From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 05, 2008 4:10 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50250

Thank you for your comment, Sharron Foster.

The comment tracking number that has been assigned to your comment is WWECD50250. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 5, 2008 04:10:15PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50250

First Name: Sharron
Last Name: Foster
Address: 515 Valencia SE Apt 5
City: Albuquerque
State: NM
Zip: 87108
Country: USA
Email: yiayia123@aol.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Dear Sirs[
It is already easy enough to get a permit to drill for gas or mine the earth.I think "grouping" the energy lines together is a good idea, but if the "energy corriders " make it easier to drill between existing facilities I don't think they are a good idea. Protections should be put into place to prevent that..
Thank you,
Sharron Foster

50250-001

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

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 06, 2008 2:30 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50251

Attachments: AR-M350_20080206_132458_WWECD50251.pdf

AR-M350_2008020
_132458_WWECD5.

Thank you for your comment, Shannon Davis.

The comment tracking number that has been assigned to your comment is WWECD50251. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 6, 2008 02:30:20PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50251

First Name: Shannon
Middle Initial: L
Last Name: Davis
Address: 1185 East Lane
City: Imperial Beach
State: CA
Zip: 91932
Country: USA
Email: williamedavisjr@email.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Kimberly A Irving\My Documents\E. Craig Smay\AR-M350_20080206_132458.pdf

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

Feb. 5, 2008 PAGE 1

SHANNON DAVIS

Westwide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue, Bldg. 900-M54
Argonne, IL 60439

Re; DOE/EIS 0386

Dear Honorable Dept. of Energy Commissioners,

I opose the West-Wide Energy Corridor Proposed Project in the Southern California Route that should the San Diego Gas and Electric Proposed Sunrise Powerlink Transmission Line be approved, may parallel through our property be-cause of possible environmental impacts. In particular to significant negative impacts to the I-8 and Modified D Route Alternative that pass through our sensitive land in the South East Jamul area at 10731 Spice Way and 10726 Thyme Way. This area is the habitat for the Federally Endangered Quino Checkerspot Butterfly, the Southwestern Willow Flycatcher, the Lests Bells Verio, the California Gnatcatcher and the Southwestern Arroyo Toad. 50251-001 50250-002

Page 2 FEB 5, 2008 PAGE 2

This Route is located near Congressionally Protected Designated Wilderness for Pine Creek Place and the Hauser Wilderness North and the Hauser Wilderness South. Our property is also near the watershed for the Barrett Lake which is emergency water supply for drought ed San Diego and is protected. This area should not be disturbed by a project of this irrevocable impactful magnitude. We have frequent earthquakes and fires that plague this location. I ask you what will happen if these multiple fuel pipelines impact our fragile groundwater resources? If there are ruptures or leaks in an earthquake, and you were aware that the possibility could result in disaster, how would you mitigate the damage? Please consider the impacts to our health and safety concerns to this area. We are vunerable to our close border location to Mexico to possible terrorist attacks that are of concern that placement of transmission links could black out Southern Californias energy. Sincerely,

Shannon Davis

50250-003

50250-004

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 06, 2008 4:54 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50252

Attachments: West_wide_energy_corridor_DEIS_WWECD50252.doc

West_wide_energy
_corridor_DEIS...

Thank you for your comment, Michael Gibson.

The comment tracking number that has been assigned to your comment is WWECD50252. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 6, 2008 04:53:31PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50252

First Name: Michael
Middle Initial: T
Last Name: Gibson
Organization: Montana Trout Unlimited
Address: PO Box 7186
City: Missoula
State: MT
Zip: 59807
Country: USA
Email: michael@montanatu.org
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Michael Gibson\My Documents\Trout Unlimited\Oil and Gas\Protests\West_wide_energy_corridor_DEIS.doc

Comment Submitted:
Please accept our comments on the West-wide corridor DEIS attached below.

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

Main Office PO Box 7186 Missoula, MT. 59807

February 6, 2008

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

To whom it may concern,

Montana Trout Unlimited (MTU) appreciates the opportunity to comment on the West-wide Energy Corridor DEIS in Montana.

MTU represents the 3,200 members and 13 chapters of TU in Montana. Our mission is to conserve, protect and restore the nation's coldwater fisheries and their watersheds. Trout Unlimited is not against energy development on public lands. Instead, we advocate for development that does not make energy transmission the dominant land use while setting aside special areas and ensuring environmental mitigation and enforcement are effective to guarantee protection of fish and wildlife and their habitats.

MTU encourages DOE , BLM, USFS and cooperating agencies to avoid designating energy corridors on isolated and discontinuous parcels of federal land in Montana that would for all intents and purposes create a corridor on adjacent private and state lands. 50252-001

MTU also questions having two parallel lines, segment 50-203 and segment 50-260, in such close proximity. Preferably, you would abandon section 50-260 and focus your efforts along the I-15 corridor (Section 50-203). 50252-002

Having that said, MTU also has concerns about section 229-54 along the Clark Fork and St. Regis rivers and section 50-203 along the Beaverhead and Red Rock rivers. The visual beauty of these watersheds has already been impacted by interstate highways, rail lines and existing high voltage transmission. The possibility of having additional overhead corridors for high voltage transmission only exacerbates existing impacts. 50252-003

The possibility of oil or gas pipelines also raises concerns for water quality and riparian health. The programmatic review should distinguish between the amount of disturbance for the construction of a pipeline and production of a transmission line. Transmission 50252-004

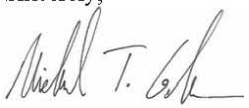
lines can often span a stream with no disturbance to the bed and banks. Pipeline construction can cause major alterations to the streambed and banks unless non-standard overhead crossings are used or crossings are directionally drilled. 50252-004 (cont.)

Section 229-254 incorporates the Clark Fork and St. Regis rivers in western Montana. These rivers provide habitat for bull trout, a listed threatened species. Construction of a pipeline or spills from a working pipeline could have major impacts on bull trout. 50252-005

In closing, this project should only move forward if there is proper mitigation for construction impacts as well as catastrophic events such as an oil spill. 50252-006

Thank you for your consideration, and please let us know if you would like to discuss these concerns in greater detail. I can be reached at 406-543-0054 or michael@montanatu.org.

Sincerely,



Michael Gibson
Outreach Director
Montana Trout Unlimited

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 06, 2008 6:55 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50254

Thank you for your comment, Monroe Jeffrey.

The comment tracking number that has been assigned to your comment is WWECD50254. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 6, 2008 06:54:26PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50254

First Name: Monroe
Last Name: Jeffrey
Address: 802 E. 6th St., #303
City: Los Angeles
State: CA
Zip: 90021-1045
Country: USA
Email: ita@sonic.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I am a senior citizen.a registered voter and a resident of Los Angeles, CA.
I would like to advocate that all wildnerness areas and areas of pending 'wildnerness area' legislation, not be included for consideration for the proposed construction of the 6,000 mile - corridor thru western lands. 50254-001

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

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 06, 2008 7:12 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50255

Thank you for your comment, Neil Stahl.

The comment tracking number that has been assigned to your comment is WWECD50255. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 6, 2008 07:12:09PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50255

First Name: Neil
Last Name: Stahl
Address:
City:
State: NC
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:
Sir or Madam:
Thank you for the opportunity to comment.

I encourage you to act in such a way as to preserve the roadless nature of much of that land, either by routing around roadless areas or by mandating construction using, e.g. helicopters so as to avoid creating roads in large areas currently without them. 50255-001

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

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 06, 2008 10:08 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50256

Attachments: ToddMonsonPEIS_letter_WWECD50256.doc

ToddMonsonPEIS_letter_WWECD502...

Thank you for your comment, Todd Monson.

The comment tracking number that has been assigned to your comment is WWECD50256. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 6, 2008 10:08:05PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50256

First Name: Todd
Last Name: Monson
Address: 1127 Narcisco St. NE
City: Albuquerque
State: NM
Zip: 87112
Country: USA
Email: tcmonson@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\Todd\My Documents\Word\Todd\ToddMonsonPEIS_letter.doc

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

Sir or Ma'am,

I am a concerned citizen living in Albuquerque, NM. I am particularly worried about several aspects of the Programmatic Environmental Impact Statement (PEIS) concerning potential energy corridors in the western United States.

First, I believe the PEIS needs to consider alternatives that will have the least impact on our few remaining wildlands. In particular, future energy corridors should not impact special places such as National Monuments, National Wildlife Refuges, National Forest Inventoried Roadless Areas and other areas with protective designations, as well as areas proposed for wilderness designation. Once these wild, fragile places are impacted the public will rarely, if ever, get this great resource back. Also, any future energy corridors should maximize travel along existing Rights of Way and roads. In some cases the proposed energy corridors do this, but not in all cases. Additionally, our future energy corridors should consider not just the locations of existing and new traditional power plants but plan for new renewable and more distributed sources of power, such as solar and wind farms. The western United States has great potential for developing both solar and wind energy and any future energy corridors should take this into consideration.

50256-001

50256-002

50256-003

I am also very concerned about what will happen in between the proposed energy corridors on public lands. No one has adequately addressed how energy corridors on public land will be connected and in turn impact both private and Native American lands. This is a serious concern and it must be addressed and the public made aware of the potential impacts.

50256-004

Finally, I am concerned about the potential impacts of designating corridors through several places which are very important to me personally. The first is Sevilleta National Wildlife Refuge, which is only a short distance from my home. I believe this wonderful wildlife refuge should not have energy corridors passing through or near the borders of this diverse and wild area. The second area is Arches National Park, where a proposed energy corridor will pass very near the park's border. I hiked through Arches and found the red rock formations and the surrounding vast and beautiful landscapes to be one of our nation's greatest treasures. I would hate to see any of the lands surrounding Arches National Park (which are almost as beautiful as the park itself) or the gorgeous views from within the park tarnished by pipelines and power lines. Routing any future energy corridors along nearby I-70 would be much more appropriate. I hope that my comments have been helpful and can improve upon the proposed energy corridors.

50256-005

Regards,

Todd Monson
1127 Narcisco St. NE
Albuquerque, NM 87112

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 07, 2008 8:00 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50257

Thank you for your comment, James Haygood.

The comment tracking number that has been assigned to your comment is WWECD50257. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 7, 2008 08:00:14AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50257

First Name: James
Last Name: Haygood
Address: 51077 Naples Court
City: Pioneertown
State: CA
Zip: 90405
Country: USA
Email: jh9856@gmail.com
Privacy Preference: Withhold address only from public record

Comment Submitted:
I am absolutely opposed to the Greenpath North project, and the West-wide Energy Corridors in general. This project is NOT green, and is simply perpetuating an outdated energy distribution model. To create energy in one place, and send it miles to users elsewhere destroys precious, irreplacable land and ecosystems.

This ill-conceived project must be stopped, and replaced by a more thoughtful approach. A more local approach. The desert is not LADWP's, or BLM's, to trash as they wish. We can, and must, do better,

50257-001

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 07, 2008 8:41 AM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50258

Attachments: Summer_WWECD50258.pdf

Summer_WWECD50
258.pdf (329 KB)...

Thank you for your comment, Michael Styer.

