

Public Hearing on
Energy Policy Act—Section 368
Energy Corridors in the West:
Draft Programmatic Environmental Impact Statement

Speakers who asked that their name and address or just their address be withheld from the public record have that information replaced by xxxxx's.

Portland, Oregon, January 8, 2008, 2:00 p.m.-5:00 p.m.

Darby Collins: Good afternoon, everyone, and we'll get started. We're going to be webcasting, so we're going to ask and give you some direction through this, but we'll get going right now.

Thank you for joining us for a public hearing on the Draft Programmatic Environmental Impact Statement on Designating Energy Corridors on Federal Lands in the West. My name is Darby Collins. I'm with the Department of Energy, and I'll serve as today's hearing officer.

Before we begin the formal hearing, Kim Titus, who is acting state director for Oregon and Washington for the Bureau of Land Management, will give us a few comments, and then she'll turn it back over to me; and I'll walk you through some of the directions and how we're going to work through this, give a brief presentation on the work leading up to this public meeting, and then we'll take comments.

But first, we want to make sure, if you're interested in commenting, that you need to sign up with the table out front. I'll do a little bit of housekeeping at the very beginning. And if you want to speak, we need you to sign up, and you can do that right now—we've got folks—or at any time during this meeting, and there are handout materials, which I think most of you guys are seeing there on the back wall there, and we're just housekeeping. Restrooms are around the corner, right at the backside there, and if, for any reason, there is any kind of a fire drill or anything, we just ask that everyone take their personal belongings with them.

So before I turn it over to Kim, who is standing up in the back, I'd like to briefly introduce the team that has worked on this. This is an interagency project, and it's part of—and I'll walk through more of that, but we have folks here from the Bureau of Land Management, but the project manager for this 368 project is Ron Montagna. So if you want to stand up right back there, Ron is here from Washington, D.C. And deputy for the Forest Service is the Deputy Glen Parker working on the project; and John Krummel, over to my left, who is with Argonne National Laboratories, done a lot of technical work on that.

We also have several folks—and I'm not going to take the time and energy to introduce everyone individually—but we've got Bureau of Land Management folks, you guys want to raise your hand if you're from the bureau; and Forest Service folks from several of the national forests—Mount Hood—and all here, so the folks will be around to answer questions after the meeting, after we take public comments.

So I'd like to turn it over to Kim to do just some brief opening comments, and I'll come back up.

Kim Titus: Thank you, Darby. Good afternoon, and thank you for coming to give your comments on the Draft Programmatic Environmental Impact Statement for the Designation of Energy Transport Corridors on Federal Lands in the West.

I am Kim Titus, and I am the acting state director for Oregon and Washington BLM, and our office is here in Portland, Oregon.

In a few moments, you'll hear a brief presentation about the document, which was completed or is in process to be completed by the Departments of Interior, Agriculture, and Energy to meet the requirements of the Energy Policy Act of 2005.

Currently, applications for rights-of-way to cross federal lands are handled on a case-by-case basis without much coordination among the various federal agencies, which lands these projects cross. In 2005, Congress directed the federal agencies to address this situation by creating Energy Transport Corridors and also performing the necessary reviews of environmental impacts on this designation.

A Programmatic Environmental Impact Statement developed under the National Environmental Policy Act, or NEPA, represents this environmental review. It's important to note that another round of site-specific NEPA will be done once a project is proposed within the designated corridor. The Department of Energy, the Bureau of Land Management, and the U.S. Forest Service developed the corridor locations proposed in the Draft Environmental Impact analysis, using a three-step process, which is detailed in the document. It's in a handout at the back table and will be outlined in the presentation that will follow.

In essence, today's hearings represent step four in the process. Public comments will help the agencies further define the locations of the corridors so that the important goals of the project will be met.

Our goals are twofold—one, to improve the energy delivery in the West and, secondly, to uphold our responsibility to protect the resources on federal lands. From the beginning, the agencies have been committed to this strategy, and your comments will help in our efforts to ensure that this is carried through to the end of the project.

Representatives from the Department of Energy, the Bureau of Land Management, and the U.S. Forest Service are here to receive your comments, and on behalf of all three agencies, thank you again for your interest and participation.

Darby?

Darby Collins:

As Kim mentioned today, we are here to receive your oral comments on the draft EIS, Programmatic EIS. You can also submit comments via the project website, by fax, or by mail. This hearing is being webcast and transcribed, so speakers are asked—we'll ask you to come up here and speak into the microphone, and if you can, please speak clearly and distinctly. And if you are having trouble hearing anyone in the room, please signal me, and I'll advise the speaker accordingly.

After everyone who has wishes—who wishes to comment has spoken, I will close the hearing. And, so far, we have about, I think, about six people who have signed up, so far, and we'll take them in order.

And, John, do you want to start? John is going to work the slide show, so I get to talk, and he gets to hit the button.

So this hearing is to take comments, as we've all mentioned, on this Draft Programmatic Environmental Impact Statement that was prepared in response to direction given by

Congress to five federal agencies—Energy, Agriculture, Interior, Commerce, and Defense. So it's an interagency project.

Under the Energy Policy Act, Section 368 directs those secretaries to designate corridors for oil, gas, hydrogen, pipe, and electric transmission lines on federal land in the 11 Western states. It also directs the agencies to perform necessary environmental reviews such as in the Programmatic EIS—that's the subject of this hearing—and to incorporate these designations into land use, land management, or equivalent plans. A separate and distinct public process is expected to begin later this year to identify corridors in the other 39 states.

Okay, Slide 4. The statute requires that when the secretaries designate these corridors, they must specify the corridor centerline with incompatible uses. Congress also directed the secretaries to take into account the need for electric transmission facilities to improve reliability, relieve congestion, and enhance the capacity of the national grid to deliver electricity.

Slide 5. The draft PEIS proposes designating more than 6,000 miles of corridors,—62 percent would incorporate existing locally designated corridors and/or rights-of-way; 86 percent would be on BLM land; and 11 percent are on Forest Service land. The draft PEIS identifies 166 proposed corridor segments in all 11 Western states. If all are included in the follow-on decisions, this would involve amending 165 land use or equivalent plans.

Slide 6. Previously designated corridors are outlined in yellow on the project map. Some of these are proposed for upgrade only. In the case of existing previously designated utility corridors, amendments to land use plans designating 368 corridors would subject these corridors to the interagency coordination process described in the PEIS, and they would be assigned Section 368 criteria—for example, centerline with incompatible purposes.

Using these alone would not meet the requirements of Section 368, so we have identified an additional 2,300 miles of proposed corridors. Proposed corridors also vary in width. We've used a 3,500-foot starting point to provide flexibility for siting multiple rights-of-way.

And energy corridor is defined as a parcel of land identified through a land use planning process as a preferred location for existing or future utility rights-of-way; and that it's suitable to accommodate one or more rights-of-way, which are similar, identical, or compatible. Corridor designations assist in minimizing adverse impact and the proliferation of separate rights-of-way.

A right-of-way is a specific land use authorization. It's not a change in ownership. The authorization is granted to allow construction and operation of a specific project that's often linear in character, such as a utility line or right-of-way—or a roadway. Right-of-way permits include requirements for compatible land uses and are not granted until a project applicant has complied with all the relevant requirements including appropriate environmental review.

In November 2007, we published the draft PEIS. Comments to this draft are due February 14th. We will analyze and respond to all comments and complete the tasks necessary to prepare a final Programmatic EIS. We expect to have this ready sometime in mid-2008. The land management agencies will then be able to find records of decision to designate corridors through amendments for land use plans no sooner than 30 days after the final PEIS is issued.

The draft PEIS analyzed two alternatives—taking No Action and a Proposed Action. Choosing to adopt the No Action alternative route would result in continuing ad hoc, uncoordinated development—and continuing ad hoc uncoordinated development as is currently done. The proposed draft is the result of a three-step corridor siting process described in detail in Chapter 2 of the draft PEIS. The first step was to coordinate comments provided by the public during scoping and after the draft map was released in 2006.

Then the agencies work closely with local federal land managers to accommodate local land use priorities, incorporate local knowledge of areas and to avoid areas known to be incompatible with energy corridors. A handout summarizing this process for determining where the proposed corridors will be located is on the information table behind us, and examples of specific corridors are also available on the project website.

We believe that the analysis of the alternative NEPA requirement—NEPA is the National Environmental Protection Act—NEPA's requirements are a hard look, because the proposed action does not involve any site-specific, ground-disturbing activities. Site-specific NEPA review will be required to support all proposed projects in a 368-designated corridor.

And today we don't know when and where any projects will be proposed by applicants seeking to site pipe and/or transmission lines. As a result of this uncertainty, the environmental effects described in Chapter 3 of the draft PEIS are necessarily more general than a site-specific analysis for a known project would be.

Comments will be most useful to us if they are specific, including suggested changes or methodologies, and provide a rationale for suggestions and refer to the specific section or page number in the draft PEIS.

Finally, we encourage you to submit comments via the project website. Hopefully, this will be easy for you. It will speed up our ability to get comments into the database for analysis and up on the website for public review, and also it doesn't require a stamp or an envelope. Hopefully, it will be easy for you.

So in today's hearing process, I will call the speakers in order in which you registered, and if you'll please step up to the microphone and clearly state your name and organization, if you do represent one, before making your comment. I will watch time right now. I think we've got enough time so folks can—we usually put a time limit on this, but we're not going to do that today because we have six, and we've got time to do that. But if we get a lot more folks coming in, then we'll have to limit the amount so, right now, we'll just take them as they go.

While the agency representatives won't be answering questions during the hearing, we'll stay afterwards and to discuss the draft PEIS with anyone who is interested in doing so. And also, if needed, we'll take a 15-minute break through ours.

