This mapping should be reflected in the designation of federal land for energy corridors.

EMNRD's energy corridors map (attached as EMNRD Map 2) recommends a corridor in the north that is not included in the PEIS. There is very little federal land along the path of this recommended corridor to the Northeast, but the limited focus of the EIS fails to deal with any assistance that federal land management agencies could provide to help the wind energy developers get their electricity to market. There is federal land along the state- proposed path in the Northwest so there is an opportunity to designate segments of the corridor in the PEIS that could assist wind development.

EMNRD's energy corridors map also recommends a corridor in the West-Central region that is not included in the PEIS. This corridor represents a path for transmitting wind power from eastern New Mexico to loads further west. We urge the federal agencies to reconsider this general path for a designated corridor, considering a path along Interstate Highway 40 and any existing facility corridor, while avoiding sensitive areas such as national monuments and wilderness areas.

Protecting sensitive areas

The draft PEIS does not sufficiently protect sensitive areas on either federal land in the corridors or on tribal, state, or privately owned lands adjacent to the corridors. In no situation is there an attempt to analyze the cumulative impact of additional transmission lines. For example, corridor

81-272, the major north-south corridor in the State, runs through the Sevilleta National Wildlife Refuge. While an interstate highway also runs through the same area, there are a number of concerns that maximizing the use of this corridor may impact endangered wildlife species and important scientific research projects. These impacts should be thoroughly evaluated before the refuge is designated as an energy corridor for multi-modal use. The route also runs along the Rio Grande River which is one of the most endangered rivers in the country. Along the way are state wildlife refuges. One of these contains the endangered Pecos sunflower. Impacts on these areas are not considered in the PEIS and this is evidence of the problem of not considering the cumulative impact of the designations.

Further south, the designated route runs through a Proposed National Conservation Area (NCA) east of Las Cruces in the Organ Mountains. The NCA status has been supported by local governments in the area, but the PEIS does not address any impact there.

The PEIS should seriously examine the impacts to federal, tribal, and state sensitive areas. It is not helpful to designate routes on federal lands that will logically lead into areas of specific concerns to New Mexico and its citizens. This includes parks, monuments, wildlife management areas, refuges, migratory bird habitats, migratory paths for large game animals, breeding areas, wetlands, and riparian areas. It is better to analyze the impacts on these areas before designating corridors on federal lands that may never be used because of the impacts on adjacent lands.

Conclusion

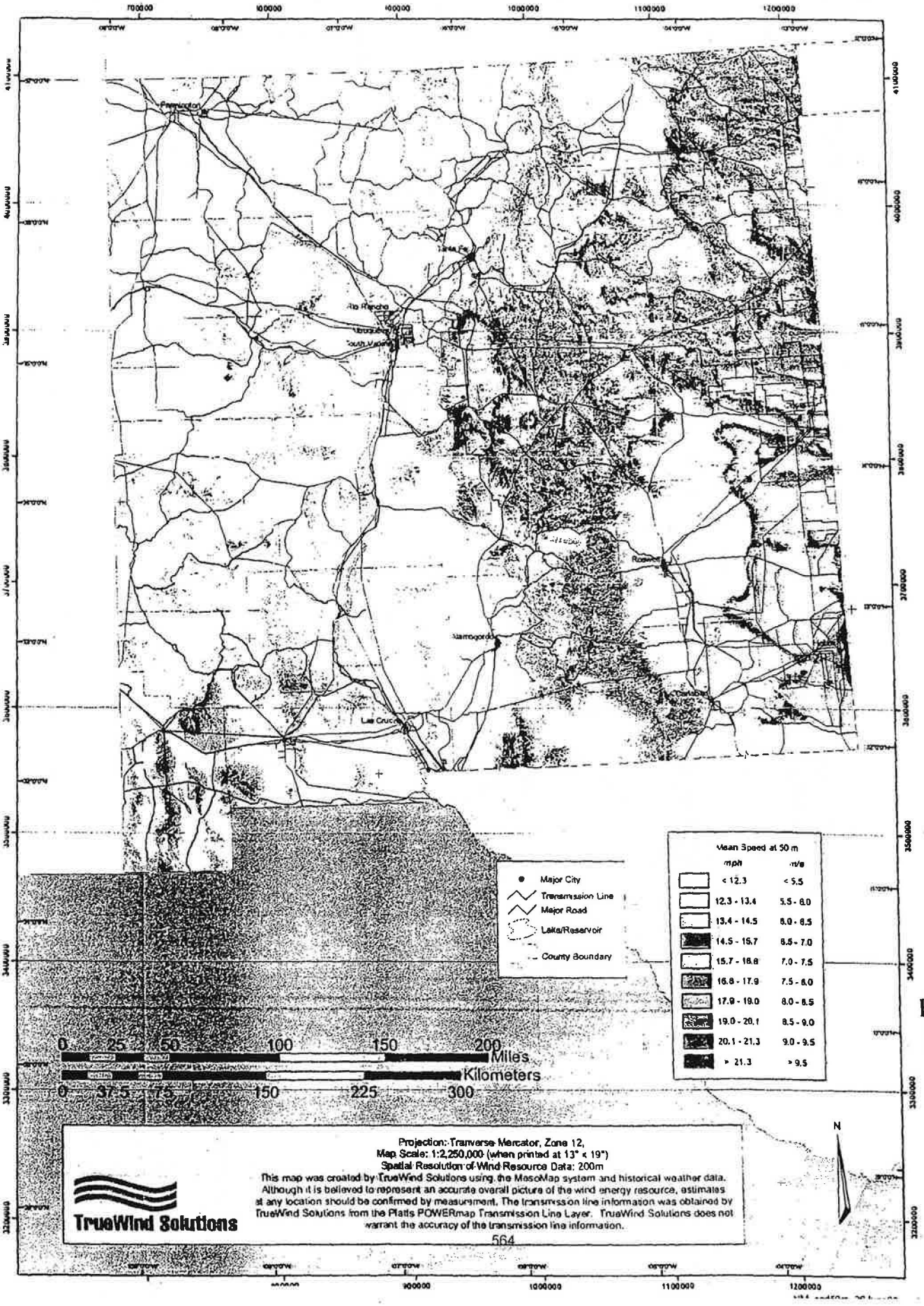
Again, EMNRD agrees with the goal of designating corridors that will assist in improving energy distribution in the West and encouraging the development of renewable energy resources. We have serious concerns with the lack of environmental analysis at this level and fear it will cause problems in the future. We request that the federal agencies analyze the cumulative impacts of the proposed corridors on both federal and adjacent lands to accurately portray the entire picture in a supplement to the PEIS. Then, after comments on the supplement, a decision can be made on the designated corridors. EMNRD is eager to work with you on this effort so the citizens of New Mexico can have the environmental and other impacts of the energy corridors fully evaluated.

Sincerely,

Joanna Prukop
Cabinet Secretary

enclosures

# Wind Speed Map of New Mexico at 50 meters

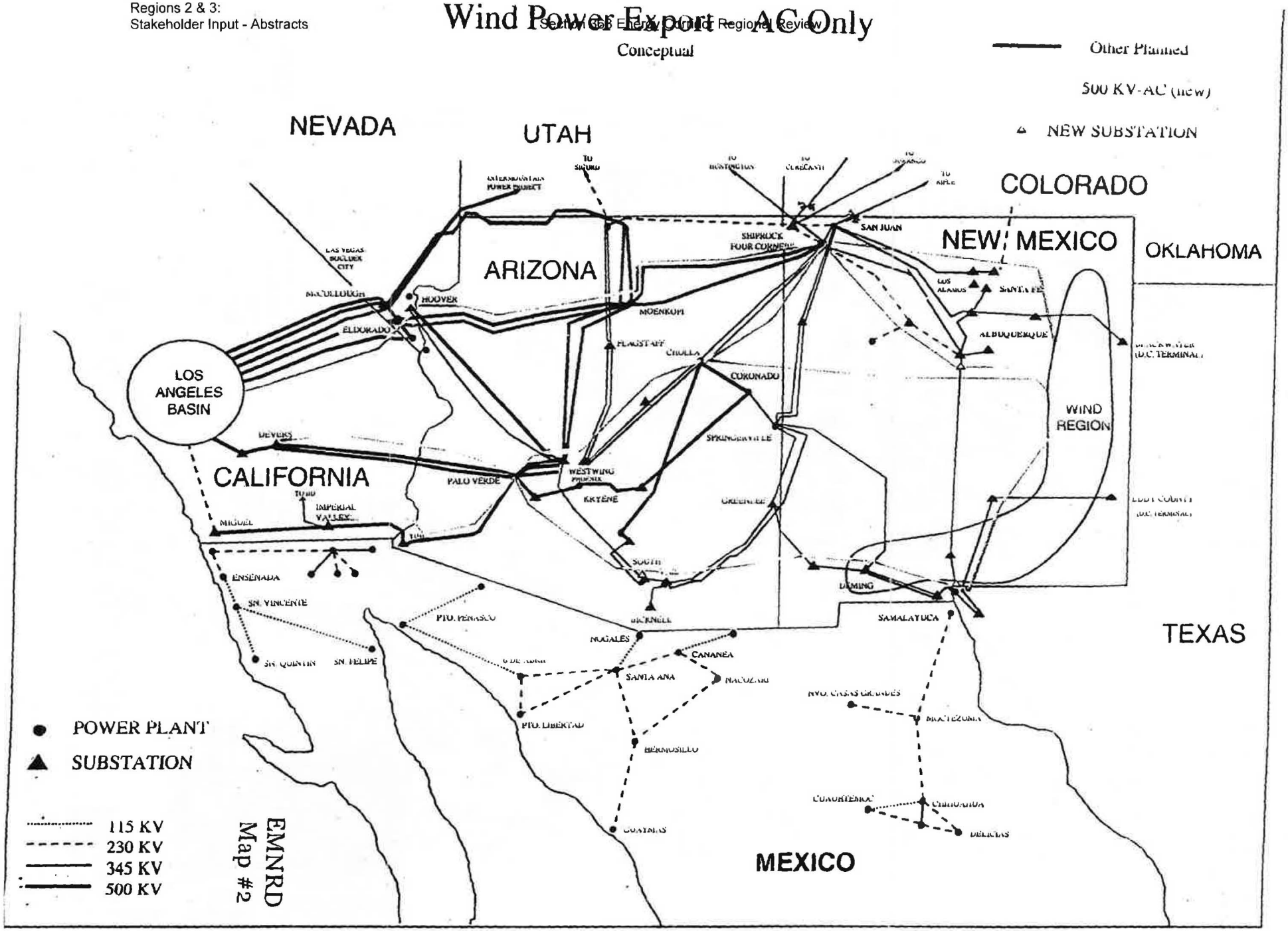



EMNRD
Map #1

# Wind Power Export - AC Only



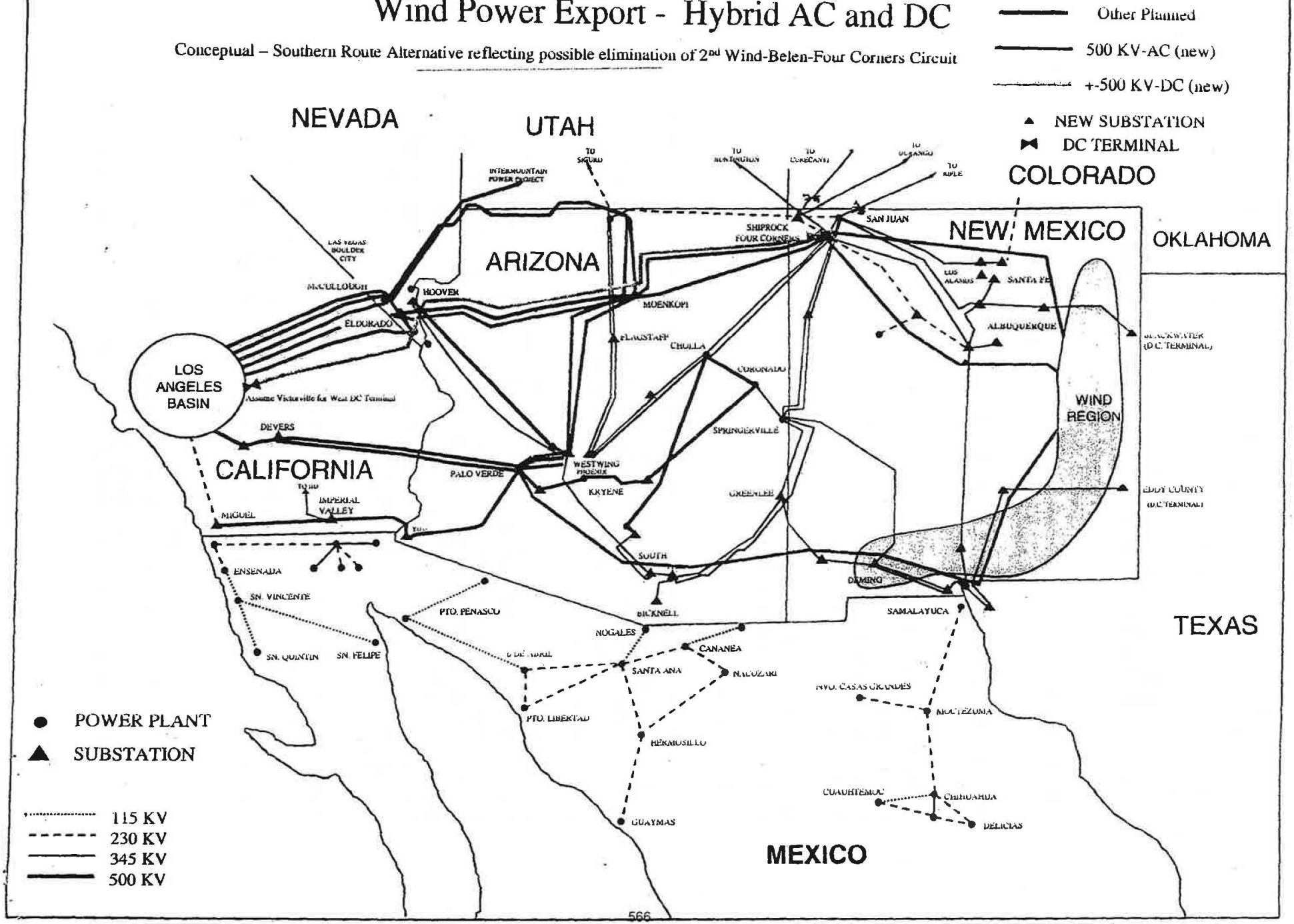
Conceptual



Section 368 Energy Corridor Regional Review

# Wind Power Export - Hybrid AC and DC

Conceptual – Southern Route Alternative reflecting possible elimination of 2nd Wind-Belen-Four Corners Circuit



# LAS PLACITAS ASSOCIATION

February 14, 2008

***Delivered via electronic mail and U.S. Certified Mail***

West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

Re: Scoping Comments for the West-wide Energy Corridor Programmatic Environmental Impact Statement

To Whom It May Concern:

Please fully consider the following comments on behalf of the Las Placitas Association. For over 20 years, Las Placitas Association has strived to protect open space, restore riparian watersheds, promote recreational, educational and rural activities, and engage the members of our community in appreciating the environmental and cultural richness of the Placitas area of Sandoval County, New Mexico.

The Programmatic Environmental Impact Statement (PEIS) for the Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386) is fundamentally flawed and unlawful in that it attempts to represent non-contiguous segments on federal land as a complete network of continuous corridors traversing both federal and non-federal lands, without conducting the necessary consultation, notification, disclosure and assessment of environmental impacts on the non-federal lands as required by the National Environmental Policy Act (NEPA) and the Energy Policy Act of 2005 (EPAct).

Although the PEIS describes corridor designation exclusively on federal land and "does not…establish energy corridors on nonfederal lands" (PEIS, p. ES-5), maps obtained from the Bureau of Land Management (BLM) under a Freedom of Information Act request illustrate internal BLM planning maps, not disclosed as part of the PEIS, that

**PO Box 888, Placitas New Mexico 87043**
**www.lasplacitas.org**
**A tax-exempt organization under the Internal Revenue Code 501(c)(3)**

demonstrate corridor designations on private and tribal lands in the vicinity of Placitas, New Mexico, in addition to federal lands (Attachment 1). Such non-disclosure is in violation of the consultation requirements presented in EPAct (PEIS, p. ES-1), and the assessment of potential conflicts of the proposed action with State, local and tribal land use plans, as required by NEPA Section 1502.16.( c).

"An agency acts arbitrarily and capriciously when it relies on factors Congress did not intend it to consider, entirely fails to consider an important aspect of the problem, offers an explanation for its decision that runs counter to the facts before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise." *Motor Vehicle Mfrs. Ass'n of U.S. v. State Farm Mutual Automobile Ins. Co., 463 U.S. 29, 42 (1983).*

The PEIS is arbitrary and capricious in the following respects:

The PEIS is arbitrary and capricious in that it fails to explain that the designated corridors will not expedite construction of any infrastructure until private and tribal corridors are designated and some of the same permitting required for federal land is obtained on private land. Many of the same laws that apply to permitting on federal land (the Endangered Species Act, the Clean Water Act, etc.) will apply to the construction of facilities on private and tribal land. For that reason, the EIS is arbitrary and capricious in its insistence that it has somehow expedited the installation of energy infrastructure when it has accomplished nothing of the kind. This explanation for its decision is implausible, if not misleading and deceptive.

The PEIS is arbitrary and capricious because it fails to explain that the way the corridors will be completed is through the threat of eminent domain against private landowners and fails to consider the impacts of such broad scale eminent domain across the west. Instead, the PEIS uses language such as "Project applicants would secure authorizations across private lands *in the same manner that they currently do*..... " [PEIS, Section ES.10, pg. ES-9.] If the federal government is going to promote wholesale eminent domain, it is not too much to ask that it refer to it as such instead of vague terms that fail to explain the actual intent. Furthermore, the impact of wholesale eminent domain across the west is entirely omitted from the NEPA analysis of impacts. This is an instance where the agencies have entirely failed to consider an important aspect of the problem, and thus have acted arbitrarily and capriciously.

The PEIS is arbitrary and capricious in that it fails to explain that the strategy of designating corridors on federal land without designating corridors on private land is ineffective and poor planning because an informed decision about where to locate the corridors on federal land cannot be made without an implicit decision about where the corridors should be located on private land. Furthermore, the agencies entirely fail to propose and analyze corridors between supplies of energy and locations with forecasted unmet demand for energy. Yet this "analysis" is supposed to be the foundation to justify

amendment of resource management *plans*. This activity is not worthy of the term "planning" and the agencies' justification for it is so implausible that it cannot be ascribed to the product of agency expertise and entirely fails to consider important elements of the problem.

The PEIS is arbitrary and capricious because it represents that there are no environmental impacts to the designation of corridors. First, this representation is fundamentally illogical because an Environmental Impact Statement is only prepared for federal decisions whose effects may be major. In fact, BLM's own regulations define preparation of a resource management plan as a major federal action significantly affecting the quality of the human environment. 43 CFR § 1601.0-6; *NM Wilderness Coalition*, 129 IBLA 158 (1994). What would the purpose of requiring BLM to do an EIS for a plan if plans don't affect the environment until a particular project is proposed and thus can't possibly have significant impacts?

Second, this misrepresentation has the effect of persuading people not to comment on or object to the EIS, thus manipulating the public process to discourage timely comments. Analysis of specific projects will be tiered to the amended resource management plans resulting from the Corridor EIS. 40 CFR §§ 1520.20 and 1508.28(b) ("Tiering…is appropriate when it helps the lead agency to focus on issues which are ripe for decision and exclude from consideration issues already decided…") Thus, by telling the public that no impacts result from this decision, the agencies are dissuading the public from commenting, defeating the role that commenting should play in a NEPA decision. 40 CFR § 1503.1 to 4.

Finally, this misrepresentation substitutes for meaningful environmental analysis of the real impacts of planning. These include:

1) Plans that provide for one type of use implicitly discourage uses incompatible with that type of use. Here, encouraging large scale industrial energy development will encourage other large scale industrial types of development and will discourage setting aside land for conservation, open space, recreation and other low impact uses.
2) Plans that encourage industrial development adjacent to residential properties are likely to decrease residential property values.
3) Plans influence land use for decades and plans are difficult to change so these impacts will go on for years.

This flawed analysis is arbitrary and capricious in that it entirely omits an important aspect of the problem, the impacts of planning. Indeed, the agency denies that such impacts even exist, a view which can only be ascribed to the product of a *lack of* agency expertise. The PEIS must be supplemented to include adequate analysis of the environmental impacts of planning.

By internally designating energy corridors on privately owned and Tribally owned lands, the author Agencies, U.S. Department of Interior (DOI) BLM, U.S. Department of

Energy (DOE) have arbitrarily and capriciously located the non-federal lands corridors (Attachment 1) without assessment of the socioeconomic, environmental and cultural impacts of these corridors. As a result of non-consultation with local, state and Tribal authorities, knowledge of alternative corridor routes that could minimize socioeconomic, environmental and cultural impacts relative to the proposed action were not considered in formulating the proposed action. For example, the map illustrated in Attachment 2 demonstrates two hypothetical alternative routes that incorporate existing utility and/or transportation Rights of Way north of Placitas, New Mexico that would have significantly fewer impacts to environmental quality, human health, cultural resources, private land values and other associated socioeconomic impacts than the proposed action. A proper consultation and dialog with private landowners, County and state governments and Tribes may have resulted in more optimal corridor locations such as those illustrated in Attachment 2.

The Las Placitas Association recommends:

a). The PEIS be revised to account for the reasonably foreseeable significant adverse effects on the human and natural environment that will occur as the result of energy corridor implementation on private, state and Tribal lands, as required by NEPA.

b). The revised PEIS give due consideration, in full consultation with the affected parties, to alternative potential corridor routes across private and Tribal lands, other than those internally published but not publicly disclosed by the author Agencies (Attachment 1). The map illustrated in Attachment 2 provides examples of more optimal corridor placements in the vicinity of Placitas, New Mexico.

c). Locations in or adjacent to Placitas, including the Placitas Development Area (per Sandoval County Land Use Planning documents) should be avoided as such sitings would adversely impact the human and natural environment, contribute to loss of property value and damage the integrity of the community.

d). Alternative corridors should be sited away from residential areas;

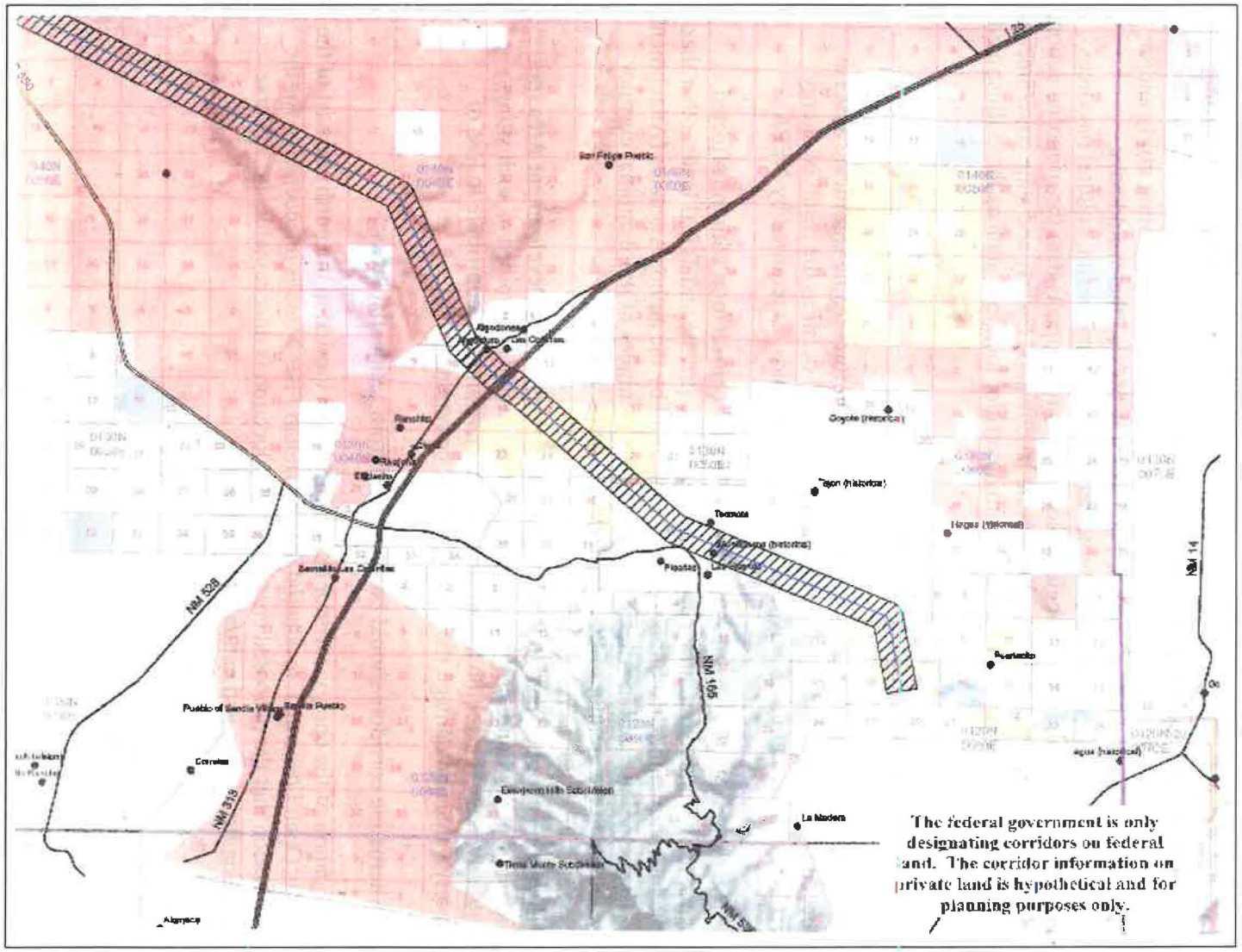
e). Location of the energy corridor on the BLM land located to the north and east of the Placitas Open Space and residential area on Indian Flats Mesa is unacceptable for the same reason that the proposed energy corridor location is unacceptable, i.e, adverse impact on the human and natural environments.

Respectfully Submitted,
Las Placitas Association

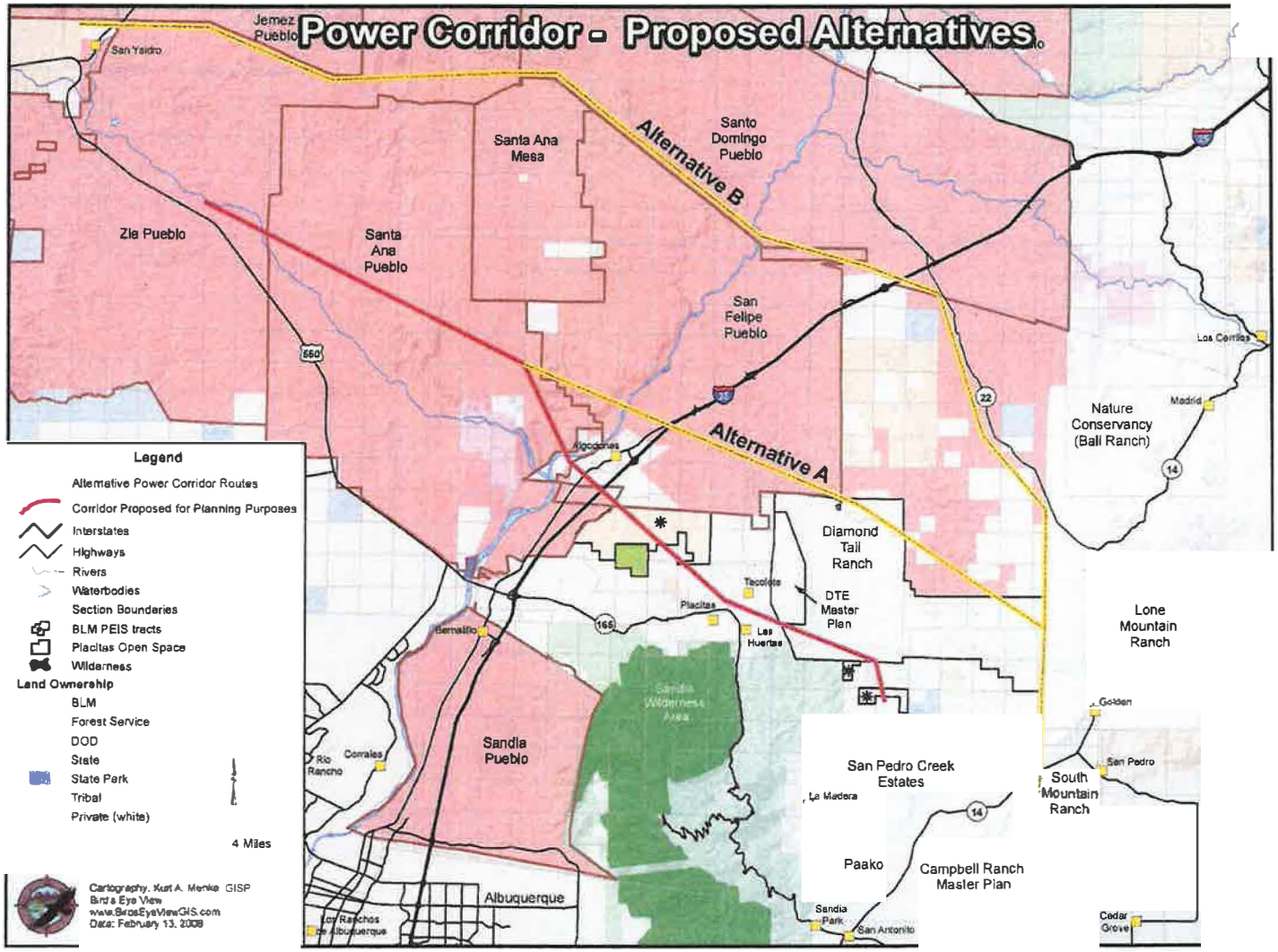
Reid F. Bandeen
Board President

Las Placitas Association, Placitas, New Mexico. Comments on DOE/EIS-0386

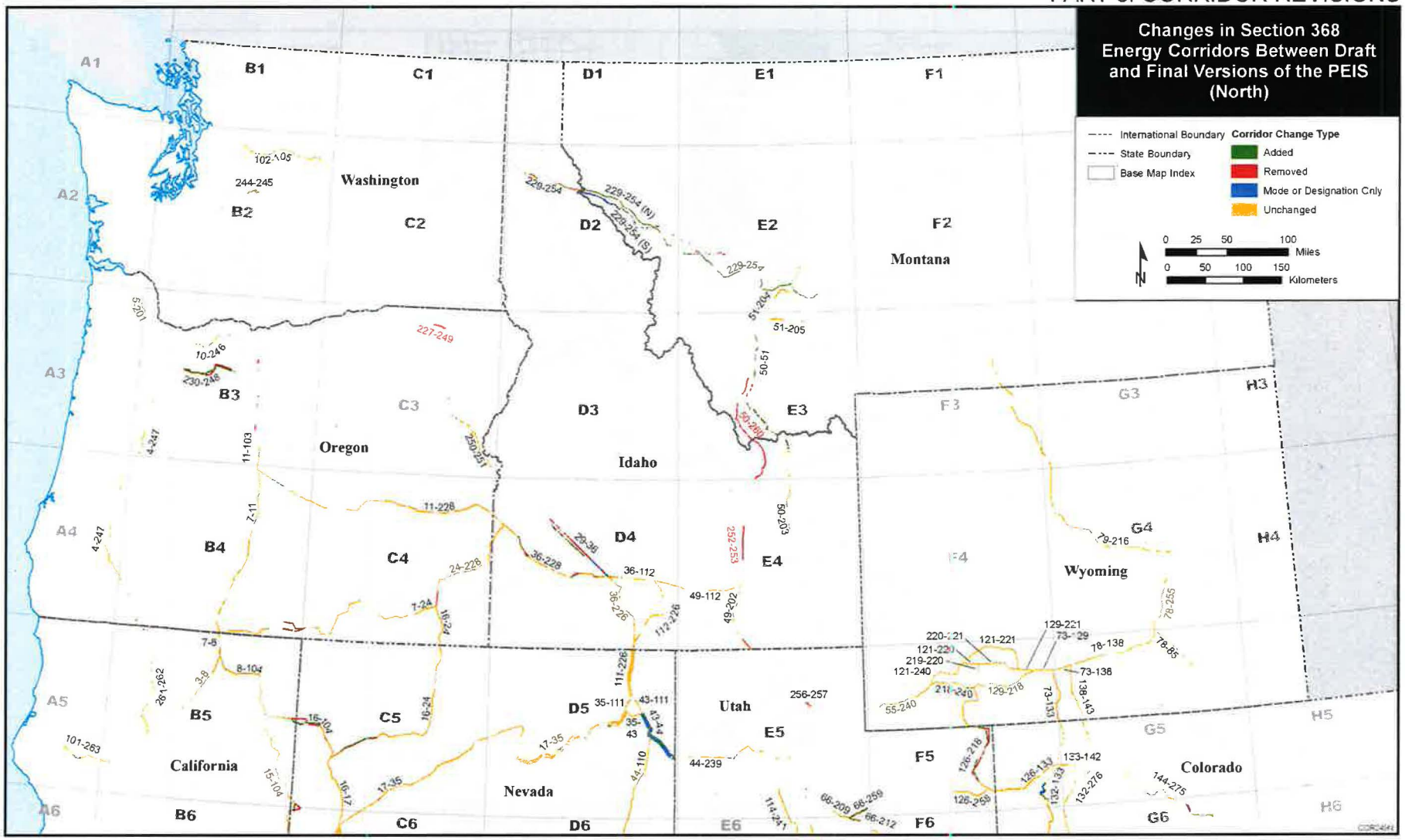
Attachment 1



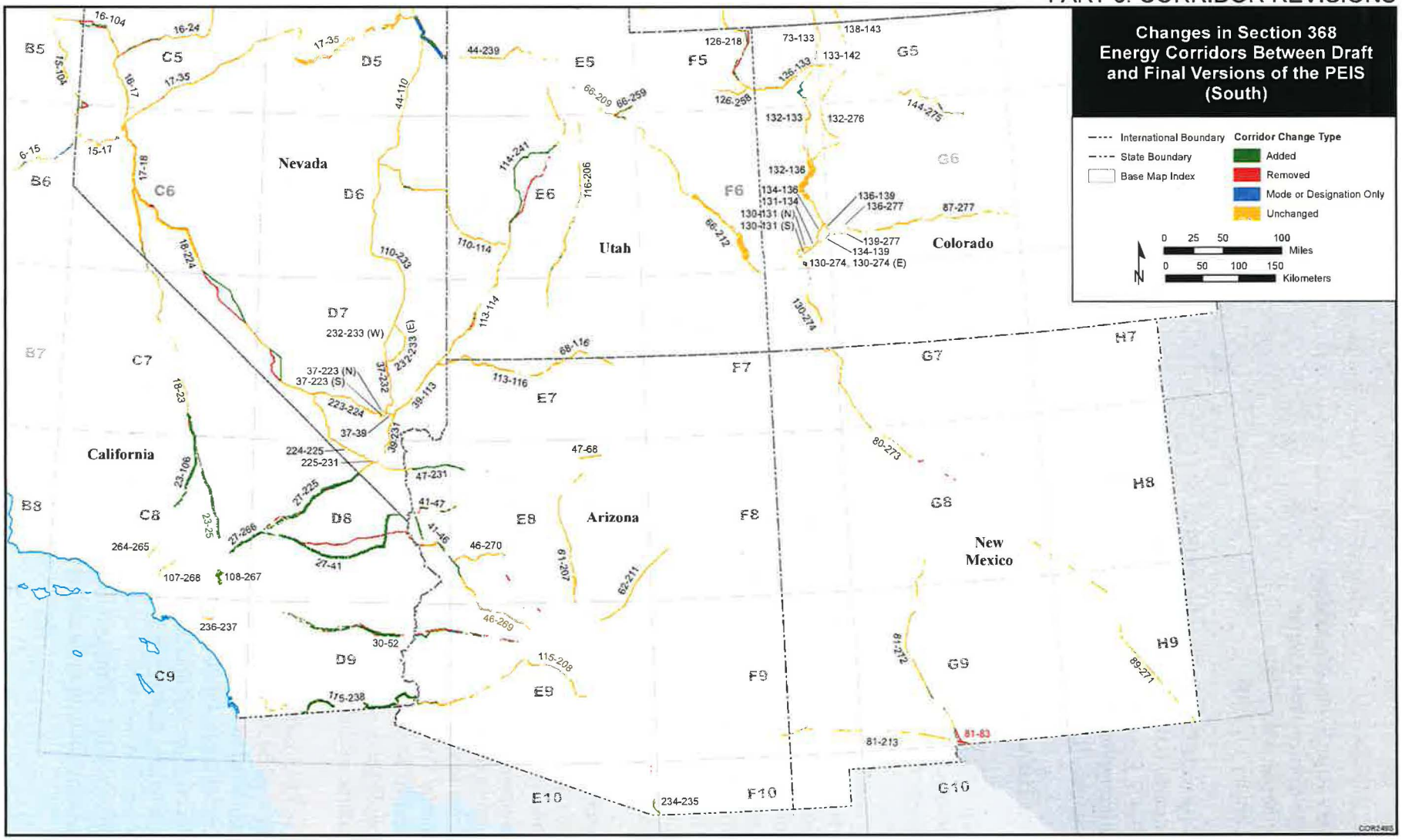

5


Power Corridor - Proposed Alternatives
Jemez Pueblo
San Ysidro
Santa Ana Mesa
Alternative B
Santo Domingo Pueblo
Zia Pueblo
Santa Ana Pueblo
San Felipe Pueblo
Alternative A
Los Cerrillos
Madrid
Nature Conservancy (Ball Ranch)
Algodones
Diamond Tail Ranch
DTE Master Plan
Tecolote
Placitas
Las Huertas
Bernalillo
Lone Mountain Ranch
Sandia Wilderness Area
Sandia Pueblo
Rio Rancho
Corrales
San Pedro Creek Estates
La Madera
Golden
San Pedro
South Mountain Ranch
Paako
Campbell Ranch Master Plan
Albuquerque
Los Ranchos de Albuquerque
Sandia Park
San Antonito
Cedar Grove
Legend
Alternative Power Corridor Routes
Corridor Proposed for Planning Purposes
Interstates
Highways
Rivers
Waterbodies
Section Boundaries
BLM PEIS tracts
Placitas Open Space
Wilderness
Land Ownership
BLM
Forest Service
DOD
State
State Park
Tribal
Private (white)
4 Miles
Cartography, Kurt A. Menke GISP
Bird's Eye View
www.BirdsEyeViewGIS.com
Date: February 13, 2008

# PART 6: CORRIDOR REVISIONS



# PART 6: CORRIDOR REVISIONS



Mary-Rose Szoka-Valladares
5515 Spruce Tree Avenue
Bethesda, MD 20814
February 14, 2008

West-wide Energy Corridor PEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

Dear Public Officials:

As a concerned citizen and a property owner in New Mexico, I appreciate the opportunity to comment on the *Programmatic Environmental Impact Statement (PEIS), Designation of Energy Corridors on Federal Land in the 11 Western States*.

By way of introduction, my family has owned property in Placitas for over thirty years. Since 1998, I have been working with a local organization, the Las Placitas Association, which seeks an update of the Rio Puerco Resource Management Plan that includes Placitas. Continuously inhabited for thousands of years, Placitas boasts a 250 year old land grant and a burgeoning residential community that has grown from 400 to 4,000 households since the early 80's. Ideally located between Albuquerque and Santa Fe, Placitas is now a highly prized residential area consisting predominantly of middle and upper middle class homes. There are not many communities like Placitas in New Mexico, a state of some two million inhabitants.

Placitas is part of the Rio Puerco Resource Management Plan (RMP), but this plan has not been updated since the early 1980's, at which time only technical modifications were made. Thus, it does not consider relevant state and local plans or local conditions, which have changed drastically. The effort to secure federal support for the RMP update finally met with success for fiscal year 2008. Shortly after learning that the RMP scoping process would soon get underway, I also learned of the need for review of the forthcoming Section 368 Westwide Energy Transmission Corridor PEIS through the local BLM office in Albuquerque, NM. The local BLM office has been most cooperative in the pre-RMP process, especially in the past couple years when the dialogue has been very constructive. In November, the draft PEIS became available. My comments on the PEIS follow.

The PEIS is deficient in that it does not actually present energy corridors on federal lands as required by Section 368; rather, it presents corridor segments. When these segments are connected (as illustrated in the map, presented at the Albuquerque public hearing, that had been obtained by FOIA action) in the Albuquerque/Placitas area, the corridor crosses non-federal property, encroaching on private property and Tribal lands. Such encroachment on non-federal land is surely not the intent of the legislation. The impact of this siting on the Placitas community would be significant and adverse, damaging property values and eroding the very fabric of the residential community. These negative impacts are completely inconsistent with the statement on the PEIS website that:

"Section 368 requires the Agencies to conduct any 'environmental reviews' necessary to complete the designation of Section 368 energy corridors. The proposed designation of Section 368 energy corridors *would not result in any direct impacts on the ground that may significantly affect the quality of the human environment* [emphasis added]."

The PEIS does not explain the use of eminent domain against landowners as the means to complete the corridors except to say, "Project applicants would secure authorizations across private lands in the same manner that they currently do."[PEIS, Section ES10, pp. ES-9].

Further, the PEIS does not offer corridor alternatives in the Placitas area. The press release explanation that "The few locations where the proposed corridors could not avoid sensitive areas are located along existing transmission lines. . ." inadequately addresses the alternatives issue. Given that the proposed Placitas location is unacceptable because of the severe adverse impacts on the Placitas community and its environment, alternative corridors must be developed. The likelihood that the Agencies will use a tiering approach in their decision-making processes underscores the need to develop alternatives, since tiering implies that higher level decisions are not revisited and alternate locations will not be considered. In developing alternatives, please consider the following recommendations:

- Locations in or adjacent to Placitas, including the Placitas Development Area (per Sandoval County land-use planning documents) should be avoided as such sitings would adversely impact the human and natural environment, contribute to loss of property value and damage the integrity of the community.
- Alternative corridors should be sited away from residential areas.
- Location of the energy corridor on BLM land north and east of the residential area on Indian Flats Mesa and the Placitas Open Space is unacceptable for the same reasons that the proposed energy corridor location is unacceptable, i.e., adverse impacts on the human and natural environments. Among the negative impacts to the Placitas Open Space, a regional resource, are erosion of the watershed and loss of viewshed.

Section 368 calls for consultation with FERC, States, tribal or local units of government as appropriate, affected utility industries and other interested persons. My understanding from testimony at the Albuquerque and Washington hearings is that many tribes were not consulted; neither was the land grant nor the many persons in Placitas who would be affected. I am also unaware that Sandoval County was consulted in this process. Surely, Federal Register notice is not the kind of consultation envisioned by Congress in Section 368. This is a deficiency that may take time to correct: the Agencies should take the time needed to comply properly with the consultation intent of the law.

While I acknowledge that America must prepare for its energy future, which includes preparations for increased transmission capacity, I also submit that the country must take a comprehensive look at a variety of important factors such as: supply and demand; load reduction; the potential for use of renewable energy and the opportunity to meet renewable portfolio standards; distributed generation; congestion and constraints in transmission of electricity, carbon dioxide captured from fossil fuel plants and hydrogen; constraints in the U.S. petroleum product distribution system; and distributed generation. The PEIS should address these concerns and rigorously evaluate environmental consequences in accordance with CRF 40 1502.16. In the case of New Mexico, the PEIS should also address the fact that

the 2002 Department of Energy *National Grid Transmission Study* did not identify any congested paths in New Mexico in its map of major western transmission bottlenecks in the Western Interconnection [*National Transmission Grid Study*, U.S. Department of Energy, 2002].

Out of consideration for the "bigger picture" of America's energy future, it is crucial that the Agencies and their PEIS send a clear signal to the public and all affected parties about the Agencies' intent to appropriately protect the human and natural environment, community integrity and property rights in the identification of transmission corridors.

Why is this so important? The development of new infrastructure is part of a long-term effort to meet America's energy needs. The consequences of this effort will impact our nation for a very long time. Development of new infrastructure will involve the private sector, including public companies as well as utilities, whether investor-owned, public or cooperative in ownership form. These entities sometimes encounter "opportunities" and trends that may not ultimately contribute to either company profitability or the public welfare. By way of illustration, consider a couple examples: first, the Enron story that was central to the recent full blown energy crisis in California; and second, the diversification activities of many IOUs that allowed them to become ensnared in the Savings and Loan crisis of the late 1980's which resulted in significant loss of shareholder value. These cautionary tales argue for careful consideration of input from the public and affected parties during the critical corridor identification process. Such consideration will send a clear message to interested corridor participants that the Agencies are serious about protecting the human and natural environment, community integrity and property rights in the identification of transmission corridors. The net effect of this message should help to safeguard the public interest during the challenging process of expanding our infrastructure for the benefit of current and future generations of Americans.

In conclusion, the PEIS is flawed because of its fragmented approach to corridor identification, encumbrance of private and tribal lands, consultation deficiencies, and inadequate evaluation of environmental consequences, as well as its proposed corridor siting in Placitas, NM and failure to develop New Mexico alternatives. I recommend that the PEIS be remanded and revised to address these concerns in accordance with my comments.

Thank you very much.