The comment tracking number that has been assigned to your comment is WWECD50258. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 7, 2008 08:40:40AM CDT

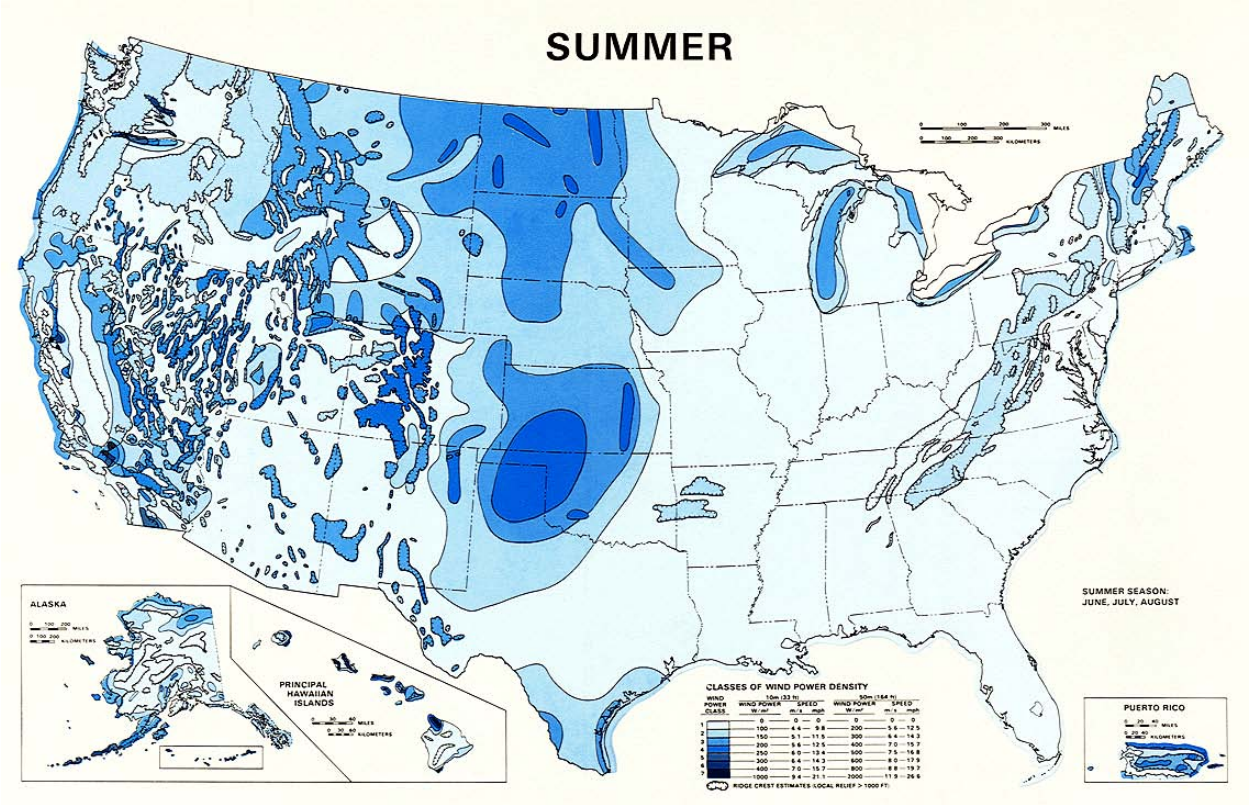
Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50258

First Name: Michael
Last Name: Styer
Organization: Integrated Transmission Solutions
Address: PO Box 834
City: Canyon
State: TX
Zip: 79015
Country: USA
Email: mike@canyonwestpartners.com
Privacy Preference: Withhold address only from public record
Attachment: C:\Documents and Settings\Michael Styer\Desktop\ITS\Summer.pdf

Comment Submitted:
Dear Sirs,
I apologize if I am "late" to the party, but I have something that I believe should be strongly considered in your corridor designation. The panhandle of Texas is the most wind rich year round and more importantly Summer wind resource in the United States.
Our company ITS has been working in conjunction with a large wind developer to deliver btween 3000-6000MWs of wind power west to the WECC, particularly delivering to Marketplace, which would provide access to a multitude of Southwestern markets. We would utilize a 500KV HVDC transmission system.
I would like to inquire how ITS could petiton for a corridor designation across the State of New Mexico through the North Central sections of Arizona. I will be involved in a meeting with New Mexico State authorties Monday, Feb 11th. This will be one of the topics of dicsussion. 50258-001
I was totally unaware of these proceedings, but am extremely interested in any assistance that your organization could offer. I have attached an NREL map that illustrates the wind resource in the panhandle of Texas, Oklahome and SW Kansas. This resource is vitally needed in the Southwest to meet growing energy demand through renewable power generation.
Please respond to this at your earliest convenience.

Respectfully,

Michael Styer
President- Integrated Transmission Solutions


SUMMER
ALASKA
PRINCIPAL HAWAIIAN ISLANDS
PUERTO RICO
SUMMER SEASON:
JUNE, JULY, AUGUST
CLASSES OF WIND POWER DENSITY
RIDGE CREST ESTIMATES (LOCAL RELIEF > 1000 FT)

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 07, 2008 10:54 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50259

Thank you for your comment, David Albright.

The comment tracking number that has been assigned to your comment is WWECD50259. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 7, 2008 10:53:51AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50259

First Name: David
Last Name: Albright
Organization: Bernalillo County Public Works
Address: 2400 Broadway Blvd SE
City: Albuquerque
State: NM
Zip: 87102
Country: USA
Email: dpalbright@bernco.gov
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I would like to compliment the agencies involved in the thorough manner in which you have sought diverse opinions. This is a good example of public service and outreach. I will be interesting in seeing how you quantify the effectiveness of the public outreach and involvement. 50259-001

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 07, 2008 11:27 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50260

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WWECD50260. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 7, 2008 11:27:08AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50260

First Name:
Last Name:
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:
Establishing new energy corridors does not seem to address the real problems we have in this country regarding energy. We need to be thinking about local production and consumption...I don't want the energy created in Montana to be shipped to Vegas and Phoenix...they need to deal with the problems of creating a metropolitan area in the middle of the desert on their own. Also, long transmissions of energy are hugely inefficient as a large portion of the enregy being transmitted is lost by the lines. We should be thinking about renewable energy, not putting new corridors on public land to haul energy created from dwindling sources. 50260-001

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 07, 2008 4:44 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50261

Thank you for your comment, Cheryl Vallone.

The comment tracking number that has been assigned to your comment is WWECD50261. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 7, 2008 04:43:53PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50261

First Name: Cheryl
Middle Initial: L
Last Name: Vallone
Address: 10 Ivy Lane
City: Ashland
State: MA
Zip: 01721-1020
Country: USA
Email: clvallone@aol.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I am writing to express my serious concerns about the proposed energy corridor described in the Draft Programmatic EIS. It is imperative that you reroute your proposed corridor to avoid special wild places, and to take the necessary steps to do the job right.

Please consider the following recommendations:

1. Areas in pending wilderness legislation should be avoided; wildlands included in recently-introduced wilderness bills (such as those in Oregon, Washington, Colorado, and California) will be impacted by the proposed corridors. The analysis of these impacts has not been completed yet, but as agencies are provided with relevant information, they should modify corridors to avoid areas poised for protection. 50261-001

2. Special or sensitive public lands should be avoided altogether; agencies should analyze impacts to special public lands and reroute corridors to avoid them. Agencies should also make this process and information transparent to the public.
best management practices should be used in projects to limit damage to resources, recreation and views. Agencies should make their Interagency Operating Procedures mandatory.

3. Alternatives should be presented and considered. Without alternatives, the public can only comment on what they don't like about the proposed plan. The agencies who have all of the pertinent information should provide the public with choices - that's why NEPA requires them to develop alternatives. 50261-002

Thank you for your consideration and for accepting these comments. I hope I can count on your support of these common-sense recommendations.

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 9:06 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50262

Thank you for your comment, Millie Rader.

The comment tracking number that has been assigned to your comment is WWECD50262. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 09:05:52AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50262

First Name: Millie
Middle Initial: M
Last Name: Rader
Organization: Lucerne Valley Economic and Development Association
Address:
City:
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:
We already have an energy corridor coming through our community, and that is more than enough.
We live here because of the relative pristine beauty of the desert, and the freedom from the toxins normally associated with cities.
We do not need nor want any more power-lines marring our views, or worse being placed in neighborhoods where they have the potential to cause health problems in our children.
We ask that you please find another route to provide cities on the South side of the San Bernardino Mountain Range with power.

50262-001

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

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 12:22 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50264

Attachments: Final_-_Comments_on_386_energy_corridors_feb_08_2008_WWECD50264.doc

Final_-_Comments_on_386_energy...

Thank you for your comment, Del Draper.

The comment tracking number that has been assigned to your comment is WWECD50264. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 12:21:45PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50264

First Name: Del
Last Name: Draper
Organization: Williams Companies, Inc
Address: P.O. Box 58900
City: Salt Lake City
State: UT
Zip: 84158-0900
Country: USA
Email: Del.M.Draper@Williams.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Y:\DD Work and projects\Pipeline info\Pipeline corridor\Final - Comments on 386 energy corridors feb 08 2008.doc

Comment Submitted:
See the attached document containing the comments of Williams Companies. If the document is not properly attached, please advise.

Del Draper

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

Programmatic Environmental Impact Statement,
Designation of Energy Corridors on Federal Land in the 11 Western States

(DOE/EIS 0386)

Comments of

The Williams Companies, Inc.

The Williams Companies Inc. ("Williams") appreciates the opportunity to comment on the Programmatic Environmental Impact Statement (PEIS) for the designation of energy corridors in the Western United States. Implementing Section 368 of the Energy Policy Act is an immense undertaking. We would like to recognize the lead agency and the cooperating agencies for their efforts in this endeavor.

Williams wishes to state at the outset that, while we have some concerns and comments, we are generally supportive of the efforts to designate energy corridors in eleven states in the Western United States. The geographic disparity between where energy sources and energy consumers are located makes it necessary that energy be transported long distances. The predominance of Federal lands in the West necessitates that energy transportation infrastructure cross public lands. 50264-001

Identity of Williams

Williams, through its subsidiaries, finds, produces, gathers, processes and transports natural gas. Williams' has three main business units, Exploration and Production, Midstream (the business of gathering and processing natural gas), and Gas Pipeline (transportation of natural gas through interstate transmission pipelines).

Williams Exploration and Production

Williams is the 13th largest natural gas producer in the United States. Our primary production areas include in the Piceance, Powder River, and San Juan basins in the states of Colorado, Wyoming, and New Mexico. Williams has 3.7 trillion cubic feet equivalent in domestic natural gas reserves, and daily production from these reserves is sufficient to serve the natural gas needs of 3.8 million homes. Williams has developed over 5,000 natural gas wells since 2004.

Williams Exploration and Production plans to continue to drill wells at the pace described above, and these activities will be impacted by the proposed corridors.

Williams Midstream

Midstream has 8,000 miles of gas gathering lines and operates 18 natural gas processing, treating and/or production handling facilities. Many of these facilities are in Wyoming, Colorado, and New Mexico. Williams is the largest gas processor in Wyoming and the largest gatherer and processor in the San Juan Basin.

Williams Midstream has at least 500 miles of large-diameter pipeline projects that may be executed over the next several years. Mileage on federal lands is estimated to be 240 miles with about 140 miles of these facilities being in the proposed corridors.

Williams Gas Pipeline

Williams Gas Pipeline operates approximately 14,600 miles of interstate natural gas pipeline that deliver approximately 12 percent of the total natural gas consumed in United States. That is enough gas to heat 30 million homes on a winter day.

In the Western United States, Williams operates Northwest Pipeline, a 4,000 mile pipeline that serves markets in Washington, Oregon and Idaho with natural gas from the states of New Mexico, Colorado and Wyoming, as well as from Canada. Substantial portions of Northwest Pipeline's existing system will be in the energy corridors being proposed in this proceeding.

Northwest Pipeline has expanded many times in recent years to meet the growing demand for natural gas in its market area. More expansions are in the works. As noted in Section ES.2 of the executive summary of the PEIS, "Demand for natural gas is expected to rise considerably in the short term. In the Pacific region, the Energy Information Agency (EIA) forecasts there will be a need for a 45% increase in pipeline capacity in the next 10 to 15 years." Williams' Northwest Pipeline is directly challenged to meet these needs for increases in pipeline capacity, and expansion in our existing ROW on Federal lands is a virtual certainty.

Williams comments on the PEIS are as follows:

Issues regarding Multiple Facilities in a Corridor

Since corridors are likely to accommodate infrastructure from different utilities and industries, a process for managing corridors that is equitable and addresses the needs of the various industries needs to be developed. Since the "critical importance to improve the western electrical transmission grid" appears to be the driving factor for establishment of Section 368 corridors, will the electric transmission industry be given preference over the pipeline industry? 50264-002

The placement of multiple energy facilities in a corridor raises safety concerns. Third party damage, often caused by someone with a backhoe or other such machine, is a leading cause of pipeline incidents. To the extent that third parties maybe less likely to enter upon and dig in an energy corridor, placing facilities in a corridors may provide a small amount of additional safety for underground facilities like a pipeline. On the other hand, other facility owners and their contractors entering on and working in the corridor or working over a loaded high pressure natural gas line present an increased element of danger to the pipeline and the public.