So are there any questions about the process? I'll name—I'll start with a couple of folks. The first person who signed up to speak is Susan Hansen, and following Susan will be Dave Willis, and then I'll step in between and call the next up. So—Susan?

Susan Hansen:

My name is Susan Hansen. I'm from Owalla, Oregon. As an organic farmer, forester, and wildlife conservationist for 17 years on lands in the Cascade foothills, I thought my life's task was simple—I would work to uphold Oregon's strong land use goals by

growing food, trees, and protecting a diverse population of wildlife along a restored creek.

However, over the last six months, I've been filled with increasing outrage as the absurd and horrific energy policies of the Bush-Cheney 2005 energy bill have begun to impact my life and my state. Oregon has now been overrun by pushy, greedy, and deceitful energy speculators hiding behind the federal government. We have seen no energy needs analysis.

We already have a long list of abuses including conflict of interest and potential environmental impacts in sensitive areas where mitigation would be impossible. For instance, the proposed Palomar gas line project would breach and do irreparable damage to at least 62 rivers and streams across the Mount Hood National Forest, the Willamette Valley, and the coast range.

The environmental consulting group hired by Palomar has in print allowed it need not consider the scores of seasonal waterways it plans to destroy, yet many of these sensitive, seasonal waterways support the lifecycles of threatened species like the Northern Red-Legged frog. Mount Hood old growth fir and spotted owl habitat is threatened by Palomar as well as Marbled Murrelet habitat on our coast.

The haste and the wholesale disregard for Oregon's environmental concerns and the disruption caused by multinational energy speculators is causing growing alarm and resistance across Oregon. This alarm and resistance would be much larger if the agencies represented here today did an honest and diligent job of publicizing meetings like the ones here today and the proposals associated with them.

Unfortunately, I have come to agree with Oregon's Senator Ryden that the agencies represented here today are filled with corruption. The Department of Interior has recently lost its leader in a flurry of controversy, and it is apparent that multinational fossil fuel corporations are attempting to hijack America's energy future. Our government agencies are energy helping—the energy speculators to destroy our environment and our important wilderness lands and resources across our state.

I have one thing to thank these agencies for in this policy—many of your policies are so threatening and ugly that they have helped isolated citizens like me wake up to the federal abuses in America today and to speak out against them. I look forward to a time when federal agencies work to end our dependence upon foreign fossil fuels and to protect our fragile environment and our public wilderness lands rather than work to destroy them. Thank you.

Dave Willis:

My name is Dave Willis. I live in southwest Oregon. I officially represent the Soda Mountain Wilderness Council, though I speak for a lot of other people as well. You can tell that from the last comment, thank you.

We commented on the preliminary EIS, and I was privileged to testify about this process in a joint House subcommittee. I say "privileged" because the Democrats were allowed one witness, and at that panel before a joint House subcommittee, there was one Department of Energy official, four utility executives, and me. How's that for fair and balanced?

Well, first, Dick Cheney had secret energy meetings and then here we are. Cheney sneered at personal virtue having anything to do with energy conservation, and he knew what he was talking about because he planned for his anything-but-virtuous energy policy to roll right over anything virtuous by using eminent domain to condemn hundreds of

thousands of acres of private property rights if not more; by considering public lands habitat as a mere inconvenient obstacle to his energy corridor mega autobahn; and by his refusal to make any policy stanch of demand more than token, rendering the efficacy of personal conservation efforts merely as quaint, as he regards them, his own self-fulfilling prophecy.

The draft plan to cover over 6,000 miles of public land in 11 Western states with energy corridors at least 3,500 feet—that's two-thirds of a mile—wide, crammed full of pipelines, power lines, and infrastructure and to move it forward with only one public meeting in Oregon for which virtually no public notice has been given in the middle of snowstorms is surreally outrageous. How secure can our homeland be when our administration makes virtual covert plans to make war on our own country like this? The American West is the only place where there is a vare there.

George Bush admitted that we are energy addicts, but far from leading the way to detox, the map of this West-wide project shows his administration is sticking the patient full of mainlining IVs, pumping mega-gallons of energy drugs from corporate energy pushers with virtually no incentives for energy users to throttle back.

The planned solution, endless energy endlessly supplied all over creation—that means two-thirds of a mile-wide pipeline and power line corridors over more than 6,000 miles of public lands in the American West and the property rights of thousands of more miles and acres of private lands be damned.

This plan is the mega-nightmare from hell, and it's not leadership, it's capitulations of the profit-driven mantra that every energy demand can only be regarded as an energy need. That's not leadership, that's not public service, it's political prostitution, and it offends me more than I can put into words in this futile little rant. I'm sorry that you folks are caught as career cogs and pawns in such sad machinations, and I'm angry, in case you couldn't tell, that citizens like me must sacrifice our own time and energy to fight such infernal foolishness because, count on it, we will.

But since Dick Cheney and friends, even though they didn't want to and invited us only mutedly, have invited us all here, I'll try to help to make the best of a bad situation in at least one small area. It's the place where corridor number 4-247 crosses the Oregon-California border on the Siskiyou Crest. Scrap it. The Siskiyou Crest is an important biological corridor recognized in the Northwest Forest Plan and elsewhere. Part of the Siskiyou Crest is in the Cascade Siskiyou National Monument, which your first maps targeted in June 2006 before you pulled those maps.

Your new Oregon maps in the document, though not the California map, please note, shows you going around the monument. Now, part of the biological corridor of the monument was established to protect is already compromised by Interstate 5, and the last thing this Northwest regionally important Siskiyou Crest corridor needs is a two-thirds-of-a-mile-wide energy debauch further compromising its ecological functions.

Moving this ridiculous corridor outside of monument boundaries is a good thing, thank you. Whoever did that, you'll probably hear a "thank you," but it legalistically ignores the whole ecological point of the monument's purpose as well as subcommittee testimony and comments on the original document.

And politically, the Siskiyou Crest is a dead end for your corridor. The People's Republic of Ashland is on the north side of the crest, where your current corridor is proposed. But you know how long, how much controversy, has dogged the attempted expansion of just one little ski area on the Ashland side of the crest? Talk to your Forest Service principle,

Google it. How do you think all those wealthy, politically active people with time on their hands will feel about their backyard if not their front and side yards as well becoming part of Dick Cheney's program? The ski area folks probably won't like it, either.

South of the Siskiyou Crest in Siskiyou County, the Sagebrush Rebellion never died. They like their private property rights a lot, and they don't trust big government. Heading over Siskiyou Crest into California, the proposed corridor barely touches federal land. It's almost all private. And in the few virtually indistinguishable on the map places, a 3,500 corridor is on federal land. It clips the Horseshoe Wildlife area, the best of the last year winter range in the region prized by hunters and state and wildlife agencies alike. It annihilates the Little Grand Canyon of Jenny Creek and Jenny Creek Falls, which is a BLM area of critical environmental concern and a place where an already-existing much smaller power line needs to come out.

Saying you're going to put a 3,500-foot wide corridor someplace because there's already a 100 of a 200-foot-wide right-of-way is like asking a python to swallow a brontosaurus. And then after Jenny Creek Falls, it heads for a substation on a Klamath River dam that could very well be removed when a judge tells PacifiCorp that salmon survival has priority over fish-killing dams. Do us all a favor—stay away from the Siskiyou Crest.

Now, George W. Bush campaigned that he was a uniter not a divider. By putting the Siskiyou Crest on your map, you may help his campaign promise come true by giving us a project that everyone can hate.

[applause]

Darby Collins: The next comment will be Adam Bless, and following Adam will be Olivia Schmidt.

Adam Bless: [inaudible]

Darby Collins: Okay, that's fine. Olivia Schmidt?

Olivia Schmidt: My name is Olivia Schmidt. I live in xxxxx, Oregon, and I work with Columbia River Clean Energy Coalition. Primarily what comes to mind when I look at the PDEIS and listen to the presentations being made, I have concerns about land use. I'm hearing the phrase "uncoordinated effort" in reference to the various energy projects that are proposed as if separate projects should not individually appeal for land use amendments.

The issue of land use amendment is a ripe one, right now, in Oregon, where we're dealing with, as Susan Hansen mentioned earlier, speculators for LNG coming in and re-zoning estuaries, protected habitat on the Columbia River, the Coos Bay area—everything—these processes should be done individually because they give the individual project—they take into account the individual project being proposed.

So if this corridor—if the intention of this corridor is to make a blanket amendment on land use for these areas, then I'm wondering how it will impact the application process for these individual projects. Will they have to—I hear you saying they will go through the Environmental Impact Statement process, and they'll comply with NEPA. But if the idea behind this is to create a land use amendment that is universal, then I'm curious as to how that's going to impact those specific land use changes.

I think—the other issue, as I look at the draft Programmatic Environmental Impact Statement, in the first section of the document it claims that this project will fall as No Effect under the Endangered Species Act, Section 7. That concerns me because the map

I'm looking at in Oregon alone goes over forested areas, mountains, areas where there are plenty of endangered species struggling right now to deal with poor mitigation in the past by energy speculators as well as poor land use decisions made by organizations like the BLM.

So I'm curious what that—as well as the land use issue and for future applications, I'm curious how designating this as a No Effect zone will impact that part of that process. I think that this project is terrible. I would like to see our government putting energy toward creating areas where we can create sustainable, renewable energy as opposed to continuing the type of infrastructure that we've seen over the last 150 years; that is, making a really terribly scarred image of our beautiful state. So thank you.

[applause]

Darby Collins: Chris Len and then following Chris would be Amy Atwood.

Chris Len: Good afternoon, everyone. My name is Chris Len. I'm the legal director of the Klamath Siskiyou Wildlands Center in Ashland, Oregon.

Darby Collins: [inaudible]

Chris Len: I thought I rather was.