Sincerely,

Mary-Rose Szoka-Valladares

NM address:
38 Llano del Norte
Placitas, NM 87043

Mary-Rose Szoka-Valladares
5515 Spruce Tree Avenue
Bethesda, MD 20814

February 24, 2018

West-wide Energy Corridor PEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439

Dear Public Official,

Thank you for the opportunity to comment on the Region 2 energy corridor abstracts that comprise part of the Regions 2 and 3 Regional Review for the Westwide Energy Corridors.

I am a longtime (40+) year member of the Placitas, New Mexico community located in Sandoval County. I am also a member of both the Las Placitas Association (LPA) and the Eastern Sandoval Citizens Association (ES-CA). As explained in my 2008 comments on the *Programmatic Environmental Impact Statement (PEIS), Designation of Energy Corridors on Federal Land in the 11 Western States*, my concern about the energy corridor plan and its non-contiguous segments stems from the adverse impacts on the greater Placitas/eastern Sandoval County community that would ensue from a designated corridor in this area. The maps in section 2 of the PEIS now show three non-connected segments: 80-273, 81-272, and 89-271 in New Mexico.

Ten (10) years after commenting on the Westwide Corridor PEIS, my comments of February 14, 2008 remain relevant. Therefore, I am resubmitting them as an attachment to this letter.

Ten (10) years after commenting on the Westwide Corridor PEIS, the entire Placitas community has grown in population and building inventory. Moreover, there has been significant increase in residential settlement immediately adjacent to BLM land that serves as an urban interface. Thus, location of an energy corridor in the Placitas environs would wreak even greater adverse impacts on the environment.

Ten (10) years after commenting on the Westwide Corridor PEIS, the final Puerco Resource Management Plan (RMP) has been developed but awaits final consideration by the BLM in Washington. Since it has not been publicly released, we do not know whether or how it addresses the Section 368 corridors.

Ten (10) years ago, this diverse community – Native American Tribes, Sandoval County government and Citizens' Associations - expressed a wide-range of concerns about the potential economic, environmental and cultural impacts of a Section 368 corridor in eastern Sandoval County. These concerns remain valid today. The three aforementioned corridor segments converge on the population center of the state, but the non-connection of these segments creates uncertainty about future activity and its impacts on Placitas, especially in view of the PEIS statement that corridors may be located in high potential conflict areas to meet EPACT requirements and the siting principles in the Settlement Agreement.

However, the map in Part 6: Corridor Revisions (Changes in Section 368 Energy Corridors between Draft and final version of the PEIS) indicates segments of removed corridor (Base Map Index Area G8) in eastern Sandoval County. This is consistent with our understanding from Dr. Heather Wilson, the Congresswoman for this District in 2008, who advised us that the potential corridor for the northern part of Placitas, New Mexico was unlikely to be included in the final PEIS. This was good news for our community at the time. Today, it is fair to say that community members, organization and Government strongly support the permanent removal of these corridors from any consideration for Section 368 Corridor designation.

In addition to my 2008 comments, I am also attaching the following documents: PEIS Part 6, Corridor Section 2 illustrating removed sections of Corridor within the area of Base Map Index G8; comments submitted in 2008 by former Sandoval County Manager Debbie Hays; comments submitted by Secretary Joanna Prukop of New Mexico Energy, Minerals and Natural Resources Department; comments submitted on behalf of the Las Placitas Association; and correspondence from U.S. Congresswoman Heather Wilson.

Thank you very much.

Sincerely,

Mary-Rose Szoka-Valladares

Mary-Rose Szoka-Valladares

NM address:

Llano del Norte
Placitas, NM 87043

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10177] |
| **Date:** | Saturday, February 24, 2018 6:30:05 PM |
| **Attachments:** | ID_10177_PEISWestwideCorrido1.pdf<br>ID_10177_WiilsonLtr0707081.pdf |

Thank you for your input, Mary Rose Szoka-Valladares.

The comment tracking number that has been assigned to your comment is **10177**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 18:29:21 CST

**First Name:** Mary Rose
**Last Name:** Szoka-Valladares
**Email:**

**Are you submitting input on the behalf of an organization?** No

**Topics**
Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

80-273 [blank, blank]
81-272 [blank, blank]
89-271 [blank, blank]

**Input**

The files below contain documents referenced in my previous submission #10176. Kindly incorporate these documents in that submission. Thank you very much. Mary-Rose Szoka-Valladares

**Attachments**

PEIS Westwide Corrido[1].pdf, WiilsonLtr070708[1].pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

February 14, 2008

Westwide Corridor PEIS
Argonne National Laboratory
9700 S. Cass Ave
Bldg. 900, Mail Stop 4
Argonne, IL 60439

e-mailed: 2-14-08
corridoreis.anl.gov
FAXED:1-866-524-5904

Dear Sir or Madam:

On February 11, 2008, a compact disk (CD) was received by my office regarding the Programmatic Environmental Impact Statement (PEIS), Designation of Energy Corridors on Federal Land in the eleven Western States (DOE/EOS-0386). You can imagine my surprise and frustration, when I learned that the PEIS was actually released to the public in November, 2007, with no formal notification to a County government that is severely impacted by your proposed action and that the deadline for comment was a mere three days away. In an effort to meet the February 14th, 2008 deadline, we have completed a cursory review of the information we received and submit the following responses:

1. Sandoval County requests an extension of the comment period to allow preparation of more in-depth comments after a thorough review by County planning, development and land use specialists.
2. Our local office of the Bureau of Land Management, the Rio Puerco Field Office, will soon be undergoing a revision of the current Resource Management Plan (RMP), and Sandoval County intends to file for cooperating agency status.
3. For the RMP planning process, Sandoval County will be providing information regarding County transportation routes and other rights-of- way corridors, including the siting and location of existing, as well as potential energy corridors.
4. Based upon our quick review of the PEIS data, some of the existing pipeline corridors may be compatible with Sandoval County Planning; however, the new energy corridor, as proposed, does not take into account even existing land uses, much less proposed land uses and does not seem to consider traffic congestion, potential hazards with traffic volume, the "pinch" point problems with tribal lands, and overall public safety, etc.
5. It is Sandoval County's contention that once completed, the Rio Puerco RMP/EIS will designate transportation routes and rights-of-way corridors that may supersede the Federal energy corridors recommendation in the PEIS.
6. Sandoval County does not agree that two alternatives are sufficient for such a large project.
7. Based upon a quick read of the maps in the document, the black lines are not connected and do not really indicate a complete project proposal; therefore, a complete analysis of impacts to land, not in Federal ownership, has not been completed and seems rather disingenuous at best.
8. The County is concerned that the Federal Government would exercise powers of eminent domain or public utilities might exercise condemnation to place these energy corridors and "taking" of private land could be utilized without compensation.
9. There is no evidence that other land use plans have been taken into consideration, including non-Federal land use plans.

10. Because of the very brief time the County has had to review the PEIS, there has been no opportunity to present staff comments to the County Commissioners for review and consideration.

The comments listed above do not represent a full or comprehensive comment package from Sandoval County, but we believe they point out critical flaws in this planning process, which must be evaluated in greater detail. It is absolutely essential that an extension of the comment period be granted in order to have the time and opportunity to fully review the information and submit all comments and concerns.

Sincerely,

_____

Debbie Hays
Sandoval County Manager

cc: Congresswoman Heather Wilson
Congressman Tom Udall
Senator Pete Domenici
Senator Jeff Bingaman
Secretary of Energy Samuel W. Bodman
Secretary of the Interior Dirk Kempthorne

HEATHER WILSON
1ST DISTRICT, NEW MEXICO

ENERGY AND COMMERCE
SUBCOMMITTEES:
TELECOMMUNICATIONS AND THE INTERNET
HEALTH
ENVIRONMENT AND HAZARDOUS MATERIALS

PERMANENT SELECT COMMITTEE ON INTELLIGENCE
SUBCOMMITTEES:
TECHNICAL AND TACTICAL INTELLIGENCE
RANKING MEMBER
OVERSIGHT

Congress of the United States
House of Representatives
Washington, DC 20515–3101

442 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–3101
(202) 225-6316
FAX: (202) 225-4975

20 FIRST PLAZA, NW
SUITE 603
ALBUQUERQUE, NM 87102
(505) 346-6781
FAX: (505) 346-6723
http://wilson.house.gov

July 7, 2008

Mr. Reid Bandeen
PO Box 541
Placitas, New Mexico 87043

Dear Reid,

Thank you for your contacting me earlier this year about the Programmatic Environmental Impact Statement (PEIS) for Energy Transmission Corridors on federal land in eleven western states. I wanted you to know the latest information we received from the DOE/BLM Interagency Team developing the PEIS.

The staff in my Albuquerque and Washington offices have been in contact with several constituents on this issue and also attended the DOE hearings in Albuquerque on January 24th and in Washington, D.C. on February 5th. My staff and I also met with several representatives of the Las Placitas Association in February and in May to discuss this issue.

I contacted Ms. Laverne Kyriss, the Department of Energy Project Manager for the PEIS. My staff followed up with Ms. Kate Winthrop, the BLM Project Manager, to emphasize the need to reconcile the 121 comments submitted by respondents from New Mexico regarding the September Draft PEIS and the concerns with the Placitas area corridor. The Department of Energy has informed me that the DOE/BLM Interagency Project Team is likely to eliminate the Placitas area corridor from the Draft PEIS. This PEIS will be presented to DOE/BLM Senior Management for final approval and a Record of Decision this fall. I have been told that it is extremely unlikely that senior managers will overturn the Project Team's recommendation.

Because of the active involvement of the citizens of Placitas, the Placitas area is unlikely to be included in the energy corridor. We will continue to monitor this issue going forward, but I thought you would want to know where things stand.

Please continue to contact me about issues that are important to you. While I commute from my home in Albuquerque to Washington D.C., for voting and committee hearings, you can always check my web site for upcoming community events to find where you can catch me around town.

Sincerely,

Heather


PRINTED ON RECYCLED PAPER

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10178]
**Date:** Saturday, February 24, 2018 6:30:13 PM
**Attachments:** ID_10178_368corridorBartlettLake.pdf

---

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10178**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 18:29:32 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Exploring more of the 368 corridor

**Topics**
Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Public access and recreation

**Geographic Area**
Area selected via Corridor Mapping Tool

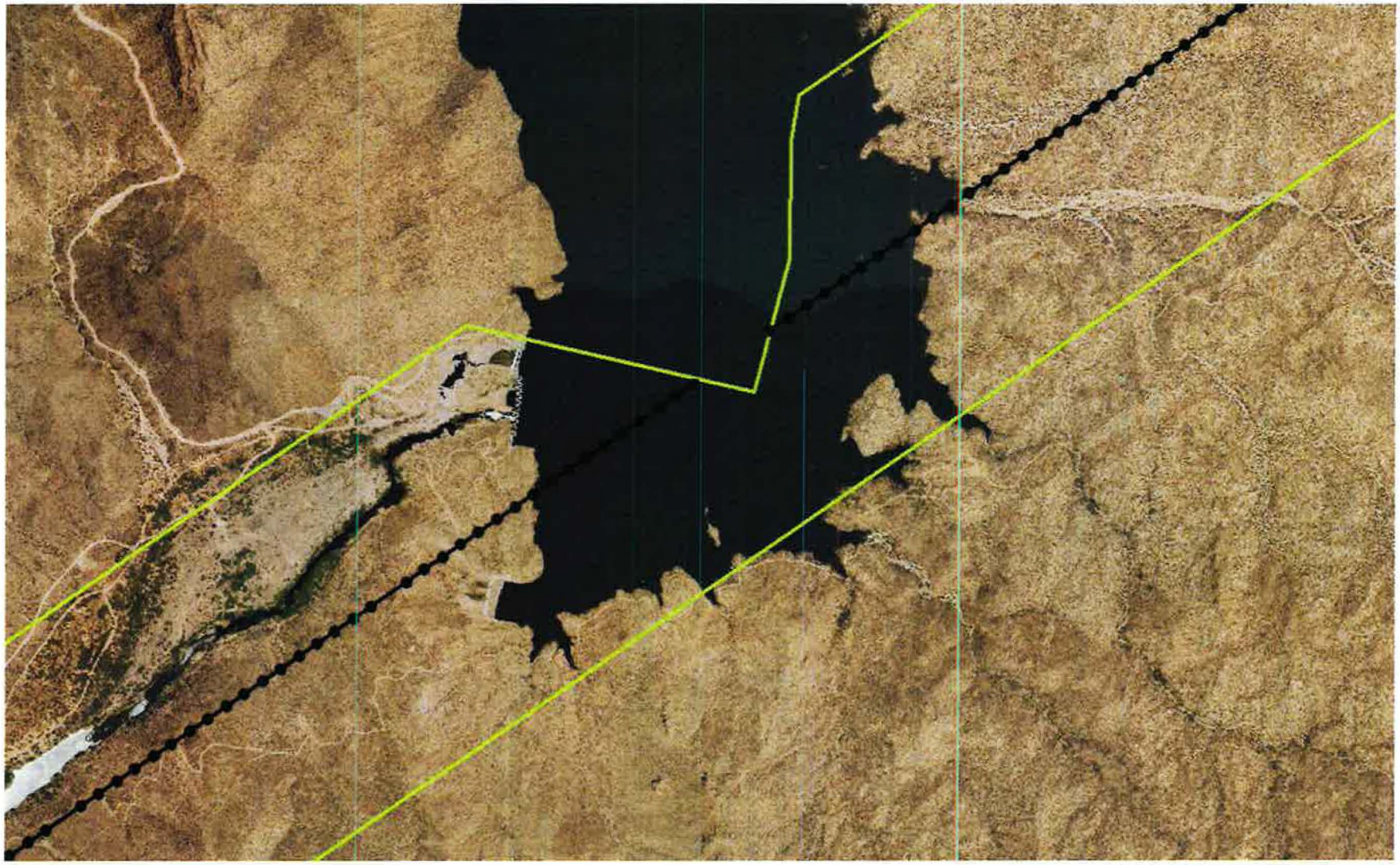
**Input**

Are you folks REALLY going to construct an energy corridor over/under Bartlett Lake on the Tonto NF? Besides issues with recreationists, will there not be safety considerations for the public??????

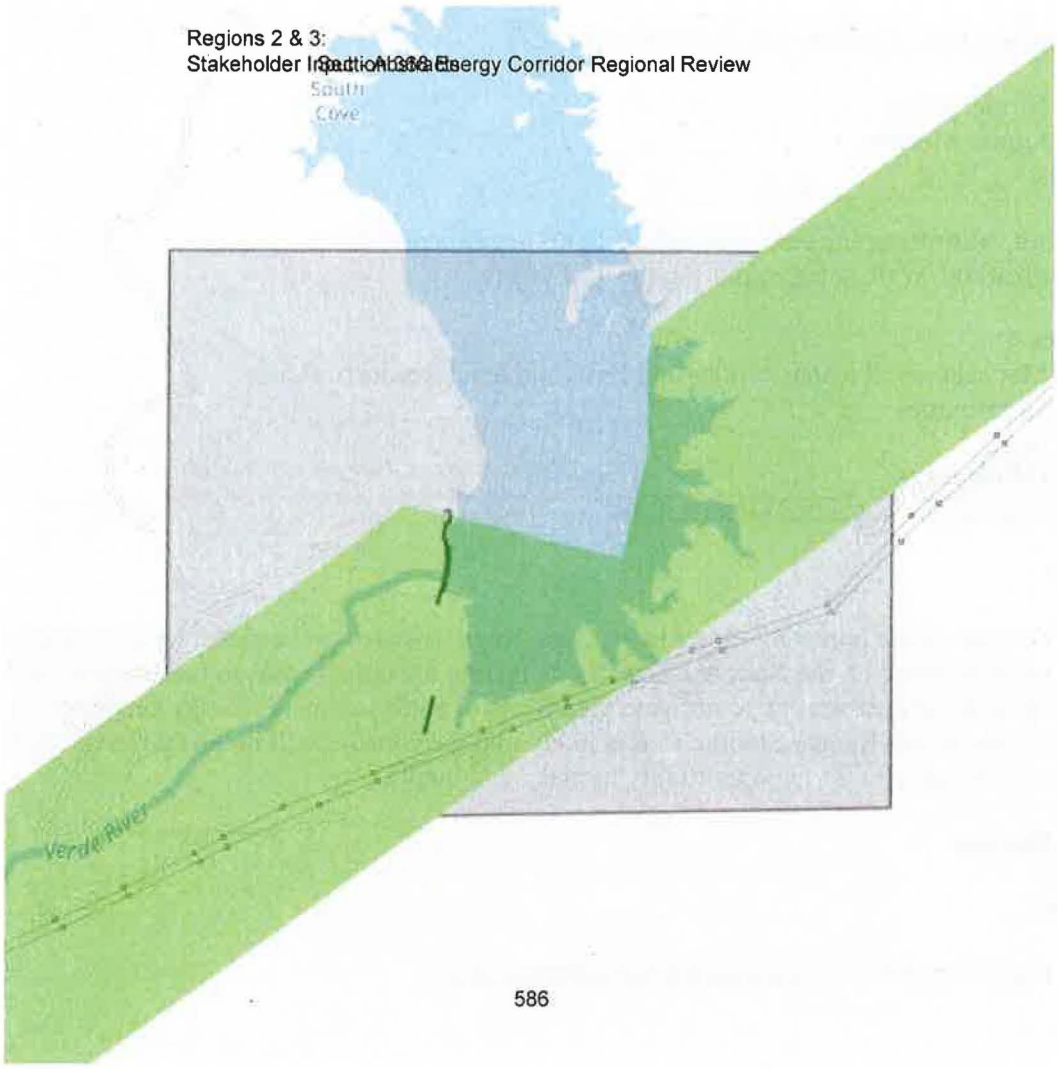
**Attachments**

368 corridor Bartlett Lake.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



**368 corridor, MP. 34: Bartlet Lake, Tonto NF: Are you seriously going to construct an energy corridor over/under Bartlett Lake?????**


South
Cove
Verde River

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10179] |
| **Date:** | Saturday, February 24, 2018 7:02:12 PM |

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10179**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 19:01:34 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Well, sorta; exploring the TNF again

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Cultural resources

**Geographic Area**
Area selected via Corridor Mapping Tool

**Input**

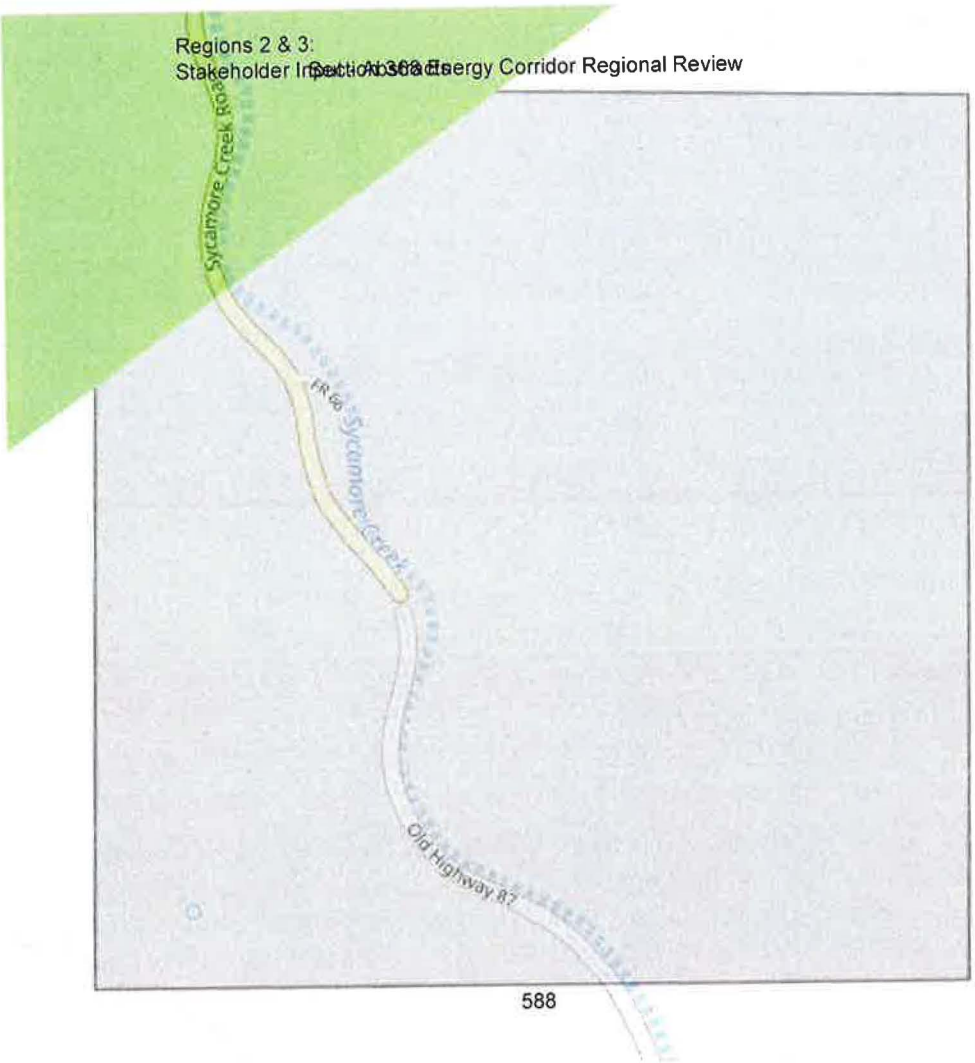
When exploring the potential effects to National Register-listed properties, please review why the sites were listed on the National Register. Is feeling or setting a reason the site is listed? If so, what will the measures be to mitigate the effects of constructing an energy corridor just north of Sunflower Ranger Station, as it is likely that the corridor will be visible from the NR property? Thank you for the opportunity to make comments.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Regions 2 & 3:
Stakeholder Input Session – Energy Corridor Regional Review




588

Arrowhe

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10180]
**Date:** Saturday, February 24, 2018 7:20:23 PM

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10180**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 19:19:58 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** No

**Topics**
Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues
Air quality
Cultural resources
Ecological resources
Lands and realty
Paleontology
Public access and recreation
Specially designated areas

**Geographic Area**
Area selected via Corridor Mapping Tool

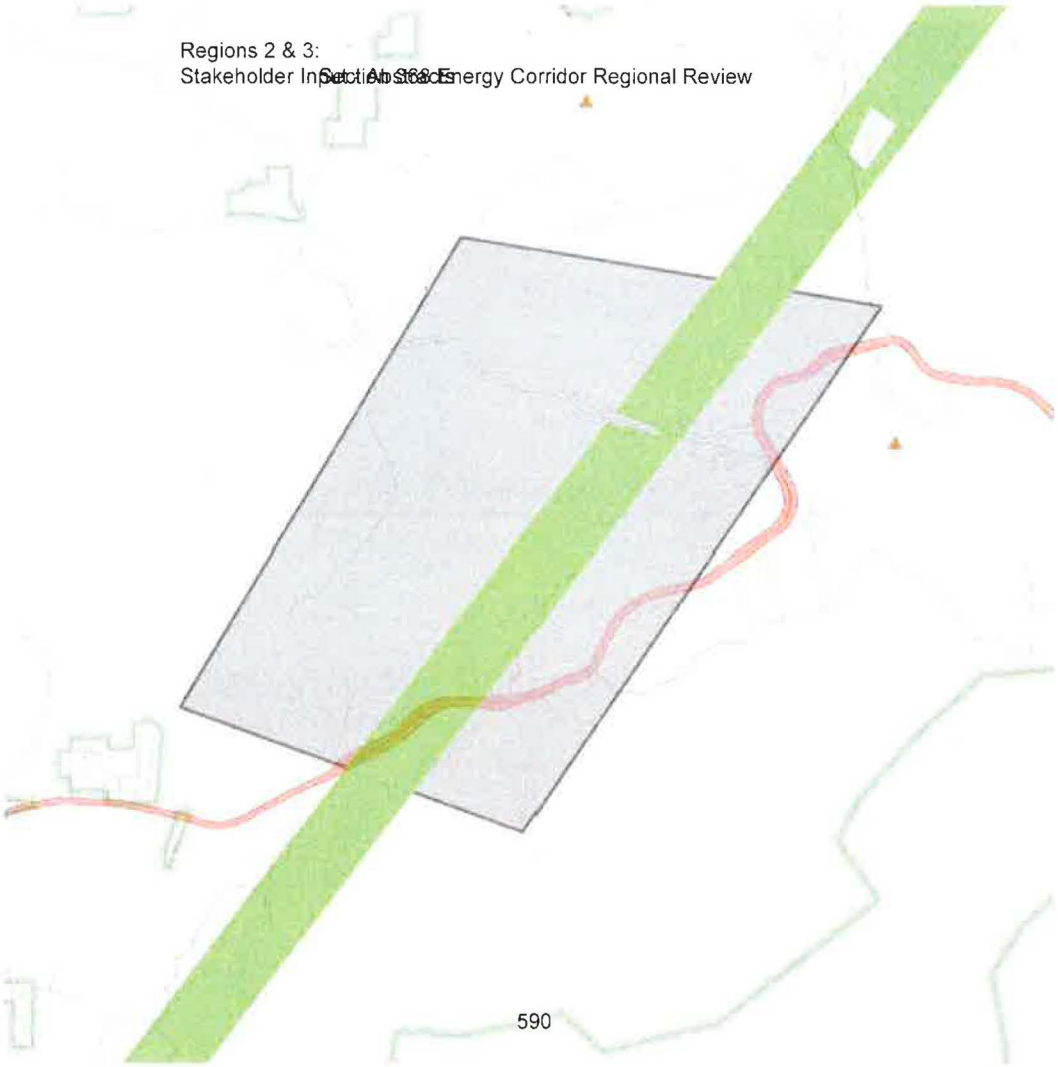
**Input**

This particular area of the 368 energy corridor is a popular Herkimer diamond collecting area for the general public. I question the logic of placing the corridor here and right over Tonto Village, which is located to the north and partially within the corridor. You'll have some serious health and safety issues here, not to mention you will be displacing a lot of people. Additionally, the Control Road is a very popular public road, especially in the spring and summer. Again, more potential health and safety issues. It would be better to place the 368 corridor over the existing powerline corridor to the east.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10181]
**Date:** Saturday, February 24, 2018 7:41:34 PM

Thank you for your input, Esther Morgan.

The comment tracking number that has been assigned to your comment is **10181**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 24, 2018 19:41:18 CST

**First Name:** Esther
**Last Name:** Morgan
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Apache-Sitgreaves National Forests

**Topics**
Energy Planning Issues
Physical barrier
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Paleontology
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

The following are some observations I made during the quick review of the 62-211 abstract. Specifically, this corresponds to MP 53 to 86.8, but may also apply to the entire corridor for 62-211. These concerns were emailed to ANL on 1/9/2018: 1) General corridor location on Figure 2: The lead [agency] did not take into consideration, and utilize, the existing powerline corridor on the ASNFs from MP 61 to 86.8; but instead digitized the corridor to the west of the existing corridor where there are significant cultural resources and traditional cultural properties, and other resources of concern. 2) Regarding the current corridor, the lead [agency] did not take into consideration the geology, topographical features, and wild and scenic river corridors on the ASNFs; there are better, less impactive locations for the energy corridor. 3) A

close review of the corridor polygon provided to the ASNFs, compared with Lidar data, NAIP photography, and landline geospatial data suggest that the corridor was quickly digitized without much thought (or time spent) and administrative boundaries were not properly digitized – see the southern end of the polygon for the ASNFs, for example, which does not follow ASNFs administrative boundaries. The northern end is similar. 4) The lead [agency] used old, inaccurate data for their geospatial analysis. Thank you again for the opportunity to make comments. It is my hope that as work progresses with identifying the Rights-of-Way, that everyone works closely together to identify the corridor with the least amount of impacts to the public's and Tribes' use and enjoyment of their National Forests, grasslands, National Monuments, BLM lands, etc., and that all resources of concern located within and adjacent to the corridors receive the least amount of impact as this develops. EM 1/24/18.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

| | |
|---|---|
| **From:** | corridoreiswebmaster@anl.gov |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10182] |
| **Date:** | Sunday, February 25, 2018 12:42:29 PM |

Thank you for your input, Kevin Emmerich.

The comment tracking number that has been assigned to your comment is **10182**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 25, 2018 12:42:15 CST

**First Name:** Kevin
**Last Name:** Emmerich
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Basin and Range Watch

**Topics**
Existing infrastructure/available space
Air quality
Cultural resources
Ecological resources
Lands and realty
Lands with wilderness characteristics
Public access and recreation
Specially designated areas
Visual resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

110-114 [blank, blank]

**Input**

Corridor 110-114 should be eliminated. The Cross-Tie line is simply an extension of the Gateway South project and there are no proposed energy projects that are really going anywhere with this. This should not be considered because it would have great impacts for only speculative renewable energy projects. This project would threaten raptors and this region has a high occurance of golden eagles, Swainson's hawks and a variety of other species. The bird kills will add cumulative impacts to the bird impacts of the Spring Valley Wind project. This project would threaten Greater sage grouse. Power lines directly kill sage grouse through collision. Transmission lines impede connectivity for sage grouse. The project will halt connectivity for desert bighorn, elk, mule deer and pronghorn antelope. The guy wires can kill animals directly. This transmission project would be a visual eyesore and would impact the viewscapes of the region. Beautiful regions like the House Range, Great Basin National Park, Mt. Moraiah Wilderness would be impacted. All visual impacts should be reviewed under BLM VRM Class One standards which discourage any major cjanges to the viewscape. Any powerline will cut off several thousand acres of public access. Again, this corridor should

be removed from consideration

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10183]
**Date:** Sunday, February 25, 2018 1:19:38 PM

Thank you for your input, Kevin Emmerich.

The comment tracking number that has been assigned to your comment is **10183**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 25, 2018 13:19:15 CST

**First Name:** Kevin
**Last Name:** Emmerich
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Basin and Range Watch

**Topics**
Physical barrier
Existing infrastructure/available space
Air quality
Ecological resources
Lands and realty
Lands with wilderness characteristics
Public access and recreation
Tribal concerns
Visual resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

30-52 [blank, blank]

**Input**

Corridor 30-52 should be eliminated for the following reasons: The Ten West Transmission Project would be a 114 mile 500 KV Transmission line with 83 miles on public lands including BLM land and FWS land in the Kofa National Wildlife Refuge. A new population of Sonoran Pronghorn was recently introduced to this part of the Kofa Mountains. Transmission lines on public lands threaten wildlife, impact cultural resources and landscapes, impact visual resources, damage small communities, create health hazards for nearby residents and create a need for eminent domain on adjacent property owners. The project would be operated by Valley Electric, a utility located in Pahrump, Nevada making us wonder what local benefits this project many have. While Section 103(c) of the Federal Land Policy and Management Act (FLPMA) of 1976 states that public lands are to be managed for multiple uses that take into account the long-term needs of future generations for renewable and non-renewable resources, there is nothing in FLPMA that states the need for renewable and non-renewable resources trumps the responsibility to protect natural, cultural and visual resources from unnecessary harm. Equally, there is nothing specific in FLPMA that points out that the

project site targeted for the project needs to be developed. In fact, FLPMA stresses preservation of important resources as pointed out in Section 8 in the FLPMA Declaration of Policy: "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will pro-vide for outdoor recreation and human occupancy and use". Fugitive Dust: Construction of the Ten West Line is likely to stir up fugitive dust Dust control in hot, arid climates is very problematic. The removal of established vegetation, biological soil crusts and centuries old desert pavement creates opportunities for dust to be airborne every time the wind blows. Not only does fugitive dust create problems for visual and biological resources, it creates issues for public health as well. Valley Fever has been blamed for 62 deaths among California prison inmates statewide, most at the Avenal and Pleasant Valley facilities, but also two at Blythe, California: http://www.pe.com/local-news/riverside-county/corona/corona-headlines-index/20130806-valleyfever-inland-inmates-may-replace-transferred-prisoners.ece According to the Center for Disease Control in 2010 there were over 16,000 reported cases of Valley Fever (i.e. coccidioidomycosis), the majority of which were located in Arizona and California (Accessed by Internet, July 3 2012 at: http://www.cdc.gov/fungal/coccidioidomycosis/statistics.html. Visual Resources: The line would traverse 113 miles with 86 miles on BLM land and roughly 25 miles through the Kofa National Wildlife Refuge. The line would be visible from adjacent public lands and wilderness areas as well as from private properties. A structure this large would cumulatively impact the view from all BLM and other lands. For this reason, we would like to request that visual resources be evaluated from VRM Class I standards. This impact cannot be avoided. The VRM Class I Objective is: To preserve the existing character of the landscape. The level of change to the characteristic landscape should be very low and must not attract attention. Valley Electric, a utility that serves Southern Nevada, will be running this transmission line from all the way in Pahrump, Nevada. As a result, ratepayers in Nevada will see a ten percent rate hike over this. But none of that power will go to the local people in Nevada. So how is it fair that people in Nevada get a rate hike for a project that serves Phoenix or Southern California? This would be an environmental justice issue for ratepayers in Nevada Here is the reference for this information: http://pvtimes.com/news/vea-district-meeting-focuses-new-projects.html The BLM should estimate how many birds (raptors, passerines, etc.) would be killed or impacted by the collision or electrocution from this corridor over its lifespan. The BLM should evaluate what wildlife migration corridors would be impacted by this project. Would the line disrupt movement of burro deer, javelina and bighorn sheep? How many desert tortoise, burrowing owls, kit fox and badgers would be relocated or hazed out of burrows? The Fish and Wildlife Service recently introduced a population of Sonoran pronghorn to the northern part of the Kofa National Wildlife Refuge. They oppose running this line through the refuge. They want the line to follow the highway. An existing line was built here in the 1980's. Expanding it will have biological and visual impacts to the refuge and the wildlife. It would be a great waste to compromise Sonoran pronghorn recover efforts for a transmission line that does not even have any legitimate big projects or power purchase agreements associated with it. The BLM has a responsibility to protect all of these resources and recognize the cumulative effects of their actions. Please do not avoid this impact because it is on FWS land. Please eliminate this energy corridor from consideration. Thank you

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

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|---|---|
| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10184] |
| **Date:** | Sunday, February 25, 2018 4:31:40 PM |
| **Attachments:** | ID_10184_CIWWECComments021517.pdf |

Thank you for your input, Suzanne Ewy.

The comment tracking number that has been assigned to your comment is **10184**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 25, 2018 16:31:19 CST

**First Name:** Suzanne
**Last Name:** Ewy
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Coldharbour Institute

**Topics**
Energy Planning Opportunities
Energy Planning Issues
Air quality
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Livestock grazing
Paleontology
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources
Interagency Operating Procedures

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

87-277 [blank, blank]

**Input**

Please see attached comments from Coldharbour Institute re: Corridor 87-277, and in particular, the "Western Portion of Corridor 87-277." The body of the comments is copied here, but the attachment makes up our formal comments. February 25, 2018 Coldharbour institute Comments on Gunnison County Portion of Corridor 87-277 US Department of Energy US Department of Interior US Forest Service Re: West-Wide Energy Corridors Regional Review, Section 368 Stakeholder Input To Whom It May Concern: I am the

Executive Director of Coldharbour Institute, a nonprofit tax-exempt organization that owns a 343-acre ranch on the Tomichi River, seven miles east of Gunnison, Colorado. The presently proposed corridor runs directly south of our land, and, as importantly, the present natural gas pipeline runs directly through our ranch. Our ranch runs across the entire Tomichi valley for about 3 miles. We are writing this letter on our own behalf and on behalf of the many other citizens who live and visit the Gunnison Area, who care deeply about the quality of our outstanding agricultural lands, our natural environment, our cultural heritage, and the health and condition of our communities. Our comments are with regard to Corridor 87-277, and in particular, the "Western Portion of Corridor 87-277." Our comments are organized into three sections. The first section deals with some specific issues along the proposed Energy Corridor route through Gunnison County, Colorado, and possibly through Coldharbour Ranch. The second deals with more general concerns about any future development of energy transportation infrastructure in the Corridor. Finally, we share concerns about what we see as the inadequacy of the process by which this consideration is occurring. Coldharbour Institute commits to participation in this Stakeholder Input Process and Resultant Processes, and reserves its right to make further comments and to fully participate in each available component of the processes of the USDOE, USDOI, and USFS regarding these matters and requests legal notice for any such processes. Coldharbour Institute facilitates education, incubation and demonstration of regenerative living practices, including regenerative agriculture, resource efficient building, regenerative energies, and wildlife and wild lands management. We do this through partnerships with local agricultural producers, building experts, energy producers and wildlife and ecology management experts from both Federal and local agencies and organizations as well as local academic experts, imparting this vast experience to our students. Our students come from Gunnison Watershed School District, where we have deep relationships with both students and educators. We work side by side with Western State Colorado University, graduate and undergraduate students, building the leaders of the future through project development and management skills and leadership experience. We work in partnership with Colorado Department of Higher Education and WSCU to provide these students, including historically disadvantaged students, with scholarships, work study funds and other critical support. In turn, these students and community partners make up the bulk of Coldharbour Institute's team, driving our programming and mission. As an agricultural producer, Coldharbour Ranch drives a large component of the local economy alongside many other critically important agricultural lands located along the Tomichi Creek/Gunnison River Corridor as well as the presently designated WWEC. As an agricultural education institution, Coldharbour helps drive the future of agriculture in the region as well as elsewhere. Coldharbour Regenerative Network is a program that brings together agricultural producers from around the region, state and world to develop ever more regenerative ways of producing food. We demonstrate exemplary ranching and farming techniques with our agricultureal partners and local collaborators. We also house the Colorado hub of the Savory Institute (savory.global) and have partners around the world. Because of its unique geographical location at a narrowing of the Tomichi Valley, Coldharbour Ranch and its surrounding lands, have been at the confluence of many natural and human crossings. SPECIFIC CONCERNS RELATED TO THE ENERGY CORRIDOR ROUTE IN GUNNISON COUNTY, COLORADO, IN RELATION TO COLDHARBOUR RANCH AND OTHER AGRICULTURAL AND HISTORIC PROPERTIES IN THE GUNNISON REGION. • It contains the natural confluence of the Tomichi and Cochetopa Creeks • Many peoples have flowed through the area, including Pre-Utes, Utes, other native tribes, trappers, explorers, Spaniards, miners, ranchers, farmers, anglers, students, outdoor recreation enthusiasts, and more. • There are prehistoric sites across the Coldharbour Ranch, exemplary of those found throughout the Tomichi Creek corridor and along the presently

designated West Wide Energy Corridor, including a flint knapping site, an eagle trap, a vision quest site, and a game drive site. • Coldharbour Ranch includes a 243-acre USDA/NRCS Wetlands Reserve Easement, protecting multiple species of wildlife and local flora. • Coldharbour Ranch has a wonderful historic homestead site which is the subject of two historic designations. This includes an amazing stone house and barn where over a hundred years of community engagement have taken place, down to dances on the specially constructed barn floor during prohibition. Regional properties, public and private, contain similar historic components. • Coldharbour Ranch includes a whistle stop on the historic Denver & Rio Grande Railroad line, which ran through the property. It was from this whistle stop that the Gunnison Community would arrive for community gatherings. • Tomichi Creek through Coldharbour Ranch is a trophy level trout creek, yielding up to 26" trout. In addition to educating children and other community members about fish ecology and angling sport, Coldharbour leases angling rights to the tune of $!0,000 earned income per year, a critical percentage of its operating funding. • Because of its protected status for the past several decades, Coldharbour Ranch has a vibrant large animal wildlife corridor that includes elk, deer, mountain lion, bear, coyotes. It also has a myriad of smaller animals including beaver, otters, fox, prairie dogs. Birds are endlessly parading the skies, including eagles, hawks, blue herons. Smaller birds are present in endless numbers. • The North Fork of the Old Spanish Trail runs through the Coldharbour Ranch property. The Corridor additionally crosses the North Branch of the Old Spanish Trail, (a National designated historic trail), in multiple places on private and public property in Gunnison County. • A majority of the corridor that spans Gunnison County has been identified as a "Section 368 Corridor of Concern" (as defined in the settlement agreement of the previous lawsuit) due to the county's important ecological and environmental qualities. As such, the stretch of corridor through Gunnison County, if constructed, will require extensive mitigation efforts, completion of an EIS, and or alternative corridor consideration. • The WWEC runs directly through land that is designated as Critical Habitat for the Gunnison Sage Grouse, including Coldharbour Ranch, under the Endangered Species Act (ESA), especially along MP 84.3 -127.3. There is already existing energy infrastructure that has been identified as having an adverse impact on the Gunnison Sage Grouse and development of the WWEC through this area further jeopardizes the vitality of an already at-risk species. We also believe that conformance with the Gunnison Basin Gunnison sage-grouse Conservation Agreement on Federal Lands is a mandatory part of all corridor practices in the Gunnison Basin. • BLM borders the Coldharbour Ranch to the north and the south. The WWEC passes through BLM Wilderness Study Areas. As The Wilderness Society has suggested, "Because all wilderness-quality lands are inappropriate for infrastructure development, the Agencies should use a consistent approach to addressing intersections with wilderness-quality lands that commits to avoiding intersections, identifies a path to making needed revisions to corridors and requires the use of mitigation measures where unavoidable impact occurs." Two BLM Wilderness Study areas intersect the corridor: o Stubbs Gulch MP 103-108, approximately 835 acres of overlap o Sugar Creek MP 113-114, approximately 260 acres of overlap • Coldharbour Ranch, along with many other regional agricultural lands, public and private, run along Tomichi Creek, Gunnison River, and Cochetopa Creek. • Highway 50 Route o U.S. Highway 50 runs the length of Coldharbour Ranch. The "Corridor Rationale" states that "(a)ny new pipelines would likely follow along U.S. Highway 50; there is one existing gas pipeline that roughly follows U.S. Highway 50 east of Gunnison." We are very concerned about this idea. It is to us astonishing that your agencies would be putting everyone to so much trouble to analyze a corridor, then flippantly say that the corridor has no meaning and will not be used. o Like many neighboring agricultural producers, Coldharbour irrigates its lands with pre-1876 historic water rights from the Tomichi. o The existing pipeline is, at places on Coldharbour and other agricultural lands, nearly a half mile from Highway 50,

across Tomichi Creek, in rough and risky terrain. The community has had a high level of concern about the present pipeline for generations, for good reasons. o The "Highway 50 Route" ought not to be assumed to be an accomplished fact. It would entail considerable evaluation of the impacts to many private properties, including important wetlands, areas subject to conservation easements, water bodies, agricultural and cultural sites adjacent to Highway 50. o None of these critical stakeholders, including Coldharbour Institute or other local landowners, have been notified of this possibility. And many of them have been lulled into inaction by the idea that the WWEC does not cross their lands. Now we are being told that even though the WWEC does not cross their lands, any pipeline that is built will in fact cross their lands because any pipeline will not follow the WWEC. o A Highway 50 route could also impact the Gunnison County landfill, which is one of the few landfills in Colorado that accepts certain hazardous wastes like asbestos. o A Highway 50 route would pass near a storage site for radioactive materials. There is a federal Uranium Mill Tailings Radiation Control Act disposal and long-term stabilization site nearby. o The site selection of the "existing pipeline" route down the center of the Valley, that would impact so many private ranches, was not based on any sound planning or route location criteria but because it was the right of way of an old railroad that went out of business in the 1940s and was thus cheap to acquire. That is not a sound basis for a modern energy corridor process. o Location of the WWEC or any pipeline component along Highway 50 is ill advised given the critical agricultural lands that surround it and waterways that it follows. o Construction along Tomichi Creek will necessarily damage and possibly destroy the Coldharbour Wetlands, its trophy and educational angling program, and its agricultural irrigation operations, among other significant impacts. GENERAL CONCERNS THAT MUST BE ADDRESSED BEFORE DEVELOPMENT OF ANY INFRASTRUCTURE IN THE CORRIDOR • We understand that this is a general, programmatic review. However, site-specific concerns cannot be resolved or avoided by the large-scale, corridor level planning currently underway. Because there is no actual policy/mandate for the construction of the corridor, we assume there will be an additional thorough potential impact review and opportunity for stakeholder involvement prior to actual construction. If construction were to proceed, some points to consider may include: o Local community impacts: economic boom/bust, employee housing, traffic, o Risk to waterways, agricultural lands and production, recreational enterprise, educational endeavors o Construction impacts such as sediment transfer and erosion and resulting impact on agricultural, ecological research, archeological, and educational endeavors o Impacts of land clearing on drainages and wetlands, including the Coldharbour Federal Reserve Wetlands For example, "The Western Portion of Corridor 87-277 crosses significant water bodies including Tomichi Creek and Cochetopa Creek, and important wetland areas. Particular attention is required to avoid immediate, on-site consequences to these water bodies and their tributaries, as well as downstream impacts to the waters in the Curecanti National Recreation Area and Black Canyon of the Gunnison River. o Disruption to wildlife corridors, such as the big game winter range in east Gunnison County, crossing Coldharbour lands. o Reclamation requirements CONCERNS REGARDING THE CONSULTATIVE PROCESS The goal of the review process is to ensure that the corridor location best satisfies the requirements of the siting principles. The current review process has not been 'publicized' to the extent necessary to elicit an appropriate level of meaningful and substantial stakeholder involvement for thorough evaluation of the corridor siting. We were stunned how few of the interested local government bodies, landowners and others in our County had any idea that this process was going on. There was something fundamentally wrong with the notice provisions. The development of the WWEC is a major project with the potential for significant, landscape-scale impacts and the fact that the review process has not been well publicized is deeply concerning. Thank you for taking our comments into account. Sincerely, Suzanne H. Ewy,

J.D. Executive Director, Coldharbour Institute www.coldharbourinstitute.org (719) 530-1103 sewy@western.edu

**Attachments**

CI WWEC Comments 021517.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# COLDHARBOUR INSTITUTE
GUNNISON, COLORADO

*Coldharbour Institute facilitates education, incubation and demonstration of responsible personal, community and land practices*

February 25, 2018

**Coldharbour institute Comments on Gunnison County Portion of Corridor 87-277**

US Department of Energy
US Department of Interior
US Forest Service

Re: West-Wide Energy Corridors Regional Review, Section 368 Stakeholder Input

To Whom It May Concern:

I am the Executive Director of Coldharbour Institute, a nonprofit tax-exempt organization that owns a 343-acre ranch on the Tomichi River, seven miles east of Gunnison, Colorado. The presently proposed corridor runs directly south of our land, and, as importantly, the present natural gas pipeline runs directly through our ranch. Our ranch runs across the entire Tomichi valley for about 3 miles.