This is especially true if pipelines are located close together. In that instance it may be necessary to place additional cover over one pipeline while working on the other. This increases the cost of pipeline construction and maintenance. During construction of a pipeline adjacent to Northwest Pipeline's facilities in Utah a few years back, Northwest purchased and temporarily erected something like 50 miles of orange fencing to clearly mark the location of its pipeline and protect it from the nearby construction work. Adequate spacing of the pipeline would have reduced the need for this expense. This spacing of pipelines within a corridor is an important concern that impacts both the safety and cost of construction and operation of a pipeline.

50264-003

The proposed separation distance between a gas pipeline and an electric transmission line is also an issue. Depending on the spacing, it can be very difficult and expensive to retrofit existing pipelines with adequate cathodic protection to make the uses compatible. Adding a gas pipeline to a corridor that contains a high voltage transmission line can also be a problem. Pipeline design would now require specific induced voltage mitigation measures to address this issue. However, there is always a danger in constructing pipeline anywhere near electric transmission lines.

Placing multiple facilities within a corridor raises safety and attendant costs concerns, a process for managing corridors that is equitable and addresses the needs of the various industries needs to be developed.

How Pipelines Are Built; Planning for Expansions

The way in which natural gas pipeline capacity is expanded needs to be considered if various energy facilities are located in a corridor. Large diameter natural gas pipelines are sized to transport a specified volume of natural gas pursuant to contracts with shippers. At the time of construction, pipelines are "right sized" in order to handle only the contracted volume, not oversized to handle possible future increases in throughput. This is a function of the facts that pipelines are very expensive to build and they are regulated as utilities with maximum allowable rates of return. No company can afford to overbuild for possible future needs if they will not be allowed to earn a return on the funds spent to oversize the pipeline.

50264-004

As a result, if the market grows and more natural gas is needed, pipelines do one of two things: they either add additional compression to push more gas through the same

pipeline, or they install an additional pipeline adjacent to the existing pipeline. New pipelines adjacent to an existing pipeline are referred to in the business as "looped" lines. 'Loop' rights are often secured at the time of acquisition for the first pipeline. Nearly all of Northwest Pipeline's main transmission lines are looped or have loop rights to build additional pipelines.

Two adjacent gas pipelines operated as a single system offer a pipeline company additional operational flexibility. If maintenance is required on one of the lines it may be possible to briefly route all of the gas into the other line. If a line needs to be emptied of gas for repairs, it may be possible to briefly divert he gas into the other pipeline rather than vent the gas to the atmosphere, which is environmentally detrimental and expensive due to the cost of the gas lost.

The draft PEIS indicates that a corridor width of 3,500 feet was selected for the Section 368 energy corridors because this width would provide sufficient room to support multiple energy transportation system. At first blush this width does seem to be adequate. As noted in the PEIS, 29 natural gas pipelines with 120-foot construction ROW could be accommodated in a 3,500 foot corridor. Electric transmission lines require more space and the PEIS assumes an operational ROW of 400-foot width for a 500-kV transmission line. 50264-004 (cont.)

Despite the seeming abundant width of the proposed corridors, there is no certainty that various energy systems will be spaced as broadly as possible. Once corridors are established, the tendency of the land managers may be to place pipelines or other utilities close together to allow additional land for future facilities.

It will be less costly to the pipeline in the corridor if space is left for the future looping of pipelines.

Routing Facilities Outside of the Proposed Corridors

Notwithstanding repeated assurances in the PEIS that facilities can continue to route on Federal lands not designated as corridors, the mere existence of corridors may result in pressure on companies to route facilities in the corridors. There may be a natural tendency for agencies to subtly or not so subtly use their authority to "push" utilities into corridors rather than let them locate on nearby lands outside of the corridors.

This is an important cost issue for constructing energy facilities. Large diameter natural gas pipelines are extremely expensive to build. Northwest Pipeline constructed a new 36 inch diameter pipeline in Washington State in the past three years and the cost was in excess of $3 million per mile. Williams has a pipeline project in the Pacific Northwest it is currently attempting to permit and the estimated cost of this pipeline is approximately $4 million per mile. Even when pipelines are constructed in more favorable environments, such as Williams' building of the Kern River pipeline through unpopulated and flat desert lands, the cost per mile remains very high. 50264-005

Because the cost per mile of pipelines is so high, even a small reroute to move a proposed pipeline into a designated corridor could be very expensive. Consider a hypothetical situation where a company wants to build a large diameter natural gas pipeline parallel to a designated corridor but approximately five miles outside of the corridor. There may be a natural inclination on the part of agencies administering the Federal lands to push the company to locate the pipeline within the corridor. To the land managers of these Federal agencies, moving the pipeline a few miles to the corridor might seem like a small change to the overall route, and the land managers could apply pressure by various means to persuade the company to place the pipeline within the designated corridor.

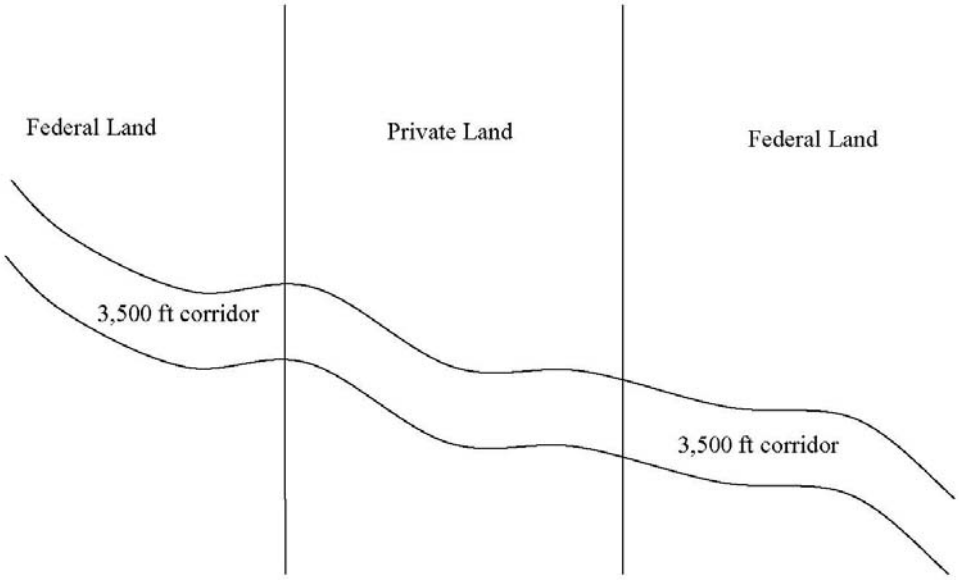
From the company's perspective, however, building five miles of pipeline to get over the preferred route into the corridor, and another five miles of pipeline at another location to get out of the corridor to where the company needs to end up, might have a $30 to $40 million impact if ten miles of additional pipeline at $3 to $4 million per mile are needed. 50265-005 (cont.)

In addition, the extra mileage may require a larger diameter pipeline and/or increased compressor horsepower, which again could drive construction and operating costs up considerably. Air emissions due to the additional horsepower might also be increased. In the regulated pipeline industry, the energy companies are generally able to recover such costs, but the consumer ultimately pays the price.

In sum, while we applaud the PEIS as written for confirming that energy facilities can continue to be constructed on Federal lands outside of the proposed corridors just as they currently are, Williams remains concerned that this may change over time, either formally or informally, and that could have a dramatic impact on the cost of constructing energy facilities.

Energy Corridor Impacts on Rights-of-Way Outside of the Corridor.

The PEIS does not appear to have evaluated the impact to the cost of rights-of-way on private lands outside of the proposed corridors. Consider a hypothetical private landowner whose property is at the end of one of the corridors proposed in the PEIS or is otherwise located such that energy facilities in the corridor would logically continue across the property of the private landowner, such as in the following diagram. 50264-006



50264-006 (cont.)

The private landowner may experience a decrease in the value of his land impacted by the logical continuation of facilities in the 3,500 foot wide corridor on Federal lands. The landowner might well argue that this portion of his land has become a utility corridor and deprives him of all other uses of the land, and therefore the compensation he is due is much greater than a situation where a single energy facility is crossing his land.

Another concern is that if a private right-of-way is preferred and a designated corridor parallels it, will the private landowner have the power and/or encouragement to deny use of his/her land and insist on use of the designated corridor? Will rights of eminent domain somehow be affected by designation of the corridors?

The impact on rights-of –way on private lands due to the creation of corridors on Federal lands needs to be evaluated and addressed.

Streamlined Processing of Applications for Facilities Within Designated Corridors

50264-007

The draft PEIS holds out the promise of streamlined processing of applications for facilities proposed within the designated corridors as a means of meeting the federal mandate for accelerating the approval of such projects. However, it is unclear as to whether the permitting process for facilities proposed within the designated corridors will still require federal land managers to perform alternatives analysis for each such project. Williams believes it is imperative that clear guidance documents be provided for all parties involved in order to create the utmost transparency for the future permitting

process, and that such guidance should eliminate the need for analysis of alternative routing. 50264-007 (cont.)

Homeland Security Issues

Placing multiple energy facilities in a corridor raises Homeland Security issues that need to be considered. To the extent that linear energy facilities are potential targets for those harboring ill intent, co-locating multiple linear energy facilities in a single corridor may increase the risk to the facilities.

Williams believes that there are real risks to energy facilities in the United States. The Department of Homeland Security has issued previous warnings when credible information has indicated the potential for attacks against energy facilities in the United States. A successful attack on facilities consolidated in an energy corridor could result in devastating safety and economic consequences. 50264-008

The Department of Homeland Security and other relevant agencies should review this matter and their comments should be taken into account. While the danger to energy facilities is difficult to ascertain and exists today without the creation of energy corridors, the agencies need to consider the issue of whether placing multiple energy facilities in a designated corridor unacceptably increases this risk.

Thanks you for considering these comments.

Respectfully Submitted on February, 8, 2008

The Williams Companies, Inc

By Del Draper
State Government Affairs – Western Region
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From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 12:52 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50265

Attachments: Energy_Corridor_020808_WWECD50265.doc

Energy_Corridor_0
20808_WWECD50...

Thank you for your comment, Gretchen Hillard.

The comment tracking number that has been assigned to your comment is WWECD50265. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 12:51:32PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50265

First Name: Gretchen
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State: OR
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Privacy Preference: Withhold address only from public record
Attachment: /Users/gretchenhillard/Documents/Energy Corridor 020808.doc

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

February 8, 2008

Dear Federal agencies,

Please consider the inconvenient truth that planning for "America's energy future" properly involves more than planning for endless energy, endless supplied. A balance needs to be established. Conservation and alternative energy sources can make the difference and protect the environment, if properly used. These should be taken into consideration when calculating power line "needs" before thousands of miles of private and public land and private property rights are sacrificed. 50265-001

The maps in the Draft PEIS are confusing and inconsistent. We will need a local public meeting in order to properly have the chance to review such a dramatic proposal with such huge potential impacts for our region. 50265-002

The Horseshoe Wildlife Area, just south of the Cascade-Siskiyou National Monument is one of the last winter deer ranges in the region. It must be protected or we will lose an important segment in our local healthy wildlife web of life. 50265-003

Of specific concern is that the Jenny Creek Fall is a Redding BLM Area of Critical Environmental Concern and should not be in the plan at all. 50265-004

Widely separated parcels are being used on the DPEIS map, identified as Corridor #4-247". These cannot actually be a corridor at all, due to their physical separation. They should not be used as a pretext for condemning for more acres of private and state lands. 50265-005

Finally, Thank you for avoiding the Cascade-Siskiyou National Monument. The Siskiyous are found just to the west. It is one system. I-5 bisects it now. A new corridor could create inestimable damage to this unique ecosystem 50265-006

Thank you for taking my comments into consideration.