Darby Collins: [inaudible]

Chris Len: Great, okay, I'll start all over again. My name is Chris Len. I'm the legal director for the Klamath—I thought I was—environmental group in Ashland, Oregon, and our job is to protect the Rogue and Klamath watersheds and the wildlands there around.

I drove five hours to get here today through snow and rain, over mountain passes, and I rather think that if the Department of Energy and the other actions agencies were interested in providing opportunity for sufficient public comment that I wouldn't have had to do that and, in addition, there would be a lot more people, a lot more of my friends and neighbors would be here today.

NEPA is a simple act, and it really only has two important goals. One, to inform the public so that they can make sufficient and understood—that wasn't well said—that they can make comments based on information that they can understand and process. And the other goal is to make sure the decision-makers have all the information they need to make sound decisions, and it seems to me that the West-wide Energy Corridor EIS, or Programmatic EIS, accomplishes neither of those goals.

The public is, frankly, inadequately informed; having only one of these—or one day—two events in the same place in a state as large as Oregon is really insufficient. Apart from me, what about the people who had to come from Pendleton? Anyone from Pendleton here today? There's no hands.

It's just not reasonable that you should expect everyone in the state of Oregon to drive here today. And, frankly, I was expecting a little bit more of the presentation to inform us all of what exactly it is that we're commenting on. It seems like it's the federal government's job to come and tell us what you're proposing and not just relying on us to read this gigantic document. The five-minute presentation was nice, but really insufficient.

Passing beyond that, the maps that the action agencies have produced are an exercise in connect-the-dots. You have small lines drawn. You have the small line coming down toward Ashland and then disappears for a couple of hundred miles. Where does it go? Does it go through my backyard or my neighbor's? Does it go around Ashland and does it go through Talent? Where does it go over the Siskiyou Crest?

[audio break] out an environmental impact statement that leaves so much to the public's imagination completely punts on the point of having an environmental impact statement.

So we have a map with many corridors on it across where the 12 Western states, and we don't know where they connect. There is no way I can reasonably comment on that.

What are the cumulative impacts of this proposal? What is the impact of this proposal along with other proposed or semi- or fully-secret pipelines or power lines that are going to be coming through? I don't know.

What is the impact in addition to the Western Oregon plan revision? It seems like you all will be cutting down a lot more trees. What's the impact? I don't know.

In addition, the process is completely insufficient to inform, as it should, the decision-maker. There's only two alternatives in the plan and, to my understanding, one of them, the action agencies think is illegal. If you have a federal act that says you have to make energy corridors and your only choices are don't make them or make this specific one, then those aren't alternatives. That's not what NEPA is for.

If you are going to be considering, as decision-makers, these alternatives, and there's only one, that completely punts on the goals of NEPA.

Also, as was mentioned earlier, it's rather bizarre to think that just because all you're doing is drawing lines on the map that this is not going to have any real-world application that will require consultation in the Endangered Species Act, and I think it's quite notable that the National Marine Fisheries Service thinks so as well. How is it that NMFS, who is in charge of the anadromous fish and their designations under the Endangered Species Act, thinks that you all should consult, and you don't?

And how is it reasonable to think that once you've drawn all these lines on the map, and the only space in the thousand-mile-long corridor goes through my backyard, that the specific EIS isn't going to put it through my backyard? You're committing resources, you are irretrievably committing resources by this process, and the irretrievable commitment of resources is exactly what full and thorough environmental impact statements should look at before making any decisions.

Now, I understand that this is just the beginning of the process, and the Programmatic Environmental Impact Statement that we have right now is not final and, frankly, it needs a lot more work, and I hope that you all will do that before you put out your final statement.

What, if any, new pipelines and power lines are actually needed? There needs to be an alternative that considers [inaudible]. There should probably be an alternative that considers more. You just having one doesn't let us know what we, as a country, require in terms of our power needs. What specific federal lands are going to be required? You've drawn the lines, but that's really not enough to know what is actually going to be the impact of the plan. Which ones should be avoided altogether because of their impact on the environment or their impact on recreational or cultural resources? What's going to

be the impact if the line goes through a place where people like to fly fish or they like to hike or they like to ride off-road vehicles? Maybe you should put it somewhere else.

By only having one proposal, we don't know if where you've decided to put them is the best place to put them.

What are the best management practices that are necessary to limit damages to natural and recreational resources? You propose to put the line there. How are you going to build it? You need to analyze that in the programmatic statement so that we know what impacts to expect. What are the realistic threats to federal, state, and private lands? You have look at federal lands, but in an Environmental Impact Statement, where all the effects of a proposal are supposed to be considered, how can you not consider whose land you are going to buy or condemn? How can you not consider the effect on state land and to the extent that those lands will be available? What are the realistic threats to those lands? What's going to happen when these pipelines actually come through? The size of the corridor seems vastly larger than might actually be used, but maybe not.

Give strong consideration how the project, if approved, will give sufficient access to renewable energy resources. Now, we are considering this whole project here so that we can continue burning coal and oil and, oddly, in a sort of Disneyland monorail kind of way, hydrogen. What about wind power? Is this going to connect to wind power facilities or solar power facilities? Are we developing this entire thing based on our understandings of our energy needs as of 10 years ago? Or 10 years from now—it seems more reasonable.

And, finally, and most importantly, perhaps, we need to develop sufficient and informative alternatives that we can analyze even at this programmatic stage. Why doesn't the project merely proceed along existing federal rights-of-way? I mean, if I were in charge of this, first of all, I'd probably not do it but, second of all, wouldn't you put it right now I-5? It's already there, it's already developed, it's not going to kill any spotted owls. Why not put it there? The whole way? We could at least analyze that, couldn't we?

And the fragmentary drawn lines that are on these maps seem designed mostly to avoid public controversy. I noticed that they go through the wildlands of Nevada and Oregon where people tend not to live. Maybe we should proposal alternatives that instead avoid important environmental, recreational, and cultural area instead of just the ones that are most likely to avoid getting the action agencies into political hot water.

You just have a lot of work to do here. The action agencies haven't given us what we need, and it's incumbent upon you to do so. Thank you for your time.

[applause]

Amy Atwood:

Good afternoon. My name is Amy Atwood, and I'm a staff attorney with the Center for Biological Diversity. I think probably the action agencies know who the center is but for those of you who don't, we are a nonprofit environmental organization concerned with the conservation of species diversity. We are the ones who have submitted a petition to list the polar bear under the Endangered Species Act. We are very concerned about the impact of our energy needs on threatened and endangered species, those listed and not listed, especially in this era of mass extinction.

It's hard to see which Western constituency could possibly support this, but the answer, of course, is that the constituency that supports this doesn't live in the West. It lives on Wall Street and in D.C., and it is attempting, essentially, to carry out the Energy Policy

Act of 2005 policy, which is to sell off as much of our public lands as possible for energy development before public outcry rises to the degree that such policy choices will no longer be tolerated.

Until that times comes, however, thank goodness, organizations and environmentalists have laws such as the National Environmental Policy Act, and the Environmental—I'm sorry—the Endangered Species Act, and along those lines, I would like to make my comments very concise. The center, of course, will be submitting a detailed comment letter on the 14th, which outlines all of the relevant legal considerations and concerns.

But for purposes of this meeting, I have two points. It is incumbent upon the federal agencies and the Department of Energy to adequately and meaningfully analyze the environmental effects and impacts of creating a network like this. Unfortunately, like the Southwest energy corridor, which was designated by the Department of Energy on October 5th, the environmental analysis conducted so far doesn't suffice. The PEIS is not a meaningful analysis of environmental impacts. The agencies must consider an adequate range of reasonable alternatives to the proposed action including alternatives that include major components of conservation, energy efficiency, local energy production, renewable energy, and other similar policy choices.

In addition, the PEIS does not and must adequately consider the impacts to claim it. The 9th Circuit simply made that very clear in a recent decision brought by the Center for Biological Diversity. And under the Endangered Species Act, it is inadequate to defer the analysis of this project to listed species to the site-specific level. We are talking about two environmental analyses, and you cannot roll those two analyses into one. It is necessary and required under these laws that the agency do a meaningful analysis of the cumulative impacts of this project and the project level and, in the process, ensure, through consultation with the National Marine and Fisheries Service and the Fish and Wildlife Service that implementation of this alternative will not jeopardize the continued existence of a listed species or adversely modify their critical habitat.

The public lands provide habitat for hundreds of listed and not-yet-listed endangered and threatened species who will experience direct impacts. The energy consumption enabling that this project will facilitate will also have incontrovertible impacts to listed species around the world including the polar bear and other species who are watching their Arctic ice habitat rapidly melt away because this country cannot come to terms with our energy consumption or the energy crisis that is looming.

And so, with that, I'll defer the rest of my legal arguments to our comment letter. Thank you.

[applause]

Darby Collins: The next speaker will be Daniel—is it Serres? And following that will be Irene—I'm not sure I can pronounce your last name. It looks like Vlach? Okay.

Daniel Serres: Thank you for this opportunity to comment, but I'd like to echo everything that has been said. It's really great to see people here from southern Oregon. Thank you for coming all the way up. I grew up in Clackamas County in Oregon City, and I'm speaking on behalf of Columbia Riverkeeper here today and Friends of Living Oregon Waters—FLOW.

FLOW is interested more in the public lands impacts. Columbia Riverkeepers are obviously concerned with issues surrounding LNG terminal and pipeline development. You might as well call the corridor that's proposed over the Mount Hood National Forest and the Upper Clackamas, the "Palomar Corridor." There is a clear relationship between

the two projects. It was somewhat surprising to me to see the two projects so perfectly overlapping, and I wonder how Palomar managed to fit their route so perfectly to a process that apparently is just beginning. So I just put that question out there to see what, presumably, this process has some results or some impact on siting of these facilities in the future. That needs to be clarified.