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P.O. Box 463, Gunnison, Colorado 81230
www.coldharbourinstitute.org

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Coldharbour Regenerative Network is a program that brings together agricultural producers from around the region, state and world to develop ever more regenerative ways of producing food. We demonstrate exemplary ranching and farming techniques with our agricultureal partners and local collaborators. We also house the Colorado hub of the Savory Institute (savory.global) and have partners around the world.

Because of its unique geographical location at a narrowing of the Tomichi Valley, Coldharbour Ranch and its surrounding lands, have been at the confluence of many natural and human crossings.

SPECIFIC CONCERNS RELATED TO THE ENERGY CORRIDOR ROUTE IN GUNNISON COUNTY, COLORADO, IN RELATION TO COLDHARBOUR RANCH AND OTHER AGRICULTURAL AND HISTORIC PROPERTIES IN THE GUNNISON REGION.

- It contains the natural confluence of the Tomichi and Cochetopa Creeks
- Many peoples have flowed through the area, including Pre-Utes, Utes, other native tribes, trappers, explorers, Spaniards, miners, ranchers, farmers, anglers, students, outdoor recreation enthusiasts, and more.
- There are prehistoric sites across the Coldharbour Ranch, exemplary of those found throughout the Tomichi Creek corridor and along the presently designated West Wide

Energy Corridor, including a flint knapping site, an eagle trap, a vision quest site, and a game drive site.

- Coldharbour Ranch includes a 243-acre USDA/NRCS Wetlands Reserve Easement, protecting multiple species of wildlife and local flora.
- Coldharbour Ranch has a wonderful historic homestead site which is the subject of two historic designations. This includes an amazing stone house and barn where over a hundred years of community engagement have taken place, down to dances on the specially constructed barn floor during prohibition. Regional properties, public and private, contain similar historic components.
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- Tomichi Creek through Coldharbour Ranch is a trophy level trout creek, yielding up to 26" trout. In addition to educating children and other community members about fish ecology and angling sport, Coldharbour leases angling rights to the tune of $!0,000 earned income per year, a critical percentage of its operating funding.
- Because of its protected status for the past several decades, Coldharbour Ranch has a vibrant large animal wildlife corridor that includes elk, deer, mountain lion, bear, coyotes. It also has a myriad of smaller animals including beaver, otters, fox, prairie dogs. Birds are endlessly parading the skies, including eagles, hawks, blue herons. Smaller birds are present in endless numbers.
- The North Fork of the Old Spanish Trail runs through the Coldharbour Ranch property. The Corridor additionally crosses the North Branch of the Old Spanish Trail, (a National designated historic trail), in multiple places on private and public property in Gunnison County.
- A majority of the corridor that spans Gunnison County has been identified as a "Section 368 Corridor of Concern" (as defined in the settlement agreement of the previous lawsuit) due to the county's important ecological and environmental qualities. As such, the stretch of corridor through Gunnison County, if constructed, will require extensive mitigation efforts, completion of an EIS, and or alternative corridor consideration.
- The WWEC runs directly through land that is designated as Critical Habitat for the Gunnison Sage Grouse, including Coldharbour Ranch, under the Endangered Species Act (ESA), especially along MP 84.3 -127.3. There is already existing energy infrastructure that has been identified as having an adverse impact on the Gunnison Sage Grouse and development of the WWEC through this area further jeopardizes the vitality of an already at-risk species. *We also believe that conformance with the Gunnison Basin Gunnison sage-grouse Conservation Agreement on Federal Lands is a mandatory part of all corridor practices in the Gunnison Basin.*

- BLM borders the Coldharbour Ranch to the north and the south. The WWEC passes through BLM Wilderness Study Areas. As The Wilderness Society has suggested, "Because all wilderness-quality lands are inappropriate for infrastructure development, the Agencies should use a consistent approach to addressing intersections with wilderness-quality lands that commits to avoiding intersections, identifies a path to making needed revisions to corridors and requires the use of mitigation measures where unavoidable impact occurs." Two BLM Wilderness Study areas intersect the corridor:
    - Stubbs Gulch MP 103-108, approximately 835 acres of overlap
    - Sugar Creek MP 113-114, approximately 260 acres of overlap
- Coldharbour Ranch, along with many other regional agricultural lands, public and private, run along Tomichi Creek, Gunnison River, and Cochetopa Creek.
- Highway 50 Route
    - U.S. Highway 50 runs the length of Coldharbour Ranch. The "Corridor Rationale" states that "(a)ny new pipelines would likely follow along U.S. Highway 50; there is one existing gas pipeline that roughly follows U.S. Highway 50 east of Gunnison." We are very concerned about this idea. It is to us astonishing that your agencies would be putting everyone to so much trouble to analyze a corridor, then flippantly say that the corridor has no meaning and will not be used.
    - Like many neighboring agricultural producers, Coldharbour irrigates its lands with pre-1876 historic water rights from the Tomichi.
    - The existing pipeline is, at places on Coldharbour and other agricultural lands, nearly a half mile from Highway 50, across Tomichi Creek, in rough and risky terrain. The community has had a high level of concern about the present pipeline for generations, for good reasons.
    - The "Highway 50 Route" ought not to be assumed to be an accomplished fact. It would entail considerable evaluation of the impacts to many private properties, including important wetlands, areas subject to conservation easements, water bodies, agricultural and cultural sites adjacent to Highway 50.
    - None of these critical stakeholders, including Coldharbour Institute or other local landowners, have been notified of this possibility. And many of them have been lulled into inaction by the idea that the WWEC does not cross their lands. Now we are being told that even though the WWEC does not cross their lands, any pipeline that is built will in fact cross their lands because any pipeline will not follow the WWEC.

- A Highway 50 route could also impact the Gunnison County landfill, which is one of the few landfills in Colorado that accepts certain hazardous wastes like asbestos.
- A Highway 50 route would pass near a storage site for radioactive materials. There is a federal Uranium Mill Tailings Radiation Control Act disposal and long-term stabilization site nearby.
- The site selection of the "existing pipeline" route down the center of the Valley, that would impact so many private ranches, was not based on any sound planning or route location criteria but because it was the right of way of an old railroad that went out of business in the 1940s and was thus cheap to acquire. That is not a sound basis for a modern energy corridor process.
- Location of the WWEC or any pipeline component along Highway 50 is ill advised given the critical agricultural lands that surround it and waterways that it follows.
- Construction along Tomichi Creek will necessarily damage and possibly destroy the Coldharbour Wetlands, its trophy and educational angling program, and its agricultural irrigation operations, among other significant impacts.

GENERAL CONCERNS THAT MUST BE ADDRESSED BEFORE DEVELOPMENT OF ANY INFRASTRUCTURE IN THE CORRIDOR

- We understand that this is a general, programmatic review. However, site-specific concerns cannot be resolved or avoided by the large-scale, corridor level planning currently underway. Because there is no actual policy/mandate for the construction of the corridor, we assume there will be an additional thorough potential impact review and opportunity for stakeholder involvement prior to actual construction. If construction were to proceed, some points to consider may include:
  - Local community impacts: economic boom/bust, employee housing, traffic,
  - Risk to waterways, agricultural lands and production, recreational enterprise, educational endeavors
  - Construction impacts such as sediment transfer and erosion and resulting impact on agricultural, ecological research, archeological, and educational endeavors
  - Impacts of land clearing on drainages and wetlands, including the Coldharbour Federal Reserve Wetlands
    - *For example, 'The Western Portion of Corridor 87-277 crosses significant water bodies including Tomichi Creek and Cochetopa Creek, and important wetland areas. Particular attention is required to avoid immediate, on-site consequences to these water bodies and*

*their tributaries, as well as downstream impacts to the waters in the Curecanti National Recreation Area and Black Canyon of the Gunnison River.*

- Disruption to wildlife corridors, such as the big game winter range in east Gunnison County, crossing Coldharbour lands.
- Reclamation requirements

CONCERNS REGARDING THE CONSULTATIVE PROCESS

The goal of the review process is to ensure that the corridor location best satisfies the requirements of the siting principles. The current review process has not been 'publicized' to the extent necessary to elicit an appropriate level of meaningful and substantial stakeholder involvement for thorough evaluation of the corridor siting.

We were stunned how few of the interested local government bodies, landowners and others in our County had any idea that this process was going on. There was something fundamentally wrong with the notice provisions.

The development of the WWEC is a major project with the potential for significant, landscape-scale impacts and the fact that the review process has not been well publicized is deeply concerning.

Thank you for taking our comments into account.

Sincerely,

Suzanne H. Ewy, J.D.
Executive Director, Coldharbour Institute
www.coldharbourinstitute.org
(719) 530-1103
sewy@western.edu

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10185]
**Date:** Sunday, February 25, 2018 6:06:50 PM
**Attachments:** ID_10185_Section368Region2CorridorReviews.pdf

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Thank you for your input, Sophie Shemas.

The comment tracking number that has been assigned to your comment is **10185**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 25, 2018 18:06:13 CST

**First Name:** Sophie
**Last Name:** Shemas
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** New Mexico Wildlife Federation

**Topics**
Ecological resources
Tribal concerns

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

80-273 [blank, blank]
81-213 [blank, blank]
81-272 [blank, blank]
89-271 [blank, blank]

**Input**

[Blank]

**Attachments**

Section 368 Region 2 Corridor Reviews.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

NEW MEXICO WILDLIFE FEDERATION

(505) 299-5404
6100 Seagull St. NE Suite B-105
Albuquerque, NM 87109
nmwildlife@nmwildlife.org

To: Bureau of Land Management, US Forest Service, Department of Energy West-wide Energy Corridor Team

From: Sophie Shemas, Public Lands Fellow, New Mexico Wildlife Federation

Date: February 25, 2018

Re: West-wide Energy Corridor Region 2 Reviews

Thank you for the opportunity to provide comment regarding the Section 368 Energy Corridor Region 2 reviews. New Mexico's public lands support some of our largest industries, from energy production to outdoor recreation. With 80,000 members across the state, the New Mexico Wildlife Federation sees this review process as an essential part of balancing and more effectively managing multiple uses on our public lands. We hope you will consider incorporating our feedback into the future management of the energy corridors specified below.

**Corridor 80-273: Rio Puerco & Farmington Corridor**

While not listed as a corridor of concern, the Rio Puerco & Farmington corridor runs through an area with numerous management conflicts. One of the most substantial conflicts stems from the checkerboard nature of the corridor region, with Bureau of Land Management (BLM) land neighboring state trust and Bureau of Indian Affairs (BIA) land. Navajo and Pueblo communities neighboring or living within the region surrounding the designated corridor have expressed their concerns about the heavy presence of extractive energy industry and resulting infrastructure in their communities.

When the Piñon Pipeline was proposed by Saddle Butte San Juan LLC back in 2014, it was met with immediate opposition from surrounding Native communities. Set to be constructed

near the designated Rio Puerco & Farmington corridor near mile marker 75, the pipeline sparked a public outcry that would persist until the right-of-way application from Saddle Butte was withdrawn in late 2016. This, along with the ongoing Farmington RMP amendment process, brought to light the communities' concerns for potential pipeline leaks, the protection of cultural resources, and the impact of industry traffic and noise on their quality of life.[1]

Secondly, as shown in the corridor abstract, this corridor also runs through several areas of high environmental conflict. North of mile marker 83, almost the entire corridor runs through crucial habitat areas, identified on the mapping tool as either a level 2 or 1 (from 1-6, with 1 being the most crucial). One of our primary concerns are the potential impacts to the mule deer population within this region. Mule deer have demonstrated avoidance of energy infrastructure in several western states—in southwestern Wyoming, 15 years of energy development led to a 36% decline in population abundance despite substantial hunting restrictions.[2,3] New Mexico has yet to study these impacts within the Four Corners despite its importance as a migration corridor for several sensitive big game species, meaning we don't currently have mitigation plans developed from long-term scientific data to help guide projects within the energy corridor region.

Realistically, any project within this corridor region above the 25-mile mark will have to undergo extensive review in order to fulfill tribal consultation requirements and mitigate environmental impacts to sensitive species. Therefore, NMWF encourages the reconsideration of this corridor designation as its designation seems to be an oversimplification of planning realities. As that may not be possible, we also encourage the revision of this corridor from mile marker 75 to mile marker 132.6 to not only more effectively mitigate impacts to wildlife in crucial habitat

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[1] https://eplanning.blm.gov/epl-front-office/projects/lup/68107/108404/132730/FMG_FinalScopingRpt_Vol1_508.pdf
[2] https://www.nwf.org/~/media/PDFs/Media%20Center%20-%20Press%20Releases/11-17-15-MT-WY-Wildlife-Report-Final.pdf
[3] Sawyer H., Korfanta N.M., Nielson R.M., Monteith K.L., Strickland D. Mule deer and energy development—Long-term trends of habituation and abundance. Glob Change Biol. 2017;23:4521–4529. https://doi.org/10.1111/gcb.13711

zones, but to better avoid conflicts with Native communities within the checkerboard region of the corridor as well.

**Corridor 81-213: Las Cruces-Tucson Corridor**

While this corridor is also not identified as a corridor of concern, NMWF has concerns about how projects within this corridor may affect areas of critical wildlife habitat. These concerns are particularly notable given the corridor's proximity to the U.S.-Mexico border, an important migration corridor for Chihuahuan Desert species through one of the world's most biologically diverse arid ecoregions. As shown in the online mapping tool, the designated corridor crosses a substantial region of crucial wildlife habitat near the Arizona-New Mexico border, from around mile marker 119 to mile marker 145.3. Nearly this entire section of the corridor is designated as either a level 1 or 2 within the crucial habitat assessment.

Revision of the corridor would be difficult given that state land occupies the less-crucial habitat immediately north of the corridor and that moving the corridor farther north would require additional revisions to avoid the lower end of the Gila National Forest. An effective revision that may help mitigate potential wildlife impacts would likely require additional corridor gaps along state land north of the existing corridor and shifting the remaining area of the corridor north onto BLM land west of Route 70. Regardless of the challenges, we encourage a deeper dive from collaborating agencies to consider a corridor revision that would allow for transmission from New Mexico to Arizona without sacrificing critical wildlife habitat.

**Corridor 81-272: Rio Grande Corridor**

The Rio Grande corridor runs through several sections with high management conflicts, many of which focus on areas designated as level 1 or 2 within the crucial habitat assessment on the mapping tool. Overall, we encourage revisions where possible to avoid high conflict management areas, especially as they pertain to wildlife resources.

In the lower region of the corridor, from mile marker 0 to mile marker 25, the corridor runs through a high conflict management region. Miles 17-29 also cross land shown to be most crucial under the crucial habitat assessment. As noted in the corridor abstract, there are BLM lands just west of I-25 that would avoid high conflict areas and are ranked very low on the crucial habitat assessment. We encourage the revision of this corridor from the mile marker 0 to mile marker 29, moving the corridor west to occupy BLM land with much fewer management conflicts.

We also encourage the involved agencies to consider shortening the corridor to mile marker 97, if possible. From mile markers 101-108.5, the corridor crosses BLM land that is considered most crucial according to the crucial habitat assessment. This would also increase existing measures to protect the Sevilleta National Wildlife Refuge. Moving this portion of the corridor to avoid crucial habitat may be difficult given the amount of private land held within the planning region, which is why—if possible—shortening this corridor may be a more effective option to avoid management conflicts through crucial wildlife habitat and ensure the protection of the Sevilleta National Wildlife Refuge.

**Corridor 89-271: Southeast New Mexico Corridor**

The Southeast New Mexico corridor has several resource issues outlined in the corridor abstract. NMWF is primarily concerned with the protection of ecosystems and wildlife habitat within this corridor. As designated, the corridor encompasses Lesser Prairie Chicken Habitat Evaluation Areas. Habitat fragmentation caused by transmission lines, pipelines, and other energy infrastructure would likely be a significant barrier to the recovery and growth of Lesser Prairie Chicken populations.

NMWF supports protections for the Lesser Prairie Chicken, but it is concerning that the only proposed revision of the designated corridor would run across potentially high karst areas with low stability for energy infrastructure. Perhaps the risk of high karst areas could be mitigated

simply through limitations on which types of infrastructure could be built within this region of the corridor, but we encourage the involved agencies to generate additional options for corridor revision.

**From:** corridoreiswebmaster@anl.gov
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10186]
**Date:** Sunday, February 25, 2018 11:20:48 PM
**Attachments:** ID_10186_EnergyCorridorReviewFeb2018.xlsx

---

Thank you for your input, Nan Daniels.

The comment tracking number that has been assigned to your comment is **10186**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 25, 2018 23:20:32 CST

**First Name:** Nan
**Last Name:** Daniels
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Colorado Native Plant Society

**Topics**
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

132-136 [blank, blank]
139-277 [blank, blank]
46-269 [blank, blank]

**Input**

The comments in Attachment 1 pertain to the subject matter in the Analysis section of 3 corridors in Regions 2-3. Line items reference the Corridor number and ID # of the concerns. Comments have been reviewed by CoNPS Conservation Committee Chairman, Bayard "Mo" Ewing. His e-mail is bayardewing@gmail.com. Botanic nomenclature to positively identify the plants is suggested. The CoNPS standard reference is Ackerfield's Flora of Colorado, 2015 and it is used here.

**Attachments**

Energy Corridor Review - Feb 2018.xlsx

Questions? Contact us at: corridoreiswebmaster@anl.gov

| Corr ID/Name | Concern ID# | Comment/Question |
|---|---|---|
| 132-136 DeBeque to Maybell | 0.009 | Has resolution of both ACEC conflicts by corridor narrowing been finalized? Could this be stated?<br>For ID purposes, suggest adding *Phacelia scopulina var. submutica* to clarify "DeBeque Phacelia".<br>" " " " *Sclerocactus glaucus* to clarify "Colorado Hookless Cactus". |
| | 0.010 | Is the threatened-level exclusion area permanently marked on relevant maps?<br>For ID purposes, suggest adding *Physaria congesta* to clarify "Dudley Bluffs Twinpod". |
| 139-277 Montrose Sub-SE | 0.009 | Has requirement for Project-spec. survey and mitigation been finalized for planning any utilities?<br>For ID purposes, suggest adding *Eriogonum pelinophilum* to clarify "Clay-loving Wild Buckwheat". |
| 87-277 Monarch Pass | 0.022 | Has requirement for mitigation been firmly established, in case listing of Skiff Milkvetch is finalized?<br>* In evaluating soil conditions for relocation of plants, suggest Gunnison FO consider an area where a few Skiff Milkvetch exist but could maybe thrive with more - just as an experiment.<br>For ID purposes, suggest adding *Astragalus microcymbus* to clarify "Skiff Milkvetch". |
| | 0.023 | Has requirement for mitigation or avoidance been finalized for any ROW application?<br>For ID purposes, suggest adding *Eriogonum brandegeei* to clarify "Brandegee Wildbuckwheat"?<br>For ID purposes, suggest adding *Mentzelia densa Green* to clarify "Royal Gorge Stickleaf". |
| | | Botanic names above are from Ackerfield's Flora of Colorado, 2015; they correspond fairly closely to the common names given in the analysis, but it's possible other species/subspecies nomenclature is more correct. Purpose of botanic names is to identify the plants very specifically. |

| | |
|---|---|
| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10187] |
| **Date:** | Wednesday, February 28, 2018 6:10:30 PM |
| **Attachments:** | ID_10187_WestWideEnergyCorridorSection368Region2ReviewComments.pdf |

Thank you for your input, Kris Holstrom.

The comment tracking number that has been assigned to your comment is **10187**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** February 28, 2018 18:10:11 CST

**First Name:** Kris
**Last Name:** Holstrom
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** San Miguel County, Colorado

**Topics**
Energy Planning Opportunities
Energy Planning Issues
Physical barrier
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Air quality
Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Livestock grazing
Paleontology
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources
Interagency Operating Procedures

**Geographic Area**
Regions 2 & 3 > Specific Region 2 & 3 corridors

130-274/130-274(E) [blank, 17.25]

**Input**

Comments Attached.

## Attachments

West Wide Energy Corridor-Section 368 Region 2 Review Comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

# BOARD OF COMMISSIONERS

KRIS HOLSTROM HILARY COOPER JOAN MAY

February 28, 2018

Tim Spisak, Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management (BLM)

Reggie Woodruff, Energy Program Manager
Washington Office Lands & Realty Management
U.S. Forest Service (USFS)

Georgeann Smale, WO-301 Realty Specialist
Bureau of Land Management (BLM)

Jeremy Bluma
National Project Manager
Section 368 West-Wide Energy Corridors Regional Review Project
Bureau of Land Management (BLM)

Brian Mills, Senior Planning Advisor
U.S. Department of Energy (DOE)

Via upload to http://corridoreis.anl.gov/involve/stakeholder-input/ and email to blm_wo_368corridors@blm.gov

RE: Section 368 West-Wide Energy Corridors Region 2 Review

Dear Mr. Spisak, Mr. Woodruff, Ms. Smale, Mr. Bluma, and Mr. Mills,

Thank you for the opportunity to comment on the energy corridor abstract for Region 2, Corridor 130-274/130-274(E) of the Section 368 West-wide Energy Corridors (WWEC). San Miguel County has been engaged in the Section 368 Corridor process as co-plaintiffs in the 2012 Settlement Agreement[1].

San Miguel County has the responsibility of ensuring the health, safety, and welfare within the County. Our responsibility extends to environmental health, which includes watershed health, soil health, and protection of wildlife habitat. Environmental quality is very important to San Miguel County. San Miguel County through its Board of County Commissioners and designated officials collaborates, cooperates, and coordinates with federal land agencies on federal land planning and projects. Sixty percent of the land in San Miguel County is federal public land,

[1] http://corridoreis.anl.gov/documents/docs/Settlement_Agreement_Package.pdf

with another 4% being owned by the State of Colorado; 70.6 % of San Miguel County is a federal mineral estate. Only 36% of San Miguel County consists of private land.

San Miguel County has assisted in the protection of thousands of acres of private lands with important wildlife habitat values, especially Gunnison Sage-grouse (GuSG) critical habitat, during the last few decades by participating in the acquisition of conservation easements intended to preserve and protect GuSG habitat. San Miguel County has financially contributed over $2.25 million of local taxpayer dollars during this period for GuSG habitat conservation and improvements through the County's Land Heritage Program, co-funding of the Gunnison Sage-grouse Working Group and funding of other actions intended to provide direct benefits to GuSG recovery and resilience. SMC continues to actively participate with the stakeholder group that developed the Gunnison Sage-grouse Rangewide Conservation Plan.[2] San Miguel County is a Cooperating Agency for the ongoing BLM Gunnison Sage-Grouse (GuSG) Rangewide Resource Management Plan (RMP) Amendments and Environmental Impact Statement (EIS).[3]

San Miguel County appreciates the coordination and efforts of the Bureau of Land Management (BLM), Department of Energy (DOE) and United States Forest Service (USFS), hereafter, "*Agencies*", on working toward meeting the terms of the 2012 Settlement Agreement with co-plaintiffs through reevaluation of energy corridor designations and recommendations and undertaking periodic reviews of these corridors. San Miguel County supports the comments submitted by The Wilderness Society, et al., on February 23, 2018. We are also in support of the comments submitted by Defenders of Wildlife, the Center for Biological Diversity, and the National Audubon Society on February 23, 2018, and comments submitted by National Trust *for* Historic Preservation on February 24, 2018. We strongly support comments provided by Colorado Parks and Wildlife (CPW) on February 23, 2018.

[2] http://cpw.state.co.us/learn/Pages/GunnisonSagegrouseConservationPlan.aspx
[3] https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=39681

**Summary of San Miguel County Requests and Findings from a review of the portion of Corridor 130-274/130-274(E) and Abstracts intersecting San Miguel County.**

San Miguel County (hereafter, "*SMC*") reviewed the portion of Corridor 130-274/130-274(E) that intersects SMC, shown in Figure 1 below. We referred to the Section 368 Energy Corridor Mapping Tool[4], January 2018 Corridor 130-274/130-274 (E) Abstract[5] and West-Wide Energy Corridor (WWEC) Conflict Assessment Table[6] during our review, as well as our in-house GIS reference layers. We are happy to provide the non-proprietary layers to the Agencies upon request.

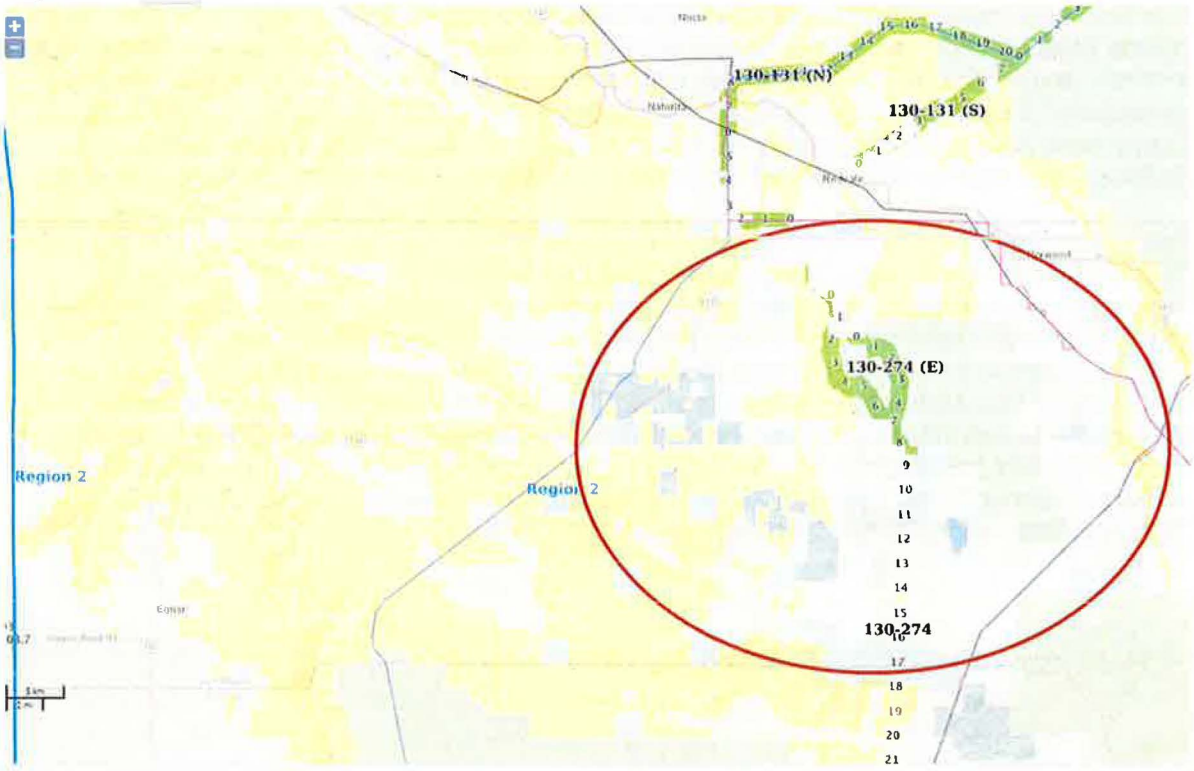


Figure 1: Screen-capture of the Section 368 Energy Corridor Mapping Tool showing the portion of Corridor 130-274/130-274(E) intersecting San Miguel County, Colorado, (within the red oval) which is the focus of our analysis and comments.

1. **Agreement with CPW on treating GuSG Critical Habitat in the San Miguel Basin satellite population of GuSG and treating private lands encumbered with conservation easements as Exclusion Areas.**

With respect to the February 23, 2018, CPW comments that are specific to Corridor 130-274, SMC believes they should be applied to both 130-274/130-274(E). We strongly agree that these corridors should be rerouted to avoid GuSG Critical Habitat. We agree that GuSG Critical Habitat should be designated a ROW Exclusion Area. Any impacts to GuSG Critical Habitat should require compensatory mitigation. We agree that the corridors should avoid CPW-owned land and private lands encumbered by conservation easements.

[4] https://bogi.evs.anl.gov/section368/portal/ (Accessed February 2018)
[5] https://bogi.evs.anl.gov/section368/abstracts/corridor-130-274.pdf
[6] http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf

**Our SMC Section 368 Corridor 130-274/130-274(E) Screen Tool (Attachment A)** shows where private land conservation easements have been achieved through the assistance of our County Land Heritage Program. The Regional Review team should obtain current data on the locations, extents, and primary conservation values of conserved lands within San Miguel County.

We agree with CPW that existing overhead transmission lines having impacts to GuSG Critical Habitat should not have their ROW expanded and should be buried with compensatory mitigation required.

Furthermore, transmission lines intersecting areas with scenic qualities/visual resources important to San Miguel County should be buried and sited to ensure retention of Wilderness/Roadless/wildland characteristics. If a corridor to accommodate overhead transmission lines is needed, preference should be given to locating it within the footprint of an existing ROW having overhead transmission lines, such as the Tri-State Nucla-Cahone expansion which has just completed an EIS process.

2. **Achieve primary objectives and Agency Guidance provided by the Settlement Agreement.**

It is our understanding that the primary objectives of the Settlement Agreement[7] include ensuring that future revisions, deletions, or additions to the Section 368 energy corridors comply with the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), and Section 368 of the Energy Policy Act of 2005 (EPAct) and consider the following:

1. Location of corridors in favorable landscapes;
2. Facilitation of renewable energy projects where feasible;
3. Avoidance of environmentally sensitive areas to the maximum extent practicable;
4. Diminution of the proliferation of dispersed rights-of-way ("ROWs") crossing the landscape; and
5. Improvement of the long-term benefits of reliable and safe energy transmission.

We expect that the Agency Guidance will adhere to the principles within the Settlement Agreement and will address the need for site-specific NEPA analysis for individual projects and that as stated on the Settlement Overview web page[8] Agency Guidance will include:

- *Encourage project proponents to locate projects within designated corridors or adjacent to existing ROWs, notify project proponents of any Section 368 energy corridor segments that are corridors of concern, and consider alternative locations if a proposed project would be located within a Section 368 energy corridor of concern segment.*
- *Corridors of concern are corridors that would have environmental impacts, extensive mitigation measures or would require preparation of EIS, alternative corridor considerations or LUP amendments. Corridors of concern are identified in Exhibit A of the Settlement Agreement.*
- *Site-specific projects will require individual NEPA analysis. To reduce redundant studies, encourage individual projects to 'incorporate by reference' data and studies in the Final PEIS. Tiering is not a substitute for site-specific analyses.*

[7] http://corridoreis.anl.gov/documents/docs/Settlement_Agreement_Package.pdf
[8] http://corridoreis.anl.gov/regional-reviews/settlement/

- *Procedures for periodic review and update of IOPs; use of IOPs outside designated corridors on federal land; and adoption of IOPs approved by the agencies.*
- *Revisions, deletions, and additions to corridors must meet the requirements specified in Section 368 of the EPAct and must consider the siting principles.*

We appreciate the Section 368 Corridor Study prepared by Argonne National Laboratory, dated May 2016[9] with the stated goal of evaluating "whether the Section 368 corridors are achieving their purpose to promote environmentally responsible corridor-siting decisions and to reduce the proliferation of dispersed ROWs crossing Federal lands."[10] It also establishes a "baseline of current conditions and identifies considerations and areas which should be explored in more detail during future Regional Periodic Reviews of energy corridors conducted in the future by BLM and [US]FS."[11]

3. **New conditions require updated analysis and rerouting of Corridors 130-274/130-274(E).**

SMC notes that the Corridor Study evaluated information during the period from January 2009 and October 2014.[12] As will be discussed in more detail below, there are a number of new conditions that have developed that increase the significance of the impacts that the proposed Corridor 130-274/130-274(E) will have in environmentally sensitive areas in San Miguel County in order to access the federal lands where it is currently sited.

This period is prior to the listing of the Gunnison Sage-grouse as a threatened species protected by the Endangered Species Act (ESA) and prior to designation of critical habitat and several other important new conditions. It is also prior to the initiation and/or decision of several major federal land agency planning processes that are currently in-progress: BLM Tres Rios Resource Management Plan (RMP) – Areas of Critical Environmental Concern (ACEC) Amendment[13] contemplating designation or modification to numerous ACECs within western San Miguel County for Gunnison Sage-grouse, rare plants, and other sensitive ecosystems; BLM Gunnison Sage-Grouse (GuSG) Rangewide Resource Management Plan (RMP) Amendments and Environmental Impact Statement (EIS)[14] which has a decision area comprised of critical habitat and areas within 4-miles of GuSG leks and which could amend both the Tres Rios RMP and Uncompaghre RMP; Uncompahgre Field Office Resource Management Plan[15] which includes nominated Wild and Scenic River segments and nominated ACECs; and the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Forest Plan revision[16] which is analyzing designation of Wilderness and other special lands.

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[9] http://corridoreis.anl.gov/documents/docs/Section_368_Corridor_Study.pdf
[10] http://corridoreis.anl.gov/documents/docs/Section_368_Corridor_Study.pdf Page ES-1.
[11] http://corridoreis.anl.gov/documents/docs/Section_368_Corridor_Study.pdf Page ES-2.
[12] http://corridoreis.anl.gov/documents/docs/Section_368_Corridor_Study.pdf Page ES-2.
[13] https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=63796
[14] https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=39681
[15] https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=86003
[16] https://www.fs.usda.gov/main/gmug/landmanagement/planning

The BLM has issued Instructional Memorandum (IM) 2014-100,[17] which is in effect until rescinded and presents some of the best available interim guidance until the GuSG RMPa is finalized. The GMUG National Forest LRMP ROD was signed in 2013, prior to the listing of the GuSG and designation of critical habitat. The Agency Review and Analysis should recognize BLM IM 2014-100 and adhere to the guidance requiring focusing any type of development in non-habitat areas. This is a new condition, and SMC believes the Agencies should consider a revision to corridors such as 130-274/130-274(E) to adhere to this guidance.

BLM IM 2014-100[18], provides, *"The BLM will focus any type of development in non-habitat areas. Disturbance will be focused outside of a 4-mile buffer around leks. The BLM intends that little, or no disturbance occurs within the 4-mile buffer, except for valid existing rights, and except where benefits to the GUSG are greater compared to other available alternatives. This guidance:*

- *Recognizes the FWS Proposed Listing of the GUSG as endangered (78 FR 2486) under the Endangered Species Act (ESA) (January 11, 2013) posted at http://www.fws.gov/policy/library/2013/2012-31667.pdf.*
- *Provides updated direction regarding management and ongoing planning actions in GUSG occupied habitat.*
- *Recognizes that the BLM proposes to incorporate objectives and conservation measures for the protection of GUSG and its habitat into relevant Resource Management Plans (RMP) through a GUSG range-wide plan amendment process.*
- *Ensures continued coordination with the FWS, State fish and wildlife agencies, and other partners regarding implementation, updates and project prioritization for GUSG conservation and strategies identified in the Range-wide GUSG Conservation Plan (RCP) and local GUSG population conservation plans.*
- *Does not preclude developing or using additional conservation measures or strategies deemed necessary to maintain or enhance local GUSG habitat and populations."*

SMC believes the provisions of the MOU and Settlement Agreement require consideration of "avoidance of environmentally sensitive areas to the maximum extent possible" and "minimum impact on the environment." Therefore, the Agencies have an obligation in this review process to make "recommendations for revisions, deletions, and additions to the section 368 corridor network" and have an obligation to re-evaluate the corridor routes to determine whether avoidance of environmentally sensitive areas is practicable and whether alternative routes could provide similar utility with less environmental impact.

An additional new condition since October 2014 is the revised agreement between Colorado Department of Public Health and Environment, U.S. Environmental Protection Agency, WildEarth Guardians and the National Parks Conservation Association as part of revisions to the Colorado regional haze State Implementation Plan (SIP) in December 2016. [19] This agreement causes the retirement of multiple coal-fired electrical generation plants in western Colorado: the 427-MW Unit, 1 at Craig Station, will be retired by Dec. 31, 2025, and the Tri-State 100-MW Nucla coal-fired generation plant will be retired by 2020 and decommissioned by 2022.

[17]https://www.blm.gov/POLICY/IM-2014-100.
[18]https://www.blm.gov/POLICY/IM-2014-100.
[19]https://www.colorado.gov/pacific/cdphe/regional-haze-plan

SMC believes that the Agencies should incorporate an updated evaluation of the purpose and need of the Section 368 Corridor with respect to coal to demonstrate need and adequacy of the existing Programmatic Environmental Impact Statement (PEIS) in light of new information and circumstances that have developed over the last ten years . For example, the updated evaluation should factor in the plant retirements and the fact that Tri-State is currently replacing its existing 115-kV transmission line which is described by Tri-State as "a major conduit for electric power from Tri-State's Nucla Generating Station and is a backbone of the transmission grid on the western slope of Colorado," with a 230-kV upgrade over the 80-mile long Montrose-Nucla-Cahone overhead Transmission Line following the existing ROW.[20] It is our understanding that Corridor 130-274/130-274(E) has been cited in part due to proximity and benefit to coal-fired generation stations.

In 2008, SMC indicated it was reluctantly supportive at the time and in the absence of better alternatives of a proposal by Teresa Pfifer of the BLM Uncompahgre Field Office (UFO) to move the 130-274 Corridor slightly west to follow San Miguel County Road 39N for multimodal use and to use 130-274(E) for underground use only. This position, taken in February – June 2008 was ten years ago.

Based on recent developments such as the listing of the Gunnison Sage-grouse and designation of critical habitat in November 2014, the implementation of the Tri-State Nucla-Cahone upgraded overhead transmission line in 2018 and 2019, the retirement of the Nucla coal-fired generation plant in 2020, and our review of the Corridor Map and Abstract, we have revised our previous tentative indication of support for Corridors 130-274/130-274(E). SMC now believes both of these corridors must be rerouted to avoid repeated disturbances to GuSG Critical Habitat, State lands managed for wildlife including GuSG, and private lands encumbered with conservation easements between MPs 7-17/4.6-17. New infrastructure and ROWs should be excluded from Critical Habitat and avoided within 4-miles of leks and the BLM Gunnison Sage-grouse Resource Management Plan Amendment/EIS Decision Area.

4. **Request for one of the Regional public meetings to be held in Norwood, Colorado and for Agencies to meet with SMC officials in person.**

It is our understanding that regional meetings are anticipated to occur in May or June 2018 potentially. San Miguel County strongly encourages the Agencies and the Regional Review team to meet with SMC officials and stakeholders, including Colorado Parks and Wildlife, U.S. Fish and Wildlife, and hold a public meeting in Norwood, Colorado. We strongly encourage the Agencies to visit Corridor 130-274/130-274(E) in person at the same time.

Agencies should meet in person with SMC officials and stakeholders such as Colorado Parks and Wildlife (CPW) and U.S. Fish and Wildlife Service (USFWS). The goal of meeting together will be to identify if there is possibly a suitable alternative corridor siting that would have less impact to environmentally sensitive areas and have less impact on non-federal lands. With more time and a robust discussion with stakeholders, we may be able to identify an alternative corridor sited for underground infrastructure located within 100-feet of an existing County Road.

[20]First Amended Complaint for Declaratory and Injunctive Relief filed by the Wilderness Society in *The Wilderness Society, et al. v. United States Department of the Interior, et al., No. 3:09-cv-03048-JW (N.D. Cal)*; Especially paragraphs 21-25 on Pages 14-17.

The need for an additional corridor for overhead transmission lines should be carefully studied, especially with the planned retirement and decommissioning of multiple coal-fired power plants in western Colorado in the next two to seven years and the Tri-State upgrade to the existing line. If a corridor to accommodate overhead transmission lines is still warranted, it should examine the potential to be located within the footprint of an existing ROW having overhead transmission lines, such as the Tri-State Nucla-Cahone expansion which has just completed an EIS process and seventeen years of study.

SMC believes by providing adequate time and having direct consultation with stakeholders such as San Miguel County government, CPW, USFWS, private landowners, and federal land managers together, there is potential for identifying a different corridor alignment that could lead to a greater extent of avoidance of environmentally sensitive areas on both federal and non-federal lands.

5. **Deficiencies present in the review process.**

While the Corridor Abstract and Section 368 Energy Corridor Mapping Tool are helpful and appreciated, this process does not fully appear to remedy the original concerns of SMC outlined in our letters to Argonne National Laboratory dated February 14, 2008, and June 11, 2008, as well as in the original and First Amended Complaint for Declaratory and Injunctive Relief filed by the Wilderness Society in *The Wilderness Society, et al. v. United States Department of the Interior, et al., No. 3:09-cv-03048-JW (N.D. Cal)* [21].

In 2008 some of our most significant concerns were potential impacts to Naturita Canyon, interruption of critical occupied Gunnison Sage-grouse habitat, and large segments of the Corridor passing through private lands that were not analyzed by the PEIS. SMC remains concerned with public and private lands located within the County being negatively impacted by the Corridor's location on federal land, including degradation of scenic character and property values. The impacted non-federal public and private lands have exceptional habitat for Gunnison Sage-grouse, (now listed and protected by the ESA as a threatened species since November 2014); conservation easements acquired with county taxpayer dollars having the primary conservation values of Gunnison Sage-grouse habitat and scenic character; scenic qualities; and recreation qualities. SMC remains concerned that there has been an inadequate consultation of local and state government agencies, interested parties, and the public. The County remains concerned that there is an inadequate NEPA process which requires analysis and disclosure of environmental impacts and development of environmentally-superior alternatives.

In 2008, SMC communicated that it was disappointed that the rapid timeframe of the process prevented a thorough evaluation of lands to identify an energy corridor in the western portion of the county. Commissioner Art Goodtimes eloquently pointed out that the "fatal flaw" in the PEIS is that "it is limited to identifying corridors on public lands without working with local governments on how best to 'connect the dots' through private lands." [22] This has not been remedied with the current conflict assessment, mapping tool, or Corridor abstract.

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[21] https://eplanning.blm.gov/epl-front-office/projects/nepa/66455/81165/94671/Tri-State_MNC_Draft_POD.pdf Page 1.

[22] Letter to Subcommittee on National Parks, Forests and Public Lands Subcommittee on Energy and Mineral Resources Joint Oversight Hearing, April 15, 2008 "The West-Wide Energy Corridor Process: State and Community Majority Questions for the Record Art Goodtimes, County Commissioner, San Miguel County, Colorado; "My Response to Questions Asked", May 6, 2008. Page 2, Question 2.

During our review and preparation of these comments, SMC finds that there are still several deficiencies in the review process which will guide the Agencies in recommending corridors for designation. These issues include:

- Inadequate NEPA and range of alternatives available given new information and circumstances that exist with respect to the listing of the Gunnison Sage-grouse as threatened[23] and designation of critical habitat in November 2014[24];
- Changes needed to consider certain areas as "high potential conflict areas" vs. "medium potential conflict areas" (see discussion below);
- Out of date land status layers that do not account for State lands around Miramonte Reservoir;
- Land status layers do not consider conserved private lands that would be intersected by a ROWs to reach the federal lands included in Corridor 130-274/130-274(E);
- Inadequate time and lack of direct consultation with stakeholders including San Miguel County government, Colorado Parks and Wildlife, U.S. Fish and Wildlife, private landowners, and federal land managers, to identify if a different alignment would lead to a greater extent of avoidance of environmentally sensitive areas on both federal and non-federal lands;
- On-the-ground field inspections and verifications were not conducted but yet are strongly recommended to be conducted as part of the Regional Reviews in the Corridor Study. [25]
- Possible out of date lek layer for GuSG used for conflict analysis – it appears at least one lek near Miramonte Reservoir may not be accounted for in certain layers of the Section 368 Energy Corridor Mapping Tool.

6. **Specific Comments on Abstract and Corridor 130-274/130-274(E).**
   a. **Corridor 130-274/130-274 (E) Abstract, January 2018**[26]
      - Figure 2a – does not show all State lands around Miramonte Reservoir, generally located near MP 10-14.
      - Corridor Rationale and Existing Infrastructure – please provide a reference for a determination that MPs other than 0 to MP 8.5 are a "locally designated corridor." MPs 0-17 are located in San Miguel County, and we are unsure if you are specifically stating that MPs 9.5 to 17 are already a locally designated corridor. We have no evidence that they are and believe the abstract is incorrect. It would be helpful if the abstract could be more specific and cite references.