I live on private land within the Cascade-Siskiyou National Monument and care deeply about its preservation and purpose.

Gretchen Hillard

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 1:20 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50266

Thank you for your comment, Thomas Ferns.

The comment tracking number that has been assigned to your comment is WWECD50266. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 01:19:57PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50266

First Name: Thomas
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Privacy Preference: Withhold address only from public record

Comment Submitted:

In TABLE 3.2-2 Acreage of Public Lands Administered by the BLM, FS, NPS, USFWS, and DOD in the 11 Western States as of FY2005 you show Washington with 408,580 acres of BLM and 344,963 acres of Fish and Wildlife acres. The U. S. Department of Energy, whose mission is Energy, has Hanford with 375,040 acres. Why wasn't DOE's Washington holdings included in the Draft EIS instead of generically mentioned as other federal properties later in the section? 50266-001

There doesn't seem to be an anlysis that links where the power is currently being produced to where it is being consumed. This draft EIS should also facilitate power production planning because power transmission is predicated on both peak power requirements and base load requirements. With the many alternative intermittent power production systems being proposed (wind, wave, solar, etc.), attention should be placed on ways to smooth the peak demand and reliably store these intermittant power supply sources. Why isn't there any emphasis on alternative technologies that can provide peak power support, such as Superconducting Magnetic Energy Storage (SMES) systems or dedicated hydro/pump systems, that would contribute to the overall goal of increased energy grid reliability, without increasing the need for more transmission facilities? 50266-002

In TABLE 3.14-9 Health and Safety Hazards Associated with Operation of High-Voltage Electricity Transmission Systems you address the corrosion potential of colocating transmission lines with pipelines, however I don't think that you give enough analysis to the potential safety issues associated with induced currents in pipelines placed parallel to high voltage transmission lines. Hydrogen in particular is very dangerous with any sparking potential. 50266-003

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

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 1:30 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50267

Thank you for your comment, JOAN KUHN.

The comment tracking number that has been assigned to your comment is WWECD50267. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 01:29:34PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50267

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Comment Submitted:
The consummate arrogance of the mayor of Los Angeles and the LADWP thinking that the Mojave Desert is Los Angeles's backyard, and LADWP's omnipotent attitude that allows them to think they can destroy another geographic portion of California as they did in the Owens Valley.

Our Morongo Basin is a quiet, lovely place to retire from urban congestion and noise. Now it is possible that the ignorance of LA will destroy this wonderful ecology, with hundreds fo years old Joshua trees and creosote bushes that are 600 plus years old.

In addition, our health will be jeopardized and our homes will lose thousands of dollars in value and we will face the hiss and buzz and ugliness of these power lines, some of the very things we came here to escape!

L.A. should use solar energy, with panels on the roofs of all public buildings. Why not subsidize private solar energy, which probably will be more cost effective and environmentally safe.

Or, if they must, use the freeway corridors for their dangerous and ugly project.

50267-001

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

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 1:59 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50268

Attachments: WestWideCorridorPEIS-BrendanHughesComments_WWECD50268.doc

WestWideCorridorP
EIS-BrendanHu...

Thank you for your comment, Brendan Hughes.

The comment tracking number that has been assigned to your comment is WWECD50268. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 01:58:50PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50268

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Attachment: C:\Documents and Settings\Administrator\Desktop\SCA Brendan\Personal Documents\Activism\WestWideCorridorPEIS-BrendanHughesComments.doc

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

Brendan Hughes
316 Mesquite Ave
Ridgecrest, CA 93555
760-780-8042

RE: Westwide Energy Corridor Programmatic EIS

To Whom It May Concern:

I urge that you take the "No Action" alternative in the Westwide PEIS. 50268-001

First, I believe that current energy corridors should be used to the greatest extent possible and the infrastructure therein upgraded if necessary to accommodate increased capacity. Second, the focus should be on increasing energy efficiency to the greatest extent possible before you begin designating new, large swaths of land for destruction. Also, we could try to stop the steady increase in population in this country that is driving the increasing demand for energy. These are the issues we need to address right now to solve this energy problem. 50268-002

As far as the content of the PEIS goes, it has several flaws. Many issues were not addressed in the PEIS, and are in need of further study. They include visual and recreational impacts, effects on human health and safety, impacts on floodplains and wetlands, and environmental justice considerations. 50268-003

Also, NEPA requires a West-wide analysis of the cumulative impacts of the corridor designation, which the PEIS does not accomplish. 50268-004

Additionally, two alternatives are not enough. Many more alternatives, and especially those that have more environmental protection measures, are needed in order to make a good decision on this issue. The current proposed action would adversely impact many special and protected areas in the West. This is unacceptable to me as a taxpayer and as a US citizen. 50268-005

The proposed action of the PEIS would have too much of an adverse effect on wildlife, wild lands, protected lands, watersheds, and ecosystems. I urge you to choose the no action alternative in the PEIS. 50268-006

Thank you for considering my comments.

Brendan Hughes

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 2:46 PM
To: corridoreiswebmaster@anl.gov
Subject: Receipt: Energy Corridor Draft Programmatic EIS Comment WWECD50269

Thank you for your comment, sylvia davis.

The comment tracking number that has been assigned to your comment is WWECD50269. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 02:46:19PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50269

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

Comment Submitted:
It took many years for us as a tribe to become citizens of the United Stated, our people of history had to endure many hardships and we continue to be treated unfairly and looked upon with prejudice. Now I find the we must yield to the request of right of passage to an energy corridor so fuel such as oil, gas, hydrogen liquid and electricity would be transported across the reservation to meet the needs of the majority so they can have electricity, heat their homes in the winter, and cool themselves in the summer, the majority who mostly frown when they see an indian. These corridors will be like a scar across the reservation where grasslands and trees will be uprooted, and with this permission, is it permissable for all according to the Energy Policy Act as a shield. How many scars will we put across the reservation. This land should stay whole, no corridors, no mining, and no defacement of the land; not any more. Look around, the weather is going crazy to global warming with greenhouse gases cause by human over consumption and how much longer, like a hungry person, are we going to stuff ourselves with ozone depleting energy when we should be looling towards alternative energy.

50269-001

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

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 3:36 PM
To: corridoreiswebmaster@anl.gov
Subject: Receipt: Energy Corridor Draft Programmatic EIS Comment WWECD50270

Thank you for your comment, Sheila Murphy.

The comment tracking number that has been assigned to your comment is WWECD50270. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 03:35:45PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50270

First Name: Sheila
Middle Initial: K
Last Name: Murphy
Address:
City:
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:
If any of your greedy ********** come by my place again I'll shoot you dead and bury your rat bodies for my trees fertilizer. Don't think I won't either! I'm over 70 years old and this land is all I got and I ain't about to let you ******* LADPW take any bit of it away! And you ain't taking away my view of the buttes out there! While I still got eyes to see it'll be your deaths before you kill my view! **** YOU ALL!!!! 50270-001

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

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 5:11 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50271

Thank you for your comment, James Catlin.

The comment tracking number that has been assigned to your comment is WWECD50271. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 05:11:16PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50271

First Name: James
Last Name: Catlin
Organization: Wild Utah Project
Address: 68 S. Main Street
Address 2: Suite 400
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State: UT
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Country: USA
Email: jim@wildutahproject.org
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
West-wise energy corridor DEIS

Please consider these comments in the preparation of this EIS.

Unfortunately, Wild Utah Project was never contacted during the scoping process of this DEIS. We are on record with a number of federal land managers, state agencies, local communities participating in ecoregional planning in Wyoming, Colorado, Utah, and parts of Idaho. While we are considered an interested public in these states on regional planning, those preparing this DEIS did not decide to include us in the notice list for scoping of this EIS. As a result, key information could have expedited this process was not incorporated in this decision process. 50271-001

At the Salt Lake hearing you recently conducted, I presented an alternative for consideration. The is alternative called for you to consider in this DEIS recommendations specific to a number of corridors that cross the Heart of the West Conservation Plan. This plan was the result of eight years of work by five dozen scientists. This plan provides guidance on those lands most important to manage primarily for wildlife values and identifies other lands where development such as these energy corridors may be more appropriate. At the hearing I provided a CD that has the detailed report and GIS data identifying on the ground specific locations for management. I ask that the documents on this CD be officially considered as comments to this DEIS and that the issues raised be addressed in the comments. 50271-002

The Heart of the West Conservation Plan includes a map of core areas and linkages between these core areas. Based on the ecological needs of this region, focal species analysis identified the minimum area needed to sustain the health of this landscape. Many of these proposed corridors cross either linkages or core areas.

Management recommendations for areas identified as core include taking action to reduce

the human footprint where habitat function is inadequate for focal species. Measures of this include vehicle route density, habitat structure and productivity relative to its ecological potential, and focal species use of this habitat.

This alternative would require that future utility use where today it crosses a linkage or core area have its impacts reduced where focal species today are unable to use this habitat at population level near their potential. Where wildlife and the utility use of the corridors now coexist, that use could continue. This further stipulations that new additions to the corridor not lead to an increased human presence or impacting footprint.

The specific species needs for a core area and linkage differ. They also differ if the linkage is primarily for fish, for example, or for a large mammal, say a raptor. A power line over a river which primarily a linkage for native fish offers few conflicts.

However, adding a power line to what is today a pipeline route causes major problems to the ferruginous hawk. This is one or our larger raptors that nest primarily in the shrub step habitat of the west. Adding new perches for raptors is very serious problem for this species. Other raptors, especially red tail hawks tend to increase their range and displace ferruginous hawks. Ferruginous hawks are in severe decline and perches on power poles and other structures is one of the factors for this. Under our management recommendations, we would argue for stipulations that reduce artificial perches in habitat identified as important to this species at risk.

50271-002 (cont.)

In general terms for most species for core areas, we recommend that road densities (total human impact densities) not be more than 0.6km per square km. We would be happy to provide you with the scientific literature supporting this metric.

To incorporate this alternative into the west wide DEIS, you will need to use the provided GIS coverage to identify those proposed utility corridors which cross a wildlands network linkage or core area then propose management stipulations suggested here as part of the decision process.

Heart of the West is not the only ecoregional plan available. Similar plans exist for the northern Rockies, for the southern Rockies, for the greater Grand Canyon, for New Mexico (Sky Island) and in a few other places. If you need help to secure the GIS coverages for these wildlands network designs, please contact us and we can provide these. We recommend that this DEIS consider an alternative that also manages these other ecoregional plans for ecosystem health.

For the preferred action, we recommend that the "no action alternative" be implemented for now. This alternative allows local regional plans to address comprehensively need for utility corridors in the context of a real need and real on the ground impacts.

Visit our web site for more information on the Heart of the West Conservation Plan.
http://www.wildutahproject.org/Templates/submenu(Heart%20of%20the%20West).dwt

Thank your this opportunity to comment. If you have any questions, please feel free to contact me.

Sincerely,

James Catlin PhD
Wild Utah Project.

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

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 6:10 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50272

Attachments: PEIS_comment_letter_West-wide_corridor_v9_WWECD50272.doc

PEIS_comment_lett
er_West-wide_...

Thank you for your comment, Brent Arnold.

The comment tracking number that has been assigned to your comment is WWECD50272. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 06:09:58PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50272

First Name: Brent
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Privacy Preference: Don't withhold name or address from public record
Attachment: Y:_Brent\West Wide Corridor\PEIS\PEIS comment letter West-wide corridor_v9.doc

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

February 8, 2008

Brent G. Arnold
Manager, Land and Environment
P.O. Box 71400
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Phone 801- 937-6259
brent.arnold@kernrivergas.com

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

To Whom It May Concern:

Kern River Gas Transmission Company ("Kern River"), a subsidiary of MidAmerican Energy Holdings Company, appreciates the opportunity to comment on the Draft Programmatic Environmental Impact Statement ("PEIS"), *Designation of Energy Corridors on Federal Land in the 11 Western States* (DOE/EIS-0386). Kern River respectfully submits these comments on issues that should be considered in the preparation of the final PEIS and in the designation of the corridors selected under Section 368 of The National Energy Policy Act of 2005. Kern River appreciates the opportunity to be involved in the undertaking of the West-wide corridor study, providing comments at scoping meetings and participating in the development of route alternatives.