If this process has any significance in terms of it then being easier to site something in the corridor, then you have to analyze the impacts of what could go in that corridor and, as an example, I would just point out that the Palomar pipeline in the corridor, then you have to analyze [audio break] successional reserves entirely within the corridor that you're proposing would have huge impacts on endangered species.

Two-thirds—and that's 120-foot wide right-of-way that's talked about. You're talking about a two-thirds wide mile area. It's unfathomable what that kind of landscape alteration would do to the Upper Clackamas, and that's heavily erosive. You probably can't get up there right now. I'm sure the roads are split out.

I grew up flyfishing on the Upper Clackamas. To imagine either the Palomar pipeline or any number of transmission lines cutting across that landscape is just—it boggles my mind that there is not substantive discussion of avoiding sensitive habitats altogether; following existing right-of-ways, and there's no discussion of what the results of this is going to be. If we're stamping a two-thirds-wide strip across these incredibly sensitive habitats in Oregon, that requires some thought exercise about what is going to happen there, and that doesn't really—it's not implied anywhere in the PEIS—PDEIS.

I want to echo what was said by all the people who have spoken in front of me about the alternatives being adequate. It's clearly violating NEPA. There's any number of ways to cross western Oregon. It might cause more of a wiggle line if they don't go through Ogroup. There's no discussion—no discussion of avoiding areas of streams that are incredibly sensitive and erosive like the Upper Clackamas, like Fish Creek, and one of the other things I want to point out is growing up in Clackamas County and working on these pipelines and seeing the impact of what's in between the federal lands. There is no discussion of that. I mean, the point you made about—from KS Wild—the point you made about going over and leaving a 200-mile gap right when it gets over Siskiyou Crest is a great one because right now there are people who are facing eminent domain, and those pieces that are in between your corridor, and that's an impact—a socioeconomic impact that has to be considered, and even envisioning the kind of wholesale alteration of Western Oregon we're talking about.

Not consulting is just, again, I just want to echo that it doesn't make any sense. The same as this has No Impact means that this process has no meaning. If you are making a decision here to facilitate energy construction in an area or suggest that this is a good area, presumably, the recommendation would have some impact on future projects, and if it doesn't, then we're all wasting our time. If it does, then you need to consult. So, logically, it doesn't make any sense.

Also, one thing I would point out is there's no real purpose, any justification, it's like this directive given from Congress. There needs to be discussion of the overall purpose of these projects and what they'll do.

And so basically I just want to close by saying if you want a taste of what it's going to look like, you can look at the Palomar pipeline proposal, which would irrevocably damage the watersheds of the Upper Clackamas and all across Western Oregon, and I think that we in Oregon have a sense of what this is going to look like, and it isn't pretty, and it does have impacts, and the PEIS just entirely violates NEPA. So, thank you.

[applause]

Irene Vlach:

Good afternoon, thank you for the opportunity to comment. My name is Irene Vlach. I am a member of the Sierra Club, however, these comments are my personal ones and do not represent the club.

I have been a member of the Sierra Club [inaudible] committee since 1989 and, as such, I have visited and documented the wilderness value of most of the some 80 wilderness study areas on the BLM management in Eastern Oregon.

As a member of the public, I could not review the many pages of the full DEIS and therefore my comments will be general, which they might as well be since we have to comment on a DEIS that is vague, both on what might or might not happen and on the possible impacts of the potential actions. The public is asked to be specific while the document is anything but.

My primary concern is impacts on WSAs. How can we assess the impacts given that the map showing the corridors are not overlaid with a map of the WSAs. Hence, it's nearly impossible to clearly identify those WSAs that will be impacted. Therefore, it's impossible to comment.

Linked to this concern is the issue of wildlife—pronghorn, sage grouse, both sensitive species among many others. How will the potential development impact wildlife and mitigate for these impacts? How about the spread of noxious weeds that's bound to happen with massive construction?

These corridors are for energy transmission. Where is this energy coming from? Where is it going? What are the many gaps on the map? What form of energy? I have no evidence that the proposed corridors are the result of an Oregon Energy Needs Assessment. Did we consider the options of energy conservation and of developing small efficient projects of renewable energy as opposed to mega projects that will be serviced by the proposed corridors?

Despite my accent, I am a U.S. citizen, and the public lands are my lands. They are not the property of the big energy companies, and their purpose is not to maximize their profits. Thank you.

[applause]

Darby Collins:

Dorothy Shoemaker.

Dorothy Shoemaker:

I'm from the Sierra Club, too. My name is Dorothy Shoemaker, and I am also not the official person from the Sierra Club, I don't know where they are, but they'll be here sometime today.

I understand that this is required by the Energy Policy Act of 2005, and I really don't think it should have been passed the way it was written, and I think we need to rethink putting hydrogen all across the West Coast and liquefied natural gas. I don't think either is a going way to get power for the West Coast. We've got a lot of hydropower, a lot of wind power. The states on the West Coast have passed laws saying we're going to use more renewable sources of energy, and it's just not the time to be putting hydrogen, which explodes, and liquefied natural gas, which is just kind of putrid, across—they've already deforested a lot of Colorado. There's five miles wide for the pipeline in

Colorado, I understand, and, you know, there are animals that live there, and people, like skiers, who appreciate the forests.

Anyway, I'm really worried about putting hydrogen and liquefied natural gas across and cutting down that much forest, and so I think it's a bad idea.

[applause]

Darby Collins: Is there anyone else who would like to make a statement? Okay. If there are no other speakers, then I'm going to now close the hearing and thank you very much for joining us today to provide oral comments on the draft PEIS that's proposing designated corridors on federal lands in the West. Comments on the draft PEIS are due February 14th and may be submitted online via the project website by mail or by fax. All comments received by February 14th will be considered in preparing the final PEIS, and comments submitted after the 14th of February will be considered to whatever degree possible.

As we mentioned earlier, there are folks here from the project that would be willing to discuss this further with you afterwards, and we'll be around to talk. Again, thank you very much for your attention, and, Ron?

Ron Montagna: [inaudible—off mike]

Darby Collins: Okay, we can do that. We can definitely—we'll stay here, but we'll—until we have folks come in and sign up, and we'll stay here and then take whoever comes in until 5, okay? So, again, thank you very much.

Darby Collins: Okay. It's 5 o'clock and we're going to officially close the hearing. We will reconvene at 6 o'clock. Thanks, guys.

Portland, Oregon, January 8, 2008, 6:00 p.m.-8:00 p.m.

Darby Collins: Okay, good evening, everybody, and we'll get started. Thank you for coming and for joining us for this public hearing on the Draft Programmatic Environmental Impact Statement on Designating Energy Corridors on Federal Lands in the West. My name's Darby Collins. I'm with the Department of Energy, and I'll serve as today's hearing officer. We have some folks here from the Forest Service—kind of wave your hands over there, Forest Service folks—and folks from BLM over here, and different folks, folks from the project, and John Krummel here is also on the project. And we have some of the key project managers that are coming in and will be available after the process, after we take public comments, they'll be available to talk to you and answer questions.

Before we begin the formal hearing, Kim Titus, who is the acting state director for BLM's Oregon and Washington offices, will make a brief opening statement, but if you haven't signed up, and you would like to sign up to speak, we're asking you that you go out and sign up on the table. We have a form. They'll hand those forms to me. We also have handout materials on the back wall there. And restrooms are around the corner on that side, and in case of a fire, the only thing we ask is that you guys just take everything with you, and we'll exit that way. So that's the housekeeping pieces to begin with.

So with that, Kim, I'll turn it over to you for opening comments.

Kim Titus: Good evening and thank you for coming to give your comments on the Draft Programmatic Environmental Impact Statement for the Designation of Energy Transport Corridors on Federal Lands in the West. I'm Kim Titus, and I'm the acting state director

for BLM in Oregon and Washington, and our office is right here in Portland across the Willamette. In a few moments, you'll hear a brief presentation about the document, which the Departments of Agriculture, Interior, and Energy are preparing to meet the requirements of the Energy Policy Act of 2005. Currently, applications for rights-of-way to cross Federal lands with pipelines or electric transmission infrastructure are considered on a case-by-case basis with less than optimal coordination between the various federal agencies whose lands are involved with those projects.

In 2005, Congress directed federal agencies to address this situation by designating an Energy Transport Corridor and also performing the necessary reviews of environment impacts of that designation. A Programmatic Environmental Impact Statement, or a PEIS, developed under the National Environmental Policy Act, or NEPA, represents that environmental review. It's important to note that additional NEPA analysis will be done once the projects are actually proposed in the designated corridor.

The Department of Energy, the Bureau of Land Management, and the U.S. Forest Service developed the corridor locations proposed in the Draft PEIS using a three-step process, as detailed in the document. It's in the handout on the information table and will also be described in the presentation this evening.

In essence, today's hearing represents step four in that process. Public comments will help agencies further define the locations of the corridors so that the important goals of the project are met. These goals are twofold. One, to improve energy delivery in the West; and secondly, to uphold our responsibility to protect the many resources on federal lands.

From the beginning, the agencies are committed to this strategy, and your comments will be valuable in helping us to ensure that it's carried through the planning process.

Representatives from the Department of Energy, the Bureau of Land Management, and the U.S. Forest Service are here to receive your comments, and on behalf of all three agencies, I thank you again for your interest and your participation.

Darby Collins:

Thank you, Kim. So, as Kim mentioned, we're here to take oral comments tonight on the Draft PEIS, and you can also submit comments in many other ways. You can submit them via the project website, and that information is posted back there and it will be on the presentation. You can submit them by fax or mail. Right now, we are also webcasting all the public meetings, so this one is being webcast, as are all the future ones, so you can dial in or other folks can dial into those webcasts. And also, after you listen to that, you can submit comments to the website.