        The Section 368 Energy Corridor Mapping Tool did not show any ROW when we turned on the "ROW Corridors – Locally Designated" Area or Line layers. The Trans Colorado gas pipeline, within the Infrastructure-Pipeline, Pipelines Natura Gas – Operation layer provided in the Section 368 Energy Corridor Mapping Tool, is located 1.2 miles east of the MP points provided. There is no existing infrastructure under MPs 0-17 of Corridor 130-274 within San Miguel County. The existing Trans Colorado pipeline is located under MPs 0-4.6 of Corridor 130-

[23] https://www.fws.gov/mountain-prairie/es/species/birds/gunnisonsagegrouse/GUSGFinalListingRule_11202014.pdf
[24] https://www.fws.gov/mountain-prairie/es/species/birds/gunnisonsagegrouse/GuSGCriticalHabitat_11202014.pdf
[25] http://corridoreis.anl.gov/documents/docs/Section_368_Corridor_Study.pdf Page ES-2, Footnote 1.
[26] https://bogi.evs.anl.gov/section368/abstracts/corridor-130-274.pdf

274(E). However, the cumulative impacts to Gunnison Sage-grouse habitat and leks are unacceptable to access 130-274(E).



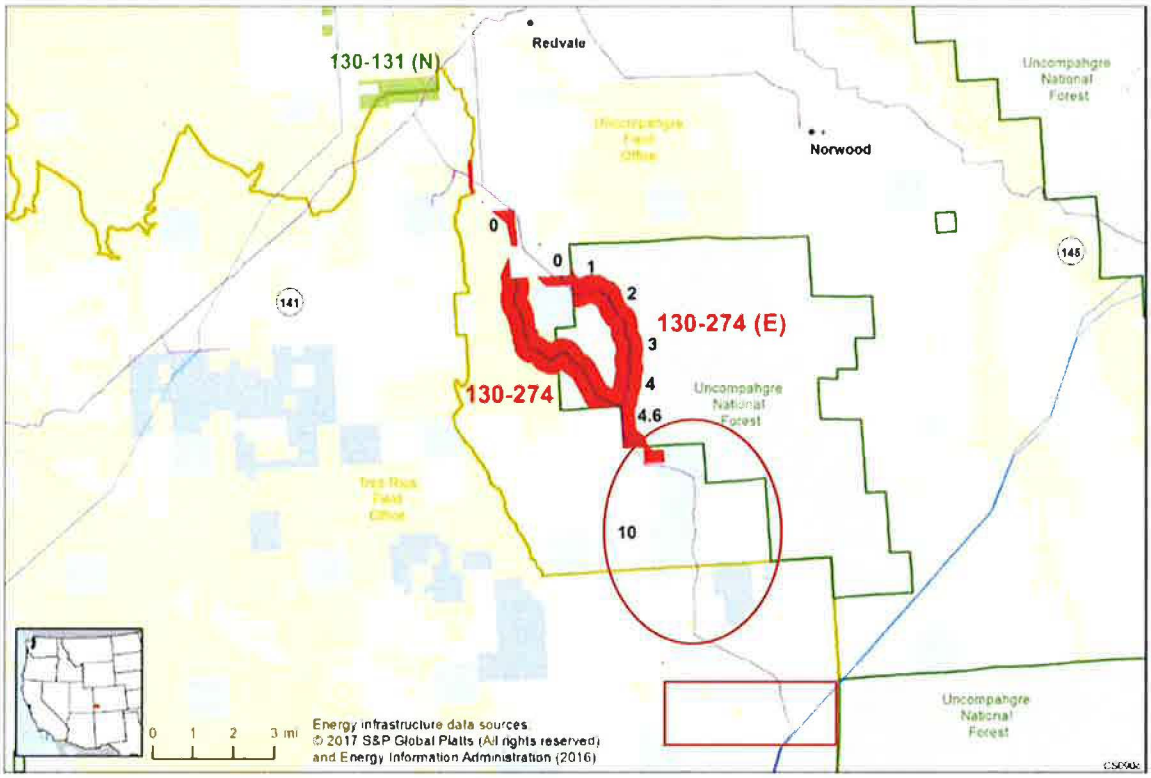



**Figure 2a. Corridor 130-274/130-274(E), Including Existing Energy Infrastructure**

Corridor 130-274/130-274 (E) Abstract, January 2018, Figure 2a—red shapes highlight areas that are missing lands owned by the State of Colorado. The purple line in the figure matches the Trans Colorado gas pipeline, within the Infrastructure-Pipeline, Pipelines Natura Gas – Operation layer provided in the Section 368 Energy Corridor Mapping Tool.

- Potential for Future Development: The statement provided, "It is possible that the corridor will be affected by the Gunnison Sage-grouse Range-wide Draft RMP Amendment/Draft EIS" [27] is appreciated but is out of date for January 2018. The GuSG RMPa/EIS was released in August of 2016[28]. This statement is not current for January 2018. MPs 4.5/6/5 to MP 16.25 is entirely within the GuSG RMPa Decision Area (see Attachment A), which is comprised of critical habitat and a 4-mile buffer of leks. Only the most southern 1,200 feet of the Trans Colorado gas pipeline is out of the GuSG RMPa Decision Area. The Decision Area GIS layer[29] is publicly available from the BLM and additional GIS files

[27] https://bogi.evs.anl.gov/section368/abstracts/corridor-130-274.pdf Page 5
[28] https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=53486
[29] https://eplanning.blm.gov/epl-front-office/eplanning/mapset_view.do?projectId=39681&currentPageId=53493&documentId=81491

should be incorporated into the Corridor Abstract figures, conflict analysis, and Section 368 Energy Corridor Mapping Tool.

- Conflict Map Analysis: The Conflict Map Analysis relies on the criteria contained in the West-Wide Energy Corridor (WWEC) Conflict Assessment Table.[30] SMC recommends changes to the assessment classifications to recognize environmentally sensitive areas better:
  - ACECs designated to protect rare plants, soils, and scenic resources may have varying degrees incompatibility with ROWs. Above-ground structures vs. underground infrastructure development may have different impacts. ACECs designated or nominated to protect ESA listed species and/or critical habitat should be automatically classified as "high potential conflict areas" and avoided. ACECs designated or nominated to protect S1 or S2 species should also be automatically classified as "high potential conflict areas" and avoided. There are ten nominated ACECs that intersect SMC and that are being evaluated as part of the ongoing TRFO ACEC RMP amendment.[31] These should all be classified as "high potential conflict areas." Areas that are nominated for ACEC designation under one or more alternatives of the GuSG RMPa/EIS should also be classified as "high potential conflict areas."[32]
  - Lands Inventoried and Managed for Wilderness Character should be all classified as "high potential conflict areas," as any impact from man-made infrastructure will forever change the wilderness character and potential for wilderness designation in the future.
  - Similar to river segments deemed suitable for Wild and Scenic River status, lands pending legislative designation as Wilderness or other special designations should be considered "high potential conflict areas" and avoided so as not to pre-judge and void any potential designation.
  - Lands acquired with federal funds for conservation purposes should be designated as "high potential conflict areas" if their purpose is to protect or conserve ESA listed species and/or critical habitat or to conserve significant viewsheds and lands with wilderness characteristics. This should be a provided GIS layer in the Section 368 Energy Corridor Mapping Tool.
  - Lands acquired with taxpayer funds for conservation purposes should also be designated as "high potential conflict areas." As noted above San Miguel County has financially contributed over $2.25 million of local taxpayer dollars during this period for GuSG habitat conservation and improvements through the County's Land Heritage Program. This program has helped protect over 25% of the occupied GuSG habitat on private land within San Miguel County through conservation easements. Over 14,000 acres of habitat has been conserved at the cost of $6.8 million and a donation value of over $11.7 million. These investments toward protection and recovery of GuSG must not be jeopardized or diminished by direct or cumulative indirect impacts of a

[30] http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf
[31] https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=63796
[32] https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=53486

corridor designation. These lands should be included in the conflict analysis as "high potential conflict areas" and avoided.

- The Corridor Abstract states that "Corridor 130-274 is entirely within a medium potential conflict area and contains existing infrastructure."[33] This seems to be contradicted by Figures 3a and 3b which mostly depict Corridor 130-274/130-274(E) to be in "No Conflict Identified" areas. Figure 3a shows that the lands south, east, west, and intersecting the southern portion of Corridor 130-274/130-274(E) to be in High Conflict areas. The Corridor Abstract figures and text need revisions for accuracy.

- Corridor Abstract Analysis Table:
  - Row 2: discussion notes that Corridor 130-274/130-274(E) is a Corridor of Concern and that the Tri-State coal-fired power plant is to be retired in 2022. It notes that no realistic wind power generation opportunities have been identified in the region. Is the logical conclusion that a corridor to accommodate high voltage electricity transmission is not warranted?
  - Rows 3-4: discussion notes that BLM and USFS can only authorize projects on Federally-administered lands and that development in corridor "gaps" on State or private lands require coordination outside of the Agencies. Corridors, where the "gaps" have high-conflict areas and environmentally sensitive areas such as ESA listed species and critical habitat, or conserved lands, should not be designated, as they are not leading to the location of corridors in favorable landscapes or maximizing avoidance of environmentally sensitive areas. Corridors should not be sited where there will be impacts as great or greater than those that led to avoided siting in similar areas on federal lands.
  - Row 8: discussion notes that per the Settlement Agreement, MP 4.2-4.6 of Corridor 130-274(E) and MP 6.2-13.2 of Corridor 130-274 should be re-routed to avoid critical GuSG habitat. The mile markers are not quite accurate. Both Corridors should be eliminated where they intersect GuSG critical habitat and conserved private lands. "The Agency Review and Analysis state that they should consider opportunities for corridor revision to avoid most areas of critical habitat and still encompass existing infrastructure."[34] The Agencies have not analyzed cumulative impacts from repeated disturbance of the ROW of the existing pipeline for its own maintenance as well as if there were to be other infrastructure co-located with it. This corridor creates impacts within critical occupied habitat and habitat located within 0.5 miles of multiple leks of the Miramonte subpopulation of the San Miguel Basin population of GuSG. This is the most viable subpopulation of the GuSG.
  - Row 8 should recognize BLM IM 2014-100[35] is in effect until rescinded and presents some of the best available interim guidance until the GuSG RMPa is finalized. The Agency Review and Analysis should recognize BLM IM 2014-100 and adhere to the guidance requiring focusing any type of development

[33] https://bogi.evs.anl.gov/section368/abstracts/corridor-130-274.pdf Page 5
[34] http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf Row 8, Page 10.
[35] https://www.blm.gov/POLICY/IM-2014-100.

in non-habitat areas. At a minimum, areas within 4-miles of a lek should be considered "high potential conflict areas."

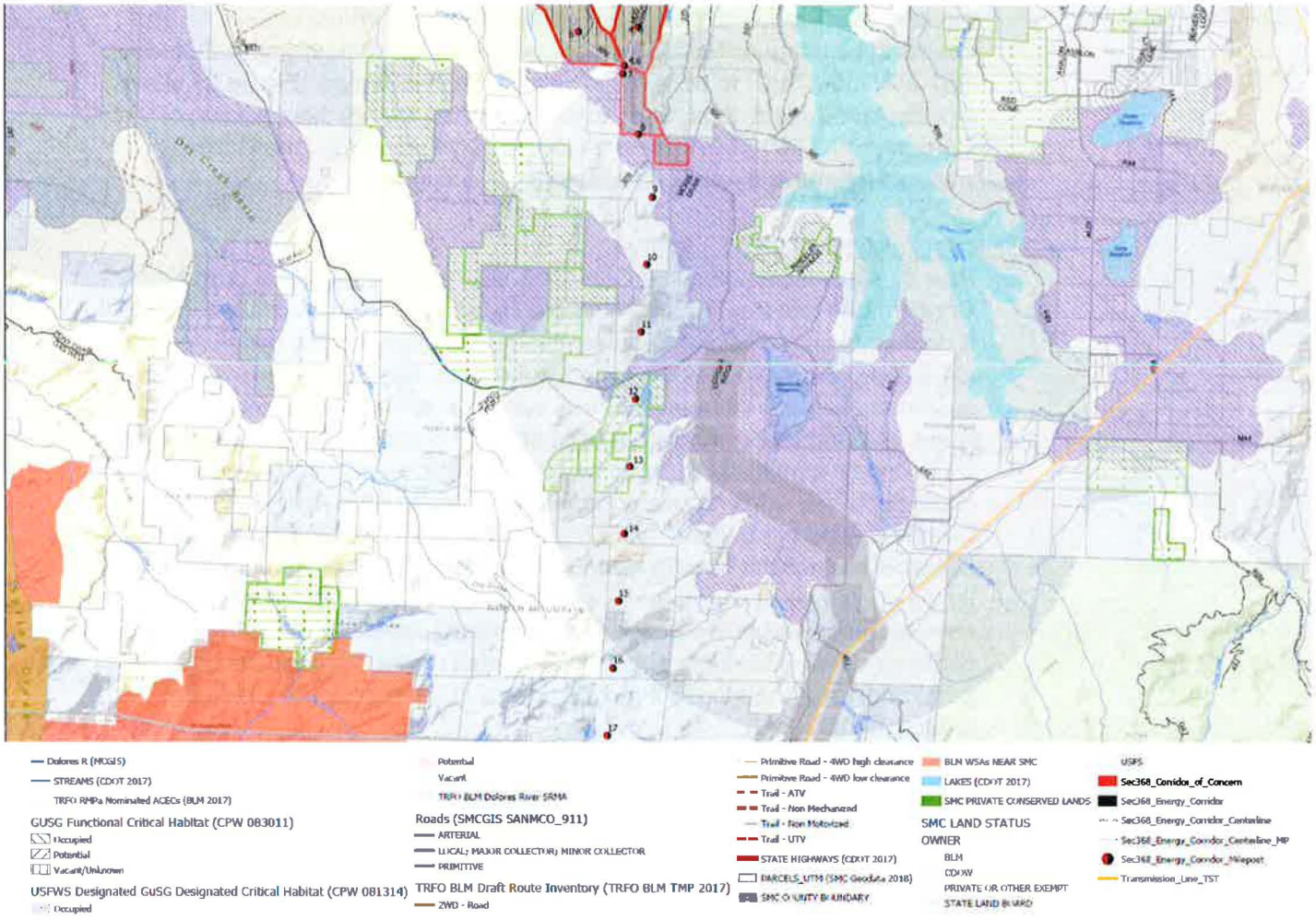



Figure 3: Showing a portion of the SMC-created screen tool for examining GuSG and other conflicts of concern to SMC. (The full-screen tool is provided as a layers-enabled pdf in Appendix A.) MPs of Corridor 130-274 from southern San Miguel County line/MP 17 at bottom center of figure, and private lands encumbered with conservation easements for the purpose of conserving GuSG and critical habitat (green hatching); lands within 4-mile lek buffers and the BLM GuSG RMPa/EIS Decision Area in light gray shading; GuSG critical habitat in striped hatching and purple. While the Corridors 130-274/130-274(E) in red outline at the top center intersect GuSG habitat and are discussed as needing re-routing in Row 8, the same reasons for re-routing on federal lands exist and should require re-routing on the State, private, and private conserved lands to the south. The proximity of MPs 15-17 to the McKenna Peak WSA in red should be mentioned in the Assessment Table and Abstract.

- Row 9: discussion claims that GuSG conservation areas "have not been identified and are not a consideration for the review at this time." Currently, the BLM GuSG Draft RMPa/EIS has an alternative that contemplates designation of an ACEC for all GuSG critical habitat on BLM-administered

lands within 4-miles of a lek. Private land conservation easements that have the primary conservation value of GuSG habitat conservation should be considered active conservation areas as should State Wildlife Areas (SWA) like the Dan Noble SWA. The 2005 Rangewide Conservation Plan contains rangewide and local conservation strategies and best management practices that should be considered as de-facto GuSG conservation areas. [36]

- Rows 17, 19: The Corridor must continue to avoid impacts and intersections to lands that are subject to the Proposed San Juan Mountains Wilderness designations, Naturita Canyon Colorado Roadless Area, and Menefee Mountain WSA. Proximity to McKenna Peak WSA should be mentioned, as it is as close as 1-mile to MPs 18-20.
- Row 21: Scenic quality is extremely important to San Miguel County's economy, as mentioned in the original and First Amended Complaint about Declaratory and Injunctive Relief filed by the Wilderness Society in *The Wilderness Society, et al. v. United States Department of the Interior, et al., No. 3:09-cv-03048-JW (N.D. Cal).* [37] The analysis table does not take into consideration the protection of visual resources desired by SMC and its citizens.

Thank you for the opportunity to provide our comments on the Region 2 Review Abstract and analysis of Corridor 130-274/130-274(E) and the need for these segments within SMC to be rerouted.

We encourage the Agencies to require that any Corridor is providing a ROW for fiber or broadband infrastructure, be required to make such broadband infrastructure open access and available for any purpose, including commercial use, to avoid any need in the future to have to go back and "perfect" easements.

We look forward to personally working with the Agencies and stakeholders to determine if a suitable corridor can be identified within San Miguel County that mitigates the concerns outlined in the Settlement Agreement and goals of the Agencies. We are happy to provide any assistance or data we might have to inform the Corridor mapping tool better, abstract and analysis.

Sincerely,
SAN MIGUEL COUNTY, COLORADO
BOARD OF COUNTY COMMISSIONERS

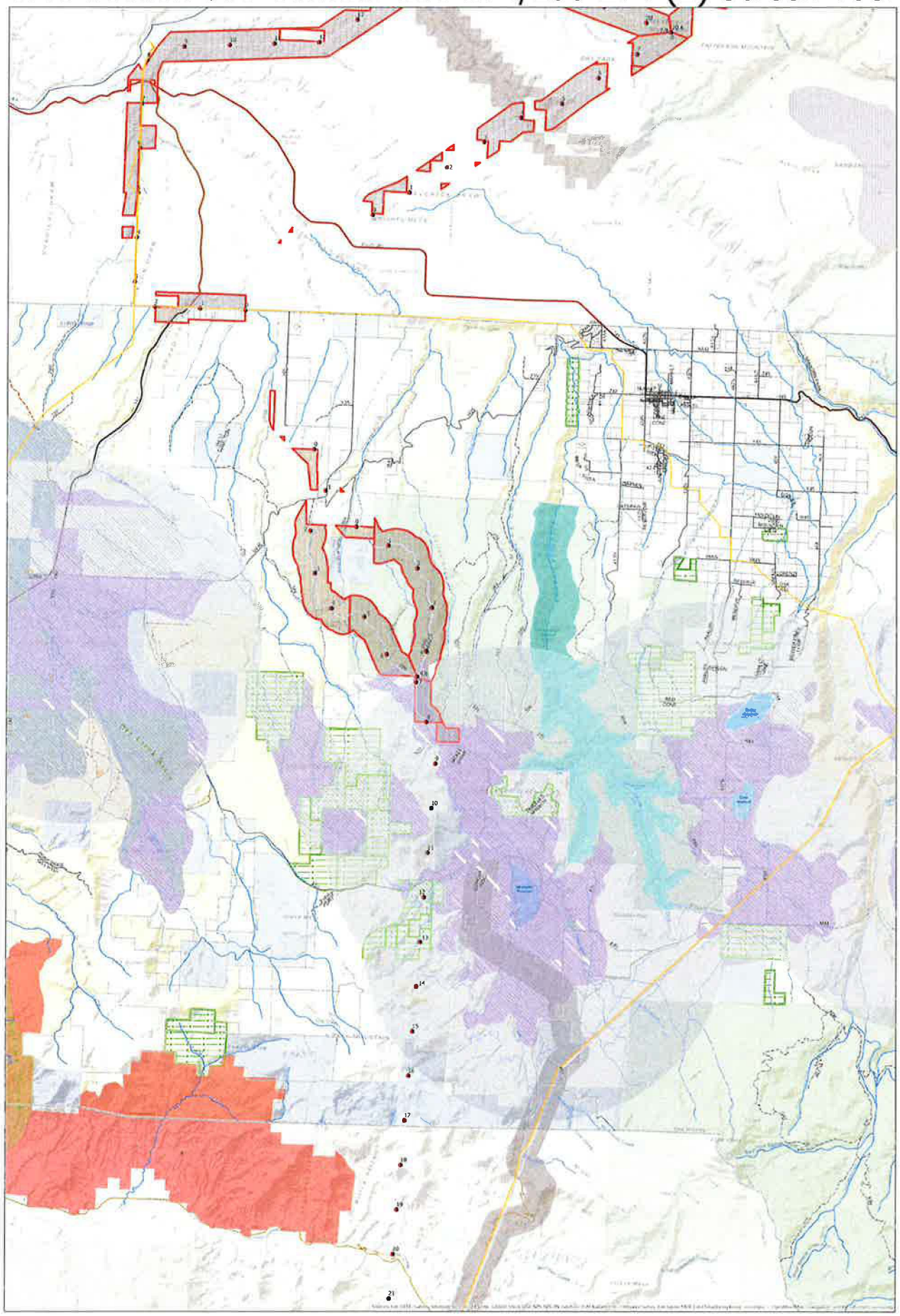
Kris Holstrom, Chair

[36] http://cpw.state.co.us/learn/Pages/GunnisonSagegrouseConservationPlan.aspx
[37] https://eplanning.blm.gov/epl-front-office/projects/nepa/66455/81165/94671/Tri-State_MNC_Draft_POD.pdf Page 1.

**Attachment A: SMC Section 368 Corridor 130-274/130-274 (E) Screen Tool**

This is a layered .pdf file. To make layers visible/invisible please open the layers contents, click on the layers list menu and click "Expand All." The legend is on the bottom of the document.

# SMC Section 368 Corridor 130-274/130-274 (E) Screen Tool



GUSG Functional Critical Habitat (CPW 093011)

USFWS Designated GUSG Designated Critical Habitat (CPW 093114)

Roads (SNCGIS SANMCO 911)

TERO BLM Draft Route Inventory (TERO BLM TMP 2017)

SMC LAND STATUS

**Draft, San Miguel County**
**Section 368 Corridor Screen Tool**
**2/23/2018**

0 0.33 0.65 1.3 1.95 2.6 Miles

1: 60,000

**Attachment B:** ***Section 368 Energy Corridor Regional Reviews - Region 2*** **Corridor 130-274/130-274(E)** ***San Juan/San Miguel Corridor*** **(January 2018)**

Energy Corridor Abstract provided by Agencies for review, downloaded February 2018 at http://bogi.evs.anl.gov/section368/abstracts/corridor-130-274.pdf.

# Corridor 130-274/130-274(E)

*San Juan/San Miguel Corridor*

## Introduction

Corridor 130-274/130-174(E) (Figures 1 and 2a,b) begins just south of the Montrose/San Miguel county line and extends generally southward terminating just south of State Route 160 at the Montezuma/La Plata county line. Corridor 130-274(E) is an additional braided segment extending east of Corridor 130-274 from MP 2 to MP 7. Federally designated portions of this corridor are 3,500 feet in width on BLM- and USFS-administered land. The Corridor 130-274(E) segment is designated as underground use only. The corridor is designated multi-modal for future electrical transmission and pipeline projects. Corridor 130-274 has 37.1 miles of designated corridor on BLM- and USFS-administered lands; the overall route including gaps is 65.5 miles. The designated area is 14,823.3 acres or 23.2 square miles. Corridor 130-274(E) has 4.4 miles of designated corridor on BLM- and USFS-administered lands; the overall route including gaps is 4.6 miles. The designated area is 1,760.9 acres or 2.7 square miles. Corridor 130-274 is in San Miguel, Dolores, and Montezuma counties in Colorado, and Corridor 130-274(E) is in San Miguel County; they are under the jurisdictions of the BLM Tres Rios and Uncompahgre Field Offices. Portions of the corridor also occur on the San Juan National Forest and Grand Mesa, Uncompahgre, Gunnison (GMUG) National Forests in Colorado. Corridor 130-274/130-274(E) is entirely in Region 2.

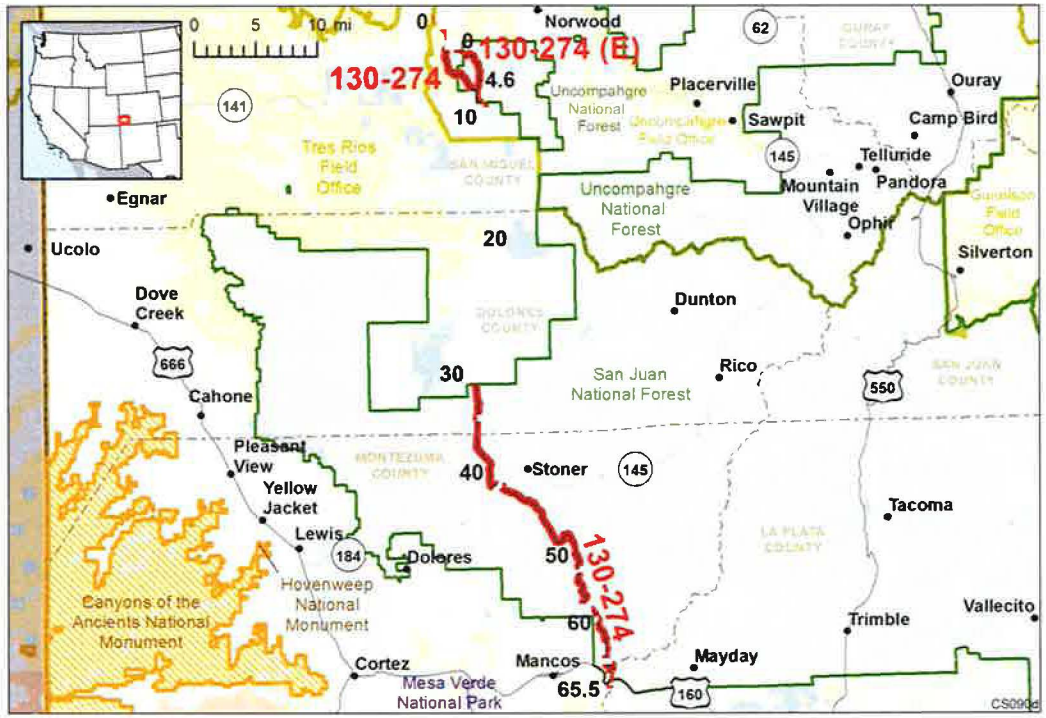
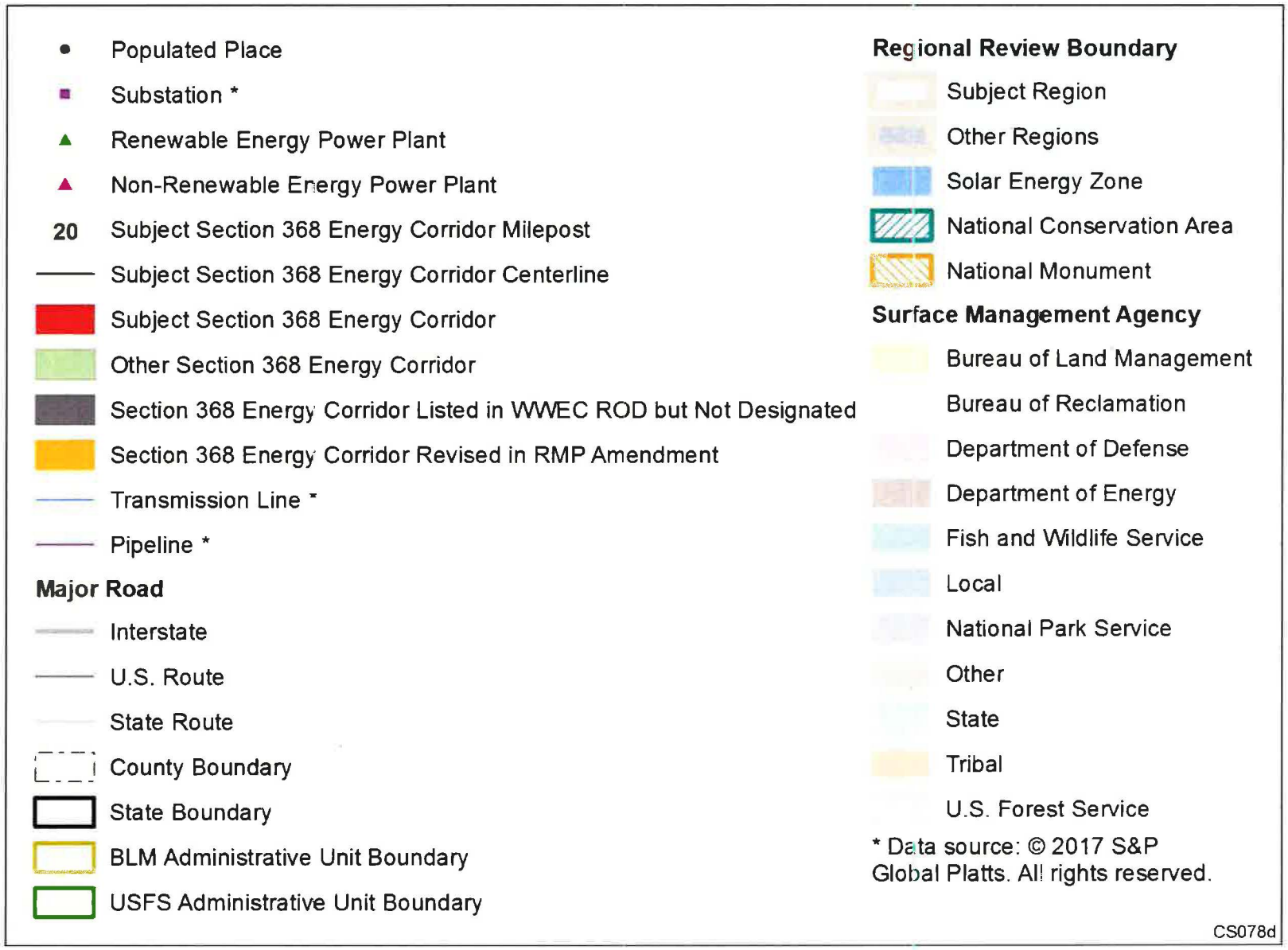



**Figure 1. Corridor 130-274/130-274(E)**




**Key for All Figures**

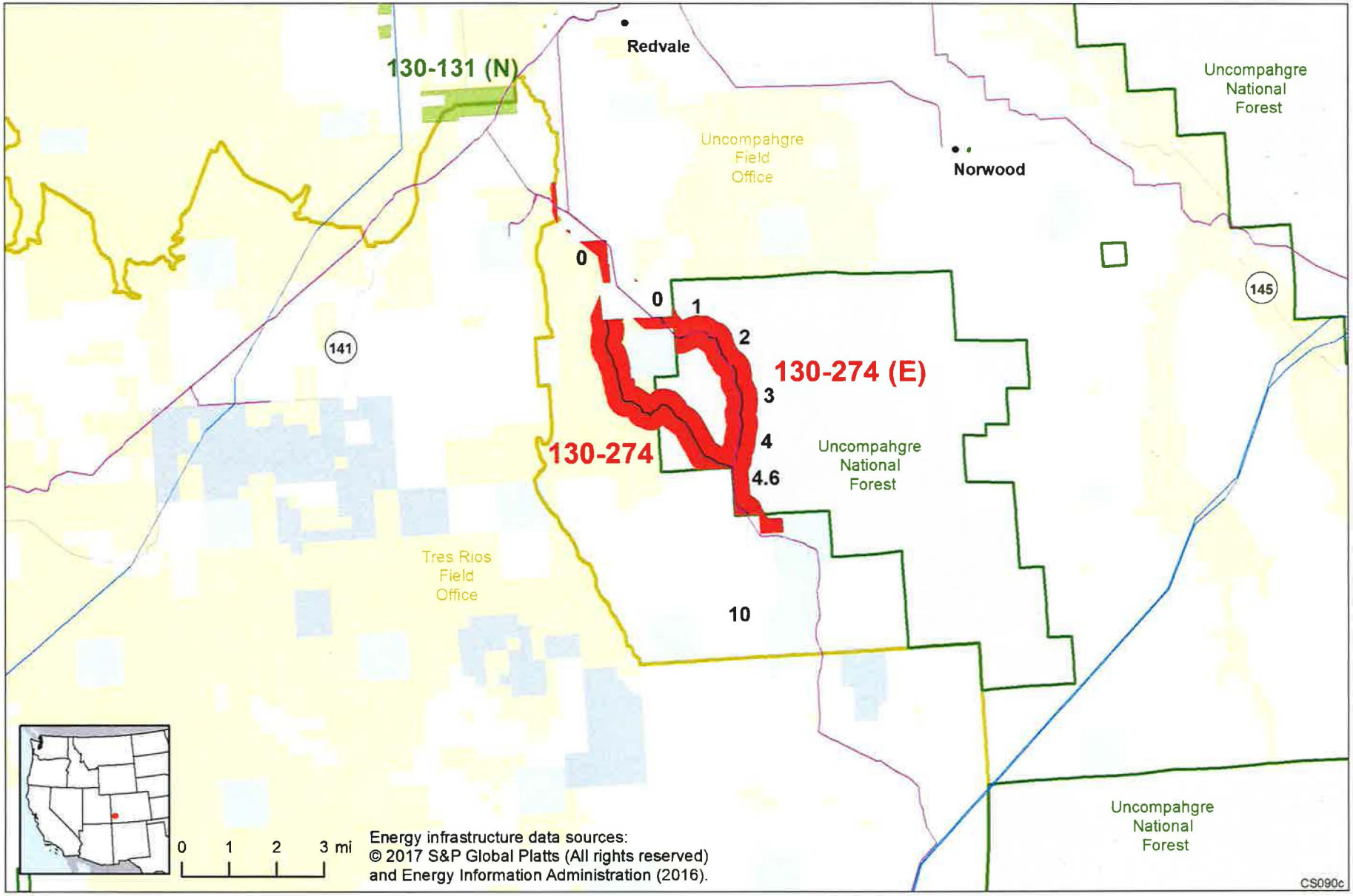



**Figure 2a. Corridor 130-274/130-274(E), Including Existing Energy Infrastructure**

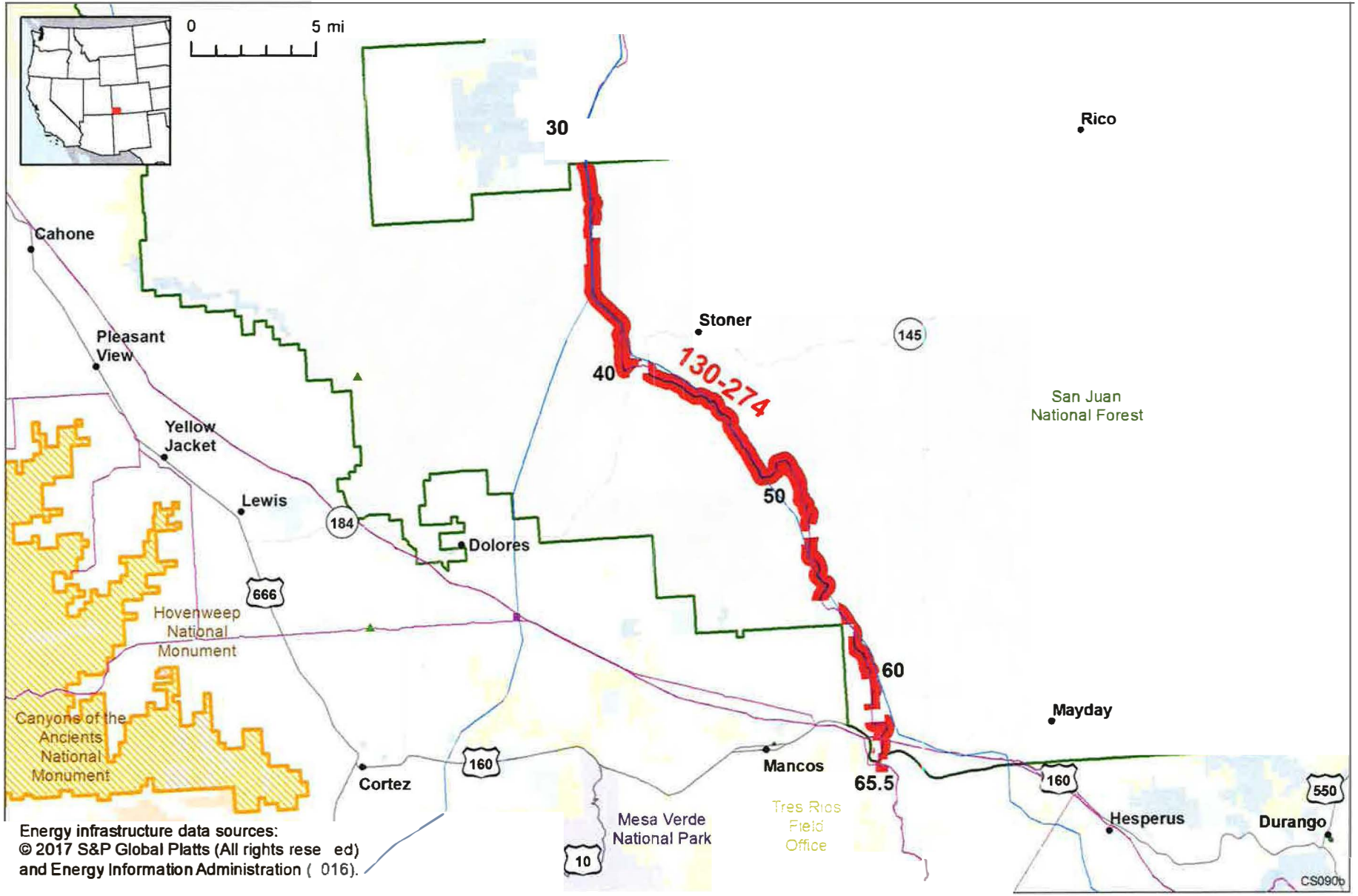



**Figure 2b. Corridor 130-274, Including Existing Energy Infrastructure**

## Corridor Rationale

During scoping for the WWEC PEIS, routes generally following this corridor were suggested by the National Grid and the Western Utility Group. The initial portion of Corridor 130-274 from MP 0 to MP 8.5 was not previously designated, but the remainder of the corridor was previously identified as a locally designated corridor.

*Existing Infrastructure:* Corridor 13-274(E) is an existing management prescription 1D Utility Corridor occupied by a natural gas pipeline operated by TransColorado Gas Transmission Company, LLC. The portion of Corridor 130-274 on the GMUG National Forest is not occupied by any utility transmission, but the remainder of the corridor contains the TransColorado natural gas pipeline, a 230-kV transmission line operated by Western Area Power Administration from MP 30.1 to MP 36.6, and generally follows a 345-kV transmission line operated by Tri-State G & T Association, Inc. from MP 30.1 to MP 63.2. Also included along the corridor is the Nucla-Naturita Tel Co FLPMA Telephone-Telegraph line, the Tri-State 115-kV power transmission line, and the CDOT Federal Aid Highway.

*Potential for Future Development:* The Platts data do not show any planned projects near this corridor. Results from the Corridor Study indicate that there had been some interest by a transcontinental pipeline company for the San Juan National Forest segment, but there was no follow-up and no application was submitted. BLM analysis indicates that there are no pending projects within corridor and no pending utility-scale renewable projects in the area. It is possible that the corridor will be affected by the Gunnison Sage-Grouse Range-wide Draft RMP Amendment/Draft EIS.

## Corridor of Concern Status

Corridor 130-274/130-274(E) is a corridor of concern. Concerns regarding access to coal, direct or indirect impacts to Gunnison Sage-grouse conservation areas, occupied Gunnison Sage-grouse critical habitat, Colorado-proposed Wilderness, and USFS Inventoried Roadless Area were identified in Exhibit A of the Settlement Agreement. These corridor of concern issues are highlighted in yellow in the Corridor Analysis table.

## Conflict Map Analysis

Figures 3a and 3b reflect a comprehensive resource conflict assessment to help the Agencies identify a corridor's proximity to environmentally sensitive areas. The potential conflict assessment (low, medium, high) shown in the figures are based on criteria found on the WWEC Information Center at www.corridoreis.anl.gov. The conflict assessment criteria table was used to identify if the corridor meets the Settlement Agreement siting principles to provide maximum utility and minimum impact on the environment. This facilitates balance between resource protection and potential development. Where feasible, corridors should be sited in the areas of low conflict; however, to meet the requirements in the Energy Policy Act and the siting principles in the Settlement Agreement, corridors may be located in high potential conflict areas. Many energy corridors were designated in land use plans prior to being carried forward into Section 368 designation. In almost all instances, these existing corridors (pre-Section 368) contained existing infrastructure. Corridor 130-274 is entirely within a medium potential conflict area and contains existing infrastructure.

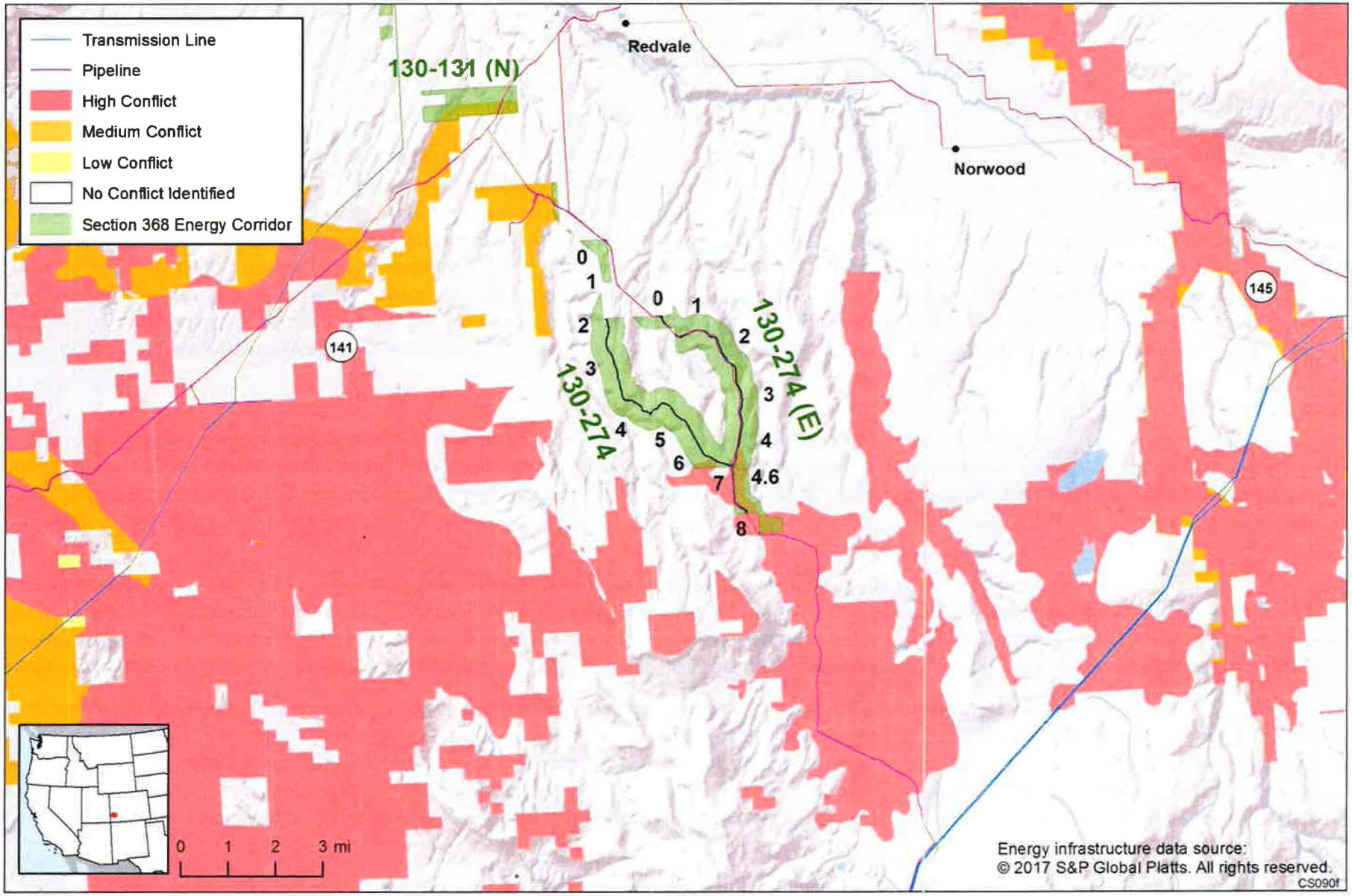



**Figure 3a. Mapping of Conflict Areas in Vicinity of Corridor 130-274/130-274(E)**

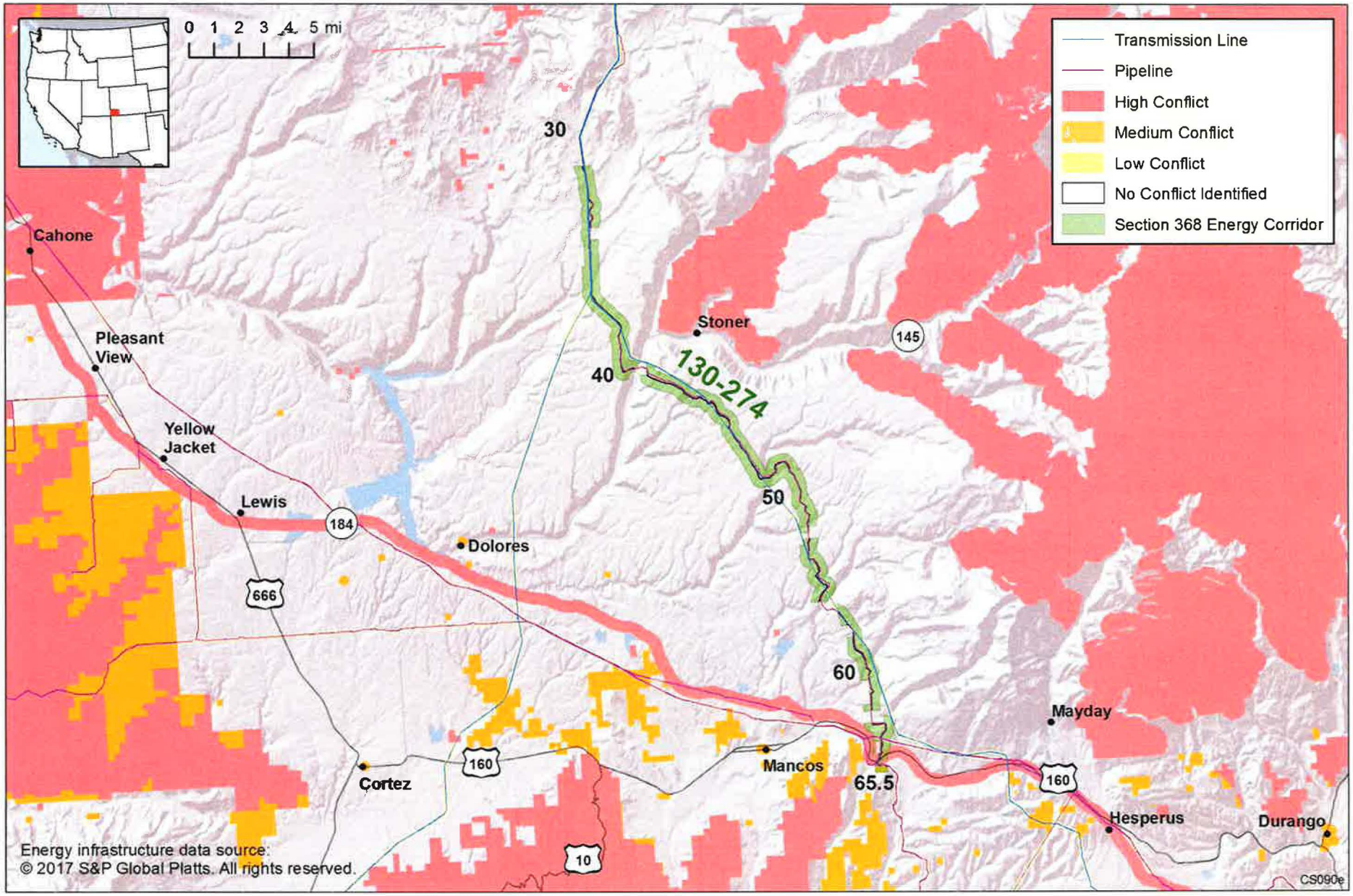



**Figure 3b. Mapping of Conflict Areas in Vicinity of Corridor 130-274**

## Corridor Analysis

The corridor analysis table below identifies issues potentially affecting Corridor 130-274/130-274(E), locations of resources within the corridor, and the results of the analysis by the Agencies. Issues are checked if they are known to apply to the corridor. Corridor of concern issues are highlighted in yellow.