Kern River owns and operates 1,680 miles of interstate natural gas pipeline through the states of Wyoming, Utah, Nevada and California. By state, 154 miles are located in Wyoming, 712 miles in Utah, 276 miles in Nevada and 538 miles in California. Approximately 850 miles are located on federally managed lands. The pipeline consists of 1,310 miles of 36-inch diameter steel pipe and 219 miles of 42-inch diameter pipe. The remaining portions are 30-inch diameter or less. The Kern River system also has four compressor stations located in Wyoming, four in Utah, two in Nevada and one in California. These compressor stations are located along the pipeline system and produce approximately 286,000 horsepower. The Kern River pipeline system currently has a design capacity of more than 1.7 billion cubic feet per day and is considered critical energy infrastructure for the western United States. For example, Kern River delivers approximately 23% of the average daily demand of natural gas into California and 84% of the average daily demand of natural gas into Southern Nevada.

Because Kern River transports natural gas in interstate commerce, it is regulated by the Federal Energy Regulatory Commission ("FERC") under the Natural Gas Act. This jurisdiction allows the FERC to review, approve and grant certificates for pipeline facilities and the routes and locations of these facilities. The FERC acts as the lead federal agency, with the Department of Interior Bureau of Land Management, the Department of Agriculture Forest Service, the Department of Defense and other federal agencies cooperating on federal lands.

Kern River files applications for rights of way on federal lands under the Mineral Leasing Act, thereby designating the Bureau of Land Management as the lead agency in issuing rights of way grants on federal lands in cooperation with the other land management agencies.

On January 25, 2007, the California Public Utilities Commission adopted an interim Greenhouse Gas Emissions Performance Standard. This facility-based emission standard required all new long-term commitments for base-load generation serving California consumers be with power plants having emissions no greater than a combined-cycle gas turbine plant. Kern River facilities are an essential component in meeting this standard. Kern River understands Nevada is looking to expand the use of gas-fired power plants to replace the traditional coal-fired power plants. It was recently announced in Utah that Rocky Mountain Power, the state's principal electric generator, has cancelled the development of coal-fired power plants due to the uncertainty of future emission standards.

Taken together, the implication of these developments is that additional gas-fired power plant facilities will be constructed in the market area served by Kern River in coming years. In this regard, Kern River believes natural gas and oil pipeline transmission corridor designations deserve the same consideration for the transmission of fuel to power plants as the transmission of the electrical output from the same plants to load centers and distant markets. It is as difficult to locate and authorize the necessary fuel lines (oil or natural gas) as it is to authorize electric transmission lines, inside or outside designated corridors, especially in congested areas.

Kern River applauds the efforts of the West-wide Corridor study team in assessing corridors using traditional multiple-use principles. It is also gratifying to note the potential designations accommodate multiple facilities, with a width sufficient for compatible use between multiple electric transmission lines and multiple pipelines. Corridor widths, depending on site-specific resource issues, should be sufficient to meet the expanding needs for energy transportation throughout the Western states. Narrow corridors may restrict long-term energy supply growth. Corridors designated through mountain passes or other land obstacles need to be studied thoroughly and may need to be widened accordingly. Corridors through these land obstacles typically cannot support the same multiple facilities as normal land terrain corridors and eventually become a bottleneck for future facilities. Corridor designation should also account for ancillary facilities associated with energy transmission. As an example, natural gas pipelines typically include compression facilities that require sites of approximately 25 acres. 50272-001

Kern River's analysis of the Draft PEIS identified several distinct advantages to the designation of corridors as defined in the document. Some of the more specific issues and removal of constraints that would be addressed by the formal designation of corridors include:

- The West-wide corridor designation will amend all existing federal land-use plans to recognize these corridors. This action would significantly reduce the time and expense required to be invested in the current authorization process.

- Due to the pre-disposition in the land-use plan toward projects within the corridor, this action would support a timelier and more favorable decision field as a project is being analyzed.

- Linking corridors through the different federal land units by a West-wide designation will allow the matching of corridor segments as they transcend each federal boundary. This is also important as contiguous states will now reflect common corridors, rather than the previous situation where there was no recognition of designated corridors across any boundaries.

- It allows for uniform treatment of applications between different agencies and locations.

- Designation of corridors provides a single point of contact for each project within the corridor.

- The designation reduces the number of National Environmental Policy Act alternative and siting studies that would be required for projects identified within the designated corridors.

- The designation may reduce some project costs. As facilities are placed more closely in the corridors, the need for lengthy laterals may be reduced.

- The PEIS proposal allows for right of way applications to be received and processed for lines outside the designated corridor utilizing already established procedures.

- The document also would limit the number of alternatives to two: either applying for a right of way within the corridor, or no action within the corridor.

50272-001 (cont.)

At the same time, while Kern River is generally very supportive of the Draft PEIS, we believe the practical effect of the document in helping to expedite the processing and construction of actual energy project rights of way within the designated energy corridors may be undermined if the specific areas of concern identified below are not addressed in the Final PEIS. Accordingly, Kern River offers the following comments intended to show how the Draft PEIS can be improved to benefit not just the proponents of projects within future designated corridors, but also to those preparing documents and to reviewers of specific proposals.

General Comments

- Corridor Routes (Volumes II and III): Energy corridors have been established through the land-use planning process for years, but an intrinsic flaw in the process is that the corridors do not continue through private, local and state-owned lands. The designation process should address the mechanisms available for establishing continuous/contiguous corridors on a regional basis, including lands not federally managed. State, county and local governments must be included in the process and encouraged to become stakeholders by designating corridors in their land-use planning processes. Energy interests are directed and counseled to utilize established corridors, but this becomes difficult when the corridor may not exist on either side of a public land block. Corridors able to accommodate the crossing of public land and private land within the urban interface are needed.

50272-002

- Volume I Chapter 3: The document and future designation does not delineate corridors on state and private lands. Non-designation of these lands leaves a project proponent with some uncertainty as to whether a project crossing a break in public land ownership has the

50272-003

ability to complete route planning and tie to the next corridor segment. Although Kern River realizes the difficulty of contiguous corridor delineations across all ownerships, such gaps leave project proponents in a difficult position as routes are considered. While it is expected a project would receive expedited treatment within a designated corridor, there is uncertainty at to what will happen at the end of a public land corridor. Concerns also arise over the type of NEPA analysis required outside designated corridors, which could make preparation of environmental documentation extremely difficult. 50272-003 (cont.)

Comments on the Draft PEIS Proposed Energy Corridor Maps

- Volume III Part 5 Map cor196UTadmin: The proposed routing of corridors does not designate corridors across the Wasatch Front or within the confines of the Salt Lake Valley, despite recommendations to the contrary submitted during the prior PEIS scoping process. Non-designation creates problems transporting product from the highly productive gas fields in southwestern Wyoming and eastern Utah to markets in southern Nevada and California. Existing corridors in the Wasatch-Cache National Forest should be included as multi-modal corridors.

- Volume III Part 5 Map cor196NVadmin: Kern River is pleased our concerns submitted early in the scoping process were acknowledged, and a corridor around the east side of Las Vegas was identified. However, the Draft PEIS, in identifying the above-mentioned proposed corridor (Segment 39-231), has the same corridor traversing the Sunrise Mountain Instant Study Area (ISA). Although this corridor already has three power lines traversing it, the designation does nothing to allow additional rights of way through the area. This may render this vitally important proposed corridor through a highly congested area useless unless resolution of the ISA is attained, or at least clarification is provided in the Final PEIS that rights of way will be authorized to cross the ISA.

- Volume III Part 5 Map cor196NVadmin: The proposed designations do not include the North McCullough Pass area south of Las Vegas, despite recommendations to the contrary submitted during the prior PEIS scoping process. The North McCullough Pass has existing transmission lines and an approved right of way for a pipeline routed through it. Designating North McCullough and South McCullough passes within an energy corridor would provide resource planners greater flexibility in pursuing possible energy transportation routes through this highly congested area. 50272-004

- Volume III Part 5 Map cor196CAadmin: Where the Draft PEIS proposed corridor leaves Nevada and enters California, Segment 27-225, the corridor designation inexplicably changes from a multi-modal classification to an electric only classification. This area already contains several natural gas pipelines and provides the only tie south and west from the Utah/Las Vegas areas. Unless reclassified for multiple use, designation of this corridor as electric-only could restrict the most attractive routes for future projects delivering natural gas from the Rocky Mountains to Southern California. Accordingly, Kern River recommends that Segment 27-225 be classified as a multi-modal corridor.

- Volume III Part 5 Map cor196CAadmin: Corridor Segment 27-225 passes through the Mojave National Preserve. When Kern River installed a second natural gas pipeline line in

2003, it was directed by regulatory agencies to locate the line so as not to pass through the preserve. However, the proposed designation would appear to allow facilities to again transect the preserve. Kern River requests that the Final PEIS clarify whether natural gas transmission lines are again authorized within the preserve boundary. 50272-004 (cont.)

Comments on Environmental Remarks in the Draft PEIS

- Volume I Chapter 3, Section 3.2.3: In trying to avoid sensitive areas, the Draft PEIS does not clear specific portions of potential corridors from encumbrances such as wilderness study areas, instant study areas or areas of critical environmental concern. Each of these areas would require additional analysis, some type of clearance and, in some cases, legislation to remove barriers for the placement of facilities in these areas, even though designated corridors pass through them. Legislative constraints should be removed to allow agencies to manage their lands within a "multiple use" framework to facilitate resource management in a way that best meets the energy transportation needs of the region. At a minimum, the Final PEIS should specifically acknowledge this limitation. 50272-005

- Volume I Chapter 3: While the Draft PEIS goes to great lengths to identify resource species and issues, it does very little to cover specific mitigation remedies, other than best management practices. Kern River believes the analytical assessment provided here as to the impacts to various ecological resources are replete with certain inaccuracies and misstatements. Kern River recommends that issues pertaining to biological issues be addressed instead in any ensuing project-specific Environmental Assessment/ Environmental Impact Statement action. 50272-006

Summary

Many areas of the West are experiencing unprecedented load growth and an overtaxed energy delivery system. Energy supply demands, existing capacity constraints and utility service reliability obligations make it imperative that new major interstate energy systems are added despite the difficult environmental and permitting challenges facing Western infrastructure developers. An optimized PEIS process leading to the well-considered designation and implementation of Western energy corridors holds great promise as a solution to Western infrastructure needs. Toward that end, Kern River is hopeful the recommendations provided above will help assure that needed energy transportation facilities are processed and constructed in an more efficient, cost-effective and environmentally responsible manner so that the resources being generated across the Western states are timely and reliably transported where needed.

Kern River appreciates the opportunity to comment on the Draft PEIS. If you have any questions on these comments or would like more information, please feel free to contact me.

Sincerely,

Brent G. Arnold
Manager, Land and Environment
Kern River Gas Transmission Company

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 6:23 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50273

Attachments: Oregon_Natural_Desert_Association_-_Energy_Corridors_DPEIS_Comments_2-8-08_WWECD50273.pdf

Oregon_Natural_Desert_Associat...

Thank you for your comment, Dave Becker.

The comment tracking number that has been assigned to your comment is WWECD50273. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 06:22:27PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50273

First Name: Dave
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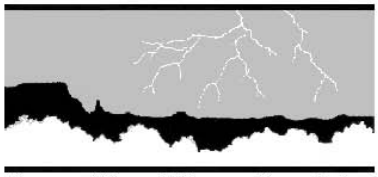
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Users\Dave\Documents\aONDA work\Energy Corridors\Oregon Natural Desert Association - Energy Corridors DPEIS Comments 2-8-08.pdf

Comment Submitted:
Please find our comments attached.