Because we are doing this on a webcast, we're asking that if you come up to give a comment—and I'll call you forward—that you speak your name and any organization if you represent an organization. And speak it clearly and into the mike so that folks can hear and it can go out over the webcast.

Okay. So basically, as Kim mentioned, we're here to take comments on the Draft Programmatic EIS that was prepared in response to direction given by Congress to five federal agencies—Energy, Agriculture, Interior, Commerce, and Defense. Under the Energy Policy Act, Section 368, directs the secretaries to designate corridors for oil, gas, hydrogen, pipe, and electric transmission lines on federal lands in the 11 Western states, to also perform necessary environmental reviews such as the PEIS that we're going through that's the subject of this hearing, and to incorporate these designations into land use, land management, and equivalent plans. A separate and distinct public process is expected to begin later this year to identify corridors in the other 39 states.

The statute requires that when the secretaries designate these corridors, they must specify the corridor centerlines within compatible uses. Congress also directed the secretaries to take into account the need for electric transmission facilities to improve reliability, relieve congestion, and enhance the capacity of the national grid to deliver electricity. The Draft PEIS proposes designating more than 3—sorry—6,000 miles of corridor. Sixty-two percent of those would incorporate existing locally designated corridors and/or rights-of-way. Eighty-six percent would be on BLM land, and 11% is on Forest Service land.

The Draft PEIS identifies 166 proposed corridor segments in all 11 Western states. If all are included on the follow-on decisions, this would involve amending 165 land use or equivalent plans.

Previously designated corridors are outlined in yellow on the project map. Some of these are proposed for upgrade only. In the case of existing previously designated utility corridors, amendments to land use plans designating 368 corridors would subject these corridors to the interagency coordination process described in the PEIS, and they would be assigned Section 368 criteria—for example, centerline width and compatible purposes. Using these alone would not meet the requirements of Section 368, so we've identified an additional 2,300 miles of proposed corridors.

Proposed corridors also vary in width. We use a 3,500-foot starting point to provide flexibility for siting multiple rights-of-way. An energy corridor is defined as a parcel of land identified through a land-use planning process as a preferred location for existing and future utility rights-of-way, and that is suitable to accommodate one or more rights-of-way which are similar, identical, or compatible. Corridor designations assist in minimizing adverse impacts and the proliferation of separate rights-of-way.

A right-of-way is a specific land use authorization, not a change in ownership, granted to allow construction and operation of a specific project that's often linear in character, such as a utility line or right-of-way. Right-of-way permits include requirements for compatible land uses and are not granted until a project applicant has complied with all relevant requirements, including appropriate environmental review.

In November 2007, we published the Draft Programmatic EIS, and comments are due February 14. We will analyze and respond to comments and complete the tasks necessary to prepare a Final Programmatic Environmental Impact Statement. We expect to have this ready sometime in mid-2008. The land management agencies will be able to sign Records of Decisions to designate corridors through amendments to land use plans no sooner than 30 days after the Final PEIS is issued.

The Draft PEIS analyzed two alternatives. One, taking No Action, or the second was this Proposed Action. Choosing to adopt the No Action alternative would result in continuing ad hoc uncoordinated development, as is done now. The Proposed Action is the result of a three-step corridor siting process described in detail in Chapter 2 of the Draft PEIS. The first step was to incorporate comments provided by the public during scoping, and after the Draft Map was released in 2006. Then the agencies worked closely with local Federal land managers to accommodate local land use priorities, incorporate local knowledge of areas, and avoid areas known to be incompatible with energy corridors. A handout summarizing the process for determining where the proposed corridors would be located is on the information table, and examples of specific corridors are also available on the project website.

We believe that the analysis of these alternatives meets the National Environmental Protection Act's—NEPA's—requirement for taking a hard look. Because the proposed action does not involve any site-specific ground-disturbing activities, site-specific NEPA review will be required to support all proposed projects in a 368-designated corridor. And today we don't know where, when and where any projects will be proposed by applicants seeking to site pipe and/or transmission lines. As a result of this uncertainty, the environmental effects described in Chapter 3 of the Draft PEIS are necessarily more general than a site-specific analysis for a known project would be.

Comments will be most useful if they are specific, include suggested changes or methodologies, provide a rationale for your suggestions, and refer to the specific section or page number in the Draft PEIS.

Finally, we encourage you to submit your comments via the project website. It's easy for you, it speeds our ability to get comments into the database for analysis and up on the website for public review, and it doesn't require a stamp or an envelope.

So the process for taking comments today will be that I will call the speakers in order that you registered. Please step up to the microphone and clearly state your name and organization, and then make your comment. After, if all who wish, who choose to speak have had a chance to speak, we'll close the hearing and give you a reminder on the comment due date and how to submit them, and if you're preparing a, speaking from a prepared copy, it would be helpful if you leave it at the desk as you leave.

While the agency representatives won't be answering questions during the hearing, we'll stay afterwards to discuss the Draft with you, and then if we need to take a 15-minute meeting—break—midway through this, we'll be happy to do that. So are there any questions about the process? Okay.

So if we'll get going. So our first speaker is Armand Minthorn and will be followed by Borden Beck.

Armand Minthorn:

My name is Armand Minthorn, a member of the Confederated Tribes of Umatilla, a member of the Tribes' Board of Trustees, our governing body, and Chairman of the Tribes' Culture Committee. To begin, the tribes—the Confederated Tribes of Umatilla—do support energy development that does not adversely impact tribal treaty reserved rights or interests. The Confederated Tribes fully support compliance with environmental review statutes such as NEPA, the National Historic Preservation Act, Native American Graves Protection and Repatriation Act. The tribes have found that in the past, treaty rights are often only considered as an afterthought in most environmental analysis.

The Confederated Tribes appreciate that the Programmatic EIS considers impacts to cultural resources. However, it primarily equates treaty rights with cultural resources. Treaty rights and cultural resources are related but concern distinctly different areas of law. For example, places associated with exercise of treaty rights are likely cultural resources. However, the treaty rights themselves, and the agencies' responsibility to protect the resources associated with those rights, are not cultural resources.

The 1,100-page Programmatic EIS mentions treaty rights only in the most cursory terms. The Programmatic EIS refers to tribal resources almost exclusively as meaning cultural resources or traditional cultural properties. The Tribal Resources section of the Programmatic EIS does include traditional hunting, fishing, and gathering places, traditionally important plant and animal species and their habitats, but it only devotes three sentences on the significance of traditional fisheries.

The Programmatic EIS must be revised to address impacts to treaty rights. It should describe the obligation of the United States to protect tribal trust resources and how that obligation will be fulfilled. It should describe how impacts will be mitigated, and not simply conclude that they will be.

The Programmatic EIS says on page 237 that the Oregon treaties did not include traditional fishing and hunting rights. This is false. It is incorrect. Many Oregon treaties included traditional fishing and hunting rights. Unless they were extinguished by Congress, tribes retained those rights. Such tribes include the Confederated Tribes of Umatilla, Warm Springs, and Klamath.

Energy transmission corridors impact a wide variety of treaty-reserved resources. Transmission lines create travel corridors which can impact wildlife migration. When corridors are created or expanded, public trespass on rights-of-way increase. Corridors and the related roads are used by public for recreation, hunting, fishing, and hiking, and looting archeological sites.

The Programmatic EIS indicates that 39% of the proposed corridors do not occur adjacent to an existing transmission or transportation right-of-way, but does not indicate how many of these rights-of-way are developed. In 2003, the Columbia River Inter-Tribal Fish Commission, on behalf of the Confederated Tribes of the Umatilla and other treaty tribes, developed tribal energy vision, and this is available at the Columbia River Inter-Tribal Fish Commission webpage. It recommends that energy generation occur close to consumption, significantly reducing the transmission expense. This is a logical alternative to constructing lengthy corridors. The energy corridor environmental analysis should consider this approach more fully.

In addition, the Department of Energy, Bureau of Land Management, and the Forest Service—these are three federal agencies that have policies on how they relate to tribes. I would strongly urge that these three agencies use that policy to initiate consultation with tribes. Each of these federal agencies have a responsibility to protect my treaty resources. I expect no less, and I would expect that the tribes would be consulted, because it's an obligation through NEPA, it's an obligation through the National Historic Preservation Act, and certainly an obligation that the government bestowed when my ancestors signed the treaty in 1855. So there's a process that is expected, particularly with the Forest Service and the BLM. These proposed corridors are going to go through our ceded areas, and the tribes, when we signed the treaty in 1855, we ceded away 6.4 million acres. However, we still retain our treaty rights in that 6.4 million acres, and these corridors are going to go through our ceded area.

So initially, I would encourage and appreciate consultation from these agencies on these corridors that are being proposed, because we can help these three agencies protect what's important to us, and we certainly want to do that. We don't expect these agencies to make a decision for us. We want to make a decision with them. That's what consultation is, and that's what government-to-government is. And again, it can't be emphasized enough—these three federal agencies have in them policy that guides consultation. They need to refer to that and use it. Thank you.

Darby Collins:

Okay. Borden Beck.

Borden Beck:

Hi. I'm Borden Beck. I'm an American citizen. I'm a little unprepared to be number two up here, but what I've looked through with the corridor proposals and I think where they're going, some of the things that concern me is I wonder how thoroughly this process has looked at how these corridors will impact different types of resources on the land. And some of the things that come to my mind that I'm concerned about include the

roadless areas and forests and wildlands out in the desert that maybe are not protected as wilderness yet, or maybe have a designation as Wilderness Study Areas, or maybe they're just wildlands that have not been given some kind of formal designation but perhaps should be eligible for that. And I don't see much on the maps that indicate, you know, where such areas are and, or much writing about how they'll, how they've made the impact, and I think more effort needs to be put into that.