☒ **Energy Planning Opportunities**

☒ **Energy Planning Issues**
- ☐ Physical barrier
- ☒ Jurisdiction
- ☒ Existing infrastructure/available space

☒ **Land Management Responsibilities and Environmental Resource Issues**
- ☐ Air quality
- ☒ Cultural resources
- ☒ Ecological resources
- ☒ Hydrological resources
- ☒ Lands and realty
- ☒ Lands with wilderness characteristics
- ☐ Livestock grazing
- ☐ Paleontology
- ☐ Public access and recreation
- ☐ Soils/erosion
- ☒ Specially designated areas
- ☐ Tribal concerns
- ☒ Visual resources

☐ **Interagency Operating Procedures**

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| **ENERGY PLANNING OPPORTUNITIES** | | | | | | | |
| 130-274/ 130-274(E) .001 | USFS | San Juan National Forest | Montezuma and La Plata, CO | Substations | Corridor 130-274: MP 61.2 and MP 64.2 | GIS Analysis: two substations within 5 mi of corridor | Nearby substations provide an opportunity for the corridor to accommodate additional transmission. |
| 130-274/ 130-274(E) .002 | | | | Access to coal-fired generation | Not specified. | Settlement Agreement;<br><br>RFI: re-route corridor to a location that can accommodate transmission tied to renewable energy development. | Currently there is a Tri-State coal-fired power plant near Nucla. It is connected to transmission lines that do not go through either corridor. Tri-State recently announced they would be decommissioning this power plant by the end of 2022.<br><br>In 2013, BLM evaluated the Four Corners terrain for potential wind power generation and determined there were no realistic opportunities to justify huge investments into this type of renewable energy prospects/ development by private industry. |

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| | | | | | | | |
| **ENERGY PLANNING ISSUES** | | | | | | | |
| ***Jurisdiction*** | | | | | | | |
| 130-274/ 130-274(E) .003 | State | State | San Miguel and Dolores, CO | Discontinuous section of corridor | MP 15.5 to MP 18 | GIS Analysis: State lands in corridor gap. | BLM and USFS can only authorize projects on Federally-administered lands. Development in corridor gaps would require coordination outside of the Agencies. |
| 130-274/ 130-274(E) .004 | NA | Private and State | San Miguel and Dolores, CO | Private and state lands within corridor gap | MP 8.5 to 31.5 | RFI: impact that development within the corridor could have on state or privately owned parcels (jurisdictional corridor gaps –) that are located between designated corridor segments on Federal lands. Recommend that the Agencies extend assessment of existing corridors to non-federal lands, including private and state trust lands. | BLM and USFS can only authorize projects on Federally-administered lands. Development in corridor gap would require coordination outside of the Agencies. |
| ***Existing Infrastructure/Available Space*** | | | | | | | |
| 130-274/ 130-274(E) .005 | BLM and USFS | Tres Rios FO and San Juan National Forest | La Plata and Montezuma, CO | Existing infrastructure | MP 53.3 to MP 65.5 | GIS Analysis: several transmission lines, pipelines and the corridor both follow each other and intersect at angles. | Generally does not affect use of the corridor. Proposed project siting and colocation alternatives to address impacts would be analyzed during the ROW application process. |
| 130-274/ 130-274(E) .006 | BLM | San Juan National Forest | Montezuma and La Plata, CO | State Highway 145 and U.S. Highway 160 | MP 40.9 to MP 41 and MP 64.6 to MP 65 | GIS Analysis: roads and corridor intersect. | Generally does not affect use of the corridor. Consistent with BLM ROW regulations, notification to adjacent ROW holders would be provided. |
| **LAND MANAGEMENT RESPONSIBILITIES AND ENVIRONMENTAL RESOURCE ISSUES** | | | | | | | |
| ***Cultural Resources*** | | | | | | | |
| 130-274/ 130-274(E) .007 | BLM | Tres Rios FO | | Cultural sites | Not specified. | Agency Input: large known cultural sites with associated surveys. | Not a consideration for corridor-level planning. Section 106 process would be followed to identify possible impact of development during the ROW application process. |

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| | | | | | | | The Tres Rios FO RMP has no ROW exclusion or avoidance prescriptions for cultural resources, but the RMP does state that important cultural areas and traditional cultural properties need protection. |
| ***Ecology: Special Status Animal Species*** | | | | | | | |
| 130-274/ 130-274(E) .008 | USFS | GMUG National Forests | San Miguel, CO | Gunnison Sage-grouse critical habitat (ESA-listed: threatened) | MP 4.2 to MP 4.6 within Corridor 130- 274(E) and MP 6.2 to MP 13.2 | Settlement Agreement; RFI: reroute to avoid concern.<br><br>GIS Analysis: corridor intersects critical habitat in southernmost portion of the corridor on the GMUG National Forest. | GMUG National Forest LRMP has no ROW exclusion or avoidance prescriptions for Gunnison Sage-grouse critical habitat. However, the LRMP does acknowledge the need to protect federally listed species and their habitats. The Agencies should consider opportunities for corridor revision to avoid most areas of critical habitat and still encompass existing infrastructure. |
| 130-274/ 130-274(E) .009 | USFS | GMUG National Forests | San Miguel, CO | Gunnison Sage-grouse conservation areas | Not specified. | Settlement Agreement; RFI: reroute to avoid concern. | Gunnison Sage-grouse conservation areas have not been identified and are not a consideration for the review at this time. |
| ***Hydrology: Surface Water*** | | | | | | | |
| 130-274/ 130-274(E) .010 | BLM and USFS | Uncompahgre FO and San Juan National Forest | Dolores and Montezuma, CO | Stream crossings: Disappointment Creek, Beaver Creek, Dolores River, Lost Canyon Creek, Chicken Creek, West Mancos River, Middle Mancos River, East Mancos River, and unidentified intermittent streams | MP 19.8, MP 32.9 to MP 33.5, MP 38.5 to MP 39.1, MP 41, MP 48.8 to MP 49.2, MP 55.4 to MP 56, MP 56.3 to MP 57, MP 60 to MP 60.9, and MP 62.2 to MP 63.7 | GIS Analysis: streams and corridor intersect. | Not a consideration for corridor-level planning. Linear ROWs can either span streams or be buried underneath them. |
| ***Lands and Realty: Rights-of-Way and General Land Use*** | | | | | | | |
| 130-274/ 130-274(E) .012 | BLM and USFS | Tres Rios FO and San Juan | Montezuma and La Plata, CO | NSO Area | MP 64.9 to MP 65.3 | GIS Analysis: NSO Area intersects corridor. | Pipeline must accommodate directional underground drilling only within two extremely steep river/canyon corridors |

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| | | National Forest | | | | Agency Input: NSO for riparian habitat exists in a small area of Corridor 130-274(E). | that are subject to landslides, including the Dolores River Canyon and Lost Canyon within the San Juan National Forest. Substantial investments in mitigation efforts/bonding are likely in these canyon corridors, if surface disturbance is warranted. |
| 130-274/130-274(E) .013 | USFS | GMUG National Forests | San Miguel, CO | Oil and gas leases | Not specified. | Agency Input: in the GMUG, the corridor is in an area available for oil and gas leasing per 1993 leading decision. | Controlled surface use stipulations would apply mostly in corridor areas. There are no existing leases on the GMUG, however there are existing leases to the west and northwest. |
| ***Lands with Wilderness Characteristics*** | | | | | | | |
| 130-274/ 130-274(E) .014 | | | | Citizens' proposed wilderness | Not specified. | Settlement Agreement; RFI: reroute to avoid concern. | This citizens' proposed wilderness is not in the RMP management prescriptions and is therefore not a consideration at the time of this review.<br><br>There are no wilderness proposals on the GMUG National Forests. The San Juan Mountain Wilderness Proposal currently identifies the Naturita Canyon, approximately 2 miles east of 130-274(E) as an area to be withdrawn from mineral leasing to prevent oil and gas leasing from occurring. Naturita Canyon is a Colorado Roadless Area and is not affected by the existing Transcolorado pipeline in Corridor 130-274(E). |
| ***Public Access and Recreation*** | | | | | | | |
| 130-274/ 130-274(E) .015 | State | Colorado Parks and Wildlife | Montezuma, CO | Mancos State Park | MP 57.1 to MP 59.9 | GIS Analysis: park is as close as 1.8 mi west of corridor. | The park does not intersect the corridor and is therefore not a consideration for use of the corridor at corridor-level planning. |

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| ***Specially Designated Areas*** | | | | | | | |
| 130-274/ 130-274(E) .016 | USFS | San Juan National Forest | La Plata and Montezuma, CO | San Juan Skyway Scenic Byway | MP 40.9 to MP 41.1 and MP 64.6 to MP 64.9 | GIS Analysis: the San Juan Skyway Scenic Byway and the corridor intersect. | The San Juan National Forest LRMP has no ROW exclusion or avoidance prescriptions for the San Juan Skyway Scenic Byway. The corridor intersects the Scenic Byway only at its intersection (a relatively small portion of the Byway). Coordination with CDOT would be required to identify any management prescriptions related to the scenic highway, including methods to reduce visual impacts on the byway. |
| 130-274/ 130-274(E) .017 | BLM and USFS | San Juan National Forest and Uncompahgre FO | Montezuma and San Miguel, CO | Naturita Canyon and Storm Peak Colorado Roadless Areas | MP 8.5 (near), MP 38.4 to MP 45.6 (near) | Settlement Agreement; RFI: reroute to avoid concern;<br><br>GIS Analysis: Storm Peak Colorado Roadless Area as close as 1.2 mi to corridor, Naturita Canyon Colorado Roadless Area as close as 1.5 mi to corridor. | The corridor is outside of the Colorado Storm Peak and Naturita Canyon Colorado Roadless Areas. The Colorado Roadless Areas would not influence development and management inside of the corridor. |

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| 130-274/ 130-274(E) .018 | BLM and USFS | Tres Rios FO and San Juan National Forest | La Plata and Montezuma, CO | Old Spanish National Historic Trail | MP 64.8 to MP 64.9 | GIS Analysis: the OSNHT and the corridor intersect.<br><br>Agency Input: San Juan National Forest Plan guidelines for development of the corridor include:<br>-Other resource activities should be designed in order to meet scenic quality objectives for these special designation trails (generally, a foreground and middle-ground of very high to high scenic integrity or VRM Class II).<br>-A literature search and/or Class III cultural resources survey should be conducted within 0.5 mile of either side of the centerline of the congressionally designated OSNHT in high potential segments, prior to authorization of ground-disturbing activities or activities that could substantially interfere with the nature and purposes of the trail. | The OSNHT is a Congressionally designated trail. Adherence to IOPs would be required. Through project-specific environmental reviews, impacts would be analyzed in relation to any other alternatives that would be identified.<br><br>The Agencies have identified the need for a new IOP to address development in Section 368 energy corridors while protecting values in Congressionally designated NHTs. |
| 130-274/ 130-274(E) .019 | BLM | Tres Rios FO | Montezuma, CO | Menefee Mountain WSA | MP 65.1 (near) | GIS Analysis: WSA as close as 1.2 mi southwest of corridor. | The corridor does not cross the WSA and therefore is is not a consideration for corridor-level planning. |

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| ***Visual Resources*** | | | | | | | |
| 130-274/ 130-274(E) .020 | BLM | Tres Rios FO | Montezuma, CO | VRM Class I | MP 65.5 | GIS Analysis: VRM Class I areas are as close as 1.2 mi west of corridor. | There are no Class I areas within the corridor. |
| 130-274/ 130-274(E) .021 | BLM | Tres Rios FO | San Miguel and Dolores, CO | VRM Class II | MP 13.9 to MP 14.4 and MP 18 to MP 19.5 | GIS Analysis: VRM Class II areas in corridor gap. | Future development within the corridor could be limited as VRM Class II allows for low level of change to the characteristic landscape. Management activities may be seen, but should not attract the attention of the casual observer. |
| 130-274/ 130-274(E) .022 | BLM | Uncompahgre FO | San Miguel | VRI Class III | MP 0 to MP 4.5<br>MP 0 to MP 0.5 | GIS Analysis: VRI Class III areas and the corridor intersect. No VRM indicated in the San Juan/San Miguel RMP, 1985, so VRI data used. | The BLM utilizes the VRM system to manage and protect visual/scenic resources. VRM cannot occur in a systematic and objective manner without a proper inventory of visual resources. An accurate inventory of visual resources creates the needed baseline data to conduct VRM. The VRI is a methodical process intended to evaluate and determine the quality of visual resources and the value of those resources in a given area. A VRI was completed for the Uncompahgre FO in September of 2009. While not yet incorporated into the current RMP, this data is the most recent and comprehensive data available for visual resources within the Uncompahgre FO. |
| 130-274/ 130-274(E) .023 | BLM | Tres Rios FO | San Miguel, Montezuma, and La Plata, CO | VRM Class III | MP 0 and MP 64.6 to MP 65.5<br><br>MP 64.9 | GIS Analysis: VRM Class III areas and corridor intersect.<br><br>Agency Input: The Old Spanish National Historic Trail and Road 109 transect a VRM Class III area of the corridor. A gas pipeline is currently located in the corridor | VRM Class III allows for moderate change to the characteristic landscape, although minimizing visual contrast remains a requirement. Management activities may attract the attention of the casual observer, but shall not dominate the view. |

| REGION 2 – CORRIDOR 130-274/130-274 (E) – ANALYSIS TABLE | | | | | | | |
|---|---|---|---|---|---|---|---|
| **ID** | **Agency** | **Agency Jurisdiction** | **County** | **Primary Issue** | **Corridor Location (by Milepost [MP])** | **Source** | **Agency Review and Analysis[1]** |
| 130-274/ 130-274(E) .024 | USFS | San Juan National Forest | Montezuma, Dolores, CO | SIO classes | Not specified. | Agency Input: no Very High SIO but a few places of High SIO. | Future development within the corridor could be limited. Landscape character appears intact. Deviations may be present but must repeat the form, line, color, texture, and pattern common to the landscape. |

[1] Projects proposed in the corridor would be reviewed during the ROW application review process and would adhere to federal laws, regulations, and policy.

## Abstract Acronyms and Abbreviations

BLM = Bureau of Land Management; CDOT = Colorado Department of Transportation; FO = Field Office; EIS = Environmental Impact Statement; GIS = geographic information system; GMUG = Grand Mesa, Uncompahgre, Gunnison National Forests; IOP = Interagency Operating Procedure; IRA = Inventoried Roadless Area; LRMP = Land and Resources Management Plan; MP = milepost; NEPA = National Environmental Policy Act; NHT – National Historic Trail; MS = Manual Section; NSO = no surface occupancy; OSNHT = Old Spanish National Historic Trail; PEIS = Programmatic Environmental Impact Statement; RFI = Request for Information; RMP = Resource Management Plan; ROW = right-of-way; SIO = Scenic Integrity Objective; USFS = U.S. Forest Service; VRI = Visual Resource Inventory; VRM = Visual Resource Management; WSA = Wilderness Study Area; WWEC = West-wide Energy Corridor.

## Attachment C: Conflict Assessment Criteria Table for Section 368 Energy Corridor Reviews

Energy Corridor Conflict Assessment Criteria Table document provided by Agencies for review, downloaded February 2018 at http://www.corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf

*Corridor reviews use a comprehensive resource conflict assessment to help the Agencies identify a corridor's proximity to environmentally sensitive areas. The potential conflict assessment (low, medium, high) is generated using the criteria from BLM's new regulations for prioritizing applications for solar and wind energy projects (43 CFR 2804.35(a)-(c)). The Agencies incorporated the criteria into the conflict assessment criteria table, shown below. The matrix was applied to each corridor to generate conflict maps to aid in reviewing whether the corridor's current location best meets the Settlement Agreement siting principles to provide maximum utility and minimum impact to the environment.*

*Where feasible, corridors should be sited in the areas of low conflict; however, to meet the requirements in the Energy Policy Act and the siting principles in the Settlement Agreement, corridors may be located in medium and high potential conflict areas. In those instances, it's important to note many energy corridors were already designated in land use plans prior to being carried forward into Section 368 designation. In almost all instances, these existing corridors (pre-Section 368) contained existing infrastructure. Retaining corridors through these areas may be the best option available for providing long-distance pathways for electrical transmission and pipelines while avoiding disperse development across Federal lands.*

**Table 2-5 Conflict Assessment Criteria Table for Section 368 Energy Corridor Reviews**

The blue rows indicate the conflict criteria, while the white rows underneath are individual GIS data layers associated with the criteria.

| Low Potential Conflict Areas |
|---|
| **Lands designated as Visual Resource Management Class IV** |
| *VRM Class IV* |
| |
| **Previously disturbed sites or areas adjacent to previously disturbed or developed sites**<br>BLM data were not available for inclusion in the figures in individual abstracts, but existing infrastructure can be viewed on the Section 368 Mapper. |
| *Existing transmission lines* |
| *Existing pipelines* |
| *Existing roadways and railways* |
| *Existing telecommunication lines, communication sites* |
| *Existing agricultural uses* |
| *Other energy development (e.g. adjacent windfarms, solar farms, power generation facilities, substations)* |
| |
| **Lands identified in BLM land use plans as suitable for disposal**<br>No BLM data are available for inclusion in the graphical display |
| |
| **Lands specifically identified as appropriate for solar or wind energy development, other than designated leasing areas** |
| *Solar Energy Zones* |
| *BLM AZ Renewable Energy Development Areas* |
| *DRECP Development Focus Areas Restricted to Solar and/or Geothermal Energy* |

| Medium Potential Conflict Areas |
| --- |
| **BLM special management areas that provide for limited development, including recreation sites and facilities** |
| *Areas of Critical Environmental Concern* |
| *DRECP Extensive Recreation Management Areas* |
| *Other recreation sites and facilities, as data are available* |
| **Lands with wilderness characteristics outside Wilderness and Wilderness Study Areas that have been identified in an updated wilderness characteristics inventory** |
| *Lands Inventoried and Managed for Wilderness Character* |
| **ROW avoidance areas** |
| *ROW Avoidance Areas* |
| **Areas where project development may adversely affect resources and properties listed in a national register, such as in the National Register of Historic Places, National Natural Landmarks, or National Historic Landmarks** |
| *Properties Listed in the National Register of Historic Places* |
| *National Natural Landmarks* |
| *National Historic Landmarks* |
| *National Historic Parks* |
| **Sensitive habitat areas, including important species use areas, riparian areas, or areas of importance for Federal or State sensitive species** |
| *Greater Sage-grouse General Habitat Management Areas* |
| *Greater Sage-grouse Priority Habitat Management Areas* |
| *Desert Tortoise Designated Critical Habitat* |
| *DRECP Wildlife Allocations* |
| *Important Bird Areas* |
| *Sagebrush Focal Areas* |
| *USFWS-identified Desert Tortoise Connectivity Areas* |
| *Least Cost Corridors for Tortoise Population Connectivity* |
| *DRECP Tortoise Conservation Areas and Linkages* |
| **Lands designated as Visual Resource Management Class III** |
| *VRM Class III* |
| **DoD operating areas with land use or operational mission conflicts** |
| Military Training Route: Instrument Route Corridors |
| Military Training Route: Slow Route Corridors |
| Military Training Route: Visual Route Corridors |
| Special Use Airspace - Low Altitude |
| *DoD High Risk of Adverse Impact Areas* |
| **Areas where project development may adversely affect lands acquired for conservation purposes** |
| *Lands Acquired with Federal Funds for Conservation Purposes* |
| *Boulder City Conservation Easement* |
| **Projects with proposed groundwater uses within groundwater basins that have been allocated by State water resource agencies**<br>No data are available for inclusion in the graphical display |

| High Potential Conflict Areas |
|---|
| **Lands designated by Congress, the President, or the Secretary for the protection of sensitive viewsheds, resources, and values (e.g., units of the National Park System, Fish and Wildlife Service Refuge System, some National Forest System units, and the BLM National Landscape Conservation System), which could be adversely affected by development** |
| *Units of the National Park System* |
| *Units of the Fish and Wildlife Refuge System* |
| *National Monuments* |
| *Wilderness Areas* |
| *Wilderness Study Areas* |
| *National Conservation Areas (except CDNCA)* |
| *Other Lands in the NLCS* |
| *EPA Class I Air Quality Areas* |
| *DRECP California Desert National Conservation Lands* |
| *DRECP National Scenic Cooperative Management Areas* |
| *USFS Roadless Areas* |
| *National Historic Trails* |
| *National Scenic Trails* |
| *National Recreation Trails** |
| |
| **Wild and Scenic Rivers and Recreational Rivers and river segments deemed suitable for Wild and Scenic River status, if project development could have significant adverse effects on sensitive viewsheds, resources, and values** |
| *Wild and Scenic Rivers* |
| *Recreational Rivers** |
| *River segments deemed suitable for Wild and Scenic River status** |
| |
| **Designated critical habitat for federally threatened or endangered species, if project development could result in the destruction or adverse modification of that critical habitat** |
| *Critical Habitat Areas* |
| *Critical Habitat Lines* |
| |
| **Lands designated as Visual Resource Management Class I or Class II** |
| *Visual Resource Management Class I* |
| *Visual Resource Management Class II* |
| |
| **ROW exclusion areas** |
| *ROW exclusion areas* |
| |
| **Lands designated as no surface occupancy for oil and gas development in BLM land use plans** |
| *No Surface Occupancy* |
| *No data are currently available for inclusion in the graphical display |

| | |
|---|---|
| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10188] |
| **Date:** | Monday, July 30, 2018 6:47:40 PM |
| **Attachments:** | ID_10188_LC_Proposed_SF_Line_Norton_Ext_2018051716mioffedlands.pdf<br>ID_10188_CoverLetter299.pdf |

Thank you for your input, lynn greene.

The comment tracking number that has been assigned to your comment is **10188**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** July 30, 2018 18:47:09 CDT

**First Name:** lynn
**Last Name:** greene
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** Lucky Corridor, LLC

**Topics**
Energy Planning Opportunities
Jurisdiction
Lands and realty
Specially designated areas
Visual resources

**Geographic Area**
Regions 2 & 3 > All Region 2 & 3 corridors

**Input**

Please find attached a second east west corridor our team believes should be designated in New Mexico. 10 mi=USFS; 6 mi=BLM. This is an existing utility corridor through federal lands. The facilities within it are old, and will soon need to be upgraded, which will require visual impact and other studies.A new line toward these lands, but not passing through federal land, has recently been accepted by the FERC, and will facilitate moving clean energy toward the nominated area. We have also filed a new SF-299 for co-located facilities for renewable energy, with both the Santa Fe National Forest and BLM. Our consultants believe these two existing east-west utility corridors, which each contain very old and full transmission lines, and are in high risk fire zones, would fulfill the goals for 368 designation in New Mexico. Designation of these two east west corridors would allow electricity made from eastern and northeastern New Mexico's energy resources to move toward the existing, already designated, 368 corridor, 80-273.Our first nomination was done via Stakeholder Nomination 10065.

**Attachments**

LC_Proposed_SF_Line_Norton_Ext_20180517-16 mi of fed lands.pdf, Cover Letter 299.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

LUCKY CORRIDOR

July 24, 2018
Steve Romero, District Ranger
Pecos Ranger District
U.S. Forest Service, Santa Fe National Forest
PO Box 429
Pecos, NM 87552-0429

Mark Lujan, Realty Specialist
Bureau of Land Management - Taos Field Office
226 Cruz Alta Rd,
Taos, NM 87571

Dear Mr. Romero and Mr. Lujan:

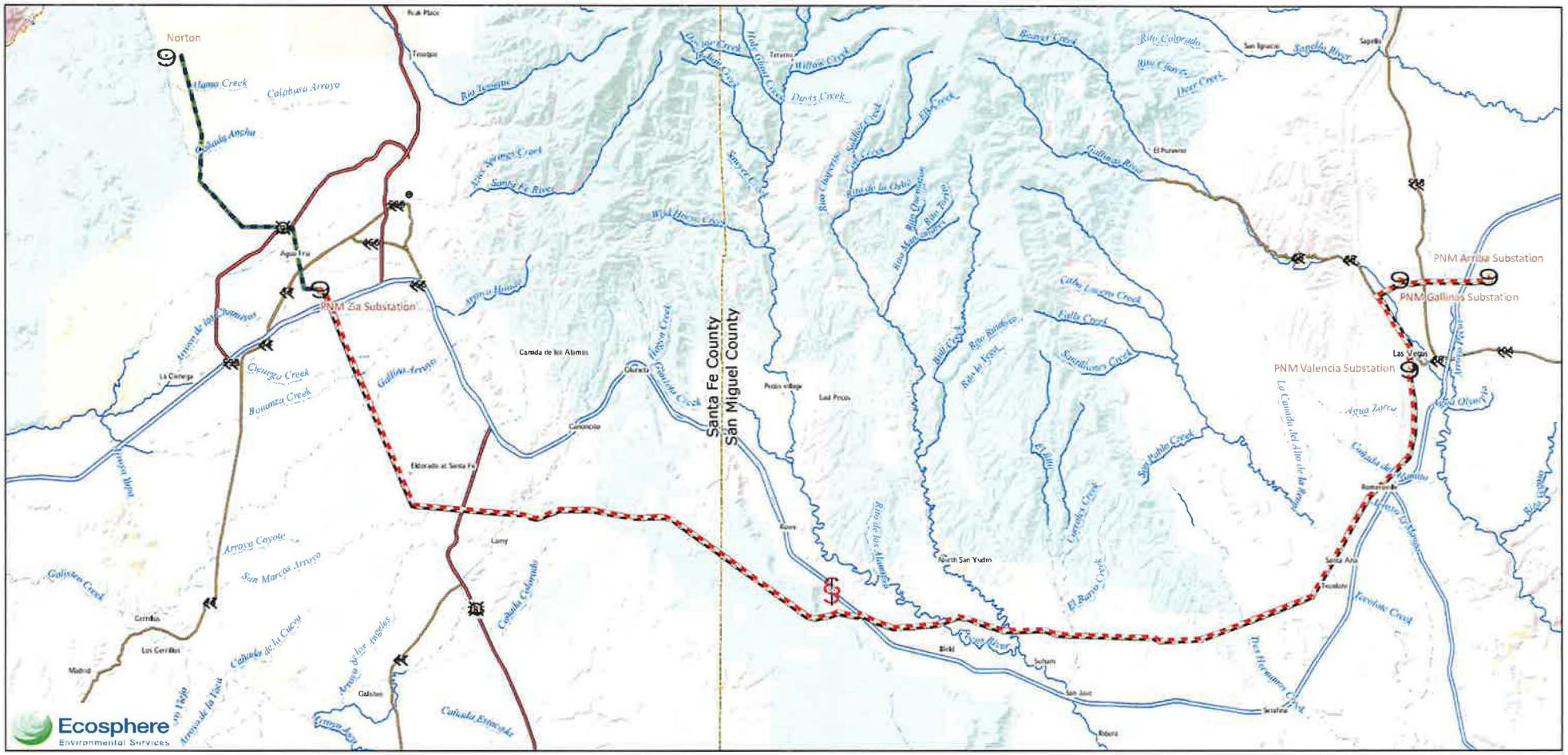
Transmitted herein is an SF-299 Application to permit **the Santa Fe Transmission Line Project** (Project) in San Miguel and Santa Fe counties, New Mexico. The applicant, Lucky Corridor, LLC, is a Colorado limited liability company qualified to do business in New Mexico. The Project is a proposed new 345-kilovolt (kV) single circuit electric transmission line that would be located within or adjacent to an existing Public Service Company of New Mexico ("PNM") 100-foot wide transmission line right-of-way ("ROW"), currently hosting an historic 115kV transmission line. PNM would be given the opportunity to either lift its 115kV onto the new steel poles hosting the 345kV facilities, or to share in the capacity of the 345kV facilities, so that PNM's commitment to serving the retail energy needs of the region would be in no way impaired. Sixteen miles of the existing transmission ROW passes through federal lands; ten miles is currently permitted to PNM by the United States Forest Service ("USFS") and six miles is currently permitted by the Bureau of Land Management ("BLM"). The proposed Project is described in detail in the attached SF 299 Application.

Once you have had an opportunity to review the SF 299 Application, we would like to schedule a meeting, either individually or jointly with BLM and USFS representatives, to further discuss the Project and application process, including any needed revisions or supplemental information.

Thank you for your time and we look forward to working with you on this important Project.

Sincerely,

Lynn Chapman Greene, Manager, CEO
Lucky Corridor, LLC
6001 E. Dartmouth Ave.
Denver, CO 80222
303-681-3073
lynn@luckycorridor.com



PNM Substations
Norton Extension
PNM Las Vegas to Santa Fe 115 kV Transmission Line
Proposed Lucky Corridor Santa Fe Transmission Line
County

Interstate Highway
US Highway
State Highway
Artificial Path
Intermittent
Perennial

Bureau of Land Management
Department of Defense
National Park Service
Other
Private
State

State Park
State Wildlife Area
Tribal
US Fish & Wildlife Service
US Forest Service

0 3 6 12
Miles

Coordinate System: NAD 1983 UTM Zone 13N

1:240,000

| Owner | Miles |
|---|---|
| Bureau of Land Management | 6 |
| Private | 51 |
| State | 4 |
| U.S. Forest Services | 10 |

**Lucky Corridor LLC**

**Proposed Santa Fe Transmission Line**

San Miguel and Santa Fe Counties, NM

Date: 5/17/2018

| | |
|---|---|
| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10189] |
| **Date:** | Wednesday, August 15, 2018 5:04:36 PM |

Thank you for your input, Alex Daue.

The comment tracking number that has been assigned to your comment is **10189**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** August 15, 2018 17:04:18 CDT

**First Name:** Alex
**Last Name:** Daue
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Lands with wilderness characteristics

**Geographic Area**
Area selected via Corridor Mapping Tool

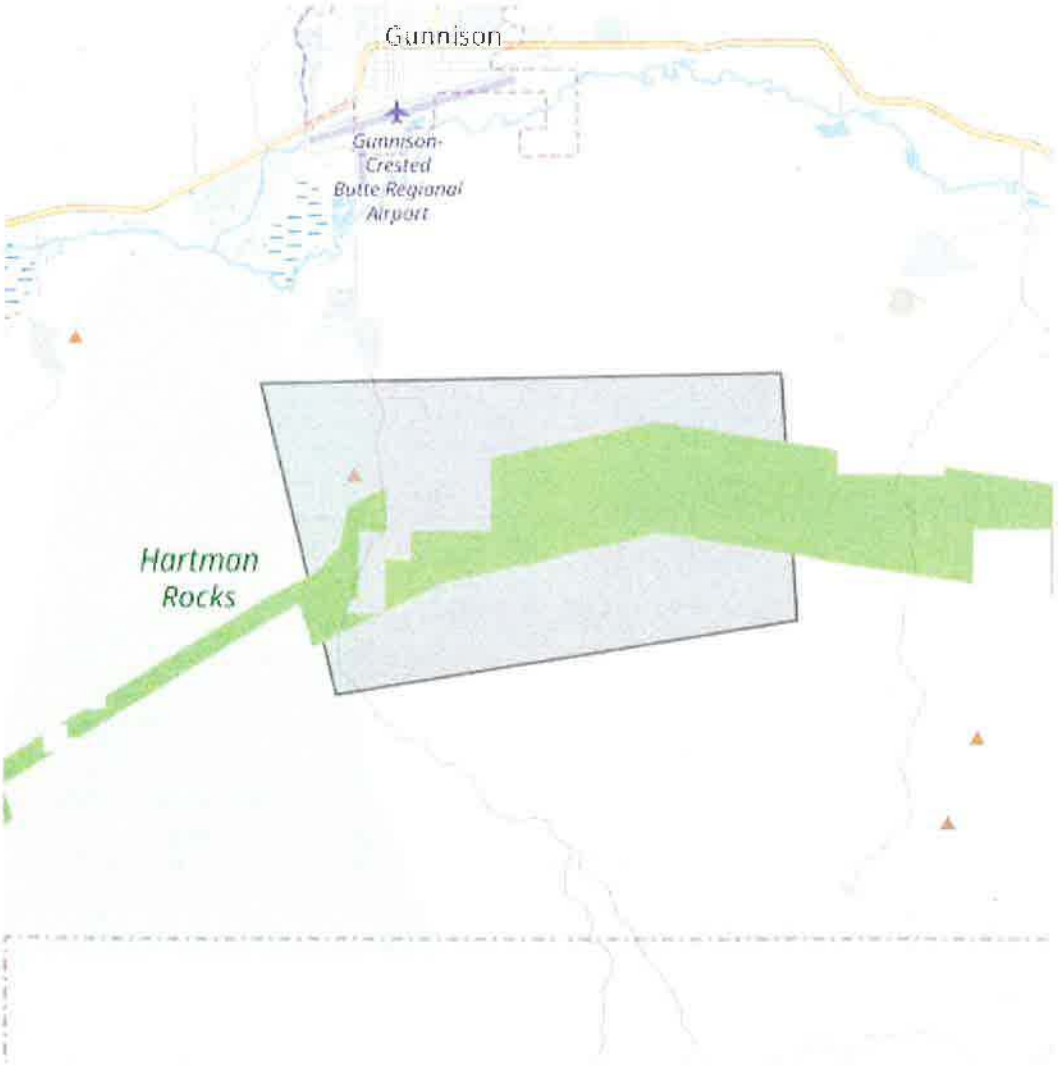
**Input**

We recommend that the Agencies adjust the West-wide Energy Corridors (WWEC) to eliminate overlap with wilderness-quality lands through the Regional Review process and future land use planning. In many cases there may be opportunities to do so by shifting a corridor away from the wilderness-quality lands and onto other BLM or USFS lands where impacts from transmission line or pipeline development would be lower. The Agencies should analyze potential impacts to other resources and values when considering possible corridor shifts and should make decisions that appropriately balance impacts to different resources and values. The Agencies should include details on opportunities for corridor shifts to avoid wilderness-quality lands in the Corridor Abstracts, and the Agencies should recommend these corridor shifts in the Regional Reports. The area noted on the map associated with this comment includes an opportunity to analyze shifting corridor 87-277 to the north on mileposts 103.5 to 106 to avoid lands with wilderness characteristics.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov


Gunnison
Gunnison-
Crested
Butte Regional
Airport
Hartman
Rocks

**From:** mail_corridoreiswebmaster
**To:** mail_corridoreiswebmaster; mail_corridoreisarchives
**Subject:** Webmaster Receipt: Section 368 Stakeholder Input [10190]
**Date:** Wednesday, August 15, 2018 5:08:34 PM

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Thank you for your input, Alex Daue.

The comment tracking number that has been assigned to your comment is **10190**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** August 15, 2018 17:08:11 CDT

**First Name:** Alex
**Last Name:** Daue
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Lands with wilderness characteristics

**Geographic Area**
Area selected via Corridor Mapping Tool

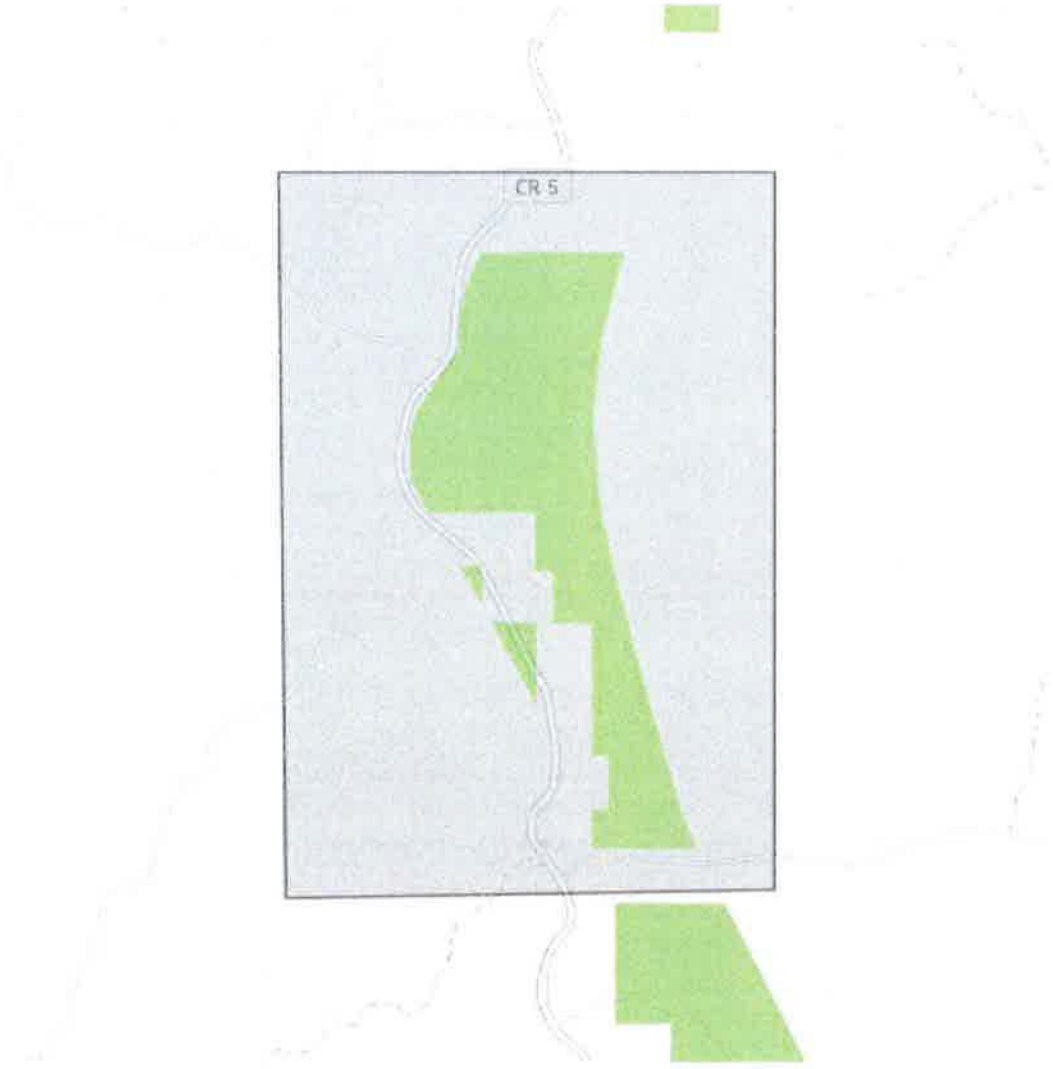
**Input**

We recommend that the Agencies adjust the West-wide Energy Corridors (WWEC) to eliminate overlap with wilderness-quality lands through the Regional Review process and future land use planning. In many cases there may be opportunities to do so by shifting a corridor away from the wilderness-quality lands and onto other BLM or USFS lands where impacts from transmission line or pipeline development would be lower. The Agencies should analyze potential impacts to other resources and values when considering possible corridor shifts and should make decisions that appropriately balance impacts to different resources and values. The Agencies should include details on opportunities for corridor shifts to avoid wilderness-quality lands in the Corridor Abstracts, and the Agencies should recommend these corridor shifts in the Regional Reports. The area noted on the map associated with this comment includes an opportunity to analyze shifting corridor 132-133 to the west from mileposts 61.5-63 to avoid lands with wilderness characteristics.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov


CR 5

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| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10191] |
| **Date:** | Wednesday, August 15, 2018 5:11:08 PM |

Thank you for your input, Alex Daue.

The comment tracking number that has been assigned to your comment is **10191**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** August 15, 2018 17:10:46 CDT

**First Name:** Alex
**Last Name:** Daue
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Lands with wilderness characteristics

**Geographic Area**
Area selected via Corridor Mapping Tool

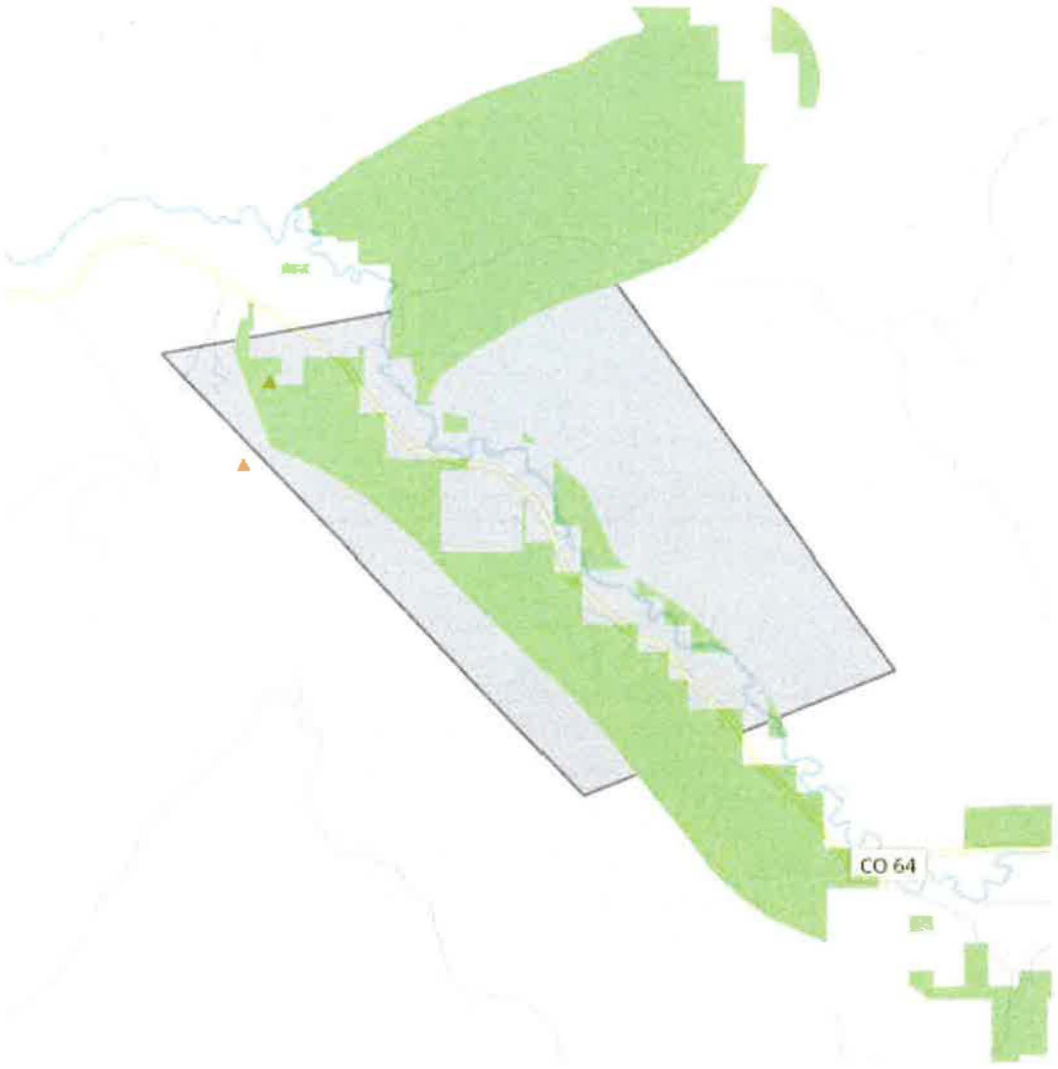
**Input**

We recommend that the Agencies adjust the West-wide Energy Corridors (WWEC) to eliminate overlap with wilderness-quality lands through the Regional Review process and future land use planning. In many cases there may be opportunities to do so by shifting a corridor away from the wilderness-quality lands and onto other BLM or USFS lands where impacts from transmission line or pipeline development would be lower. The Agencies should analyze potential impacts to other resources and values when considering possible corridor shifts and should make decisions that appropriately balance impacts to different resources and values. The Agencies should include details on opportunities for corridor shifts to avoid wilderness-quality lands in the Corridor Abstracts, and the Agencies should recommend these corridor shifts in the Regional Reports. The area noted on the map associated with this comment includes an opportunity to analyze shifting corridor 132-133 to the northeast from mileposts 71.5 to 75.5 to avoid lands with wilderness characteristics.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov


CO 64

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|---|---|
| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10192] |
| **Date:** | Wednesday, August 15, 2018 5:14:07 PM |

Thank you for your input, Alex Daue.