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



Oregon Natural Desert Association

VIA Project Web Site (http://corridoreis.anl.gov)

February 8, 2008

LaVerne Kyriss
Federal Energy Corridor Projects Manager
U.S. Department of Energy
West-Wide Energy Corridors PEIS
Argonne National Laboratory
9700 S. Cass Ave., Bldg 900, Mail Stop 4
Argonne, IL 60439

Re: Draft Programmatic Environmental Impact Statement entitled "Designation of Energy Corridors on Federal Land in the 11 Western States."

Dear Ms. Kyriss:

Please accept these comments from the Oregon Natural Desert Association ("ONDA") on the interagency Draft Programmatic Environmental Impact Statement entitled "Designation of Energy Corridors on Federal Land in the 11 Western States." ("DPEIS"). ONDA is a non-profit public interest organization dedicated to preserving and protecting the public lands of eastern Oregon. ONDA has a long history of interest and involvement in eastern Oregon's public land management. ONDA's mission is to protect, defend, and restore forever the health of Oregon's native deserts. The members and staff of ONDA use and enjoy the public lands, waters, and natural resources within the proposed corridor pathway for recreational, scientific, spiritual, educational, aesthetic, and other purposes.

ONDA and its members also participate in information gathering and dissemination, education and public outreach, commenting upon proposed agency actions, and other activities relating to the federal government's management and administration of the public lands of eastern Oregon. Our comments on the DPEIS focus on the proposed Section 368 corridors which pass through eastern Oregon, numbered 7-24, 11-228, 7-11, 24-228, 16-24, and 11-103.

ONDA appreciates that the modifications to the "conceptual" corridors originally distributed when scoping for this project began in 2005 resulted in the re-routing of certain proposed corridors around some wild lands and important wildlife habitat areas. However, the DPEIS is inadequate to support a decision to designate new energy corridors because it fails to analyze any alternatives beyond "No Action" and the designation of approximately 6,055 miles

of Section 368 energy corridors, lacks analysis of impacts from foreseeable projects within the corridors on wilderness characteristics of the lands that will be designated as corridors or on the wildlife and plants for which these lands are important habitat, and contains no assessment of the cumulative impact of designating energy corridors in conjunction with dozens of pipeline and electricity transmission projects already on the drawing board throughout the West.

The result is a draft programmatic environmental impact statement that is remarkably limited in its evaluation of impacts to the environment from the action. Despite the proposal to designate over 6,000 miles of energy corridors up to three miles wide, where it is foreseeable to within a few thousand feet where currently-proposed and future transmission projects will be sited, the agencies have not consulted with the Fish and Wildlife Service ("FWS") regarding the effects of such projects on listed and sensitive species and their habitat—and have compounded this deficiency by not even assessing whether there are alternatives or different combinations of routes that could significantly decrease the detrimental effects of future energy transmission projects on wildlife and wild lands and yet still effectively transmit energy across the West.

I. The Agencies Must Consider More Than Two Alternatives for Designating Energy Corridors in the Final PEIS.

The DPEIS improperly considers only a No Action alternative and the preferred alternative to designate approximately 6,055 miles of energy corridors under Section 368, including 591 miles in Oregon. NEPA requires that federal agencies provide a detailed evaluation of alternatives to the proposed action in every NEPA document. 42 U.S.C. § 4332; 40 C.F.R. § 1502.14(a). This discussion of alternatives is essential to NEPA's statutory scheme and underlying purpose. See, e.g., Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1228 (9th Cir. 1988), cited in Alaska Wilderness Recreation & Tourism Ass'n v. Morrison, 67 F.3d 723, 729 (9th Cir. 1995); Muckleshoot Indian Tribe v. U.S. Forest Serv., 177 F.3d 800, 813 (9th Cir. 1999). Indeed, NEPA's implementing regulations recognize that the consideration of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14.

The purpose of the DPEIS is to consider the effects on the environment of potential routes for oil, gas, electricity and other energy transmission projects throughout the west. The routes designated, by their design, are intended to serve as the preferred locations for the future development of energy transmission infrastructure. DPEIS at ES-2. At the end of the environmental review process, the agencies intend to "designate a system of energy corridors … for the purpose of establishing those corridors as the preferred location for energy transport projects." DPEIS at ES-4. Once a Section 368 corridor is designated, the agencies intend to facilitate and expedite the approval of projects proposed within the corridors. DPEIS at ES-5. Notably, no further amendments to land use plans will be required for projects proposed in these corridors. DPEIS at ES-4. 50273-001

The DPEIS is unique as a programmatic EIS in that the extent of the corridors the agencies designate at this time—what route to take, what width will be allowed, and what lands and habitat will be disturbed—will coincide almost exactly with the future projects that will, by virtue of the designations, be sited in those corridors. This is not a landscape-wide PEIS where development could occur at an exponential number of locations within the large area surveyed—rather, at this time, the agencies know exactly what sorts of projects are expected, precisely

where they will go, and are designating these corridors explicitly to encourage development of the projects within them. It is therefore disingenuous for the agencies to conclude that there will be no direct impacts from corridor designation that will significantly affect the human environment.

As discussed below with reference to cumulative effects, not only the types of projects, but certain specific projects, are already reasonably foreseeable. Because the nature and location of future transmission projects in the designated corridors can be determined with some certainty at this time, this is also the time that the agencies should assess a variety of alternatives—with the goal of ensuring that the corridors ultimately designated are necessary, and eliminating or re-routing those corridors which pose unacceptable risks of harm to the wildness and the biological integrity of these eleven western states.

The agency's obligation in its environmental review is to "[r]igorously explore and objectively evaluate all reasonable alternatives" in order "to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of [the agency's] actions upon the quality of the human environment." 40 C.F.R. §§ 1502.14(a), 1500.2(f). Analysis of alternatives must be "sufficiently detailed to reveal the agency's comparative evaluation of the environmental benefits, costs and risks of the proposed action and each reasonable alternative." Id. The all-or-nothing alternatives presented in the DPEIS fall far short of this standard. The agencies should prepare a set of genuine reasonable alternatives that include several different configurations which would designate fewer corridors, and incorporate options such as increasing the capacity of existing corridors, reducing demand for transmission by encouraging use of local energy sources, or coordinating corridor designation with existing planned or proposed transmission projects. 50273-001 (cont.)

Most important, the alternatives should focus more attention than the DPEIS currently does on routing corridors to protect sensitive areas of the public lands and the creatures that live on them. Where site-specific decisions are being made in a programmatic EIS—such as here, where specific, narrow corridors for future energy projects are being designated—and potentially designating different corridors, or corridors that follow different geographical paths is a reasonable alternative, considering only two alternatives is inappropriate under NEPA. See, e.g., IlioUlaokalani Coalition v. Rumsfeld, 464 F.3d 1083, 1096-01 (9th Cir. 2006).

II. The Agencies Should Undertake a Comprehensive Environmental Analysis Before Designating New Energy Corridors.

The agencies are now designating long, narrow, precisely-placed corridors where energy transmission projects will almost certainly pass in the future. Even if the agencies do not mandate that development occur only in designated corridors—which they should—the effect of the designations will be to encourage development within those corridors, rather than placement of transmission projects elsewhere. In addition, the Bureau of Land Management ("BLM"), which administers the majority of federal land over which the designated corridors would pass, has a substantive duty to ensure that the route designation decision complies with the multiple use mandate in the Federal Land Policy and Management Act ("FLPMA"). This includes FLPMA's unnecessary or undue degradation and "without permanent impairment" provisions, the Section 603 nonimpairment duty, and the duty to act consistently with BLM's land use plans 50273-002

(which contain standards, goals, objectives, etc. for wildlife, habitat, and other values/resources associated with wilderness). The practical result is that this PEIS presents the proper occasion for a full assessment of the impacts to wilderness, wildlife, plant life, and the cultural, scenic, and historic values of the lands through which the corridors may pass. Comprehensive analysis of these factors is necessary to properly assess—and minimize—the effects of future projects in the corridors on the environment.

As discussed further below, wilderness values, wildlife, and largely-intact native ecosystems are threatened by the routes of some of the proposed corridors. In particular, any project that might be developed in corridor 7-24 will have significant, adverse effects on intact roadless areas containing some of the remaining strongholds for shrinking populations of sage grouse and pygmy rabbits, and which serve as important habitat for pronghorn, bighorn sheep, and native plant species. Corridor 7-24 will pass alongside Steens Mountain Wilderness and two designated Wilderness Study Areas, and cut through or between six additional proposed Wilderness Study Areas. The PEIS must fully analyze the wilderness values of these lands where the corridors designations will inevitably lead to roadbuilding and transmission projects that could eliminate their wildness forever. 50273-002 (cont.)

In addition, the agencies should consult with FWS, NOAA Fisheries, and other state and federal agencies under the Endangered Species and National Historic Preservation Act regarding the proposed corridor routes. In eastern Oregon, the route of the designated energy corridors—particularly 7-24—will further fragment habitat that is necessary to ensure the survival of sage grouse and pygmy rabbits, two species that are currently under review for listing as threatened or endangered. Only through consultation—during the preparation of the FPEIS—with FWS can the agencies make an informed decision about whether the corridors they will designate appropriately minimize potential harm to these and other sensitive species from future energy transmission projects. Once the corridors are designated, and once site-specific projects are proposed, it will be too late to comprehensively assess whether the corridors (and the projects they will contain) are located in the right places. 50273-003

III. Impacts of the Energy Corridor Designations on the Wilderness Resource.

ONDA noted in its July 2006 scoping comments that the corridor routes had been revised so as to avoid some sensitive areas, and it appears that the proposed corridors analyzed in the DPEIS conform to the revised route proposals. Despite this positive development, proposed corridor 7-24 still crosses through three proposed Wilderness Study Areas: the Hart Mountain proposed WSA, the Beaty Butte proposed WSA,[1] and the Coleman Rim proposed WSA (see attached map, Exhibit 1). Corridor 7-24 also runs adjacent to designated WSAs and designated wilderness in several places. The route of this corridor passes through some of the most important remaining intact habitat for Greater sage grouse, pygmy rabbits, and pronghorn. Because of the remarkable concentration of wilderness-quality land and relatively unspoiled wildlife habitat that remains in the area through which corridor 7-24 would pass, ONDA urges the agencies to develop alternatives that would remove this corridor from among those proposed for designation. 50272-004

1 Formerly identified as the "Spaulding WSA addition 2" on citizen wilderness proposal maps and in ONDA's scoping comments on the DPEIS.

Federal agencies must present and analyze the effects of the proposed action on the wilderness resource even on lands that have not formally been designated as wilderness or as WSAs. The U.S. District Court for the District of Oregon recently held that impacts to such proposed wilderness areas should be considered in conducting environmental impact evaluations under NEPA. The court held that the BLM "was obligated under NEPA to consider whether there were changes to or additions to the wilderness values within the East-West Gulch [the project area], and whether the proposed action in that area might negatively impact those wilderness values, if they exist." Ore. Natural Desert Ass'n v. Rasmussen, 451 F. Supp. 2d 1202, 1213 (D. Or. 2006). Ironically, corridor 7-24 is planned to run through the East and West gulches in the proposed Beaty Butte WSA—the very gulches which were at issue in Rasmussen, which resulted in a court order that BLM must consider wilderness values before authorizing livestock-related pipelines and fences there. Yet the agencies have not considered the impact of corridor designation, and the projects they are meant to carry, on the wilderness values of these lands.

Currently, the DPEIS does not even consider Wilderness Study Areas and National Conservation Areas to be "major" sensitive resource areas that would be intersected by proposed energy corridors. DPEIS at 2-12. There is no indication in Section 2.2.1, which describes how corridors were sited, that the agencies considered citizen-proposed wilderness areas—even though it is clear that NEPA requires consideration of impacts to wilderness values on all public lands that are subject to major federal actions. As currently proposed, several energy corridors would intrude on or destroy the wilderness values of several roadless wild areas.[2] These include:

Corridor 7-24 (see attached map, Exhibit 1)

- Steens Mountain Wilderness
  - Corridor runs along the southern boundary.
- Basque Hills, Rincon, and Spaulding Wilderness Study Areas
  - Corridor runs within one mile of a WSA boundary.
- Beaty Butte proposed Wilderness Study Area
  - Corridor bisects the northern half of the proposed WSA, fragmenting it and reducing its value as contiguous wilderness in conjunction with the designated WSAs to its east and west. The District Court in Oregon has explicitly held that an agency must consider wilderness values in this proposed WSA before approving a proposed action.
- Hart Mountain proposed Wilderness Study Area
  - Corridor runs through the proposed WSA in three different places, diminishing the wilderness characteristics of the area.
- Coleman Rim proposed Wilderness Study Area.
  - Corridor runs through the proposed WSA.
- Tule Springs proposed Wilderness Study Area, Alvord Lake proposed Wilderness Study Area, and Black Point Wilderness Study Area.