Similarly, the areas that the corridors go through that I'm more familiar with are out in the desert. I've looked at some of them, and I think that I've been seeing wildlife corridors and places where birds migrate through. The area between Park Mountain and Sheldon Antelope Refuge is a migratory route for antelope. Sage grouse live out there that are yet talked about a lot as a threatened species that perhaps to be someday put on the Endangered Species List, and maybe we ought to be careful about protecting areas where they live.

I look at, the corridors seem to go off near Soda Mountain, they go either through or alongside a couple of Wilderness Study Areas. One of the areas that, the corridor south of Park Mountain goes through, goes through an area that I'm familiar with as having all sorts of cultural resources for the tribes. It's one of the highest concentrations of petroglyph sites in the States, in the Northwest, that isn't under water from the dams anymore. And I just am curious as to whether the people that have marked these lines on the map are even aware of that, and I'm guessing, since they haven't—seems like consulted with the tribes a whole lot—that maybe they don't. And maybe they should consult with the tribes as to where there are cultural resources that they value that would be potentially impacted by these corridors. Given the fact that they seemingly haven't been very well consulted, it's kind of embarrassing.

The other thing that concerns me, especially about some of the corridors through the desert, is that they kind of seem to go nowhere. They go out into the desert and stop, and, or they're, well, they go up into the desert and stop. They don't seem to have some destination, and I assume that's because there's the expectation that something will be put out there that will be generating energy, whether it's wind power—which I'm all for—whether it's coal-fired power plants, we don't know. And until the cumulative impact of such development is also taken into play, I think it's premature to develop or designate these corridors that don't go to a defined and studied project. So I think you need to look at the cumulative impacts that this development would have on those wildlands as well as the development of that corridor would have. And to do just one is doing a disservice to this whole process.

I also, I mean, I've come and commented on the things with the BLM and stuff periodically, and usually there are options more than just No Action or the Proposed Action. Usually, I'm used to seeing some range of actions for people to comment on, and I think that it's a disservice to the public to offer us, you know, Do Nothing or Do What We Want. And maybe there should be looked at some in-between options that people could give you better feedback on as opposed to, you know, me just saying, "Well, I'd rather have you do nothing than do this, what I see as a [inaudible] prepared proposal."

And the other thing that concerns me is that it seems that there, in this process, and maybe nationwide as well, as we develop energy, that we're looking at how to develop more energy, and green and renewable energy is wonderful, and we want to push for that. But I don't see anything in this, this kind of process that focuses on how can we conserve energy as opposed to having to constantly develop more and more and more. So perhaps that's my five minutes, and I'll stop. Thank you.

Darby Collins:

Heidi Dahlin and Alex Brown.

Heidi Dahlin: My name is Heidi Dahlin. I am an Oregon resident. That's my claim to fame. Many of my comments will reflect the same opinion as Mr. Beck, so I guess there's two Oregonians that have concerns about these proposed corridors.

I specifically would like to raise questions about Corridor 7-24, the corridor that goes down below Hart Mountain Antelope Refuge and above the border. And I spent quite a bit of time in this area volunteering for the Oregon Natural Desert Association. I'm not representing them in any way, shape, or form, but one of the things we were looking at was potential Wilderness Study Areas. And these have not been identified by the BLM, and yet when we were down there inventorying the lands, we did, though, find significant wilderness character to these lands. It's a beautiful place to go to get away from society, and our state needs to go and recognize that we do have a need for these areas that are not crossed by, crossed by transmission lines, that are places to get away.

And as I think about this area that this proposed corridor is going through, I have some similar concerns. What about the sage grouse leks? Has there been a look at where the locations of these specific leks are in relation to the proposed corridor? We have one of the last and best tracts of pristine sagebrush habitat area, and species such as the sage grouse do need an area to be able to go and reside.

And when you think about taking a corridor 3,500 feet wide, you have to go and say specifically, "What are the things that it's going to impact?" That area does go and cross between Sheldon National Antelope Refuge and Hart Mountain, and what impact will this have on the wildlife that goes and migrates between these two areas?

I also am concerned about Native American cultural petroglyphs that are there, that these areas be preserved and undisturbed. I also raise concerns about why this line is necessary. On the map it goes to what looks like the middle of nowhere. I've been there, and it really is the middle of nowhere, so that alerts me to, is there proposed or potential energy development in that area, and if so, what impact will that have on this wild area?

These are all questions that I have looking at this map that I feel that have not been addressed, and I think that as a member of the public, in addition to looking at what our energy needs are, we also have to say, "We don't want that to be at the expense of an area that has importance in other means." Thank you.

Darby Collins: Alex Brown.

Alex Brown: Hi. My name is Alex Brown. I am the Director of Bark, a forest conservation group dedicated to protecting Mount Hood National Forest, our amazing back yard. I have to say, first of all, does anyone else have the feeling like this is already a done deal? It's, it's disappointing to see so few people in the audience with a project that's going to have such an enormous impact on Oregonians, and before I get to my specific suggested changes, I would just like to say that I think that one of my primary concerns is that I learned of this meeting tonight from one of Bark's members who read it in the Mountain Times newspaper. I don't know how many Oregonians are here in the crowd tonight and who are familiar with the Mountain Times newspaper, but it is a newspaper that covers Government Camp and the communities surrounding that area. Needless to say, it is one of the smaller newspapers that is available in this region of the state. I am, I'm concerned that not enough people are hearing about this and being provided the information needed to give their input the Department of Energy and this process.

My specific suggested change for this process is for the, for the PEIS, is to accept the No Action alternative. On Mount Hood National Forest, which is my primary concern and

Bark's primary concern, an energy corridor clearly is going to relate to a 40-mile clearcut across Mount Hood National Forest in the form of a pipeline for LNG to central Oregon. And while this is a Programmatic EIS and site-specific impacts may not already be analyzed, the bottom line is a 40-mile clearcut across Mount Hood is the last thing in the world that we need in our back yard. We already have at least 4,000 miles of linear clearcuts on Mount Hood National Forest in the form of roads. In addition to that, we have 2,200 clearcuts in the form of a checkerboard that many of you have seen from the air when flying into the Portland International Airport.

My comments are brief. I feel like the No Action alternative is the only one that's acceptable at this time until there is a more creative look at the specifics of what this project could result in and impact, and how it could impact Oregonians. And that's all I have. Thank you.

Darby Collins: Harry Anderton and Ivan Maluski.

Unidentified Speaker: [inaudible]

Darby Collins: Okay.

Harry Anderton: Okay. I'm Harry Anderton, and I'm a member of the Sierra Club. As you can probably tell from my accent, I'm an import. I come from England, and I have a fairly significant experience in seeing what over-industrialization and over-dependence on technology and energy can do to a nation. And that's one reason I left. I came here to a country that had some free space when I came here, allowed people to say what they thought, and you know, was considered to be a free country.

I'm beginning to get the impression, as the gentleman who was talking about the Mount Hood development said, that some of these things are a done deal. We are not being consulted. These are our lands. I am, by the way, a citizen now. I'm no longer English. I am American. These are our lands, these are my lands. And it really would be nice to be consulted on things like people driving a two-thirds-wide corridor through what is right now a really nice wild and scenic area. Or, as Heidi mentioned, putting a corridor to nowhere. I mean, what's the purpose of doing that? Clearly, there's an ulterior motive, another purpose on this. And I would definitely say that this idea of putting in energy corridors when you haven't decided where the energy's coming from, and you've not decided where the energy's going to, has got to be a bad idea.

You know, in my, in my day job, I'm a project manager with a fairly well-known printer company that's located in Wilsonville, Oregon. I can't say the name, but that's enough for you to know who it is. And the first thing you decide when you're doing a project, is you decide what it is you're trying to do. You're trying to get something from A to B. And you decide what it is that's at A, and why you want it at B. And you lay that out clearly. And not only that, you decide how much it's going to cost.

Now, when I look at these corridors, I see there's a pile of corridors somewhere, but no. Maybe you can say some are going through, you know, these, the liquid natural gas, which we may need, we may not need, nobody's really told me for sure about that. But some of them don't seem to be going anywhere. What I'd really like to understand is, how much is this going to cost, and could we use that money a little more sensibly to start reducing our energy dependence? You know, bringing in big tankers of liquid natural gas, probably from the Middle East, isn't going to help the U.S. long haul. It's just going to make us more dependent. We really need to start thinking about how we're going to use our money wisely, and not just using it for ill-defined projects or driving bulldozers over the wilderness.

Anyway, that's all I have to say. Thank you.

Darby Collins:

Ivan Maluski.

Ivan Maluski:

Good evening. My name is Ivan Maluski. I am a conservation coordinator for the Oregon chapter of the Sierra Club, and I'll be delivering some comments on behalf of the Sierra Club this evening. And so I'll just give you the general rundown. This is an issue we've been following for some time. The Oregon chapter of the Sierra Club has serious concerns regarding the Draft Environmental Impact Statement before us tonight. With nearly 24,000 members in Oregon, with members all across the state, the Sierra Club is one of the most geographically well represented groups in the state, and one of the largest environmental groups in Oregon.

Previously the Sierra Club has submitted comments during the scoping phase for this EIS back in November of 2005, as well as during the comment period on draft maps, which was in July 2006. I'll recall that shortly after that comment period, the maps were pulled off the website for some time. And until this recent round came up, the maps, you know, there were no maps for us to even look at for many months.

The Sierra Club's nearly 800,000 members nationwide, including our members in Oregon, have a strong interest in the management of America's public lands, as well as the development of a sustainable energy future. We intend to participate in public meetings, not just this one, across the, for this planning process, and we will be submitting formal written comments by the February 14 deadline. The comments and questions raised today, however, are Oregon-specific and do not cover additional concerns the Sierra Club has with this process across the 10 other Western states involved, so I need to note that.