The comment tracking number that has been assigned to your comment is **10192**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** August 15, 2018 17:13:37 CDT

**First Name:** Alex
**Last Name:** Daue
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Lands with wilderness characteristics

**Geographic Area**
Area selected via Corridor Mapping Tool

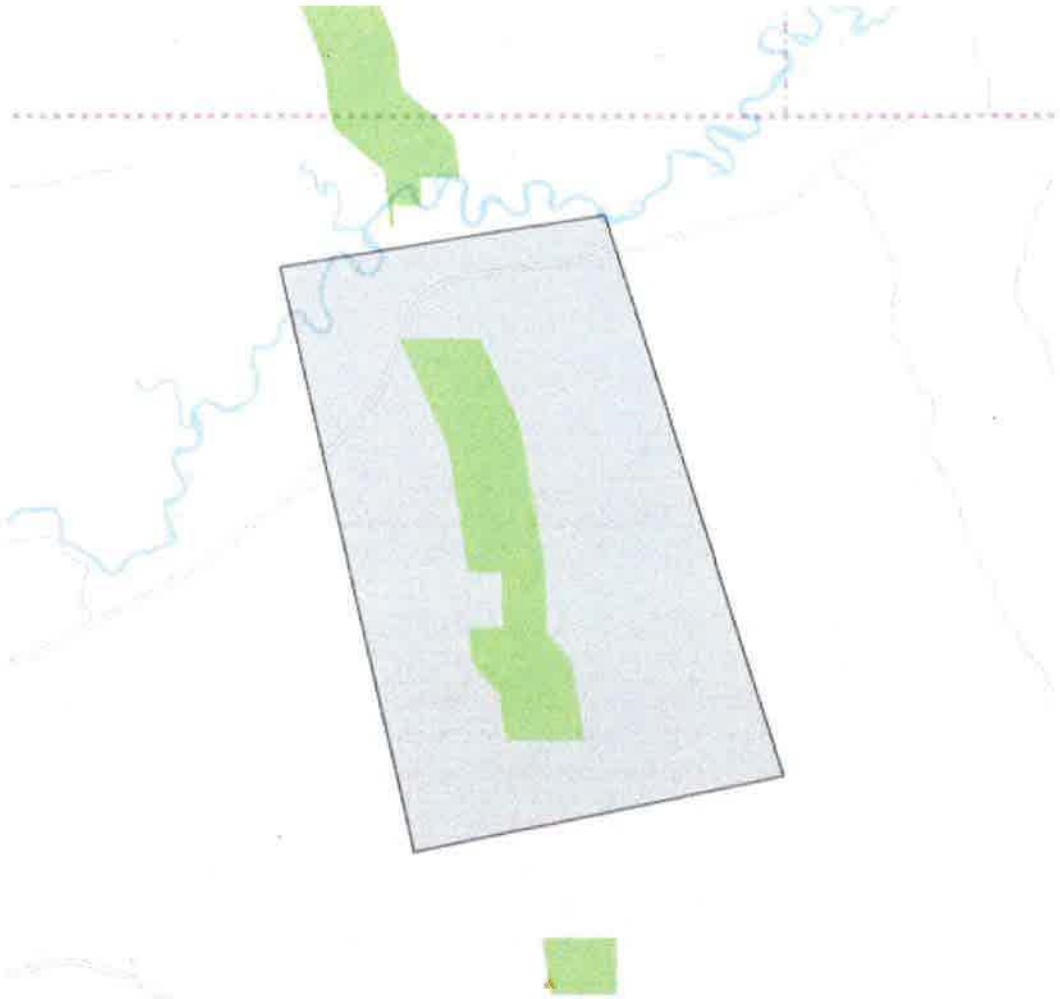
**Input**

We recommend that the Agencies adjust the West-wide Energy Corridors (WWEC) to eliminate overlap with wilderness-quality lands through the Regional Review process and future land use planning. In many cases there may be opportunities to do so by shifting a corridor away from the wilderness-quality lands and onto other BLM or USFS lands where impacts from transmission line or pipeline development would be lower. The Agencies should analyze potential impacts to other resources and values when considering possible corridor shifts and should make decisions that appropriately balance impacts to different resources and values. The Agencies should include details on opportunities for corridor shifts to avoid wilderness-quality lands in the Corridor Abstracts, and the Agencies should recommend these corridor shifts in the Regional Reports. The area noted on the map associated with this comment includes an opportunity to analyze shifting corridor 73-133 to the east from mileposts 49 to 52 to avoid lands with wilderness characteristics.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



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| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10193] |
| **Date:** | Wednesday, August 15, 2018 5:15:59 PM |

Thank you for your input, Alex Daue.

The comment tracking number that has been assigned to your comment is **10193**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** August 15, 2018 17:15:41 CDT

**First Name:** Alex
**Last Name:** Daue
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Specially designated areas

**Geographic Area**
Area selected via Corridor Mapping Tool

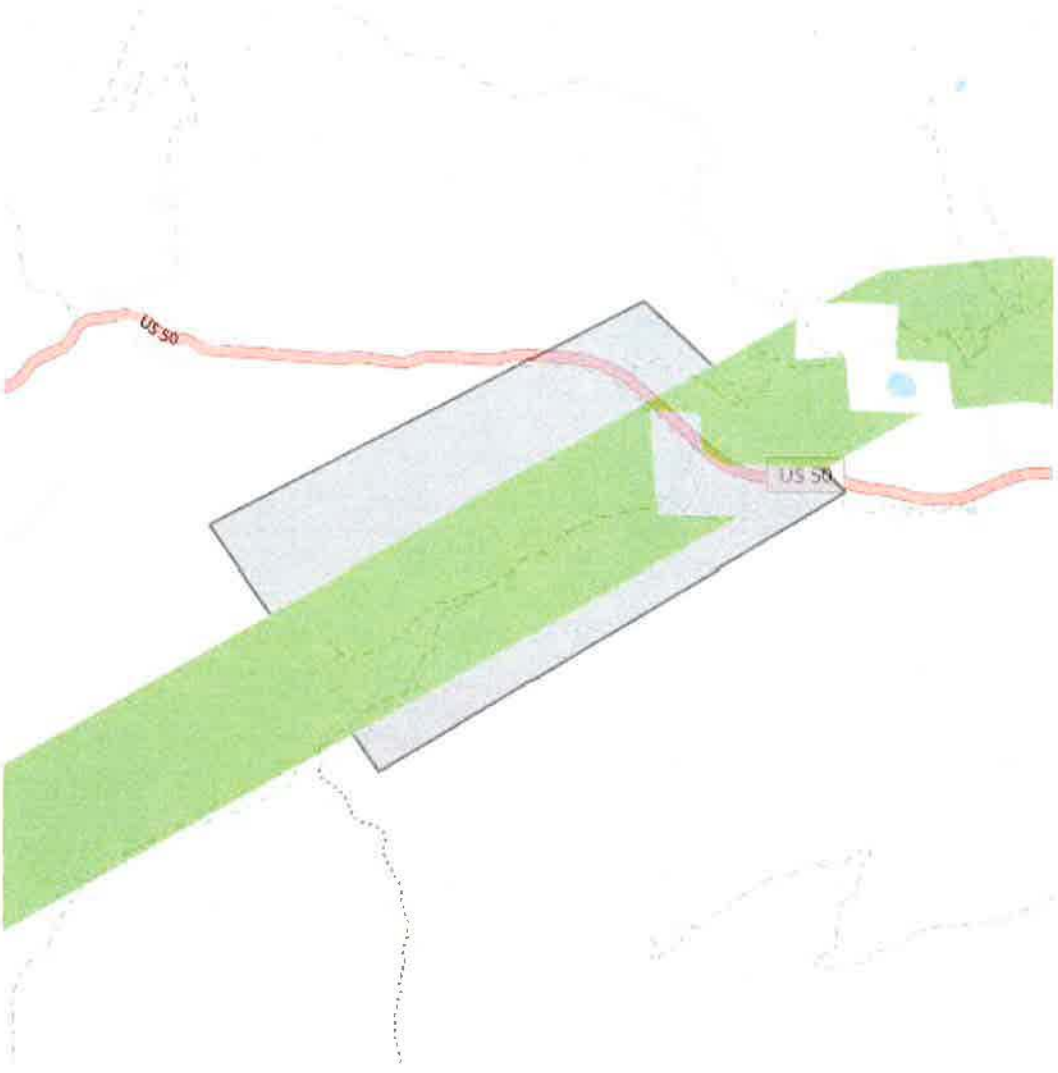
**Input**

We recommend that the Agencies adjust the West-wide Energy Corridors (WWEC) to eliminate overlap with wilderness-quality lands through the Regional Review process and future land use planning. In many cases there may be opportunities to do so by shifting a corridor away from the wilderness-quality lands and onto other BLM or USFS lands where impacts from transmission line or pipeline development would be lower. The Agencies should analyze potential impacts to other resources and values when considering possible corridor shifts and should make decisions that appropriately balance impacts to different resources and values. The Agencies should include details on opportunities for corridor shifts to avoid wilderness-quality lands in the Corridor Abstracts, and the Agencies should recommend these corridor shifts in the Regional Reports. The area noted on the map associated with this comment includes an opportunity to analyze shifting corridor 87-277 to the northwest from mileposts 68 to 69.5 to avoid an Inventoried Roadless Area.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov


US 50
US 50

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|---|---|
| **From:** | mail_corridoreiswebmaster |
| **To:** | mail_corridoreiswebmaster; mail_corridoreisarchives |
| **Subject:** | Webmaster Receipt: Section 368 Stakeholder Input [10194] |
| **Date:** | Wednesday, August 15, 2018 5:18:14 PM |

Thank you for your input, Alex Daue.

The comment tracking number that has been assigned to your comment is **10194**. Please refer to the comment tracking number in all correspondence relating to this comment.

**Comment Date:** August 15, 2018 17:18:06 CDT

**First Name:** Alex
**Last Name:** Daue
**Email:**

**Are you submitting input on the behalf of an organization?** Yes
**Organization:** The Wilderness Society

**Topics**
Specially designated areas

**Geographic Area**
Area selected via Corridor Mapping Tool

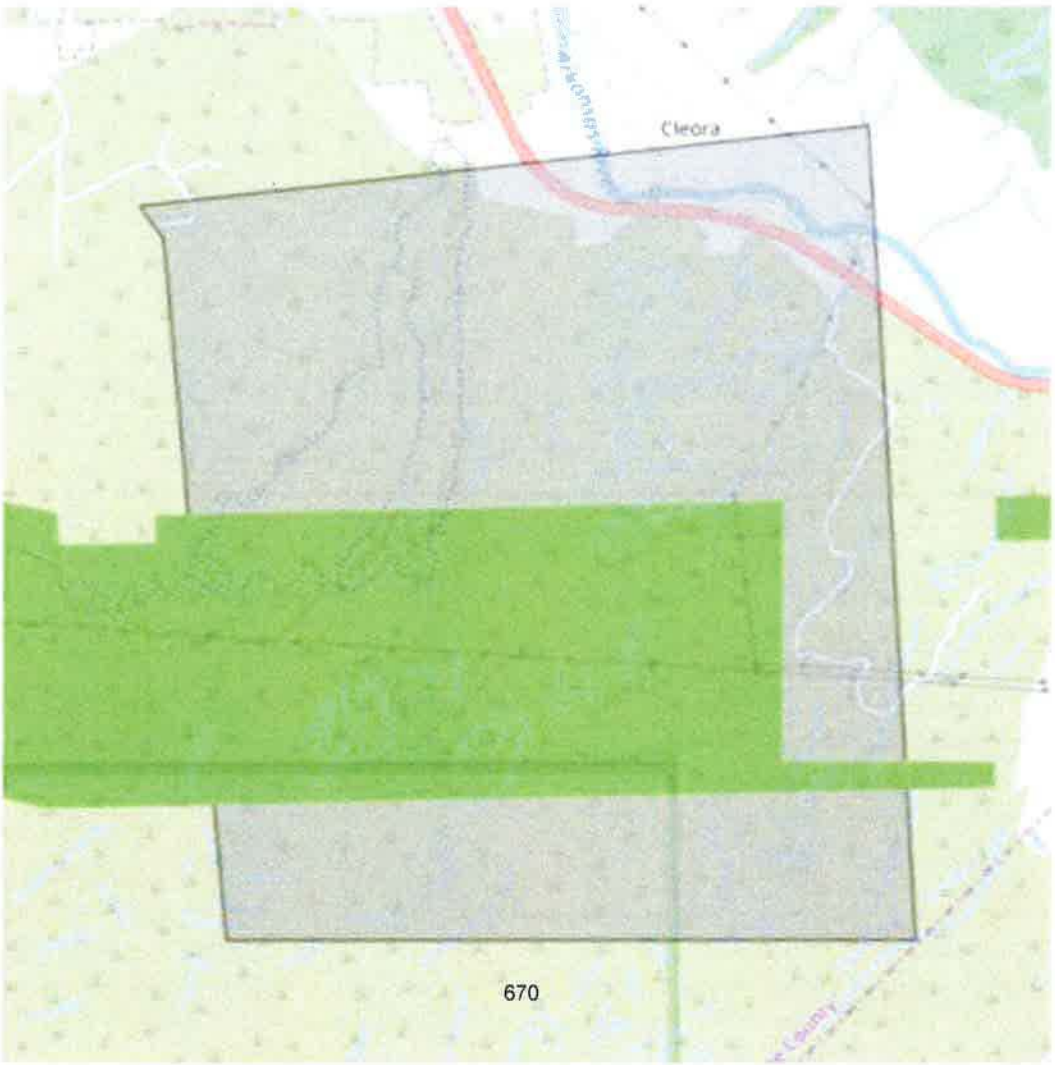
**Input**

We recommend that the Agencies adjust the West-wide Energy Corridors (WWEC) to eliminate overlap with wilderness-quality lands through the Regional Review process and future land use planning. In many cases there may be opportunities to do so by shifting a corridor away from the wilderness-quality lands and onto other BLM or USFS lands where impacts from transmission line or pipeline development would be lower. The Agencies should analyze potential impacts to other resources and values when considering possible corridor shifts and should make decisions that appropriately balance impacts to different resources and values. The Agencies should include details on opportunities for corridor shifts to avoid wilderness-quality lands in the Corridor Abstracts, and the Agencies should recommend these corridor shifts in the Regional Reports. The area noted on the map associated with this comment includes an opportunity to analyze shifting corridor 87-277 to the north from mileposts 52-53 to avoid an Inventoried Roadless Area.

**Attachments**

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov


Cleora

February 23, 2018

Georgeann Smale
Realty Specialist
Transmission/368 Corridors
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Lands and Realty Management
U.S. Forest Service

Brian Mills
Senior Planning Advisor
Office of Electricity Delivery and Energy Reliability
Department of Energy

Sent electronically via blm_wo_368corridors@blm.gov

Re: Comments on Corridor Abstracts for Regions 2 and 3 under West-wide Energy Corridor Regional Review

Dear Ms. Smale, Mr. Woodruff, and Mr. Mills:

Please accept the comments of Defenders of Wildlife, the Center for Biological Diversity, and the National Audubon Society on the Regions 2 and 3 corridor abstracts for the regional reviews of the Section 368 West-wide Energy Corridors (WWEC).

Defenders of Wildlife ("Defenders") is dedicated to protecting native animals and plants in their natural communities. Founded in 1947, Defenders is a national conservation organization with approximately 1.8 million members and supporters dedicated to wildlife and habitat conservation and protecting biodiversity across the nation.

The Center for Biological Diversity ("CBD") is a public interest non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center for Biological Diversity has over 1.6 million members and online supporters throughout the United States, including members that have interests in preservation of habitats and species throughout WWEC Regions 2 and 3, as well as members that live near and/or visit the public lands managed by BLM in the areas proposed for energy corridors.

The National Audubon Society ("Audubon") protects birds and the places they need, today and tomorrow, throughout the Americas using science, advocacy, education, and on-the-ground conservation. Audubon's reach spans over one million members, nearly 500 local chapters, and 23 affiliated state offices across the country. Since 1905, Audubon has worked to shape effective conservation plans in diverse ecosystems, educate the public through nature centers and citizen science projects, and manage designated Important Bird Areas (IBAs) for species throughout the Western Hemisphere.

# A. Introduction

Our organizations have a long history of engagement in the Section 368 Corridor planning process. In 2012, Defenders and CBD we were part of the Settlement Agreement[1] in which the Bureau of Land Management (BLM), the United States Forest Service (USFS) and the Department of Energy (DOE) (collectively, "the agencies") and other stakeholders agreed to, among other things, reevaluate energy corridor designations and undertake periodic reviews of such corridors. Since then, we have provided extensive comments in 2014 and 2016.

We believe that the WWECs provide BLM a significant opportunity to apply a directed development, smart from the start approach to transmission planning to further both its clean energy and wildlife objectives for public lands. It also provides BLM a great opportunity to ensure the long-term success of its solar energy program and the Wind and Solar Leasing Rule by identifying recommended changes and additions to the existing corridors to incentivize transmission to low-conflict zones. Without transmission, many of the zones that BLM identified and designated in the Solar Energy Program Programmatic Environmental Impact Statement (PEIS) will fail to attract development interest. At the same time, the review process also provides an opportunity to properly site new infrastructure to avoid high quality habitat for endangered or threatened species and to conserve wildlife migration corridors and habitat as envisioned by Secretarial Order 3362[2] in which the Secretary of Interior emphasized conservation of migration corridors in sagebrush ecosystems in the western states. While we are supportive of the planning process for energy corridors, specifically transmission corridors, we have some concerns and recommendations on both BLM's WWEC regional review process as well as specific designated corridors within Regions 2 and 3.

# B. Section 368 Review General Comments and Recommendations

## I. Online mapping tool and updates to spatial data

We appreciate the investment the agencies have made in creating the Section 368 Energy Corridor Mapping Tool[3] that provides mapping data for Section 368 energy corridors in 11 western states under Section 368 of the Energy Policy Act of 2005.[4] The current version of the mapping tool is helpful in understanding the location of the corridors in relation to various land use types, land ownership, existing infrastructure, and areas of ecological importance. We appreciate that the agencies added data layers on existing transmission lines, pipelines, and substations that we had identified as important but missing in 2016.[5] We also appreciate the agencies including the Western Association of Fish and Wildlife Agencies' Crucial Habitat Assessment Tool (CHAT.)

While we appreciate the tool improvements, there are a few places where additional or complete information would be helpful. For example, the identifier for the data layer "Areas of Critical Environmental Concern (ACEC)" provides valuable electronic "fields" about the ACEC including

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[1] Wilderness Soc'y et al. v. U.S. Dep't of Interior, No. 3:09-cv-03048 JW (N.D. Cal.) (July 3, 2012)
[2] Secretarial order No. 3362. (2018) Available at https://www.doi.gov/sites/doi.gov/files/uploads/so_3362_migration.pdf
[3] Available at https://bogi.evs.anl.gov/section368/portal/
[4] Energy Policy Act of 2005, 42 U.S.C. § 15926 (a)(1).
[5] Defenders of Wildlife. October 20, 2016. Comments on Section 368 Energy Corridors within Priority Region 1. Pg. 2.

the name of the ACEC, related land use plan name, the record of decision date and the reason for designation. However, quite often many fields are empty.[6] We recommend that the BLM provide complete information related to ACECs, especially information on why the designation was made. Quick access as to the purpose of the designation would be helpful in understanding the potential resource issues related to Section 368 corridors that go through or close to the ACEC.

The agencies, in the Conflict Assessment Criteria Table,[7] state that no data are currently available for the following GIS data layers: National Recreation Trails and River segments deemed suitable for Wild and Scenic River Status. We wish to inform the agencies that American Trails maintains a database and a map of National Recreation Trails called the NRT database which is publicly available at http://www.americantrails.org/NRTDatabase/index.html. Similarly, the National Park Service maintains a database of eligible and suitable rivers for Wild and Scenic status at https://www.nps.gov/maps/full.html?mapId=e24283d3-ece2-4460-930a-361d41fa77c8. In addition, the Corridor Mapping Tool does not have the data layer for Important Bird Areas (IBAs) which is identified as a GIS data layer under in the Conflict Assessment Criteria Table. The IBA data layer is available at http://audubon.maps.arcgis.com/home/item.html?id=2e401b20392449918f6b6b00b7f49074. We recommend that the agencies incorporate these data layers into the Section 368 Corridor Mapping Tool.

**Recommendation**: Provide complete information related to ACECs in the mapping tool.

**Recommendation**: Add data layers for National Recreation Trails, River segments deemed suitable for Wild and Scenic River Status, and IBAs to the Section 368 Corridor Mapping Tool.

## II. Better stakeholder engagement

We appreciate the agencies' commitment to conduct better outreach to solicit stakeholder input including BLM's webinar on January 24, 2017 and the commitment to hold in-person workshops in each of the five states within Regions 2 and 3. We agree that in-person meetings and workshops can be very effective in allowing meaningful public participation. We request the agencies to include field trips as part of the public workshops for stakeholders to get a better understanding of the location of the energy corridors and the resources issues. We request that each workshop be followed up with a field visit to an energy corridor close to the workshop venue, preferably a corridor of concern, if available and feasible for a field visit.

Furthermore, we think it would be in the public benefit for the agencies to make electronically available all public comments provided during the regional review process. We think it is helpful for all stakeholders to know what other input was provided by others, mostly for informational purposes but also to check for any possibilities for coordination. Where possible, stakeholders can exploit any potential opportunities for collaboration and coordination to make the review process more efficient.

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[6] See Copper Hill ACEC (north of Santa Fe, NM), Arkansan Canyonlands ACEC (Canon City, CO), Mount Garfield ACEC (Northeast of Grand Junction, CO) and Red Bluff ACEC (west of St. George, UT) for examples.
[7] Table 2-5 Conflict Assessment Criteria Table for Section 368 Energy Corridor Reviews. Available at http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf.

**Recommendation**: Include field trips as part of the scheduled workshops.

**Recommendation**: Publish all public comments electronically in the "Documents" section in the West-wide Energy Corridor Information Center at http://corridoreis.anl.gov/.

## C. Affirmation With the 20112 Settlement Agreement and 2013 Memorandum of Understanding

### I. Adherence to siting principles stipulated in the Settlement Agreement and MOU has improved but is still not sufficient

It is prudent to emphasize the agencies' obligation in this review process to make "recommendations for revisions, deletions, and additions to the section 368 corridor network" that adhere to four "general principles"[8] pursuant to the settlement agreement. The first of these principles being that the "corridors are thoughtfully sited to provide maximum utility and minimum impact to the environment." The provisions in the MOU and the Settlement Agreement require the BLM to consider "avoidance of environmentally sensitive areas to the maximum extent possible" and "minimum impact to the environment" when planning for energy corridors. In addition, per the MOU and Settlement Agreement, BLM specifically agreed to "re-evaluate" the "Corridors of Concern" ("COCs") identified in the Settlement Agreement "[a]s part of the periodic review process" that would be established by the MOU.[9] Therefore, for the COCs in particular, BLM clearly has an explicit obligation to re-evaluate the corridor routes to determine whether avoidance of environmentally sensitive areas is practicable and whether alternative routes could provide similar utility with less environmental impact.

While improvements have been made in BLM's regional review process, we still have concerns that final report for the regional review will ultimately result in recommendations for corridors that "are thoughtfully sited to provide maximum utility and minimum impacts to the environment." We are appreciative that the abstracts no longer categorize environmental concerns as "not a constraint" for development based on the assumption that future consultation or mitigation would address any impacts. However, the BLM has yet to clarify whether and how BLM will evaluate predicted environmental impacts and construct recommendations for future revision or deletion to address such impacts in "Step 2" of this process.

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[8] The Memorandum of Understanding (MOU) between the agencies identifies the following four general siting principles in siting energy corridors.

1. Section 368 corridors are thoughtfully sited to provide maximum utility and minimum impact to the environment;
2. Section 368 corridors promote efficient use of the landscape for necessary development;
3. Appropriate and acceptable uses are defined for specific Section 368 corridors; and
4. Section 368 corridors provide connectivity to renewable energy generation to the maximum extent possible while also considering other sources of generation, in order to balance the renewable sources and to ensure the safety and reliability of electricity transmission.

[9] Settlement Agreement at 4.

**Recommendation**: Clarify BLM's intent and process to ensure Step 2 of this review process yields recommendations for potential corridor revision, deletions or additions that are consistent with the four general principles in the MOU as required under the Settlement Agreement.

## II. Analysis on intersection with Areas of Critical Environmental Concern is inconsistent

We note that there are several corridors in which sections of the corridor intersect with Areas of Critical Environmental Concern (ACEC). We also note that there are inconsistencies in how intersection with ACECs is analyzed in corridor abstracts. We provide several examples below:

1. The abstract for Corridor 126-218 identifies Browns Park ACEC (Mile post 40.6-48.1 and Mile post 52.4 to 63.2) and Red Creek ACEC (Mile post 58.6 to MP 68.6) as avoidance area.[10]
2. The abstract for Corridor 232-233 (E) states that "the [Kane Springs] ACEC (Mile post 1-14.9) is an avoidance area for ROWs and other land use authorizations in the future but additional ROWs could be authorized subject to environmental impact analysis and Section 7 consultation for specific application."[11]
3. For Corridor 39-113 where Mormon Mesa ACEC underlies the proposed corridor (Mile post 46.7 to 56.5), the analysis notes that the ACEC is an avoidance area in the related Ely Resource Management Plan (RMP) but that "...ROWs may be granted if there is minimal conflict with identified resource values and impacts can be mitigated."[12]
4. Finally, the abstract for corridor 46-269 which intersects with Harquahala (Mile post 62.4 to 68.5) and Black Butte (Mile post 77.4 to 77.6) ACECs notes that "Development in the corridor can occur within the ACEC."[13]

The agencies must establish a consistent method and approach to analyzing intersection of corridors with ACECs. Where possible, the agencies should make a commitment to avoiding the ACEC during the review process.

**Recommendation**: Provide an explanation as to why different ACECs are analyzed differently.

**Recommendation**: Where appropriate and possible, use consistent approach to address and analyze corridor intersection with ACECs.

**Recommendation:** Exclude ACECs while planning for energy corridors.

## III. The Conflict Assessment Criteria Table provides a useful guidance but needs to be updated

The Conflict Assessment Criteria Table[14] that the agencies have used to identify potential conflict areas and to produce conflict maps provide useful guidance for the planning process to

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[10] Corridor Abstract for Corridor 126-218, Pg. 13.
[11] Corridor Abstract for Corridor 232-233, Pg. 9.
[12] Corridor Abstract for Corridor 39-113, Pg. 7.
[13] Corridor Abstract for Corridor 46-269, Pg. 8.
[14] Table 2-5 Conflict Assessment Criteria Table for Section 368 Energy Corridor Reviews. Available at http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf.

identify, potentially avoid or address concerns related to environmentally sensitive areas. We recommend that the agencies reclassify the following categories of resources from "Medium Potential Conflict Areas" to "High Potential Conflict Areas."

1. Areas of Critical Environmental Concern

The BLM defines ACECs as "...[a]reas where special management attention is needed to protect important historical, cultural, and scenic values, or fish and wildlife or other natural resources."[15] Allowing development, especially new development such as pipelines or transmission lines, is likely to impact the above-mentioned values. While the impact of infrastructure development on historical or cultural values may vary by the type of development and the ACEC in question and may even be nominal, impacts to fish and wildlife may be more prominent. Therefore, for ACEC designations due to fish or wildlife values, we recommend that those ACECs be classified as "high potential conflict areas" and be avoided.

2. Desert Tortoise Designated Critical Habitat

USFWS defines "critical habitat" as "...specific geographic area(s) that contain features essential to the conservation of an endangered or threatened species and that may require special management and protection."[16] It is a little puzzling to us that the agencies have classified "Critical habitat areas" (for federally threatened or endangered species) as "high potential conflict area" but the "Desert Tortoise designated critical habitat" is classified as "medium potential conflict area" despite Desert Tortoise (Gopherus agassizii) being a threatened species under the Endangered Species Act (ESA). The classification is inconsistent. In order to provide special management and protection to the species as envisioned in the designation, we recommend that the "Desert Tortoise designated critical habitat" be classified as "high potential conflict area."

3. USFWS-identified Desert Tortoise Connectivity Areas

Similarly, the BLM has stated that "Desert Tortoise Connectivity Areas will need to be free of large-scale impediments from human activities" [17] and has excluded approximately 515,000 acres of land that coincides with priority desert tortoise connectivity habitat from the Solar Energy Program. In order to avoid any conflict with habitat and habitat linkages for Desert Tortoise, we recommend that the energy corridors be avoided in USFWS-identified Desert Tortoise Connectivity Areas and that the connectivity areas be classified as "high potential conflict area."

4. Gunnison Sage-grouse Critical Habitat

The corridor mapping tool incorporates a data layer for Gunnison sage-grouse Critical Habitat. However, the conflict assessment criteria table does not classify the layer in any of the categories. Given that the Gunnison Sage-grouse are a threatened species under the ESA and that their habitat

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[15] Bureau of Land Management. Areas of Critical Environmental Concern, https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/acec. Accessed February 16, 2018.
[16] U.S. Fish and Wildlife Service. Listing and Critical Habitat. Frequently Asked Questions. https://www.fws.gov/endangered/what-we-do/critical-habitats-faq.html. Accessed February 20, 2018.
[17] Bureau of Land Management. Variance Process Protocol for Desert Tortoise. http://blmsolar.anl.gov/variance/process/factors/desert-tortoise/. Accessed February 20, 2018.

has significantly shrunk to limited fragmented areas in southwestern Colorado and eastern Utah, we recommend that Gunnison sage-grouse critical habitat be avoided during corridor review and, at a minimum, classified as "high potential conflict area" in the conflict assessment criteria table.

5. Greater Sage-grouse Priority Habitat Management Areas (PHMAs)

PHMAs are BLM-administered lands identified as having the highest habitat value for maintaining sustainable greater sage-grouse populations.[18] BLM believes that the integrity of the PHMA can be maintained through management decisions to avoid or minimize surface disturbance. In fact, the BLM has identified PHMAs for greater sage-grouse and designated PHMAs as exclusion areas for renewable energy development including solar and wind energy development.[19] The agencies should similarly identify PHMAs as avoidance or exclusion areas for transmission development given that renewable energy development cannot occur in those areas. At a minimum, the agencies should classify PHMAs as "high potential conflict area."

6. Sagebrush Focal Areas (SFA)

While majority of the SFAs in the corridor planning area fall in Regions 4 and 6, there is a significant amount of SFAs in northern Nevada and northeastern Utah within Region 3. In fact, Corridors 35-111, 43-111, and 111-226 traverse SFAs. SFAs are areas of highest habitat value for greater sage-grouse (and other wildlife) and have been have been identified as essential to conservation and persistence of the species. SFA contain high-quality sagebrush habitat and breeding bird densities. BLM has identified SFAs as areas "where it is most important that the BLM and Forest Service institutionalize the highest degree of protection to help promote persistence of the species."[20] SFAs are exclusion areas for an array of development, which should include transmission. At a minimum, SFAs should be considered "potential high conflict areas" for corridor planning.

The regional review process provides the best opportunity for the agencies to identify areas of high resource value and avoid potential conflict between energy transmission and other multiple uses on these lands. Therefore, the agencies should recommend that these areas and other areas classified as high potential conflict be excluded from Section 368 energy corridors.

**Recommendation**: Reclassify the above six categories as "potential high conflict area" in the conflict assessment criteria table.

**Recommendation**: Exclude all areas in "potential high conflict area" during corridor planning.

## IV. Agencies have failed to examine cumulative impacts to resources from multiple but closely designated corridors

Another concern we have with respect to the agencies' approach to the periodic review process is that it discusses the environmental impacts within each corridor individually, but at no point considers the total impact to sensitive resources that are affected by multiple corridors. For example,

[18] Bureau of Land Management. 2015. Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region, Including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, Utah. Pg. I-16.
[19] Except in southeastern counties in Oregon where PHMAs are avoidance areas.
[20] Bureau of Land Management. 2015. Pg. I-16.

within the portion of Region 3 in eastern Nevada and western Utah, multiple corridors in Region 3-113-114, 113-116, 232-233 (W), and 232-233 (E) cut through a large area of sensitive habitat for Mojave Desert tortoise, a federally listed species. In fact, two other corridors in Region 1 also run through the same area of desert tortoise sensitive habitat. While the corridor abstracts for each corridor provide some analysis on how impacts to desert tortoise will be addressed, they fail to assess the collective impacts of potential development in those corridors on desert tortoise. It is important to review and assess if the cumulative impacts of development in those corridors would be significant enough to warrant avoidance of the sensitive habitat due the possibility of habitat loss and fragmentation from development. The agencies' approach instead tacitly finds that no avoidance by the corridor routes is required so long as impacts to the species from induced development proceed to the threshold of causing jeopardy, but do not cause jeopardy. This is the case because consultations for individual ROWs will allow harmful development to continue up until the individual project that would be the "final straw" that causes jeopardy. Finding that no avoidance of the route is required because the harm from the corridors can reach the threshold of jeopardy does not comport with the obligation to ensure that the corridor siting provides "minimum impact to the environment." The brink of jeopardy is not "minimum impact." Further, because BLM has neither engaged in programmatic consultation on the 368 corridors nor conducted any analysis of the impacts of concentrating transmission development within the corridors, there is no way of knowing whether or at what point jeopardy might occur as a result of the decision to continue to attract development to these corridors. Therefore, BLM has also failed to meet its obligation to ensure that the corridor locations "promote efficient use of the landscape"[21] because it lacks the information to decide whether it would be a more efficient use of the landscape to direct transmission development elsewhere from the start.

**Recommendation**: Perform a cumulative impacts analysis for corridors intersecting critical or sensitive habitat for ESA-listed species.

## D. New Information on Mojave Desert Tortoise Habitat

Defenders wishes to share new information we have developed on Mojave Desert tortoises (also known as Agassiz's desert tortoise) since the designation of WWEC corridors in Regions 2 and 3 and submission of our comments related to those corridors in 2014. The Mojave ecoregion, which includes portions of WWEC Region 3 (and most of Region 1) is home to many endemic species, including the Mojave Desert tortoise, a species listed as "threatened" under the ESA. The Section 368 Energy Corridor Mapping Tool[22] also shows presence of Desert Tortoise Sensitive Habitat and USFWS-identified Desert Tortoise Connectivity Areas in Regions 2 and 3 with some designated corridors going through these areas.

Desert tortoises are declining throughout most of their range due to a myriad of threats, including habitat loss, disease, roadkill, and high juvenile mortality. Expanding infrastructure development in the region, which includes transmission or pipeline facilities, involves contouring and clearing the project area, resulting in habitat loss and disruption of connectivity across the site.

[21] MOU at Section V. C. (Pg. 6)
[22] Available at https://bogi.evs.anl.gov/section368/portal/.

In addition, transmission lines provide perching opportunities for ravens and other corvids, which prey on juvenile desert tortoise.[23] Given these threats, impacts to desert tortoise must be thoroughly considered in this review process pursuant to BLM's obligations under Federal Land Management and Policy Act (FLPMA) and the ESA. To this end, it is critically important that BLM have adequate information about desert tortoise habitat within the planning area.

We have updated the widely-used current habitat suitability model for high quality, contiguous desert tortoise habitat developed by the U.S. Geological Survey's (USGS) in 2009.[24] The USGS model is 1km resolution, meaning each pixel represents about 247 acres. Because this resolution is too coarse to guide infrastructure siting decisions, Defenders contracted NatureServe to create a high-resolution species distribution model for the Mojave region desert tortoise. The output from this model is the tortoise habitat suitability for the entire Mojave ecoregion, at 30m resolution (each pixel is about 0.02 acres). This new tortoise habitat suitability model is over a thousand times finer resolution and takes advantage of newer satellite imagery from Landsat 8 (launched in 2013), higher spatial and temporal resolution climate data, as well as NatureServe's proprietary tortoise observation data.

## I. Updated habitat suitability model

Creating a species distribution model requires occurrence data for the species and relevant environmental predictors. These data can be used to build a statistical model to predict where suitable habitat exists, regardless of whether the species has been recorded at a site previously. Occurrence data for the Mojave Desert tortoise was obtained from the U.S. Fish and Wildlife (USFWS) and NatureServe's California, Nevada, and Arizona programs. Various environmental predictors, including all Landsat 8 bands, herbaceous and shrub cover, temperature seasonality, and annual precipitation, were used to test the model. After the least statistically important variables were eliminated, the twelve remaining (see Table 1) were used to build the model, including: (1) two topographic variables, (2) eight climate variables, (3) and two Landsat 8 imagery bands. Topographic variables were calculated from the 10m National Elevation Dataset. Climate variables were derived by interpolating a grid from stations and elevation data. Finally, cloud-free Landsat imagery was obtained during the spring green-up period from April-May 2016. All variables were assembled into 30m grids for modeling.

Table 1. Final variables used for NatureServe's desert tortoise habitat suitability modeling, listed by rank. The higher the rank (or, the larger the rank number), the more important the variable.

| Rank | Variable |
|---|---|
| 14 | Elevation |
| 13 | Terrain roughness index |
| 12 | Mean annual temperature |

[23] 3 Boarman, W., B. Heinrich. Corvus corax: Common Raven, in The Birds of North America, 476: 1-32 (1999) (finding that ravens and other corvids, which prey on juvenile desert tortoise have been shown to range as far as 4.3 miles in either direction from transmission lines in some landscapes, greatly increasing the potential threat from linear corridor development to the tortoise). See also Leu, M., Hanser, S.E., and Knick, S.T., The human footprint in the west-A large scale analysis of anthropogenic impacts, in Ecological Applications, v. 18, p. 1119-1138 (2008).

[24] Nussear, K.E., Esque, T.C., Inman, R.D., Gass, Leila, Thomas, K.A., Wallace, C.S.A., Blainey, J.B., Miller, D.M., and Webb, R.H. (2009). Modeling habitat of the desert tortoise (Gopherus agassizii) in the Mojave and parts of the Sonoran Deserts of California, Nevada, Utah, and Arizona: U.S. Geological Survey Open-File Report 2009-1102, p. 18.

| | |
|---|---|
| 11 | Maximum temperature of the warmest month |
| 10 | Mean temperature of the wettest quarter |
| 9 | Precipitation of the warmest quarter |
| 8 | Mean temperature of the warmest quarter |
| 7 | Mean temperature of the driest quarter |
| 6 | Band 1 (ultra blue) |
| 5 | Precipitation of the driest quarter |
| 4 | Band 4 (near infrared) |
| 3 | Solar insolarity |

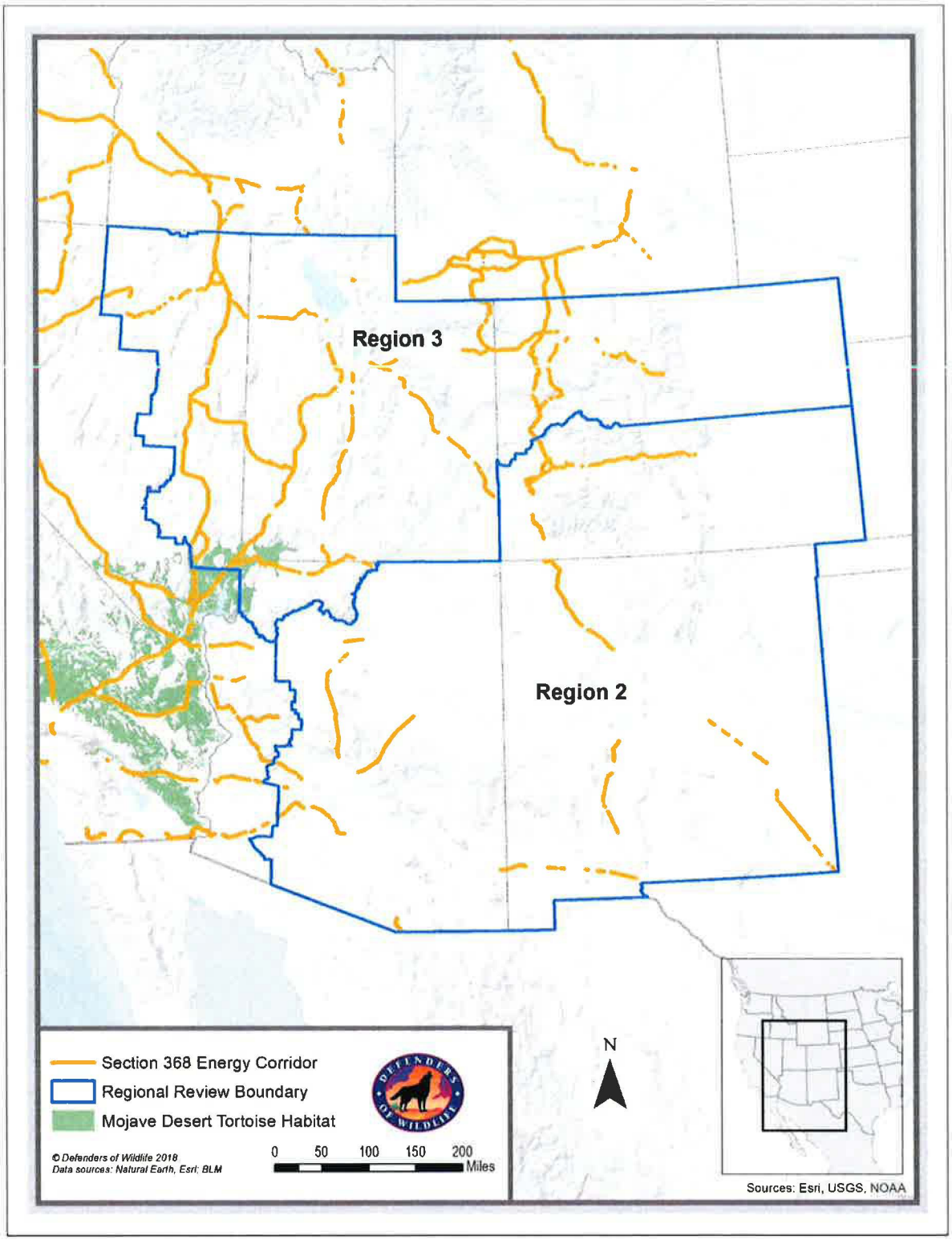
Using the occurrence records and environmental predictors, NatureServe used Random Forest, a type of species distribution model, to create the habitat suitability layer for the tortoise's range. Random Forest is a machine learning algorithm that creates a 'forest' of classification trees. The individual models are then combined to form a single ensemble model.

For evaluation and to prevent over-fitting, approximately 25% of the occurrence points are not used to build the model, but were instead used to test model performance. Area Under the Curve (AUC) is a commonly used metric of model performance, with AUC values between 0.7 and 1.0 representing successful models. This model received an AUC value of 0.778.

Overall, there is general agreement between this model and existing habitat maps produced by the USGS in 2009.[25] However, there are some areas where the USGS model predicts suitable habitat that the NatureServe model does not. This is likely a consequence of the more fine-scale environmental variables used in the NatureServe model. An initial review of the model output by NatureServe scientists found it consistent with known tortoise habitat requirements, although we invite additional review by tortoise experts. Overall, the new high-resolution model provides a defensible representation of likely habitat for Mojave Desert tortoise across its range and can be seen in Figure 1 below.

[25] Nussear et al. 2009.

Figure 1. Mojave Desert Tortoise Habitat and WWEC Regions 2 and 3.



This new tortoise data, to our knowledge, represents the best available science and high-quality data for tortoise habitat suitability. We are making the GIS data available for the public to use, which can be downloaded as a layer package at the following URL: https://defenders.org/layer-downloads, click "Download the Mojave Desert Tortoise gopherus-agassizii-final-habitat-model layer file." Please contact Defenders' Renewable Energy and Wildlife program for assistance or if the URL fails to work.

**Next Steps**

The higher resolution habitat suitability model can help identify contiguous, high quality habitat for protection but protecting connectivity corridors is imperative for tortoise populations to persist on the landscape. To address this, Defenders has begun to collect information and consult with tortoise experts to create a connectivity model, based on our new habitat suitability model. We will use LinkageMapper to find potential corridors and Circuitscape to understand how individual tortoise may be moving across the landscape. After the connectivity models are built, they, along with the habitat suitability model and other relevant information, will be imported into a decision/support conservation planning tool such as NatureServe Vista, which will allow us to assess various development scenarios and determine how proposed projects can impact the entire tortoise network. All products will be shared with BLM and made available for the public to use.