50273-004 (cont.)

2 Litigation is currently pending in federal courts against the Department of the Interior concerning impacts to wilderness values in many (or all) of these areas—for example, Ore. Natural Desert Ass'n v. BLM, No. 05-35931 (9th Cir.) (regarding the South Eastern Oregon RMP), Ore. Natural Desert Ass'n v. Shuford, No. 06-242 (D. Or.) (regarding the Andrews-Steens RMP), Ore. Natural Desert Ass'n v. Gammon, No.07-35728 (9th Cir.) (regarding the Lakeview RMP), Ore. Natural Desert Ass'n v. Freeborn, No.06-1311 (D. Or.) (regarding the Louse Canyon GMA), in addition to administrative appeals over several other projects and plans.

- Corridor cuts through the narrow gap that separates these proposed WSAs, promising additional development along an existing utility line corridor that could further erode the wilderness characteristics of this area.

- Proposed Sage Grouse National Conservation Area (see attached map, Exhibit 2).
  - Since 2004, this area has been informally proposed and described in submissions to state and federal agencies involved in sage grouse protection efforts as a means for protecting significance concentrations of sage grouse, leks, and contiguous, relatively intact sage-steppe habitat.
  - Corridor bisects proposed NCA and pass near many sage grouse leks.
- Crane Mountain Inventoried Roadless Area, Fremont National Forest.
  - Corridor cuts through inventoried roadless area.

Designation of corridor 7-24 has the greatest potential to change forever many areas in eastern Oregon that retain wilderness characteristics. Not only would the inevitable roads and transmission projects in this corridor mar the landscape, but they would create soil disturbance that would facilitate the spread of non-native weeds and grasses, leading to further degradation of wilderness values. And, as discussed in more detail below, this corridor would also have significant impacts on sage grouse and other species for which the area is important and relatively intact habitat. Because corridor 7-24 would unacceptably fragment these cohesive habitat areas, the agencies must fully evaluate and consider eliminating corridor 7-24 from the final set of designated corridors.

Please refer to descriptions of the wilderness values of the Hart Mountain proposed WSA in ONDA's Wilderness Inventory Recommendations for the Lakeview BLM district, at page 87.[3] Descriptions of the wilderness values of the Beaty Butte proposed WSA (called "Spaulding" in the report) can be found at the same document at page 209, and of the Coleman Rim proposed WSA at page 47. The report also includes maps of these areas. The descriptions and maps for Hart Mountain, Beaty Butte, and Coleman Rim proposed WSAs from that report are reproduced below in the Appendix following the Exhibits.

50273-004 (cont.)

Corridor 11-228 (see attached map, Exhibit 3)

- Camp Creek, Cottonwood Creek, and Dry Creek Wilderness Study Areas.
  - Corridor runs along a WSA boundary.
- Keeney Ridge and Grassy Mountain proposed Wilderness Study Areas.
  - Corridor runs along the boundaries.
- Freezeout Ridge proposed Wilderness Study Area.
  - Corridor slices through the southern portion.

Corridor 24-228

- Alvord Desert and Bowden Hills Wilderness Study Areas.
  - Corridor runs between these WSAs, slightly within each.

3 Available at www.onda.org/defending-desert-wilderness/campaign-to-protect-desert-wilderness/more-info-on-ondas-campaign-to-protect-desert-wilderness/LakeviewInvRep.pdf/view?searchterm=lakeview (document last modified April 1, 2005).

Corridor 16-24

- Oregon Canyon Wilderness Study Area.
  - Corridor runs within a mile of the southeastern boundary.

Appendix G to the current DPEIS provides a list of "Sensitive Resource Areas That Would be Intersected by Proposed West-Wide Energy Corridors." However, this list omits many roadless areas in Oregon that have been identified as retaining wilderness characteristics, including WSAs and areas which ONDA has proposed to BLM for designation as Wilderness Study Areas. A proper analysis of the impacts of the foreseeable transmission projects in these corridors must acknowledge and discuss the significant wilderness values documented in detail in ONDA's wilderness inventory reports and consider whether any aspect of the proposed action would impact wilderness values or these areas' ability to be designated as wilderness in the future. It should also consider cumulative effects on the wilderness resource, and document all wilderness-quality lands (whether designated or not) and where they are located with respect to the proposed transmission corridors and other pending or proposed transmission projects. 50273-004 (cont.)

IV. Impacts of the Energy Corridor Designations on Wildlife and Plant Habitat

As noted above, part of the process of developing a PEIS that accurately assesses the west-wide impacts of designating energy corridors is early and comprehensive consultation with fish and wildlife management agencies on the impacts to listed and candidate species from the development that is almost certain to occur in these corridors. Although specific impacts from particular projects will still need to be analyzed at the project level, a comprehensive assessment at the programmatic level will ensure that corridor siting—likely to condition the paths that future transmission development will take—is done to minimize detrimental effects to the plant and animal habitat through which these corridors will pass.

This is of particular concern in the sage-steppe environment of eastern Oregon and other interior western states, where fragile lands and species that depend on them are already seriously threatened by chronic overgrazing, increasing pressures from oil and gas development, and growing threats from destructive wildfires, drought, and climate change. Because of its relative remoteness and lack of development, eastern Oregon remains a stronghold for several species which are federally protected or are being considered for federal protection. 50273-005

The area of eastern Oregon where corridor 7-24 is proposed for designation is one of the largest relatively intact sections of sage-steppe habitat remaining in the West. The public lands on and surrounding the proposed Hart Mountain and Beaty Butte WSAs comprise a significant, critical swath of habitat linking Hart Mountain National Antelope Refuge to the northwest to Sheldon National Wildlife Refuge in northern Nevada, and connecting with designated wilderness and WSAs to create a corridor to Steens Mountain to the northeast. The area supports a vast array of wildlife, and includes critical winter and migratory habitat for pronghorn, as well as important habitat for sage grouse, pygmy rabbits, Western big-eared bats, ferruginous hawks, burrowing owl, desert and short-horned lizards, and countless other birds and mammals. The neighboring Hart Mountain and Sheldon refuges are unique in that they comprise the largest area in the Great Basin no longer grazed by livestock.

This area is the heart of the proposed Sage Grouse National Conservation Area, depicted in the map in Exhibit 2. The Greater sage grouse population has declined as much as 45—80 percent over the past 20 years due to habitat destruction, degradation and fragmentation, with the current breeding population estimated at 140,000 individuals, representing only about eight percent of historic numbers. A 2004 survey by state and federal scientists found that sage grouse are in long-term decline, with the report concluding it was "not optimistic about the future of sage-grouse because of long-term population declines coupled with continued loss and degradation of habitat and other factors (including West Nile Virus)."[4] Sage grouse depend on unbroken, healthy expanses of sagebrush habitat such as that present within the proposed Sage Grouse NCA.

Recognizing the importance of Oregon as an area of critical importance for the species's survival, Oregon's Department of Fish and Wildlife ("ODWF") has adopted a conservation strategy for the sage grouse,[5] underscoring that human activities and structures decrease the quality of sage grouse habitat and can result in habitat loss and direct bird kills. The strategy, at pages 83—84, recommends that land management agencies carefully evaluate actions that could lead to harm to sage grouse habits. Specifically, new transmission projects should follow "existing utility corridors and rights-of-ways to consolidate activities to reduce habitat loss, degradation, and fragmentation by new construction." If transmission projects are not possible within existing corridors, ODWF recommends that planners "seek to minimize disturbance to known breeding, nesting, and brood-rearing habitats by placing power line corridors >3.2 km from these areas." ODWF's strategy highlights the importance of preserving habitat integrity and connectivity, noting that

> Habitat loss and fragmentation are probably the 2 leading causes for the long-term decline in sage-grouse. Current and future land management will need to examine landscape patterns of sagebrush habitat and seek strategies to ensure that large connected patches of sagebrush are present. The implementation of the connectivity model and habitat monitoring techniques suggested in the Plan will help minimize the impacts of habitat loss and fragmentation.

50273-005 (cont.)

Similar guidance, stressing the importance of maintaining intact habitat, is found in the BLM's National Sage Grouse Habitat Conservation Strategy and BLM's guidelines regarding Special Status Species such as sage grouse.

In December 2007, the U.S. District Court for the District of Idaho ordered the FWS to evaluate properly whether the Greater sage grouse should be listed as threatened or endangered under the Endangered Species Act. The FWS will begin its new review of the sage grouse's status this month, perhaps as early as next week. Federal agencies proposing actions as significant as designating new energy corridors must be particularly careful that their decisions do not have adverse impacts on species whose status is so precarious that it may be listed under the ESA. The agencies' discussion of the sage grouse in the DPEIS at 3-202 to 3-204 does

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4 Connelly, J. W., S. T. Knick, M. A. Schroeder, and S. J. Stiver. 2004. Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats. Western Association of Fish and Wildlife Agencies. Unpublished Report. Cheyenne, Wyoming.

5 Oregon Department of Fish & Wildlife, Greater Sage-Grouse Conservation Assessment and Strategy for Oregon: *A Plan to Maintain and Enhance Populations and Habitat*, available at http://www.dfw.state.or.us/wildlife/sagegrouse/.

acknowledge that projects within the designated corridors are likely to harm sage grouse, recognizing that the birds need "contiguous, undisturbed areas of high-quality habitat," and that "[t]ransmission lines, pipelines, and access roads may adversely affect habitats important to gallinaceous birds by causing fragmentation, reducing habitat value, or reducing the amount of habitat available (Braun 1998). Transmission lines, pipelines, and other structures can also provide perches and nesting areas for raptors and ravens that may prey upon gallinaceous birds." However, the information about the potential harm to sage grouse does not actually inform the agencies' decision of where transmission corridors should be sited, and whether there are alternatives that would avoid disrupting the "contiguous, undisturbed" sage grouse habitat present througout southeastern Oregon.

Because of a lack of consultation with FWS, and the absence of alternatives that might route corridors differently to avoid sensitive species habitat, the DPEIS contains no adequate analysis on the effects of the proposed action alternative on sage grouse and other sagebrush-dependent wildlife. As shown on the attached map (Exhibit 4), corridor 7-24 will pass through areas with high concentrations of sage grouse leks, fragmenting areas (including the proposed WSAs) that are currently intact habitat for these birds. Because any development within the proposed corridor could have a detrimental effect on sage grouse, the DPEIS should have considered the effects of designating corridor 7-24 and other corridors through southeast Oregon on these leks and on the sage grouse generally. The agencies have a duty to consider "cumulative effects" under NEPA, and consider alternatives—different routes, or not designating corridor 7-24 at all—that would preserve the relatively intact sage-steppe habitat in this area.

The area through which the proposed corridors would pass in eastern Oregon is also habitat for pygmy rabbits. On January 8, 2008, the U.S. Fish & Wildlife Service announced a positive 90-day finding on a petition to list the pygmy rabbit under the ESA, beginning the listing review process. Pygmy rabbits, like sage grouse, are dependent on large areas of intact sage-steppe habitat for their survival. Any activities that fragment pygmy rabbit habitat—such as the development of energy transmission projects within designated corridors—could lead to increased pressure on the species and its continued existence. As a result, the DPEIS should have included consultation with FWS on the status of the pygmy rabbit, and the potential impact of energy transmission projects in any designated corridors on the rabbit and its habitat.

50273-005
(cont.)