We have some very specific concerns regarding the designation of new and expanded energy corridors in Oregon, but several of these concerns remain unaddressed by the current Draft Environmental Impact Statement. So I'll go into those. There's three primary areas.

First of all, both the maps and the EIS continue to be inadequate by not fully addressing the range of specific environmental impacts associated with new or expanding energy corridors. The new maps that I mentioned, they are better than the previous maps that we had the comments on in the Draft, and we can submit some written comments here that identify a list of roughly 15 or 20 land designations we believe should be identified on all maps. And while some of them are identified on the new map, not all of them have been, and the DEIS failed to provide any meaningful specificity regarding the impacts of these specific areas, wildlife habitats, and management allocations.

The DEIS additionally fails to provide detailed information regarding the types of energy that will be transported across these corridors, and the types of environmental impacts anticipated from both the construction and maintenance of these corridors.

And further, just in my review of the EIS, there is no information provided, nowhere to be found, of the types of energy development that will be associated with these corridors, and we certainly know that the Mount Hood pipeline that was mentioned earlier as relating to the Palomar Liquefied Natural Gas Pipeline, that's got its own Environmental Impact Statement underway. Many of these other corridors, we have no idea what exactly is going on, and the only information that is publicly available in this EIS appears to mention that some are multi-modal, some are electric only, but I think there needs to be a greater level of detail in terms of what these specific corridors are for.

So in addition to these broad concerns, I want to read into the record—if you'll bear with me, folks—the following list of very specific concerns about the proposed corridors in Oregon. And I found appendix, Appendices F and A to be most instructive in terms of information on where these corridors are and what general impacts there might be. But certainly they are inadequate. So my questions are—

How will Corridor 7-24, 16-24, 24-228, 7-11, and 11-228 affect sage grouse and pronghorn antelope, including their habitat, reproduction, and movement across the landscape? Specifically, Corridor 7-24 runs across public land between the Hart Mountain National Antelope Refuge and the Sheldon National Wildlife Refuge, critical areas for both antelope and sage grouse, yet these important wildlife habitat issues are not mentioned in the EIS.

Second, how specifically will Corridor 24-228 affect the Alvord Desert and Bowden Hills Wilderness Study Areas and the viewshed of the Steens Mountain Wilderness? We only know that the corridors will be shrunken down a little bit in order to accommodate these minimized impacts, but we don't have a more specific understanding of what the impacts are.

How specifically will Corridors 230-248 affect the Soosap Meadows Area of Critical Environmental Concern on Cascades District BLM lands? Again, we understand that the corridors will be shrunken down a little bit to minimize impacts, but we don't have a clear understanding of what those impacts will be.

How specifically will Corridor 11-228 affect the Owyhee below the dam area of Critical Environmental Concern?

How will Corridors 7-11 and 7-24 affect the Cascade-Siskiyou National Monument? This does not appear to be discussed in this EIS, and the national monument's location is not identified in the maps provided.

I will note that the maps that I found in the EIS were fairly vague. There is a map here tonight titled, "Steps in the West Wide Energy Corridor Designation" which provides a little more detail with some site-specific information. I'd like to see these types of maps reproduced on a more broad scale so that we can identify very specific impacts or the potential for specific impacts.

Additionally, how will, specifically will Corridor 230-248 affect the threatened northern spotted owl and the Wild and Scenic rivers in the Mount Hood National Forest? This corridor clearly bisects the national forest, yet no specific environmental impacts were discussed. Additionally, the EIS mentioned that two inventoried roadless areas in Oregon will be impacted by the proposed energy corridors, but no further information was provided. Which inventoried roadless areas are these, and which corridors will impact them and how?

So we, you know, I mentioned a series of specific corridors, but for the ones I didn't mention, we would like to see a more specific discussion of impacts associated with them.

Finally, in Appendix A of the DEIS, it indicates that essentially every proposed energy corridor in Oregon will require amendments to existing forest plans and resource management plans. And so we'd like to know for each of these, what are the specific amendments you're anticipating will be necessary, and also we ask you to please disclose if there are anticipated energy developments that may also present or necessitate plan

amendments and for those to be identified at this time as well. It's a critical part of the cumulative impact assessment that should be conducted, even in a programmatic document such as this.

So I would sort of conclude there on the issue of cumulative impacts. Again, this document appears to essentially gloss over the notion that there may be new energy developments associated with some of these corridors, and it's simply that potential for new energy developments and the expansion of existing developments should be noted on the maps, and it should be discussed in this document as part of the cumulative impacts assessment. So I'll leave it at that. We'll be submitting these for the record and hope to be able to work with the agencies on these types of issues. But we would ask you to withdraw this proposal at this time. It seems rushed by the Energy Policy Act of 2005, and it's not necessary to push through. Thanks.

[applause]

Darby Collins:

Michele McKinzie.

Michele McKinzie:

Hello and thank you. I'm representing myself today as an Oregon citizen. I'm also a member of Bark, and I have not had an opportunity to review the entire Draft Programmatic EIS as of yet, but I feel bad that I haven't, but I will be providing comments by the February 14 date. And I just wanted to make a couple of quick points. I have read the scoping letter. I have visited numerous places on Mount Hood and around the rest of Oregon.

I have noticed that there's numerous clearcuts and logging and stuff that's going on, on Mount Hood. I've been actively involved in a lot of that on the mountain, and Oregonians, three-fourths of Oregonians get their drinking water from Mount Hood National Forest. They also, it's the number one visited national forest in the entire United States. More people climb Mount Hood than they do just about any other mountain on the planet, and I don't understand why we're putting a pipeline through one of the best recreation places that we have, not only in Oregon, but in the United States, but just an hour, if not two hours from Portland. I think that is just completely ridiculous.

I also don't understand logically why a 36-inch pipeline in diameter needs a 1,000- to 3,500-foot corridor. It seems very strange to me. I don't, I'm not a proponent of roads, but you could actually put a two-lane road along the entire corridor, and you still don't need 3,500 feet to do that. So I'm a little confused as to where the logic behind why you need to log so many trees to put this pipeline through. I just don't get it.

Secondly, I'm very concerned with the amount of roads that are going to be built to access this pipeline in Mount Hood National Forest. Bark has spent a considerable amount of time working on roads issues in the national forest. We're working heavily with the Forest Service on their roads management plan, and we are strongly concerned about the roads that are already there, all the temporary roads. Temporary roads do not go away. They're not temporary. You will notice them for 100 years. I wish we would get rid of the word "temporary" with roads, because that just doesn't go together. And so I'm concerned about that.

I'm also very disappointed that it's going to cross over the Pacific Crest Trail. I have hiked numerous sections of this trail myself, including the area that it's going to, the pipeline is going to go through. I've had numerous friends who have hiked from Mexico to Canada. And most people in the United States think of Oregon as being a very green state, and I can't imagine walking from Mexico, getting almost all the way to Canada, and you have to cross a pipeline in a state that's known around the United States as being an

environmentally friendly, very conscious and progressive state. So that just does not make any sense to me, either.

I'm also disappointed by the number of people here today, and I don't think that that is because people aren't interested in this. I think that is because it was not well, it wasn't put out there. I don't remember seeing anything in Portland about this. I actually found out about this meeting from Governor Vic Atiyeh's son, Thomas Atiyeh, who is my current boss. And he has a cabin on Mount Hood in Rhododendron, where he leases land from the Forest Service, and he's the one who gave me the information on this meeting. Unfortunately, he's not here today, but I expect that he will probably be writing some kind of comment, since he also lives in Yamhill County, where there's numerous wineries.

And we're going to be putting a pipeline through some winery areas which are now becoming a booming industry in Oregon. And I like to drink wine, and I don't want my wine to be, I like to purchase local things, try to eat all of my food as locally as possible, including my alcohol and wine consumption, and I don't want that tainted by a nasty non-alternative, possibly going to leak all over the place, pipeline.

Mount Hood, also, a few years ago when Mount St. Helens was having all of its eruption issues, where it possibly was going to blow up again, Mount Hood, I think had about 100 or plus earthquakes that were very small that you did not really feel, but they registered. And it's been well documented that that is the case. And even a very small-scale, mild earthquake, I wonder how that's going to respond to the infrastructure of this pipeline. I don't think that our government is doing the best research on this aspect of it.

In addition to why I'm on the subject of renewable energy, I am a proponent of renewable energy, not non-renewable energy. I think that in today's world, where we have carbon levels skyrocketing and we are focusing, we should be focusing on how to reduce our energy consumption instead of using more of it. And if we are going to need to use energy, we need to be developing renewable energy sources. I'm very disappointed in the federal government for the direction that they're taking right now.

We—Montana alone has basically enough capacity to pretty much power three-fourths to a little bit more of the entire United States with wind power. Oregon has enough to power just about its entire, the state. I mean, there's no reason why we need to be doing this, and I am very disappointed by our federal government and the agencies that are involved that we're not pushing in the direction of renewable energies when we know that's where we need to go. And it's almost embarrassing to be a member of a group of people in this country who are not pushing for that. Just ridiculous.

On that note, you know, just as an example, we often build—I don't know how many times we've heard the story of building a freeway, and five years down the road, the freeway's not done, and by then it's outdated already, and it's not even done yet. This is what's going to happen with this pipeline. This pipeline's not going to be built, actually. It's going to start being built for about another five years or so by the time you get through all this process. You know, you have the environmental organizations that are probably going to sue over it. It's going to be a nasty process, I'm sure. And it's going to be years before this pipeline's actually starting to be developed, and we're already behind in the renewable energy sector, and five years down the road, it's just, we're just going to be more behind. So we're going to be outdated before it's even started.

So with that, I will only accept the No Action alternative with this proposal, and I will be sending my comments to the Department of Energy. Thank you.