**Recommendation**: This higher resolution Mojave Desert tortoise data should be used, in conjunction with existing the existing Desert Tortoise Sensitive Habitat and USFWS-identified Desert Tortoise Connectivity Areas layers in the Section 368 Corridor Mapping Tool to analyze how proposed corridors will impact desert tortoise habitat and connectivity corridors.

## II. Section 368 corridors overlap with new tortoise habitat suitability layer

To get a better understanding of how the new information on desert tortoise habitat suitability impacts Section 368 corridors in Regions 2 and 3, we overlaid the corridors in the two regions with our higher resolution Mojave Desert tortoise modeling data. We found that five corridors in Region 3 intersect with our Mojave Desert tortoise habitat data layer. See Figures 2-6 below.

Figure 2: Mojave Desert Tortoise Habitat and Corridor 37-232.

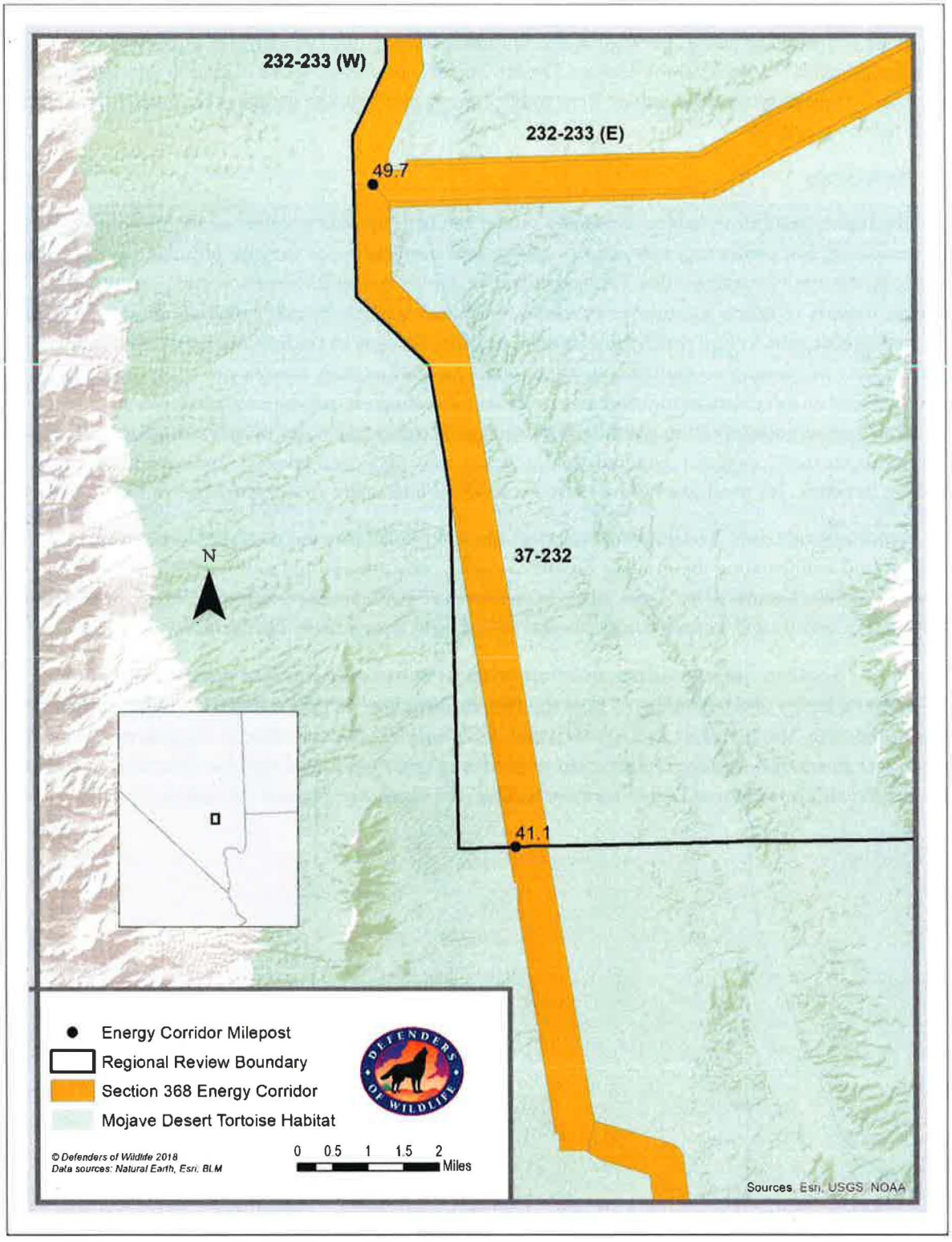


Figure 3: Mojave Desert Tortoise Habitat and Corridor 39-113.

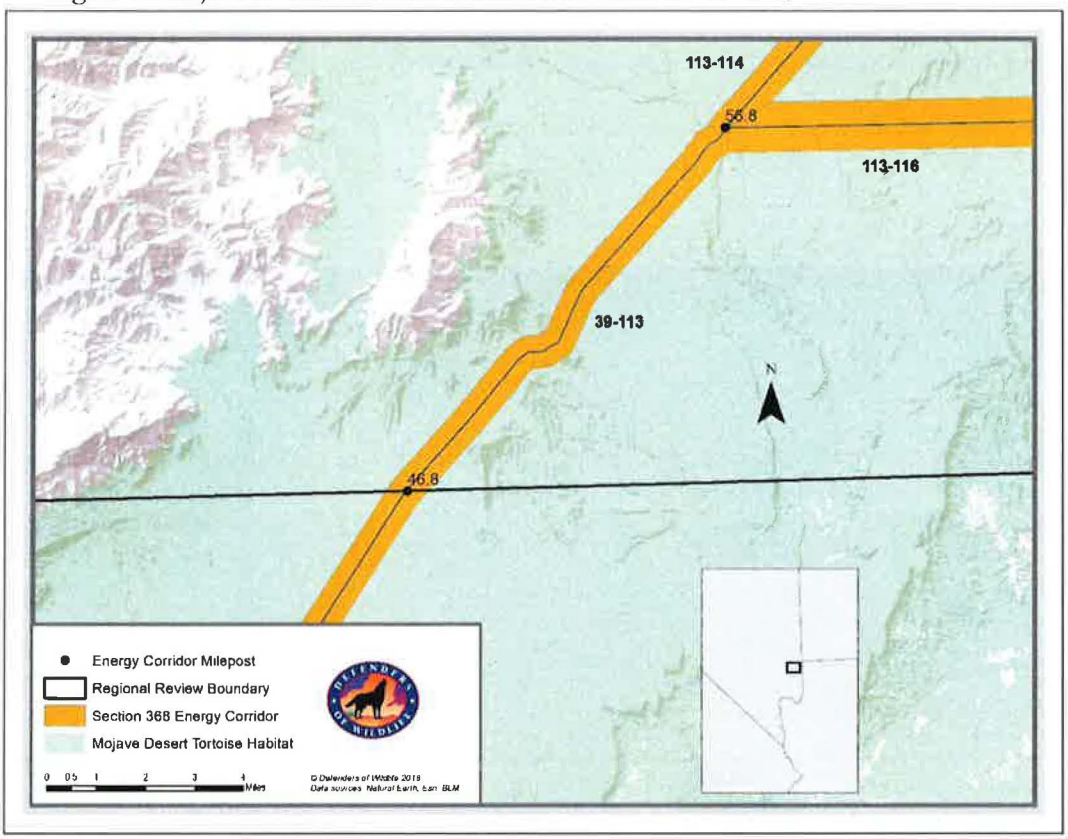
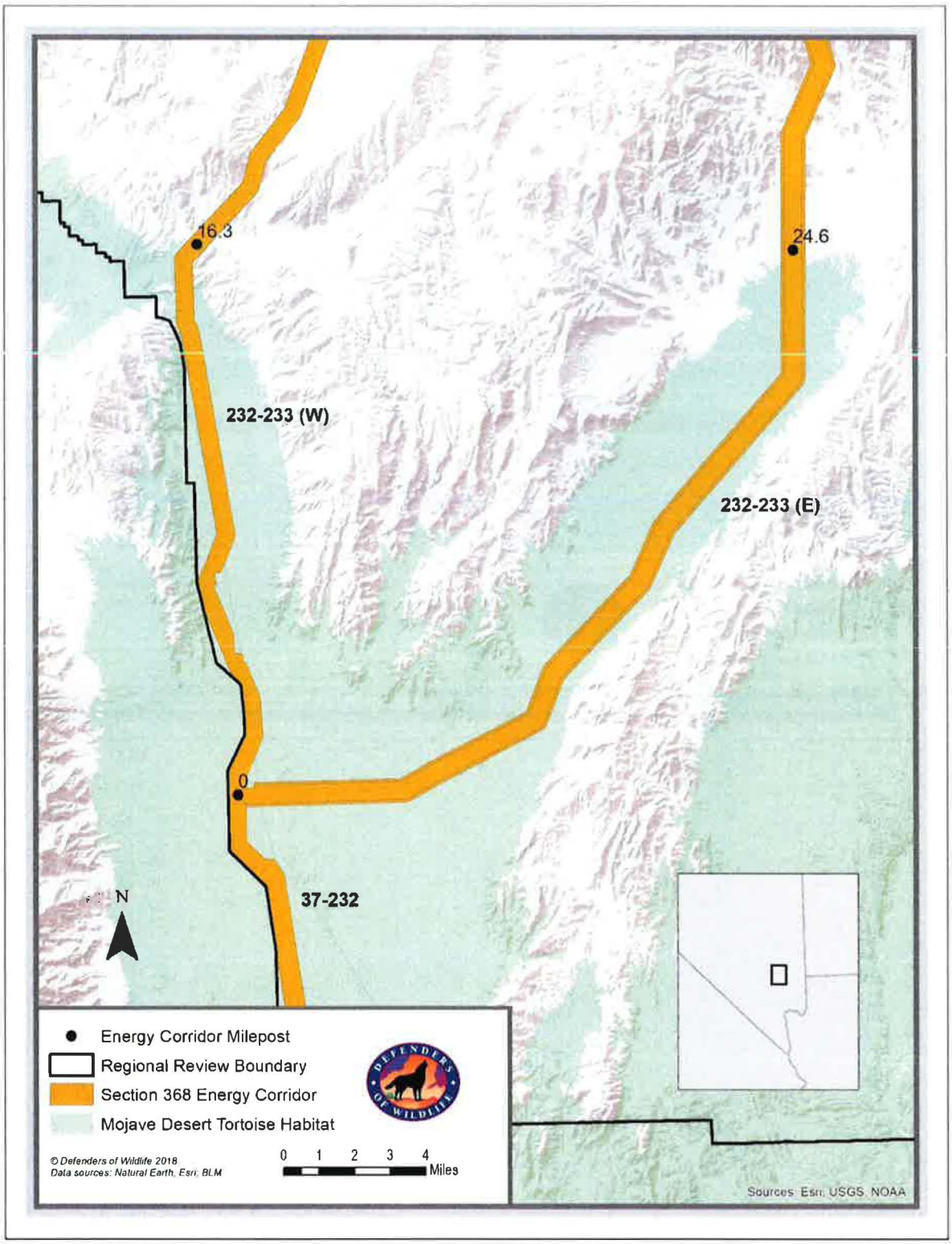


Figure 4: Mojave Desert Tortoise Habitat and Corridor 113-114.

Figure 5: Mojave Desert Tortoise Habitat and Corridor 113-116.

Figure 6: Mojave Desert Tortoise Habitat and Corridor 232-233.



These overlays reveal that the five corridors intersect with good quality desert tortoise habitat. Based on this initial analysis, these corridors might require either rerouting or mitigation for impacts to desert tortoise. However, further analysis is required to both confirm the model output and understand the short- and/or long-term developability of these areas from an industry perspective. Regardless, this is an important first step for screening purposes.

# E. Information on Important Bird Areas

## I. Important Bird Areas (IBA)

The IBA program identifies and conserves the most important places for bird conservation. IBAs provide essential breeding, wintering, or migration habitat for one or more species of bird that is threatened or endangered, restricted to a particular biome or region, restricted to one habitat type, or that occurs at particularly high density during some portion of the year. Species of concern have also been identified through the United States Fish and Wildlife Service (USFWS) Birds of Conservation Concern 2008 (BCC) report, which identifies species that are likely to become candidates for protection under the ESA without further conservation action. IBAs are large enough to safeguard a viable population of a species, group of species, or avian community during at least part of its life-cycle, but small enough to be conserved in their entirety, and are located on a mixture of public and private land.

Coordinated by BirdLife International and administrated by Audubon in the United States, the program uses science-based assessment to identify habitats of particular importance. In order to qualify, each proposed site undergoes a rigorous review process by a committee of ornithological and conservation experts that consider data-driven evaluations of bird populations and habitat. The IBAs are assigned a priority value after considering the large geographical context, with the rankings ranging from State (lowest threshold), to Continental, to Global (highest threshold).

Under the Conflict Assessment Criteria for Section 368 Energy Corridor Reviews (Table 2-5 Conflict Assessment Criteria Table for Section 368 Energy Corridor Reviews)[26], Important Bird Areas have been designated as "Medium Potential Conflict Areas," under the criterion "Sensitive habitat areas, including important species use areas, riparian areas, or areas of importance for Federal or State sensitive species." Corridors should be sited to avoid medium and high conflict areas like IBAs where possible.

## II. Section 368 corridors overlap with IBAs

We have compared where WWEC corridors in Regions 2 and 3 overlap with the existing boundaries for IBAs in the two regions. These overlays reveal that a total of four corridors- three in Region 2 and one in Region 3- intersect with preexisting IBAs. See Figures 7-10 below.

[26] Available at http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf

Figure 7: Mogollon Rim Snowmelt Draws IBA and Corridor 62-211.

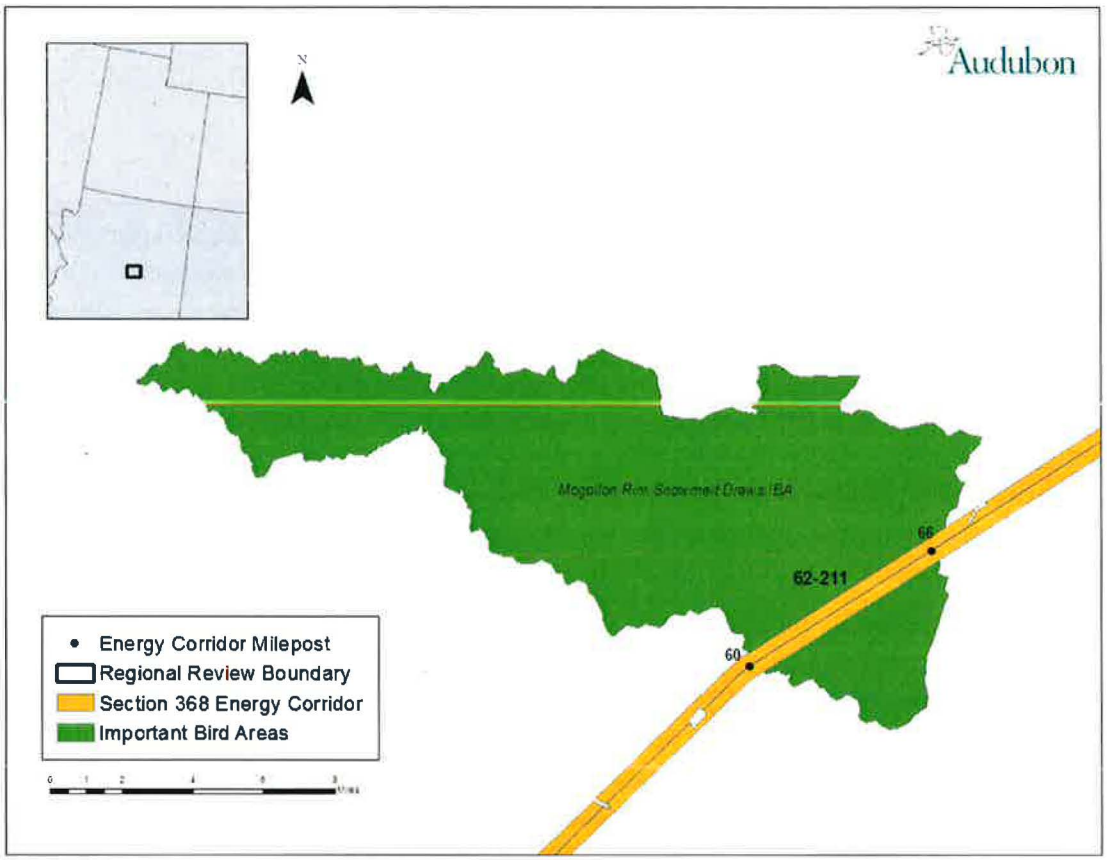


Figure 8: Gunnison Basin IBA and Corridor 87-277

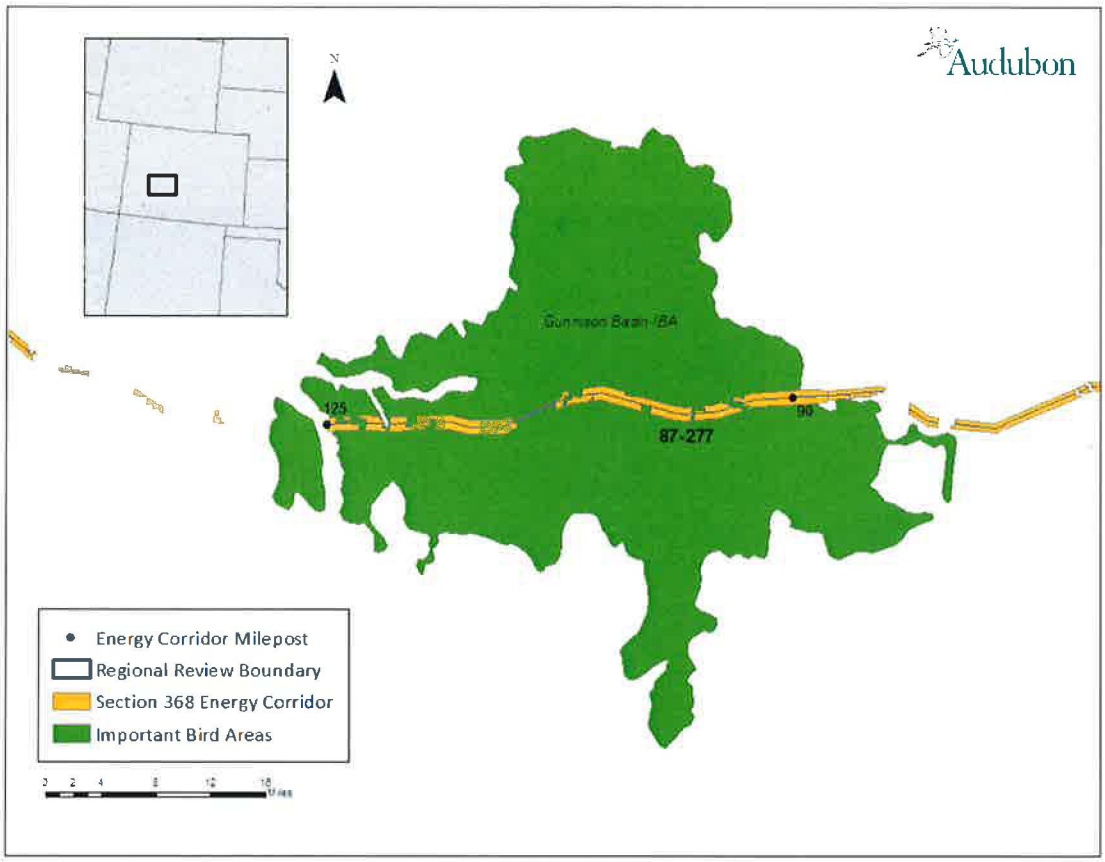


Figure 9: Grand Valley Riparian Corridor IBA and Corridor 132-136.

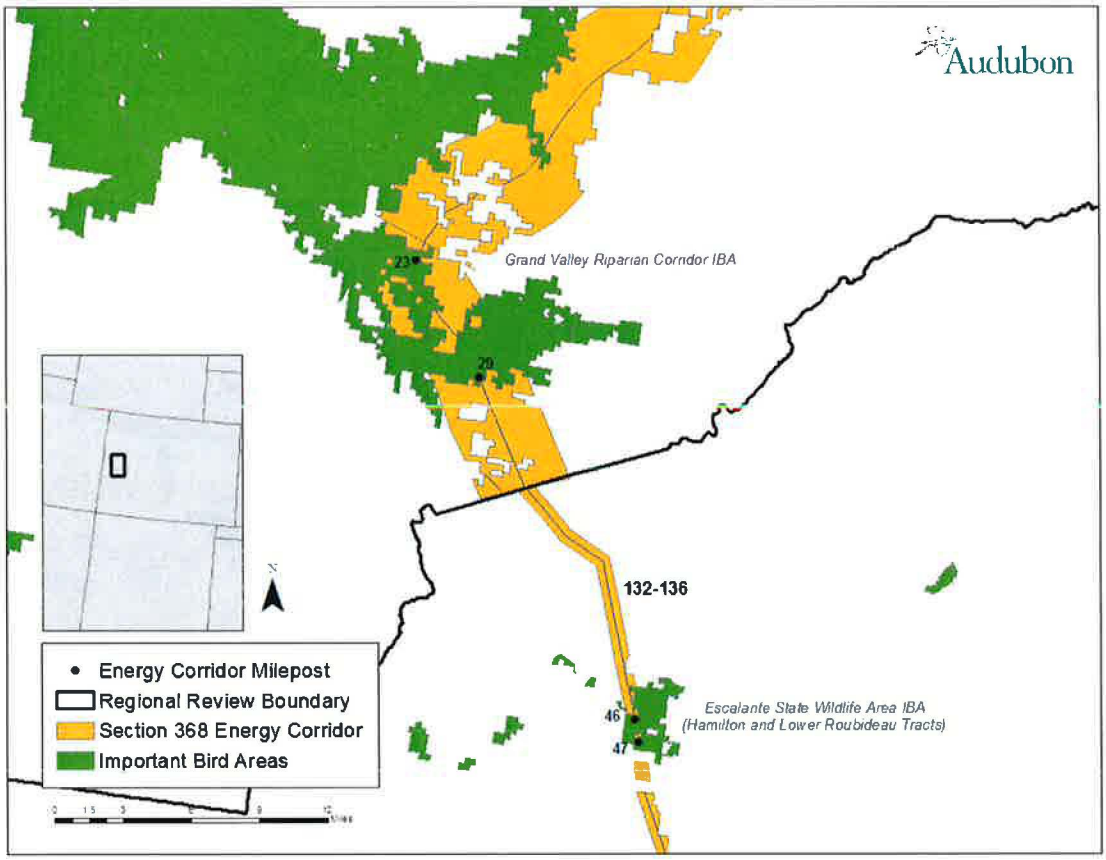
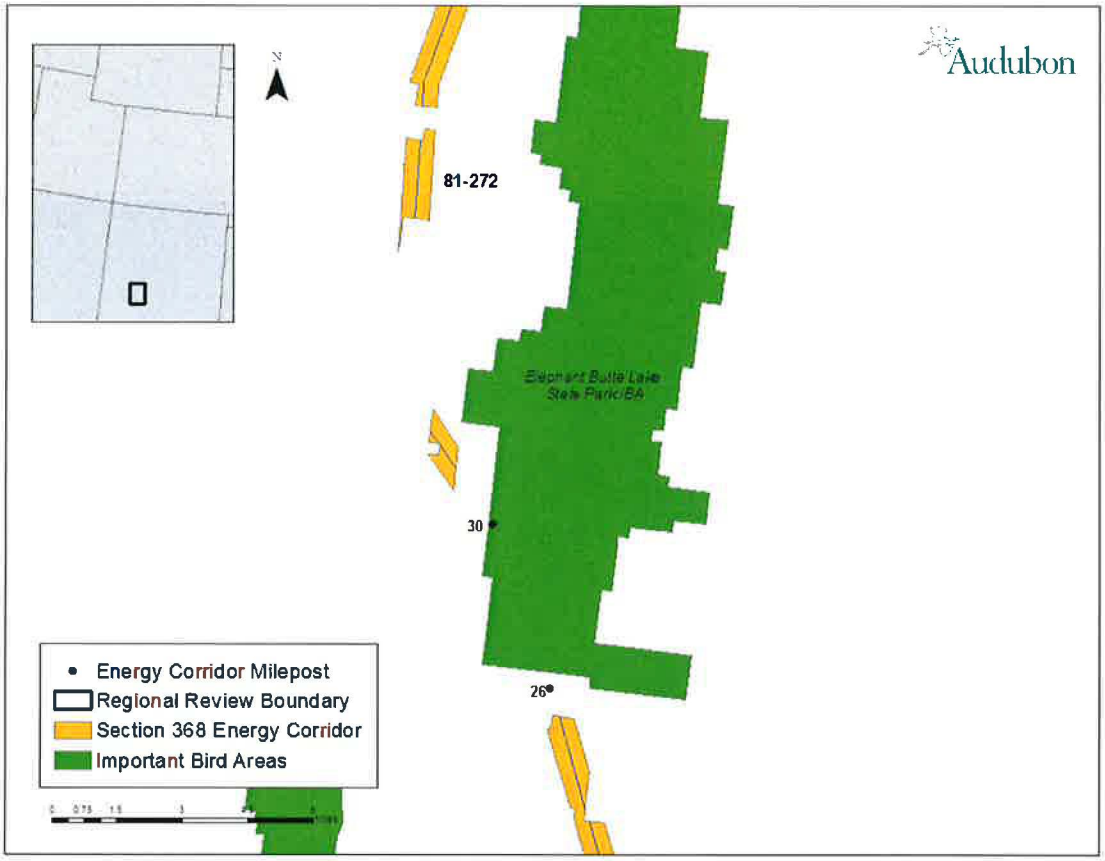


Figure 10: Elephant Butte Lake Stake Park IBA and Corridor 81-272.[27]




[27] While the Corridor Mapping Tool does not show the Corridor 81-272 going through the Elephant Butte Lake State Park IBA, we presume that it's because the State Park is not a state property and thus not under the jurisdiction of the agencies. Given the trajectory and the location of milepost labels, we presume that the corridor will pass through the State Park IBA from Milepost 26 to 30.

# F. Comments on Regions 2 and 3 Corridor Abstracts

In addition to the concerns and recommendations stated above, we offer the following comments on specific corridors in Regions 2 and 3 and hereby incorporate by reference the comments Defenders of Wildlife submitted on May 27, 2014 (DOW May 2014).

## I. Corridors in Region 2

| Corridor | Concern | Comments and Recommendations |
|---|---|---|
| 30-52 | Corridor intersects Sonoran Desert Tortoise Category I and II management habitat and Turtle Conservation Areas (TCA).<br><br>Category I & II Sonoran Desert Tortoise habitat are avoidance areas. | Re-route to avoid Sonoran Desert Tortoise Category I and II management habitat and Mojave Tortoise Conservation Areas. Minimize impacts from new energy infrastructure development to the maximum extent practicable, and where impacts are unavoidable, utilize compensatory mitigation pursuant to BLM policy. Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within four miles of Sonoran Desert Tortoise Category I & II habitat, Tortoise Conservation Areas, and Mojave Desert Tortoise Priority 1 and 2 habitats. See DOW May 2014. |
| 46-269 | 13.2 miles of corridor intersects with Sonoran Desert Tortoise Category I and II habitat. | Re-route to avoid siting new facilities in Sonoran Desert Tortoise Category I and II management habitat. See DOW May 2014 |
| 61-207 | 5.6 miles of the corridor passes through critical habitat for ESA-listed species and 9.3 miles of corridor passes through Sonoran Desert Tortoise Category II and III Management Habitat<br><br>Possible presence of other ESA-listed species | Reroute to avoid critical habitat for ESA-listed species. Avoid siting new facilities in Sonoran Desert Tortoise Category I and II management habitat. Where impacts are unavoidable, utilize compensatory mitigation pursuant to BLM policy. Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within 4 mi of Category II habitat.<br><br>At Milepost 65, the corridor intersects Roundtail chub habitat at the Verde River, according to the Arizona Heritage Data Management System. Although the Roundtail Chub is not currently listed it has been proposed for listing in the recent past and this river crossing has also numerous other T & E species (such as northern Mexican Gartersnake, Narrow-headed Gartersnake, Loach Minnow, Spikedace) with critical habitat. |
| 62-211 | 35.9 miles of the corridor passes through critical or proposed critical habitat for ESA-listed species, including 25.1 miles going through Mexican Spotted Owl critical habitat<br><br>Possible presence of other ESA-listed species | Reroute to avoid critical habitat. Consult with USFWS to avoid adverse modification to Mexican spotted owl and Southwestern willow flycatcher (within 2 km) designated critical habitat. See DOW May 2014.<br><br>Mileposts 6 – 8, the corridor intersects Roundtail Chub habitat at the Verde River according to the Arizona Heritage Data Management System. |

| | | |
|---|---|---|
| | Corridor goes through Mogollon Rim Snowmelt Draws IBA | Approximately 6 miles of the corridor pass through the Mogollon Rim Snowmelt Draws IBA (Milepost 60-66). The IBA serves as significant breeding habitat for many species designated as BCC by the USFWS including Olive-sided Flycatcher, Red-faced Warbler, Virginia's Warbler, and Grace's Warbler.<br><br>Reroute to avoid breeding habitat within the designated IBA region. Consult with USFWS to ensure corridor does not disturb breeding habitat for birds of concern. |
| **80-273** | Possible presence of other ESA-listed species | Corridor 80-273 milepost 101 intersects Yellow-billed Cuckoo critical habitat at the San Juan River.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **81-272** | 2.4 miles of the corridor goes through Southwestern Willow Flycatcher critical habitat<br><br>Desert bighorn sheep wildlife corridor intersects the Section 368 energy corridor<br><br>Possible presence of other ESA-listed species<br><br>Impacts to several bird species | Reroute to avoid critical habitat. See DOW May 2014.<br><br>Approximately four miles of the corridor (miles 26-30) are set to cut through the Elephant Butte Lake State Park IBA. This state park hosts the largest concentration of wintering Western and Clark's Grebes in the state and is an important stopover site for migrating waterbirds.<br><br>Coordinate with the New Mexico Energy, Minerals and Natural Resources Department to avoid impacts to habitat within and around the state park.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Mexican Gray Wolf, New Mexico Meadow Jumping Mouse, Least Tern, Mexican Spotted Owl, Northern Aplomado Falcon, Piping Plover, Yellow-billed Cuckoo, Narrow-headed Gartersnake, Chiricahua Leopard Frog, Gila Trout, Rio Grande Silvery Minnow, Alamosa Springsnail, Chupadera Springsnail, Socorro Springsnail, Socorro Isopod, Pecos Sunflower, Sneed Pincushion Cactus, Todsen's Pennyroyal, and Wright's Marsh Thistle<br><br>Conduct further analysis to determine the presence of above-mentioned species |
| **87-277** | 64 miles of corridor goes through Gunnison Sage-grouse critical habitat and 42 miles through Gunnison Basin IBA intermittently; 2.1 miles through Mexican Spotted Owl critical habitat; 10 miles through Canadian | 42 traverse the middle of the Gunnison Basin IBA, which has achieved the status of Global IBA due to its importance to the Gunnison Sage-grouse, which is listed as 'threatened' under the ESA. This IBA provides breeding, nesting, brood, and winter habitat for approximately 4,500 individuals.<br><br>Drop this corridor or reroute to avoid Gunnison Sage-grouse critical habitat to avoid disturbing breeding and nesting activity |

| | | |
|---|---|---|
| | Lynx habitat; and unspecified number of miles through Yellow-billed cuckoo critical habitat<br><br>Possible presence of other ESA-listed species | in the area. Coordinate with Colorado Division of Wildlife to better understand species concerns. See DOW May 2014.<br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, North American Wolverine, Southwestern Willow, Flycatcher, Bonytail Chub, Colorado Pikeminnow, Greenback Cutthroat Trout, Humpback Chub, Razorback Sucker, Clay-loving Wild Buckwheat, Skiff Milkvetch.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 89-271 | Lesser prairie chicken habitat in unspecified mile posts, Lesser Prairie Chicken Habitat Evaluation Areas identified as ROW exclusion.<br><br>Possible presence of other ESA-listed species | Consider opportunities for corridor revision by following existing State Highway 176, State Highway 62 towards Carlsbad, and route north on State Highway 360 until it terminates at State Highway 82 to avoid Lesser Prairie Chicken and Dunes Sagebrush habitat.<br><br>Milepost 144-145 intersects the Pecos River within 3 miles of Pecos bluntnose shiner critical habitat.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: New Mexico Meadow Jumping Mouse, Penasco Least Chipmunk, Least Tern, Mexican Spotted Owl, Northern Aplomado Falcon, Piping Plover, Red Knot, Southwestern Willow Flycatcher, Pecos Bluntnose Shiner, Pecos Gambusia, Texas Hornshell, Koster's Springsnail, Pecos Assiminea Snail, Roswell Springsnail, Noel's Amphipod, Gypsum Wild-buckwheat, Kuenzler Hedgehog Cactus, Lee Pincushion Cactus, Pecos Sunflower, Sneed Pincushion Cactus, Wright's Marsh Thistle.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 115-208 | Over 28 miles of corridor intersects with Sonoran Desert Tortoise Category I and II management habitat. | Re route to avoid siting new facilities in Sonoran Desert Tortoise Category I and II management habitat. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Lesser Long-nosed Bat, Sonoran Pronghorn, California Least Tern, SW willow flycatcher, yellow-billed cuckoo, Yuma clapper rail, Northern Mexican Gartersnake and Desert Pupfish.<br><br>At milepost 7, at the crossing with the Gila River there is evidence from the Arizona Heritage Data Management System |

| | | |
|---|---|---|
| | | that this area is habitat for the Yuma clapper rail and Southwestern willow flycatcher. There are also numerous observations in eBird's database (www.ebird.org) of Yellow-billed cuckoo at the Gillespie Dam.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **130-131** | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: North American Wolverine, Gunnison Sage-grouse, Mexican Spotted Owl, Bonytail Chub, Colorado Pikeminnow, Greenback Cutthroat Trout, Humpback Chub, Razorback Sucker.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **130-274** | 7-mile segment of corridor intersects Gunnison Sage-grouse critical habitat or conservation areas<br><br>Possible presence of other ESA-listed species | Reroute to avoid critical habitat. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: New Mexico Meadow Jumping Mouse, North American Wolverine, Mexican Spotted Owl, Southwestern Willow Flycatcher, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Greenback Cutthroat Trout, Humpback Chub, Razorback Sucker, Mesa Verde Cactus.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **131-134** | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: New Mexico Meadow Jumping Mouse, North American Wolverine, Mexican Spotted Owl, Southwestern Willow Flycatcher, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Greenback Cutthroat Trout, Humpback Chub, Razorback Sucker, Mesa Verde Cactus.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **134-136** | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, North American Wolverine, Gunnison Sage-grouse, Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Greenback Cutthroat Trout, Humpback Chub, |

| | | |
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| | | Razorback Sucker, Clay-loving Wild Buckwheat, Colorado Hookless Cactus.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 134-139 | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, North American Wolverine, Gunnison Sage-grouse, Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Greenback Cutthroat Trout, Humpback Chub, Razorback Sucker, Clay-loving Wild Buckwheat, Colorado Hookless Cactus.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 136-139 | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, North American Wolverine, Gunnison Sage-grouse, Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Greenback Cutthroat Trout, Humpback Chub, Razorback Sucker, Clay-loving Wild Buckwheat, Colorado Hookless Cactus.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 136-277 | 8.1 miles of corridors intersects Gunnison Sage-grouse critical habitat and 5.3 miles intersects with Yellow-billed Cuckoo critical habitat<br><br>Possible presence of other ESA-listed species | Reroute to avoid critical habitat. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Mexican an Wolf, New Mexico Meadow Jumping Mouse, Least Tern, Mexican Spotted Owl, Northern Aplomado Falcon, Piping Plover, Yellow-billed Cuckoo, Narrow-headed Gartersnake, Chiricahua Leopard Frog, Gila Trout, Rio Grande Silvery Minnow, Alamosa Springsnail Chupadera Springsnail, Socorro Springsnail, Socorro Isopod, Pecos Sunflower, Sneed Pincushion Cactus, Todsen's Pennyroyal, and Wright's Marsh Thistle.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |

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| 139-277 | 9.5 miles of corridor intersects with Gunnison Sage-grouse critical habitat and 1.9 miles with Yellow-billed Cuckoo critical habitat<br><br>Possible presence of other ESA-listed species | Reroute to avoid critical habitat. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Mexican an Wolf, New Mexico Meadow Jumping Mouse, Least Tern, Mexican Spotted Owl, Northern Aplomado Falcon, Piping Plover, Yellow-billed Cuckoo, Narrow-headed Gartersnake, Chiricahua Leopard Frog, Gila Trout, Rio Grande Silvery Minnow, Alamosa Springsnail Chupadera Springsnail, Socorro Springsnail, Socorro Isopod, Pecos Sunflower, Sneed Pincushion Cactus, Todsen's Pennyroyal, and Wright's Marsh Thistle.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 234-235 | 12.2 miles of corridor intersects intermittently with critical habitat for Jaguar, Mexican Spotted Owl, Southwestern Willow Flycatcher, Yellow-billed Cuckoo, and Chiricahua Leopard Frog<br><br>Possible presence of other ESA-listed species | Delete/replace this segment. Drop this corridor or reroute to avoid critical habitat. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Lesser Long-nosed Bat, Ocelot, Sonoran Pronghorn, Northern Mexican Gartersnake, Gila Topminnow, Pima Pineapple Cactus.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |

## II. Corridors in Region 3

| Corridor | Concern | Comments and Recommendations |
|---|---|---|
| 17-35 | Corridor intersects Greater Sage-grouse habitat including four miles of important sage-grouse breeding areas<br><br>Possible presence of other ESA-listed species | Re-route to avoid greater sage-grouse habitat and breeding areas.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Lahontan Cutthroat Trout.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 35-43 | Corridor intersects with Greater sage-grouse PHMA and Priority Areas of Conservation (PAC) | Delete/replace the corridor: 100% overlap with Greater sage-grouse PACs. |

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| | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Clover Valley Speckled Dace, Independence Valley Speckled Dace, Lahontan Cutthroat Trout, Whitebark Pine.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 35-111 | Corridor intersects with Greater sage-grouse PHMA and PACs | Delete/replace the corridor: 100% overlap with Greater sage-grouse PACs. See DOW May 2014. |
| 37-232 | Overlap with Mojave Desert Tortoise Priority 1 & 2 Connectivity Habitat | Re-route to avoid siting new facilities in Tortoise Conservation Areas. See DOW May 2014. |
| 39-113 | Overlap with Mojave Desert Tortoise Conservation Areas; Critical habitat and connectivity areas intersect corridor. | Re-route to avoid Tortoise Conservation Areas and critical habitat. See DOW May 2014. |
| 43-44 | Corridor goes through Greater Sage-grouse PACs.<br><br>Possible presence of other ESA-listed species | Delete/replace: 84% overlap with Greater sage-grouse PACs.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Yellow-billed Cuckoo, Independence Valley Speckled Dace, Lahontan Cutthroat Trout.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 43-111 | Corridor goes through Greater Sage-grouse PACs.<br><br>Possible presence of other ESA-listed species | Delete/replace: 100% overlap with Greater sage-grouse PACs.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Independence Valley Speckled Dace, Lahontan Cutthroat Trout, Jones Cycladenia, Ute Ladies'-tresses.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 44-110 | Corridor goes through Greater Sage-grouse PACs.<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PACs.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified |

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| | | in the corridor abstract may be present: Clover Valley Speckled Dace, Hiko White River Spring, Independence Valley Speckled Dace, Lahontan Cutthroat Trout, Pahrump Pool, White River Spinedace, White River Spring, and Whitebark Pine Pinus albicaulis.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 44-239 | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Yellow-billed Cuckoo, Jones Cycladenia, Ute Ladies'-tresses.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 66-212 | Corridor intersects Gunnison Sage-grouse habitat and critical habitat for other ESA species<br><br>Possible presence of other ESA-listed species | Re-route to avoid critical habitat. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: California Condor, Southwestern Willow Flycatcher, Western Yellow-billed Cuckoo, Bonytail Chub, Greenback Cutthroat Trout, Humpback Chub, Barneby Reed-mustard, Jones Cycladenia, Navajo Sedge, San Rafael Cactus.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 66-259 | Corridor goes through Greater Sage-grouse PACs.<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PACs.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Humpback Chub, June Sucker, Razorback Sucker, Clay Phacelia, Deseret Milkvetch, Jones Cycladenia, Ute Ladies'-tresses.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 68-116 | Possible presence of other ESA-listed species | There is potential conflict with Siler pincushion cactus according to data from the AZ Heritage Data Management System.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: California Condor |

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| | | Spotted Bat, Allen's Big-eared Bat, Small-footed Myotis, Fringed Myotis, Speckled Dace, Western Burrowing Owl, Houserock Valley Chisel-toothed Kangaroo Rat, Chuckwalla, and Northern Sagebrush Lizard.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **73-133** | Corridor intersects with Greater Sage-grouse PHMA | Delete/replace this segment or Re-route to avoid Greater Sage-grouse PHMA. |
| **110-114** | Corridor intersects with Greater Sage-grouse PHMA, including important breeding areas<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PHMAs.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Hiko White River, Lahontan Cutthroat Trout, Pahrump Poolfish, White River Spinedace, White River Springfish.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **110-233** | Corridor intersects with Greater Sage-grouse PHMA | Re-route to avoid Greater Sage-grouse PHMA. |
| **111-226** | Entire corridor in GRSG PAC | Delete/replace the corridor- 100% overlap with GRSG PACs. |
| **113-114** | Corridor intersects critical habitat for Mojave Desert Tortoise and Greater Sage-grouse PHMA | Re-route to avoid Greater Sage-grouse PHMA and Desert Tortoise critical habitat.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Utah Prairie Dogs, California Condor, Mexican Spotted Owl, Southwestern Willow Flycatcher, Western Yellow-billed Cuckoo, Virgin River Chub.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| **113-116** | Corridor intersects Sonoran Desert Tortoise Category I and II management habitat and Mojave Desert Tortoise Priority 1 & 2 Connectivity Habitat and critical habitat for other ESA species<br><br>Possible presence of other ESA-listed species | Re-route to avoid Mojave Desert Tortoise Priority 1 & 2 Connectivity Habitat and critical habitat.<br><br>Milepost 33-39 intersects critical habitat for the endangered Gierisch mallow. There is potential conflict with Siler pincushion cactus according to data from the AZ Heritage Data Management System.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC |

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| | | tool indicates that the following additional species not identified in the corridor abstract may be present: Utah Prairie Dog, California Condor, California Least Tern, Yuma Clapper Rail, Mexican Spotted Owl, Northern Mexican Gartersnake, Razorback Sucker.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 114-241 | 32.6 miles of the corridor intersects with Greater Sage-grouse priority habitat | Re-route to avoid Greater Sage-grouse PACs |
| 116-206 | Corridor intersects Greater Sage-grouse PHMA<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PHMA.<br><br>There is potential conflict with Siler pincushion cactus according to data from the AZ Heritage Data Management System.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Utah Prairie Dogs, California Condor, Mexican Spotted Owl, Southwestern Willow Flycatcher, Western Yellow-billed Cuckoo.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 126-133 | Corridor intersects Greater Sage-grouse PHMA, Black-footed Ferret reintroduction site and expansive White-tailed Prairie Dog colonies<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PHMA and Prairie dog colonies.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Bonytail Chub, Colorado Pikeminnow, Humpback Chub, Razorback Sucker.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 126-218 | Corridor intersects Greater Sage-grouse PACs and critical habitat for other species<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PACs.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, Mexican Spotted Owl, Yellow-billed Cuckoo, Ute Ladies'-tresses.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |

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| 126-258 | Corridor passes through critical habitat for several ESA species<br><br>Possible presence of other ESA-listed species | Re-route to avoid critical habitat.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Black-footed Ferret, Canada Lynx, Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail Chub, Colorado Pikeminnow, Humpback Chub, Razorback Sucker, Uinta Basin Hookless Cactus, Ute Ladies'-tresses, White-tailed prairie dogs, Burrowing owl.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 132-133 | Corridor intersects critical habitat and Greater Sage-grouse PACs<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PACs. See DOW May 2014<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, North American Wolverine, Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail Chub, Humpback Chub, Razorback Sucker, Greenback Cutthroat Trout, Debeque Phacelia, Dudley Bluffs Bladderpod, Dudley Bluffs Twinpod, Parachute Beardtongue, Ute Ladies'-tresses.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 132-136 | Corridor intersects critical habitat for several species<br><br>Corridor goes through Escalante State Wildlife Area IBA and Grand Valley Riparian Corridor IBA<br><br>Possible presence of other ESA-listed species | Re-route to avoid critical habitat.<br><br>2 miles of corridor pass through Escalante State Wildlife Area IBA, specifically the Hamilton and Lower Roubideau Tracts, managed by the Colorado Division of Wildlife. This IBA supports approximately 98% of birds in the area, including Southwestern Willow Flycatchers, which are listed as 'endangered' under the ESA.<br><br>Approximately 6 miles of corridor (miles 23-29) pass through the Grand Valley Riparian Corridor IBA. This IBA provides nesting, wintering, and/or resting habitat for approximately 75% of the states bird species.<br><br>Reroute a portion of this corridor around the State Wildlife Area to avoid disturbing habitat.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, North American Wolverine, Mexican Spotted Owl, Bonytail Chub, |

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| | | Humpback Chub, Greenback Cutthroat Trout, Debeque Phacelia, Parachute Beardtongue, Ute Ladies'-tresses, Colorado Hookless.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 132-276 | Corridor intersects Greater Sage-grouse PHMA and critical habitat<br><br>Possible presence of other ESA-listed species | Re-route to avoid Greater Sage-grouse PHMAs. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, North American Wolverine, Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail Chub, Humpback Chub, Razorback Sucker, Greenback Cutthroat Trout, Colorado Pikeminnow, Ute Ladies'-tresses.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 144-275 | Corridor intersects Greater Sage-grouse PHMA | Re-route to avoid Greater Sage-grouse PHMAs. See DOW May 2014. |
| 232-233 | Corridor intersects Desert Tortoise TCAs and critical habitat<br><br>Possible presence of other ESA-listed species | Re-route to avoid Desert Tortoise TCAs. See DOW May 2014.<br><br>Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Southwestern Willow Flycatcher, Yellow-billed Cuckoo, Yuma Clapper Rail, Hiko White River Springfish, Pahranagat Roundtail Chub, White River Spinedace, White River Springfish.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |
| 256-257 | Possible presence of other ESA-listed species | Our analysis of corridor intersection with possible habitat for ESA-listed species using US Fish and Wildlife Service's IPaC tool indicates that the following additional species not identified in the corridor abstract may be present: Canada Lynx, Yellow-billed Cuckoo.<br><br>Conduct further analysis to determine the presence of above-mentioned species. |

## G. Conclusion

Thank you for the opportunity provided by the agencies to provide comments on the corridor abstracts for Regions 2 and 3. We believe that the agencies are heading in the right direction in planning for energy corridors at a landscape level in order to plan our nation's renewable energy future while also addressing wildlife concerns. We look forward to continuing to work with the agencies and other stakeholders in the energy corridor planning. Please do not hesitate to contact Rupak Thapaliya at 202.772.3217 or via email at  if you have any questions about our comments.