- Darby Collins: That completes all the registered comments. Would anyone else like to make a comment tonight?
- Justin Snyder: I would. I own property on this corridor.
- Darby Collins: Can I get you—because we're webcasting, so, and if you'd state your name.
- Justin Snyder: Justin Snyder. I'm just a landowner in Oregon. I own property on an existing corridor, and a lot of these maps that I've seen, the only one that I have seen is the one in the Mountain Gazette, doesn't specify what is going to happen beyond the Mount Hood National Forest with public lands. I was just kind of curious. Has that been considered? You know, there's, there's, there's not just animal habitat, there's people habitats here, too, which coexist with animal habitat. How is that going to play into it? That's all I've got.
- Darby Collins: Is there anyone else who'd like to make a comment? So at this point, we'll be here until eight o'clock, so we can, we'll just take a pause for any formal comments. A couple of the folks in the back there—Ron, if you'll stand up right back there. He's from BLM. He was on the project team. And Glen Parker right there, who was also on the project team from the Forest Service. We'll all be around to talk, to discuss this further and answer any questions offline. I will take a pause through this. If anyone at any point wants to make another comment, we'll reinstitute this. We'll be here until eight o'clock. I want to thank everyone who has made a comment. They're extremely valuable, and we would encourage anyone to continue. You can comment. Again, the deadline is February 14. You can comment through webcast and on the web line and the additional public meetings will be webcast and go to the website. And you can do it by mail or by fax. All comments received by February 14 will be considered in the Final PEIS, and comments submitted after February 14 will be considered to the degree possible.
- So again, thank you very much for your comments and for your attention, and we'll stay around.



**Comments on the Draft Programmatic Environmental Impact Statement for the
Designation of Energy Corridors across Oregon**

January 8, 2008 – Public Meeting
Portland, Oregon

The Oregon Chapter Sierra Club has several concerns and comments regarding the Draft Programmatic Environmental Impact Statement for the Designation of Energy Corridors across the West. With nearly 24,000 members located across the state, the Sierra Club is among the largest and most geographically widespread conservation organizations in Oregon. Previously, the Sierra Club has submitted comments during the scoping phase for this EIS (November 2005) as well as during the comment period on draft maps (July 2006). The Sierra Club's nearly 800,000 members nationwide, including our members in Oregon, have a strong interest in the management of America's public lands as well as the development of a sustainable energy future. The Sierra Club intends to participate in public meetings associated with this Draft EIS, and will submit formal written comments by the February 14, 2008 deadline. The comments and questions raised today are Oregon specific and do not cover additional concerns the Sierra Club has with this process across the ten other western states involved.

In previous input on this EIS and draft maps, the Sierra Club raised very specific concerns regarding the designation of new and expanded energy corridors. Several of these concerns remain unaddressed by the current Draft EIS:

1. **Both the maps and the EIS continue to be inadequate by not fully addressing the range of specific environmental impacts associated with new or expanding energy corridors.**

While new maps in the current DEIS better identify land management allocations as well as some sensitive resource areas, the maps and the DEIS continue to lack sufficient specificity regarding a variety of potential impacts to the following:

- A. Wilderness Areas;
- B. Wilderness Study Areas (WSAs);
- C. National Parks;



- D. National Wildlife Refuges;
- E. National Monuments;
- F. National Conservation Areas;
- G. Other lands within BLM's National Landscape Conservation System (NLCS), such as Outstanding Natural Areas;
- H. National Historic and National Scenic Trails;
- I. National Wild, Scenic, and Recreational Rivers, study rivers and segments, and eligible rivers and segments;
- J. National Wild, Scenic, and Recreational Rivers, study rivers and segments, and eligible rivers and segments;
- K. Areas of Critical Environmental Concern (ACECs);
- L. Forest Service Roadless Areas, both inventoried and uninventoried;
- M. Threatened, endangered and sensitive species habitat, designated critical habitat, and critical cores and linkages for wildlife habitats;
- N. Old Growth (Late Successional) reserves, and other areas designated for the protection and conservation of Old Growth forests under existing Forest Service Forest Plans, BLM Land and Resource Management Plans, or other regional ecosystem management plans;
- O. Citizen Proposed Wilderness Areas; and other lands with wilderness characteristics

While some of these areas have been identified on maps presented in the DEIS, not all of them have, and the DEIS fails to provide any meaningful specificity regarding the impacts to these specific areas, wildlife habitats and management allocations. The DEIS additionally fails to provide detailed information regarding the types of energy that will be transported across these corridors, or the types of environmental impacts anticipated from both the construction and maintenance of these corridors. Further, information regarding associated new or expanding energy development infrastructure that will be served by these corridors is nowhere to be found, though this is clearly an associated and cumulative environmental impact that should be discussed and assessed.

In addition to these basic concerns, the following is a list of specific questions about proposed corridors in Oregon:

- a. How will corridors 7-24, 16-24, 24-228, 7-11, 11-228 effect sage grouse and pronghorn antelope including their habitat, reproduction and movement across the landscape? Specifically, corridor 7-24 runs across public land between the Hart Mountain National Antelope Refuge and the Sheldon National Wildlife Refuge, a critical area for both antelope and sage grouse, yet these important wildlife habitat issues are not mentioned.
- b. How specifically will corridor 24-228 affect the Alvord Desert and Bowden Hills Wilderness Study Areas, and the viewshed of the Steens Mountain Wilderness?
- c. How specifically will corridor 230-248 affect the Soosap Meadows Area of Critical Environmental Concern? The DEIS indicates that energy corridors will be constructed with reduced width in order to ‘minimize’ impacts to the Soosap Meadows ACEC. The DEIS needs to be more specific on what these impacts will be.
- d. How specifically will corridor 11-228 affect the Owyhee-Below-the-Dam Area of Critical Environmental Concern? Again, the DEIS indicates that a reduced width of the proposed energy corridor is intended to ‘minimize’ impacts, but the impacts are not specifically identified.
- e. How will corridors 7-11 and 7-24 affect the Cascade Siskiyou National Monument? This does not appear to be discussed in the DEIS, and this National Monument’s location is not identified on the maps provided.
- f. How specifically will corridor 230-248 affect the threatened northern spotted owl and Wild and Scenic Rivers in the Mt. Hood National Forest? This corridor clearly bisects the national forest yet no specific environmental impacts are discussed.
- g. The DEIS mentions that two inventoried roadless areas in Oregon will be impacted by proposed energy corridors, yet no further information is provided. Which inventoried roadless areas are these, which corridors will impact them, and how?
- h. Additionally, we request that in answering the specific questions about the previously mentioned energy corridors, please disclose the specific potential environmental impacts of the other corridors in Oregon not identified above.

- i. Finally, appendix A of the DEIS indicates that for essentially every proposed energy corridor in Oregon, existing Forest Plans and Resources Management Plans will need to be amended where new and expanding energy corridors cross public lands. For each corridor, please identify what specific management plan amendments will be necessary, and please disclose whether additional plan amendments will be necessary or anticipated for new energy developments on these public lands that may make use of the proposed energy corridors.

2. The DEIS fails to discuss cumulative impacts including associated new energy production and development on or near public land associated with proposed corridors as well as global warming potential.

A theme in previous Sierra Club comments was the need to analyze the cumulative impacts associated with creating new energy corridors or intensifying use of existing corridors. Simply put, the footprint of the energy corridors is much larger the actual acreage they take up. The DEIS is delinquent in not identifying or analyzing the extent to which these corridors and the types of energy expected to flow across them (whether oil, gas, hydrogen or electricity) lead to or encourage additional energy production, development and extraction on public lands, or whether additional energy production proposals associated with these corridors are reasonably anticipated. *Thus, potential new energy developments and the expansion of existing developments should be noted on the maps and in the DEIS and their potential environmental impacts should be identified and disclosed.*

Aside from noting that some corridors are ‘multimodal’ vs. ‘electric only’ the DEIS provides little clue as to what types of energy will be moving through these corridors or whether new development will be taking place nearby. Surely this information has been provided to one or more of the federal agencies working on the DEIS. It is unlikely that without this type of information, these corridors would not be proposed in the first place. Thus, we request that information on proposed or anticipated energy production and development that led to these corridors being proposed be disclosed before the Final EIS is issued. This information underscores the question of whether these corridors are even *needed* and is critical for the public

to make a reasonable assessment of the value or potential benefit or harm to public resources from specific corridor proposals. Additionally, depending on the types of energy development proposed, there may be global warming impacts that must be acknowledged and discussed as part of any credible cumulative impacts analysis.

We have serious concerns about the NEPA process being undertaken and specifically request to know what are the criteria and what has been the process for why certain corridors are being proposed and what types of energy will be transported. What are the sources of information that were used to determine why these corridors have been proposed and what types of energy they will be used for? Further, an accompanying analysis of potential alternatives to these sources of energy or specific corridors needs to be provided as well.

3. The DEIS only focuses on new energy corridor development and fails to address the need for increased conservation and efficiency as an alternative to new corridors and in the context of current and future energy needs

The DEIS should examine America's energy demands and needs and include an Alternative other than the No Action Alternative that calls for ramping up energy conservation and efficiency programs to either eliminate the need for proposed corridors or to reduce the size of certain corridors. Reducing energy demand over time through conservation and efficiency could negate what appears now to be a 'need' for certain corridors, particularly when factoring in significant issues such as transmission loss from new power lines traveling over great distances.

The DEIS has the potential to help the development of a new energy future for America by ensuring that energy needs are met to their maximum extent by increased efficiency, conservation resulting in reduced energy demand, and long-term planning that does not further degrade the environment. Such an alternative would consider maximization of conservation plus smaller, local alternative energy resources such as solar and wind, sited in an appropriate way. This could be both economically efficient and environmentally beneficial.

Further, such an alternative should also include no new or expanded energy corridors or energy developments in undeveloped or sensitive areas of public land.