Sincerely,

Rupak Thapaliya
Renewable Energy and Wildlife Policy Analyst
Email:
Defenders of Wildlife

Curt Bradley
Senior Scientist
Email:
Center for Biological Diversity

Garry George
Renewable Energy Director
Email: ggeorge@audubon.org
National Audubon Society

SOUTHERN NEVADA WATER AUTHORITY
100 City Parkway, Suite 700 • Las Vegas, NV 89106
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(702) 862-3400 • snwa.com

February 12, 2018

Konnie Wescott
West-Wide Energy Corridor Regional Reviews (Regions 2 and 3)
Argonne Project Manager 368 Corridor
Argonne National Laboratory
9700 S. Cass Ave., Bldg. 240
Argonne IL 60439

Dear Ms. Wescott:

**SUBJECT: SECTION 368 WEST-WIDE ENERGY CORRIDOR REGIONAL REVIEWS – REGION 3 PUBLIC COMMENTS**

Southern Nevada Water Authority (SNWA) appreciates the opportunity to provide recommendations for corridor modifications regarding the Section 368 West-wide Energy Corridor (WWEC) Regional Reviews for Region 3. SNWA is a political subdivision of the State of Nevada and is responsible for managing the regional water resources of southern Nevada. SNWA has an authorized right-of-way (ROW) (N-78803) within and adjacent to the existing WWEC alignment. Design and siting decisions for this ROW were based on the analysis of construction specifications for a water pipeline and transmission lines, site-specific topography, and proximity to major roads, highways, sensitive resources, sensitive land designations, existing ROWs, existing utilities, and tribal and private lands. Since these criteria are similar to the WWEC siting principles, we are sharing our alignments as they may help the Bureau of Land Management (BLM) and joint agencies determine where to modify or retain the corridor.

Please find enclosed maps and shapefiles showing the SNWA-granted ROW alignment within the WWEC Region 3. Highlighted on the maps are the areas where the ROW diverges from the WWEC due to technical constraints. The BLM and joint agencies may consider modifying the WWEC in these areas to accommodate for the technical constraints, which other energy alignments will also face, and to minimize land disturbance. The shapefiles included on the compact-disc show the SNWA-granted ROW alignment, as well as the proposed modifications to the WWEC.

SNWA appreciates the opportunity to provide recommendations for corridor modifications for Region 3. Please continue to keep SNWA informed of the status of the review. If you have any questions regarding these comments or need additional information, please contact me at (702) 862-3457 or kimberly.reinhart@snwa.com.

Sincerely,

Kimberly Reinhart

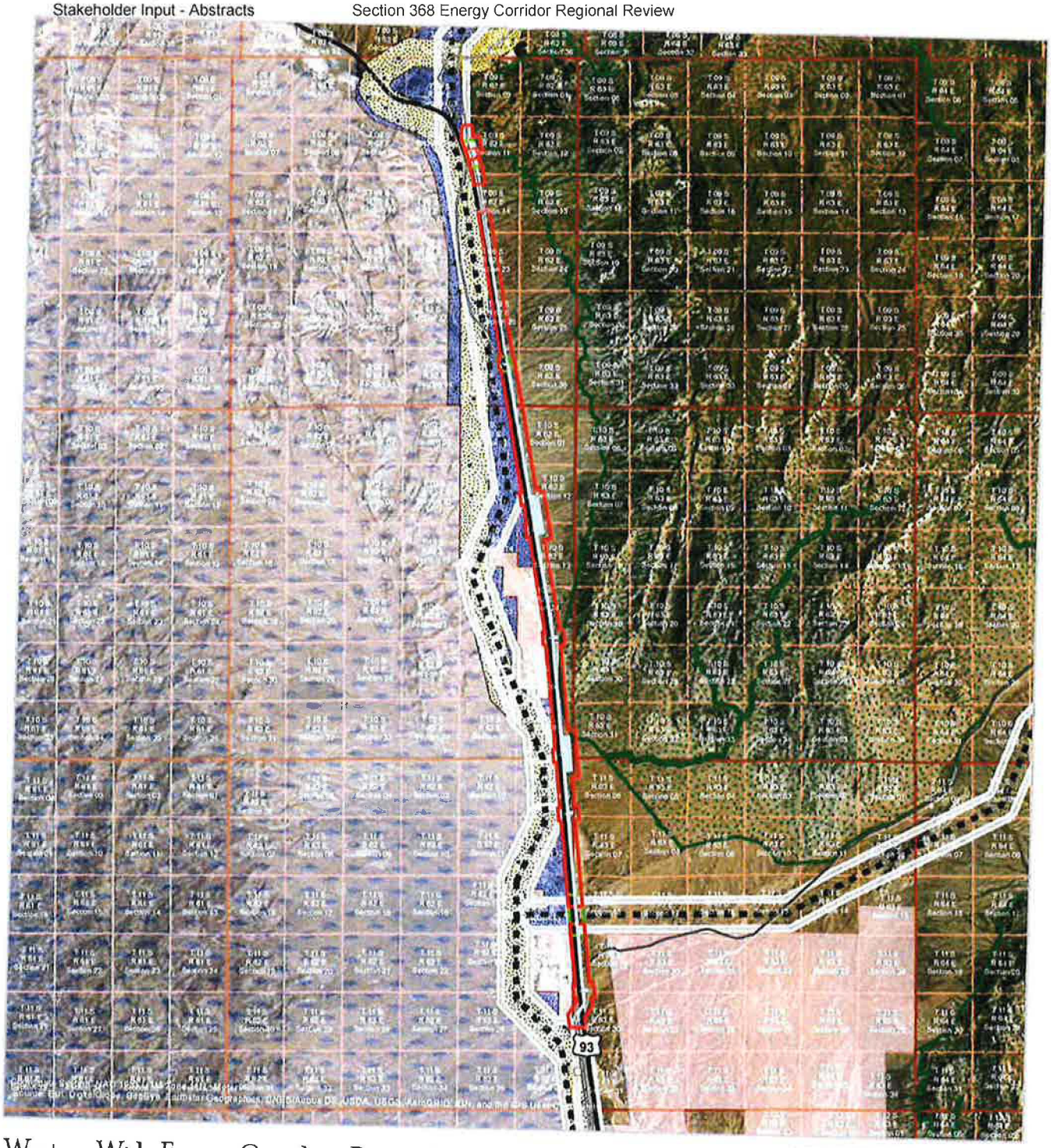
Kimberly Reinhart
Senior Environmental Planner

KR:CL:dg

Enclosures

cc: Jeremy Bluma, Section 368 Project Manager

# MAPS




# Western Wide Energy Corridor - Region 3

West Wide Energy Corridor
- Energy Corridor Centerline Corridor
- L.C.C.R.D.A. Half Mile Corridor
- Southwest Intertie Project (SWIP) Corridor

Land Ownership
- BLM
- USFW
- Private
- Wilderness Areas - Designated (BLM)

Granted Right-of-Ways
- Granted Water Pipeline/Transmission ROW N-78803

SNWA Recommendation
- Modification to W.W.E.C. Recommended
- No Modification to W.W.E.C. Recommended

0 5 10 Miles

The information depicted on this map represents data collected from various sources by the Southern Nevada Water Authority and is intended for planning purposes only

MAP ID 30185 X0028 LM 11/1/2016

# Western Wide Energy Corridor - Region 3

**West Wide Energy Corridor**
- Energy Corridor Centerline
- Corridor
- L.C.C.R.D.A. Half Mile Corridor
- Southwest Interlie Project (SWIP) Corridor

**Land Ownership**
- BLM
- USFW
- Wilderness Areas - Designated (BLM)

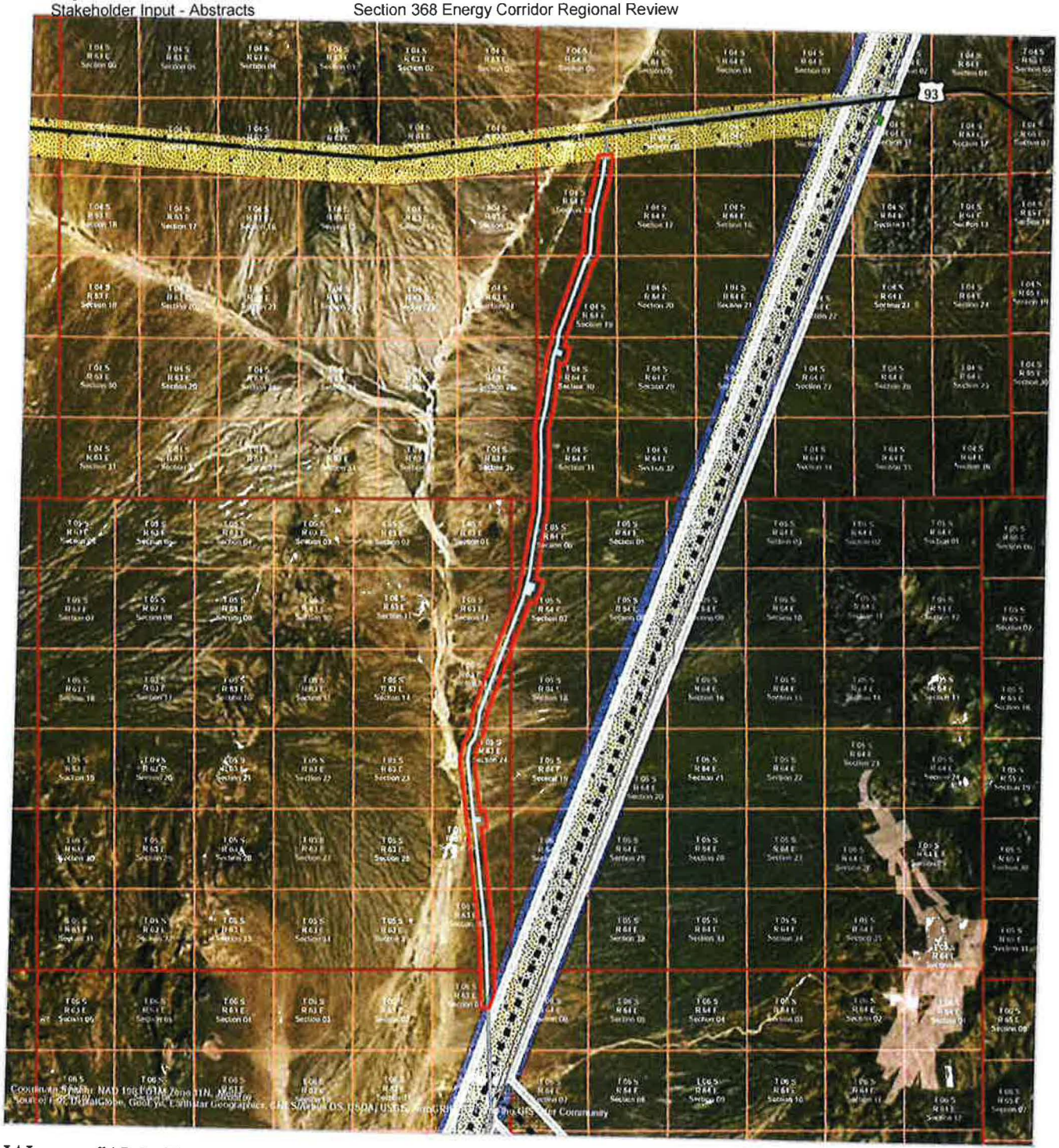
**Granted Right-of-Ways**
- Granted Water Pipeline/Transmission ROW N-78803

**SNWA Recommendation**
- Modification to W.W.E.C. Recommended

0 2,600 5,200'

The information depicted on this map represents data collected from various sources by the Southern Nevada Water Authority and is intended for planning purposes only.

MAP ID 30165 X0028 LM 11/1/2016




# Western Wide Energy Corridor - Region 3

**West Wide Energy Corridor**
- Energy Corridor Centerline
- Corridor
- L.C.C.R.D.A. Half Mile Corridor
- Southwest Intertie Project (SWIP) Corridor

**Land Ownership**
- BLM
- Private

**Granted Right-of-Ways**
- Granted Water Pipeline/Transmission ROW N-78803

**SNWA Recommendation**
- Modification to W.W.E.C. Recommended

0 3,600 7,200

The information depicted on this map represents data collected from various sources by the Southern Nevada Water Authority and is intended for planning purposes only.

MAP ID 30185 X0028 LM 11/1/2016

# Western Wide Energy Corridor - Region 3

**West Wide Energy Corridor**
- Energy Corridor Centerline
- Corridor
- BLM Utility Corridor
- Southwest Intertie Project (SWIP) Corridor

**Land Ownership**
- BLM
- Forest Service
- Private
- Wilderness Areas - Designated (USFS)

**Granted Right-of-Ways**
- Granted Water Pipeline/Transmission ROW N-78803

**SNWA Recommendation**
- Modification to W.W.E.C. Recommended
- No Modification to W.W.E.C. Recommended

0 2,600 5,200'

The information depicted on this map represents data collected from various sources by the Southern Nevada Water Authority and is intended for planning purposes only

MAP ID 30185 X0028 LM 11/1/2016

Office of the Governor
PUBLIC LANDS POLICY COORDINATING OFFICE

KATHLEEN CLARKE
*Director*

State of Utah

GARY R. HERBERT
*Governor*

SPENCER J. COX
*Lieutenant Governor*

February 23, 2018

*Submitted via electronic mail: jbluma@blm.gov*
*blm_wo_368corridors@blm.gov*

Jeremy Bluma
National Project Manager
Section 368 Energy Corridor Regional Review Project
Bureau of Land Management
20 M Street, SE
Washington, D.C. 20003

Subject: **BLM Energy Corridor Region 3 Review, Stakeholder Review**

Dear Mr. Bluma:

The State of Utah has reviewed the energy corridor abstracts under review as part of the Bureau of Land Management's ("BLM") regional review of Section 368 energy corridors in the western United States. The State of Utah appreciates this opportunity to offer input and work cooperatively with the BLM to advance the region's energy infrastructure.

Of the fifty-three energy corridors under review in Region 3, thirteen corridors are in Utah. All thirteen of these energy corridors are expected to provide critical access for Utah's energy, natural resources, and information infrastructure. Of those thirteen corridors, six were identified as "corridors of concern" in the *Wilderness Soc'y, et al. v. U.S. Dep't of Interior* Settlement Agreement ("Settlement Agreement)".[1] The State has not at this time identified any conflicts within the BLM's designated energy corridors, and requests that all thirteen corridors remain open to infrastructure development in their existing configurations.

[1] *Wilderness Soc'y, et al. v. U.S. Dep't of Interior*, No. 3:09-cv-03048 JW, Joint Motion to Dismiss Case Pursuant to Fed. R. Civ. P. 41(a)(2).

The State favors an "all of the above" energy policy that embraces a diverse array of renewable and nonrenewable energy sources. Affordable energy is a critical component of Utah's thriving economy and strong middle class. The transmission of energy across Utah's federal land is imperative to our low cost and reliable electricity. The corridors currently under review by the BLM will only become more important as Utah continues to develop renewable energy sources around the state including wind, solar, and geothermal energy.

The State has not at this time identified specific locations where new or expanded energy corridors are currently needed, but it is likely that new corridors on public lands will be necessary in the future as more resources are developed. The State reserves the right to request additions to the existing system of Section 368 energy corridors at a later time during the ongoing review process.

The development of energy infrastructure on public federal land is often laborious and time-consuming, even within designated energy corridors. The State requests that the BLM find ways in which to expedite the review process for projects proposed within energy corridors. Although we understand that such an endeavor is outside the scope of this review, nevertheless the BLM should prioritize ways to facilitate the utilization of these corridors. If projects within energy corridors are subject to the lengthy review periods and administrative delays typical of other federal lands, the value of a designated BLM energy corridor is greatly diminished.

Thank you for this opportunity to submit input. The pages below contain specific input regarding each of the thirteen energy corridors in Utah. These comments were compiled in conjunction with the Utah Governor's Office of Energy Development and other state agencies. We look forward to further coordination with the BLM to protect and enhance these critical energy corridors. Please address any questions or concerns to the Utah Public Lands Policy Coordinating Office.

Sincerely,

Kathleen Clarke
Director

## Corridor Specific Technical Comments

### 1. Corridor 110-114

The sections of Corridor 110-114 within Utah play an important role for existing and future energy infrastructure in the region, and the State requests that no change are made to the existing alignment of the corridor. Corridor 110-114 was identified as a "corridor of concern" in the Settlement Agreement, yet the State does not find any conflicts with surrounding resources. This corridor has exceptional importance to the growing renewable resources industry in Utah's west desert, an area rich in wind, solar and other resources.

The State concurs with the BLM's analysis that that the Frisco Charcoal Kilns, a NRHP property, is not within the corridor, thus a re-route of the corridor to avoid this location is not warranted. As stated by the BLM, the Section 106 process should be followed during the right-of-way application process and not during the current corridor-level planning.

Previous commenters have requested re-routes of the corridor to avoid "citizens' proposed wilderness." As stated by the BLM, a "citizens' proposed wilderness" does not carry any legitimate legal meaning and thus should not be considered in the review of energy corridors. The only special land management designations that should be considered in this review are designations that are formally adopted by law or the relevant BLM resource management plans and Forest Service forest management plans.

The State concurs with the BLM's findings that the Wah Wah Mountains WSA should not be considered in this corridor review since the WSA and corridor do not intersect.

### 2. Corridor 113-114

Corridor 113-114 plays a critical role for existing and future energy infrastructure in southwestern Utah, and the State requests that no changes are made to the existing alignment of the corridor. The State concurs with the BLM's analysis that the corridor does not conflict with any "lands with wilderness characteristics" and thus a re-route of the corridor is not warranted. As stated by the BLM, the area of the corridor within the Beaver Dam Wash National Conservation Area is not managed for wilderness characteristics under the Beaver Dam Wash National Conservation Area Management Plan.

As stated in the BLM's analysis, the State agrees that the corridor does not cross "inventoried roadless areas" within Dixie National Forest, thus there should be no change to the corridor regardless of the proximity.

**3. Corridor 113-116**

Only a small portion of Corridor 113-116 is within Utah. This portion of the corridor in Utah plays an important role for existing and future energy infrastructure in the Washington County region, and the State requests that no changes are made to the existing alignment of the corridor. The State has not identified any conflicts with the corridor that would warrant a change to the corridor's alignment or other major changes.

**4. Corridor 114-241**

Corridor 114-241 plays a critical role for existing and future energy infrastructure in western Utah, and the State requests that no changes are made to the existing alignment of the corridor. This corridor has added importance to the State's growing renewable energy industry, as the corridor is in close proximity to numerous solar, wind, and geothermal developments. Renewable energy will not be feasible if public lands energy corridors such as this do not remain open. The State has not identified any conflicts with the corridor that would warrant a change to the existing route.

**5. Corridor 116-206**

Corridor 116-206 plays a critical role for existing energy infrastructure in central and southern Utah, and the State requests that no changes be made to the existing alignment of the corridor. The State has not identified any conflicts with the corridor that would warrant changes to the existing route.

Corridor 116-206 was identified as a "corridor of concern" in the Settlement Agreement. However, the State finds that the corridor is sited appropriately in a way that avoids impacts to the surrounding landscape. A previous commenter requested that the corridor be re-routed to "avoid undisturbed areas."[2] The State agrees that the corridor generally follows existing infrastructure and disturbance to the extent possible, and a re-route is unwarranted and would likely cause more harm to undisturbed areas.

Other previous commenters requested a re-route to avoid "citizens' proposed wilderness."[3] A "citizens proposed wilderness" has no legal basis in law, regulation, or federal land management plan, and cannot be used to determine energy corridor location.

[2] Corridor 116-206 abstract, at 12.
[3] Corridor 116-206 abstract, at 12.

Some special interest groups use wilderness proposals not to protect wilderness quality lands but as a tool to impede the development of necessary infrastructure. The State concurs with the BLM's analysis that proposed wilderness is not a valid consideration in the corridor review.

A previous commenter requested that the corridor be re-routed to avoid the Old Spanish National Historic Trail.[4] While the Old Spanish National Historic Trail is a congressionally designated trail, this corridor review is not the appropriate time in which to evaluate possible impacts to the trail, and a re-route of the corridor is unwarranted. The protections of the rail's historic values should be considered as part of any project-specific environmental reviews and through adheres to the IOPs. Energy corridors frequently coexist with national historic properties without any adverse impacts to those national historic properties when managed correctly.

Although previous commenters requested a re-route of the corridor to avoid the Grand Staircase-Escalante National Monument,[5] the BLM correctly found that the corridor is not in the National Monument and therefore cannot be considered in corridor-level planning. Furthermore, the boundaries of Grand Staircase-Escalante National Monument were modified by Presidential Proclamation on December 4, 2017.[6] This boundary modification further reduced the proximity of the corridor to the National Monument. Proximity of an energy corridor to any national monument should not be used to justify re-routing an energy corridor, as the co-existence of energy infrastructure and specially-protected lands is a fundamental part of the BLM's multiple-use mission.

Similarly, previous commenters requested that the energy corridor be re-routed to avoid USFS inventoried roadless areas in Fishlake National Forest, including the Beehive Peak, Circleville Mountain, City Creek, Marysvale Peak, and Signal Peak inventoried roadless areas.[7] The BLM is correct in finding that the corridor does not intersect any of these inventoried roadless areas, and there is nothing in the Roadless Rule or federal policy that prescribes moving an energy corridor merely due to the proximity to an inventoried roadless area. The development of additional energy infrastructure within the corridor would have no impact whatsoever on nearby inventoried roadless areas. This vital corridor should therefore remain open to infrastructure in its existing configuration.

**6. Corridor 126-113**

[4] Corridor 116-206 abstract, at 14.
[5] Corridor 116-206 abstract, at 14.
[6] Presidential Proclamation Modifying the Grand Staircase-Escalante National Monument, December 4, 2017, *available at* https://www.whitehouse.gov/presidential-actions/presidential-proclamation-modifying-grand-staircase-escalante-national-monument/.
[7] Corridor 116-206 abstract, at 14, 15.

Although only a small segment of Corridor 126-113 is within Utah, the section of the corridor plays an important role for existing and future energy infrastructure in the Uintah Basin, and the State requests that no changes are made to the existing alignment of the corridor. The State has not identified any conflicts with the corridor that would warrant a change to the existing route.

**7. Corridor 126-218**

Corridor 126-218 plays an important role for existing and future energy infrastructure in the Uintah Basin, and the State requests that no changes are made to the existing alignment of the corridor. This corridor is particularly important due to its proximity to oil and gas developments which require quality transportation infrastructure. The State has not identified any conflicts with the corridor that would warrant a change to the existing route.

**8. Corridor 126-258**

Corridor 126-258 plays an important role for existing and future energy infrastructure in western Utah, and the State requests that no changes are made to the existing alignment of the corridor. The State has not identified any conflicts with the corridor that would warrant a change to the existing route.

Corridor 126-258 was identified as a "corridor of concern" in the Settlement Agreement. A previous commenter requested that the corridor be re-routed to ensure connection to renewable energy resources. While the State has no identified any necessary additions to the corridor in order to access renewable energy resources, the State asks that the BLM work cooperatively with the State to expand the corridor as necessary should renewable resources in the area be developed in the future.

**9. Corridor 256-257**

Corridor 256-257 plays an important role for existing energy infrastructure in Weber County, and the State requests that no changes be made to the existing alignment of the corridor. The State has not identified any conflicts with the corridor that would warrant changes to the existing route.

**10. Corridor 66-209**

Corridor 66-209 plays an important role for existing energy infrastructure in Weber County, and the State requests that no changes be made to the existing alignment of the

corridor. The State has not identified any conflicts with the corridor that would warrant changes to the existing route.

**11. Corridor 66-212**

Corridor 66-212 plays an important role for existing and future energy infrastructure in central and eastern Utah, and the State requests that no changes are made to the existing alignment of the corridor. This corridor forms a vital link between some of Utah's richest energy producing areas, including Carbon and Emery counties, and the rapidly growing Wasatch Front. The region surrounding this corridor also holds great potential for future renewable resources. Any alternations or closures to this corridor could be very harmful to Utah's economy and quality of life.

Corridor 66-212 was identified as a "corridor of concern" in the Settlement Agreement, yet the State does not find conflicts with the corridor that warrant a re-route or other significant changes. This corridor follows busy state and federal highways for the vast majority of its route, thereby focusing impacts in disturbed areas and minimizing impacts to undisturbed areas.

The State concurs with the BLM's analysis that the corridor should not be re-routed to avoid Arches National Park. As stated in in the corridor abstract,[8] the corridor does not go through Arches National park and the current route was appropriately designated in the relevant RMP because of existing energy transport projects, railroads and highways that already existed in the corridor. It would not be feasible for the BLM to re-route all energy corridors away from scenic areas in a state as scenic as Utah – the best option is to focus future development in corridors of existing development.

A number of previous commenters requested re-routing the corridor in order to avoid places listed as national historic places in Carbon, Grand, and Emery Counties.[9] The State agrees with the BLM's analysis that impacts to national historic places under the Section 106 process is not appropriate for corridor-level planning, but should be addressed during ROW application processes. As stated by the BLM's analysis, several of the NRHP-listed properties identified by previous commenters are not within the corridor and should have no bearing on this review.

Under "Public Access and Recreation," a number of commenters requested re-routing the corridor to avoid "America's byways." [10] The State finds that the corridor generally meets the siting principles and that changes to the corridor to avoid these byways

[8] Corridor 66-212 abstract, at 10.
[9] Corridor 66-212 abstract, at 12.
[10] Corridor 66-212 abstract, at 20.

are unwarranted. As stated in the BLM's analysis, VRM Class II areas in the Moab RMP and treated as VRM Class III for utility projects, and thus future utility projects should be located within the existing corridor.

Previous commenters requested a re-route of the corridor to avoid impacts to the Negro Bill Canyon WSA, the Mill Creek Canyon WSA, and the Behind the Rocks WSA. As stated in the corridor abstract, the corridor does not intersect the WSAs. The fact that the corridor is in close proximity to these WSAs does not mean that infrastructure in the corridor has any tangible negative impacts on the WSAs themselves. The close proximity of energy infrastructure and scenic WSA is a necessary reality on the BLM's multiple-use lands. The State concurs with the BLM's finding that the corridor is appropriately located along an existing railroad and highway.

A previous commenter requested a reroute of the corridor to avoid "proposed wilderness."[11] As stated by the BLM, this proposed wilderness is not part of any BLM RMP or other duly adopted management plan and thus cannot be considered as part of this review.

**12. Corridor 66-259**

Corridor 66-259 plays an important role for existing energy infrastructure in central Utah, and the State requests that no changes be made to the existing alignment of the corridor. The State has not identified any conflicts with the corridor that would warrant changes to the existing route.

Corridor 66-259 was identified as a "corridor of concern" in the Settlement Agreement. A previous commenter requested a re-route of the corridor to avoid Greater Sage-Grouse Priority Habitat.[12] The State concurs with the BLM's analysis that the corridor runs through a mapped non-habitat portion of a Sage Grouse Management Area. Due to the area being non-habitat, a re-route or ROW exclusion is not warranted. The State requests that the BLM and USFS coordinate with the Utah Division of Wildlife Resources during the ROW application process for new infrastructure in the corridor to ensure mitigation of negative impacts to greater sage-grouse habitat.

Previous commenters requested re-routing the corridor to avoid impacts to USFS "inventoried roadless areas." The State agrees with the BLM's findings that the corridor is adjacent to, but does not intersect, these USFS inventoried roadless areas, and as such the inventoried roadless areas would not affect development inside of the corridor. The close proximity of energy infrastructure and pristine forest areas is a simple reality on USFS land dedicated to multiple use and does not constitute a conflict where certain kinds of forest

[11] Corridor 66-212 abstract, at 25.
[12] Corridor 66-259 abstract, at 7.

uses preclude other forest uses nearby.

The State agrees that the Transwest Express project, which will intersect the Chipman Creek Inventoried Roadless Area, will use tools and methods that are in full compliance with the Roadless Rule and should proceed as currently planned. Some energy infrastructure through or nearby inventoried roadless areas is necessary for Utah's continued economic growth and quality of life.

**13. Corridor 68-116**

The section of Corridor 68-116 within Utah is important to existing and future energy infrastructure, and the State requests that the corridor remain open without changes to the current alignment. The State has not identified any conflicts with the corridor that would warrant re-routing. Corridor 66-116 was identified as a "corridor of concern" in the Settlement Agreement. Previous commenters requested a re-route of the corridor due to its location within the Grand Staircase-Escalante National Monument. However, President Donald J. Trump modified the boundaries of Grand Staircase-Escalante National Monument in a Presidential proclamation dated December 4, 2017.[13] Due to these modifications, Corridor 68-116 is now entirely outside of the Grand Staircase-Escalante National Monument,[14] rendering moot any alleged conflicts between the energy corridor and the Monument.

Moreover, the State concurs with the BLM's analysis that the management prescriptions in the Grand Staircase-Escalante National Monument Management Plan allowed for utility ROWs in "Front County" and "Outback" zone, and thus there were not exclusions or avoidance prescriptions for the corridor within the Monument.

The State also concurs with the BLM's finding that the proximity of the corridor to the Paria River does not warrant any changes to the corridor's route. As stated in the BLM's analysis, the Paria River is not a designated Wild and Scenic River, nor would future infrastructure projects within the corridor impact the free-flowing condition of the Paria River.

**Comments Regarding Livestock Grazing- Utah Department of Agriculture and Food**

The Utah Department of Agriculture and Food (UDAF) has reviewed the West-Wide

[13] Presidential Proclamation Modifying the Grand Staircase-Escalante National Monument, December 4, 2017, *available at* https://www.whitehouse.gov/presidential-actions/presidential-proclamation-modifying-grand-staircase-escalante-national-monument/.
[14] Grand Staircase-Escalante National Monument Map of Modified Boundaries, Bureau of Land Management, January 2018, *available at* https://www.blm.gov/sites/blm.gov/files/Utah_GSENM_New2018.pdf.

Energy Corridors Review. UDAF harbors some concerns over the impacts that energy development may have on agriculture in adjacent areas if not developed and maintained properly. Energy corridors are vulnerable to invasion by invasive and noxious weed species, which can become established and spread further onto farmland, range, and wildlife habitat. UDAF urges the Bureau of Land Management (BLM) to ensure that all developments, changes, or alterations to energy corridors do not adversely affect agriculture and especially domestic livestock grazing in the affected areas.

Livestock grazing is an efficient and cost-effective form of vegetation management, including vegetation management within energy corridors. Proper livestock grazing can maintain healthy ecosystems while managing vegetation (Davies *et al.* 2009) and reducing the risks of wildfire (Diamond 2009; Diamond *et al.* 2009). Literature shows that grazed areas reduce the size, intensity, and recovery time of wildfires (Davies *et al.* 2009; 2015; Strand *et al.* 2014). Federal land management agencies should consider the positive effects that livestock grazing has on fuel load management and the reduction in risk of catastrophic wildfires in all of the considered energy corridors.

COLORADO
Parks and Wildlife
Department of Natural Resources

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February 23, 2018

Mr. Jeremy Bluma
National Project Manager
Section 368 West-Wide Energy Corridors Regional Review Project
U.S. Bureau of Land Management
20 M Street, SE
Washington, DC 20003

RE: Section 368 West-Wide Energy Corridors Review

Dear Mr. Bluma-

Colorado Parks and Wildlife (CPW) appreciates the opportunity to provide information during the Section 368 West-Wide Energy Corridors Review conducted by the Bureau of Land Management (BLM), United States Forest Service (USFS) and Department of Energy. CPW provided extensive comments in 2008 on the Programmatic Environmental Impact Statement regarding the necessary avoidance, minimization, and mitigation measures for wildlife habitats and species in Colorado that could potentially be affected by corridor development. It is our understanding that this review is not a NEPA process and that development with a designated corridor would require site-specific NEPA analysis. Further, we understand that the purpose of the West-Wide Energy Corridors Review is to identify issues that could be taken into account during future land use planning efforts for BLM and USFS, and that CPW would have the opportunity to be involved in any future corridor development proposals.

CPW has been involved in a number of past and current land use planning efforts throughout Colorado. We have provided comments and input regarding resource conflicts (ROW avoidance/exclusion areas) and/or potential future land management prescriptions within federal land management planning process. The comments below reiterate some of our previous and existing comments on land management planning efforts to date.

Greater Sage-Grouse (GRSG)
The Northwest Colorado Greater Sage-grouse Approved Resource Management Plan Amendment (dated September 2015) designates GRSG Priority Habitat Management Areas (PHMA) and General Habitat Management Areas (GHMA) as Right Of Way (ROW) Avoidance Areas. We support these existing designations. Portions of Corridors 73-133, 126-133, 133-142, 138-143, 132-133, and 144-275 fall within PHMA or GHMA and many of them go directly through or adjacent to known active GRSG leks, nesting, and production areas. We recommend that these identified corridors be rerouted to avoid PHMA and GHMA. In areas where existing overhead transmission lines are present we recommend the disturbance for a designated corridors be within the pre-existing infrastructure footprint - allowing for upgraded capacity of existing infrastructure without expansion of corridor ROW within these habitat types. If avoidance or co-location is not possible we recommend burying the transmission line and instituting compensatory mitigation to offset the habitat fragmentation and loss to GRSG.

Gunnison Sage-Grouse (GUSG)
Gunnison Sage-grouse have been listed by the US Fish and Wildlife Service (USFWS) as a 'Threatened Species' under the Endangered Species Act. The West-Wide Energy Corridor document was completed prior to GUSG listing. Corridors 132-277, 139-277, 130-274 pass through areas mapped by the USFWS as Critical Habitat essential for the conservation of Gunnison Sage-grouse.

Bob D. Broscheid, Director, Colorado Parks and Wildlife • Parks and Wildlife Commission: Robert W. Bray • Marie Haskett • Carrie Besnette Hauser
John Howard, Chair • Marvin McDaniel • Dale Pizel • Jim Spehar • James Vigil, Secretary • Dean Wingfield • Michelle Zimmerman, Vice-Chair • Alex Zipp

CPW is a Cooperating Agency for the ongoing the Range-wide Gunnison Sage-grouse RMP Amendment process. Throughout the planning process we have recommended that GUSG Critical Habitat within the satellite populations (Crawford, Cerro Summit-Cimarron-Sims Mesa, Dove Creek, Dry Creek Basin, Miramonte, Poncha Pass and Pinon Mesa) be designated as a ROW Exclusion Area and in the Gunnison Basin, Critical Habitat be designated a ROW Avoidance Area. We recommend that these identified corridors be rerouted to avoid GUSG habitat, particularly corridors 130-274 and 132-277 in GUSG satellite populations. In areas where existing overhead transmission lines are present we recommend the disturbance for a designated corridors be within the pre-existing infrastructure foot print - allowing for upgraded capacity of existing infrastructure without expansion of corridor ROW within these habitat types. If avoidance or co-location is not possible within the Gunnison Basin, then we recommend burying the transmission line and instituting compensatory mitigation to offset the habitat fragmentation and loss to within the Gunnison Basin. Additionally, CPW recommends that the BLM and USFS consult with the USFWS to ensure compliance with the Endangered Species Act.

Columbian Sharp-tailed Grouse (CSTG)

Portions of corridor 144-275 go directly through or adjacent to known active Columbian sharp-tailed grouse (CSTG) leks, nesting, and production areas. We recommend that these identified corridors be rerouted to avoid these habitats. In areas where existing overhead transmission lines are present we recommend the disturbance for a designated corridor be located within the pre-existing infrastructure foot print - allowing for upgraded capacity of existing infrastructure without expansion of corridor ROW within these habitat types. If avoidance or co-location is not possible, then we recommend burying the transmission line and establish compensatory mitigation to offset the habitat fragmentation and loss to CSTG.

Conservation Easements and CPW Properties

Corridors 13-274, 139-277, 136-277, 132-276, 132-136, 132-133, 144-275, 47-52, 138-143, 126-133, 73-133, 87-277 and 126-133 cross private lands encumbered by conservation easements or CPW-owned properties. CPW owned properties are managed for wildlife, wildlife related recreation, and other recreational uses. In many instances corridor development would be incompatible with the purpose for which those properties were acquired and are managed. We recommend avoiding CPW properties for corridor alignments. If avoidance is not possible we will require close pre-planning and coordination with our staff.

The corridors identified above also cross many private land parcels that are encumbered by conservation easements. CPW, Great Outdoors Colorado, private land owners, local and national land trusts, and the citizens of Colorado have made significant financial investments in private land conservation for public benefit. While each individual property has specific allowable and prohibited uses, corridor development in most cases could be incompatible and detrimental to the conservation values for which those parcels have been conserved. We recommend that the Corridor Review take into account private land conservation and avoid those parcels that have been conserved in perpetuity. In instances where an easement prohibits corridor development and avoidance of the parcel is not possible, and the exercise of Eminent Domain may result, then the lost conservation values due to corridor development must be compensated for and replaced.

Black Footed Ferrets

The eastern portion of Corridor 87-227 has prairie dog colonies that may support black-footed ferrets *(Mustela nigripes)*, a Federal and State of Colorado 'Endangered Species'. Re-introduction sites for this species are located in black-tailed prairie dog colonies just east of the start of corridor 87-227. CPW recommends consultation with USFWS for any work that might impact black-tailed prairie dog

colonies in this area and potentially black-footed ferrets, particularly if the right of way intrudes onto a property currently enrolled under a USFWS Programmatic Safe Harbor Agreement or the NRCS Black-footed Ferret Special Effort Conservation Program.

Raptors
Numerous raptor species nest and forage in the vicinity of the corridor alignments. Protecting existing raptor nest sites and the reproductive activities at those sites is critical for managing long-term raptor population trends in Colorado. If any of these corridors are to be developed we recommend instituting raptor nest surveys and avoiding nest sites per our recommendations outlined in our 2008 letter.

Species of Interest
The corridor alignments intersect and bisect a number important habitats and migration routes for species of interest throughout Colorado. The habitats include mapped production areas for elk and bighorn sheep, critical winter ranges for deer and elk, boreal toad breeding sites, lynx habitat, and cutthroat trout streams. We anticipate that the application of best management practices to avoid, minimize, and mitigate development impacts to these species could be dealt with at the project specific level should a corridor be proposed for development.

Thank you for the opportunity to comment on the West-Wide Energy Corridor Review. If you have additional questions or would like to discuss our recommendations please contact Southwest Land Use Coordinator, Brian Magee at (970) 375-6707.

Sincerely,

Bob Broscheid
Director

xc: JT Romatzke, NW Region Manager
Mark Leslie, NE Region Manager
Dan Prenzlow, SE Region Manager
Patt Dorsey, SW Region Manager
Jon Holst, SW REL
Michael Warren, NW REL
Brandon Marette, NE REL
Karen Voltura, SE REL
Brian Magee, SW Land Use Coordinator
Taylor Elm, NW Land Use Specialist
Brett Smithers, NW Land Use Specialist

CONTACT'S NAME: _____ AGENCY / ORGANIZATION NAME: U.S. MARINE CORPS

| # | Corridor | Milepost | Concerns/Comments | Preferred Mitigation |
|---|---|---|---|---|
| Comment Number | List the Corridor Segment | List the Milepost or span of Mileposts | Your comment. List the mission impact in brief.<br><br>If you have more comments than lines provided below, just click Table \| Insert \| Rows Above (or Rows Below) on the menu in Microsoft Word. | If a known mitigation would remedy the concern, please list it here. Subsequent discussion will address viability and details. |
| 1 | 30-52 | 175-199.8 | Military training route (IR-218) with floor of 500' AGL. Potential for an obstruction in airspace used for high speed, low altitude military aircraft operations, which presents a potential safety risk. | Recommend structures remain below 500' AGL. Taller structure will require further analysis for operational and safety impacts. |
| 2 | 46-269 | 59-63 | Military training route (IR-250) with floor of "SURFACE". Potential for an obstruction in airspace used for high speed, low altitude military aircraft operations, which presents a potential safety risk. | Recommend structures remain below 200' AGL. Taller structure will require further analysis for operational and safety impacts. |
| 3 | 61-207 | 0-11 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 4 | 115-208 | 46.7-59.5 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 5 | 115-208 | 17-39 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or |

| # | Corridor | Milepost | Concerns/Comments | Preferred Mitigation |
|---|---|---|---|---|
| | | | Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 6 | 115-208 | 7-10 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 7 | 115-238 | 18-22 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 8 | 115-238 | 2.5-13.5 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 9 | 46-269 | 61-83 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 10 | 113-116 | 0-21.5 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to- | Recommend appropriate land management agency take efforts to avoid or mitigate impacts to the critical or sensitive habitat for the desert tortoise in accordance |

| # | Corridor | Milepost | Concerns/Comments | Preferred Mitigation |
|---|---|---|---|---|
| | | | ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 11 | 113-114 | 0-26.2 | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or m tigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| 12 | 39-113 | Entire length | Impacts to sensitive desert tortoise habitat has the potential to adversely impact use of MCAGCC Twentynine Palms and Barry M. Goldwater Range for ground-to-ground, air-to-ground, and maneuver training, as well as use of transit routes near, around, or between DOD ranges. | Recommend appropriate land management agency take efforts to avoid or m tigate impacts to the critical or sensitive habitat for the desert tortoise in accordance with the Desert Tortoise Range-wide plan and other applicable guidance/policy. |
| | | | | |

CONTACT'S NAME: _____ AGENCY / ORGANIZATION NAME: NAVY

| # | Corridor | Milepost | Concerns/Comments | Preferred Mitigation |
|---|---|---|---|---|
| Comment Number | List the Corridor Segment | List the Milepost or span of Mileposts | Your comment. List the mission impact in brief.<br><br>If you have more comments than lines provided below, just click Table \| Insert \| Rows Above (or Rows Below) on the menu in Microsoft Word. | If a known mitigation would remedy the concern, please list it here. Subsequent discussion will address viability and details. |
| 1 | 44-110 | 29-42 | MTR VR-1259, Floor of 200' AGL | Request the height of any proposed transmission structures not exceed height of any existing infrastructure in the ROW. Taller structure will require further analysis for operational impact. |
| 2 | 110-114 | 43-56 | MTR VR-1259, Floor of 200' AGL | All the same comment |
| 3 | 110-233 | 4-30 | MTR VR-1253, Floor of 200' AGL | |
| 4 | 110-233 | 19-24 | MTR VR-209, Floor of 200' AGL | |
| 5 | 110-233 | 40-83 | MTR VR-1253, Floor of 200' AGL | |
| 6 | 110-233 | 109-123 | MTR VR-1259, Floor of 200' AGL | |
| 7 | 110-233 | 137-146 | MTR VR-209, Floor of 200' AGL | |
| 8 | 232-233 (W) | 9-26 | MTR VR-1253, Floor of 200' AGL | |
| 9 | 232-233 (E) | 2-9 | MTR VR-1253, Floor of 200' AGL | |
| 10 | 39-113 | 47-56.8 | MTR VR-209, Floor of 200' AGL | |

| # | Corridor | Milepost | Concerns/Comments | Preferred Mitigation |
|---|---|---|---|---|
| 11 | 113-116 | 1-2 | MTR VR-209, Floor of 200' AGL | |
| 12 | 113-114 | 1-20 | MTR VR-209, Floor of 200' AGL | |
| 13 | 114-241 | 22-27 | MTR VR-209, Floor of 200' AGL | |
| 14 | 110-114 | 76-81 | MTR VR-209, Floor of 200' AGL | |
| 15 | 115-208 | 43-47 | MTR VR-267, Floor of 300' AGL | |