Southeastern Oregon is also a region of major importance for pronghorn. In recent years, pronghorn populations throughout the west have suffered significantly accelerated loss of habitat from increased oil and gas development. Because of pressure on pronghorn from energy projects in states such as Wyoming and Colorado, it is particularly important to preserve pronghorn habitat in areas, such as southeastern Oregon, where they still relatively intact and undisturbed. In Oregon, the federal government has set aside 278,000 acres as the Hart Mountain National Antelope Refuge, while more than half a million acres are protected as pronghorn wintering habitat in the Sheldon National Wildlife Refuge in northern Nevada. The FWS, which administers both areas, refers to them as the "Sheldon-Hart Mountain National Wildlife Refuge Complex."

Pronghorn summer and calve at Hart Mountain and at Steens Mountain, and migrate south to winter in Sheldon. Recognizing the importance of a similar migration corridor, this week FWS signed a pledge, along with the National Park Service and U.S. Forest Service, to

protect the "Path of the Pronghorn," a 300-mile migration corridor from Grand Teton National Park to central Wyoming. The migration pathway between Hart Mountain and Sheldon NWR is likewise worthy of protection. As indicated in the map in Exhibit 2, this outstanding pronghorn habitat coincides with the proposed Sage Grouse National Conservation Area, which would protect habitat critical to the survival of several sage-steppe-dependent species. In addition, reintroduced bighorn sheep also depend on the relatively unbroken stretches of wilderness in this area, and avoiding habitat fragmentation is important to the continued restoration of this species.

As discussed above, the area between Hart Mountain and Sheldon consists of enormous, contiguous areas of designated wilderness, WSAs, or lands retaining wilderness characteristics which ONDA has proposed as WSAs. However, proposed energy corridor 7-24 would bisect this area and this important wildlife habitat. The construction of new roads and transmission lines or pipelines in this corridor would also result in soil disturbance, encouraging the spread of non-native weeds and grasses and further disturbing the relatively intact sage-steppe habitat in this area. Prior to finalizing and designating new energy transmission corridors based on the PEIS, the agencies should involve FWS and other wildlife and fish management agencies in the decisionmaking process to ensure that the corridors and the projects they will eventually contain have as few impacts as possible. Where particularly valuable areas of intact habitat remain for sensitive species—such as in the proposed Sage Grouse National Conservation Area—the agencies should eliminate or substantially re-route proposed corridors to avoid these areas.

50273-005 (cont.)

V. Cumulative Impacts of Corridor Designation and Currently Pending or Proposed Energy Transmission Projects in Eastern Oregon.

Finally, Chapter 4 of the DPEIS fails to provide any concrete analysis of the foreseeable effects on the environment from the projects that will certainly be sited in the designated corridors in combination with other currently pending or proposed energy transmission projects. NEPA requires an analysis of the cumulative effects of the proposed action. 40 C.F.R. §§ 1508.7, 1508.25(a)(2). Cumulative impacts are defined as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. Id. § 1508.8. However, even though it is almost certain that gas, oil, and electricity transmission projects will be built in the proposed corridors, the DPEIS's cumulative effects discussion has no analysis of how impacts from these projects will combine with foreseeable impacts from other currently pending or proposed projects outside the corridors.

50273-006

In analyzing the cumulative effects of a proposed action, an agency must do more than just catalogue "relevant past projects in the area." City of Carmel-by-the-Sea v. United States Dep't of Transp., 123 F.3d 1142, 1160 (9th Cir. 1997). The EIS "must also include a 'useful analysis of the cumulative impacts of past, present and future projects.'" Id. This means a discussion and an analysis in sufficient detail to assist "the decisionmaker in deciding whether, or how, to alter the program to lessen cumulative impacts." Id. NEPA requires informed decisionmaking—and the agencies have not undertaken any meaningful analysis of the cumulative effects of foreseeable projects within the corridors in conjunction with existing, pending, or planned energy transmission projects. The agencies have not undertaken sufficient analysis of the current environmental impacts of proposed corridors to make an informed decision regarding where best to site them. The level of generality in the cumulative effects analysis, combined with the lack of meaningful alternatives, suggests that the DPEIS cumulative

impacts analysis may be a *pro-forma* exercise designed to justify a previously-made decision, which is impermissible under NEPA. See, e.g., IlioUlaokalani Coalition, 464 F.3d at 1101-02.

NEPA cumulative effects analysis requires that past and reasonably foreseeable future actions be quantified and detailed, "regardless of what agency (Federal or non-Federal) or person" undertook those actions. 40 C.F.R. § 1508.7. In eastern Oregon, the failure to consider pending and proposed projects in designation the corridors considered in the DPEIS is likely to result in piecemeal planning and further fragmentation of the natural landscape. The agencies must actually assess the cumulative effects of the transmission corridors they propose to designate together with other existing or reasonably foreseeable projects that will involve energy transmission, in particular with respect to wilderness resources, impacts to sage grouse and pygmy rabbit populations and habitat, migratory birds and wildlife, and potential harm to native plants from invasive weeds. A failure to do so is a failure to comply with NEPA. See, e.g., Kern v. U.S. Bureau of Land Mgmt., 284 F.3d 1062, 1071 (9th Cir. 2002). The agencies should consider the combined effects of foreseeable projects currently proposed outside the corridors together with the proposed corridors themselves to develop alternatives and mitigation measures that will minimize the overall effect of energy transmission development on the fragile lands through which transmission projects will pass.

There are many currently foreseeable and significant energy transmission projects in development that would run through eastern Oregon and that must be taken into consideration by the agencies in their cumulative effects analysis for the PEIS. The following are several of these projects, with references to websites at which further information is available. Attached as Exhibits 5—9 are publicly-posted maps showing the projected routes of several of the projects through eastern Oregon, many of which parallel or cross the corridors the agencies propose to designate.

50273-006 (cont.)

Project name	Starting point	Ending point	Length	Nature of project
Ruby Pipeline	Opal, WY	Malin, OR	680 mi.	42" natural gas pipeline[6]
Bronco Pipeline	SE WY	Malin, OR	650 mi.	42" natural gas pipeline[7]
BC-N. CA Transmission	Tracy, CA	Selkirk, BC	1,000 mi.	3,000 MW electricity line[8]
Northern Lights Celilo	Bay Area, CA	Alberta, BC	1,100 mi.	3,000 MW electricity line[9]
Pacificorp's Hemingway - Captain Jack	Southern OR	Central ID	375 mi.	1,500 MW electricity line[10]

6 Information on this project is available at http://www.ferc.gov/docs-filing/elibrary.asp—FERC Docket No. PF08-9—and at www.rubypipeline.com. A map from that website is attached as Exhibit 5. The full-scale map of the proposed pipeline can be retrieved through the advanced search at http://elibrary.ferc.gov/idmws/search/fercadvsearch.asp using accession number 20080130-0221, and selecting the first file listed. Because of the file's size—25 MB—it is not attached to these comments.

7 Information available at http://www.spectraenergy.com/businesses/projects/bronco/. A map of the proposed route from the Bronco Pipeline Open Season brochure is attached as Exhibit 6.

8 Information available at www.pge.com/biz/transmission_services/canada/. A map from the study plan, linked to from that website, is attached as Exhibit 7.

9 Information available at http://www.transcanada.com/company/northernlights.html. A map of the proposed project from that site is attached as Exhibit 8.

10 Information available at www.oatioasis.com/PGE/PGEdocs/Master_Slides_1-24-08.pdf. A map of the proposed project from that site is attached as Exhibit 9.

In considering alternative corridor designations, the agencies must expressly consider pending energy transmission projects along with those on the horizon. For example, the Federal Energy Regulatory Commission ("FERC") has received a pre-filing submission by Ruby Pipeline Co., LLC, proposing a 680-mile gas pipeline from Opal, Wyoming to Malin, Oregon. According to proposed maps of the route on file with FERC,[11] the Ruby Pipeline would pass through the southern portion of the proposed Sage Grouse NCA, running the full length of the southern border of the Sheldon NWR in Nevada, then enter Oregon at the common border of Nevada, Oregon and California, and run parallel to the California border into Malin. This route has the potential to disturb sage grouse lek sites and break up contiguous areas of habitat. Because Ruby Pipeline Co., LLC has already filed a right-of-way application for this pipeline, which would be located outside of any of the proposed designated corridors, BLM and DOE must consider its proposed path as a foreseeable action in its cumulative effects analysis and take into consideration how best to consolidate the Ruby Pipeline with the corridors to be designated.

Similarly, news reports on the Bronco Pipeline have described that it is proposed to follow the same route as the Ruby Pipeline, ending in Malin, Oregon.[12] However, a brochure soliciting bids for the suppliers indicates a different route[13]—one which, through eastern Oregon, would pass through many of the same proposed WSAs and currently-designated wilderness areas where corridor 7-24 would be designated. The cumulative effects analysis in the DPEIS must evaluate how the designation of Section 368 corridors will interact with these two imminent projects for major natural gas pipelines, and whether these synergistic effects should lead to a different decision regarding whether and where to designate a new energy transmission corridor through southern Oregon or northern Nevada.

50273-006 (cont.)

The agencies must also evaluate current proposals for electricity transmission corridors through southeast Oregon as part of the cumulative effects analysis in determining whether it is appropriate to designate energy corridors, particularly corridor 7-24. For example, PacifiCorp's "Hemingway – Captain Jack" proposal for a 1,500 MW rated transmission line from central Idaho to southern Oregon would connect two areas where there is neither a major concentration of population nor any significant new electricity generating capacity proposed. Yet building a transmission line along this route, roughly where corridor 7-24 is proposed for designation, would destroy the wild character of areas through which it passes and from which it would be visible, as well as harm species for which the area remains important habitat. Before designating corridor 7-24, and *de facto* approving the route of a future project like the Hemingway – Captain Jack project, the agencies must adequately analyze the foreseeable impacts from the siting of projects within the proposed corridor.

The agencies must evaluate the Ruby and Bronco pipeline projects and the proposed electricity transmission projects as part of the cumulative impacts analysis in the transmission corridor PEIS, and develop an alternative that will best concentrate these projects in existing

11 Available at http://www.ferc.gov/docs-filing/elibrary.asp - FERC Docket No. PF08-9 – the map of the proposed pipeline can be retrieved through the advanced search at http://elibrary.ferc.gov/idmws/search/fercadvsearch.asp using accession number 20080130-0221, and selecting the first file listed.
12 http://www.bizjournals.com/denver/stories/2007/12/03/daily7.html.
13 See Exhibit 6.

corridors or a single new corridor sited to minimize the potential harm to the wilderness values and wildlife habitat of eastern Oregon. 50273-006 (cont.)

ONDA also strongly urges the agencies to consider reducing or eliminating the need for these corridors through the aggressive adoption of renewable alternative energy sources. In developing modified alternatives for the final PEIS, the agencies should avoid routing energy corridors through sensitive wild areas in eastern Oregon. This can be achieved by:

- Ensuring that designated corridors are "smart"—that they are necessary, and that they are configured to take advantage of developing renewable energy technologies and not focused on existing or proposed non-renewable energy sources.
- Taking into full consideration the cumulative impacts of energy transmission projects that are currently pending or on the horizon, whose proposed paths are known by
    - concentrating these pending and impending projects into the corridors that will be designated as part of the PEIS process, and 50273-007
    - where it would result in fewer environmental impacts, modifying the corridors proposed in the DPEIS to conform to the proposed routes of pending and impending projects, eliminating corridors that pass through sensitive areas or areas of particular importance as wildlife and listed species habitat, and
    - requiring, to the extent feasible, that all future energy transmission projects be located within designated corridors, and
    - conducting additional analysis of pending and impending transmission projects, and making corridor designations coincide as much as possible with those projects or vice-versa, to further encourage that development of future projects occur within the same corridors.

ONDA incorporates by reference its previous comments dated November 28, 2005 and July 10, 2006. Please keep us informed on this project. Thank you.

Sincerely,

s/ Dave Becker
Staff Attorney
Oregon Natural Desert Association
917 SW Oak St. Ste. 409
Portland, OR 97205

cc: Brent Fenty, Executive Director
Oregon Natural Desert Association

EXHIBIT 1

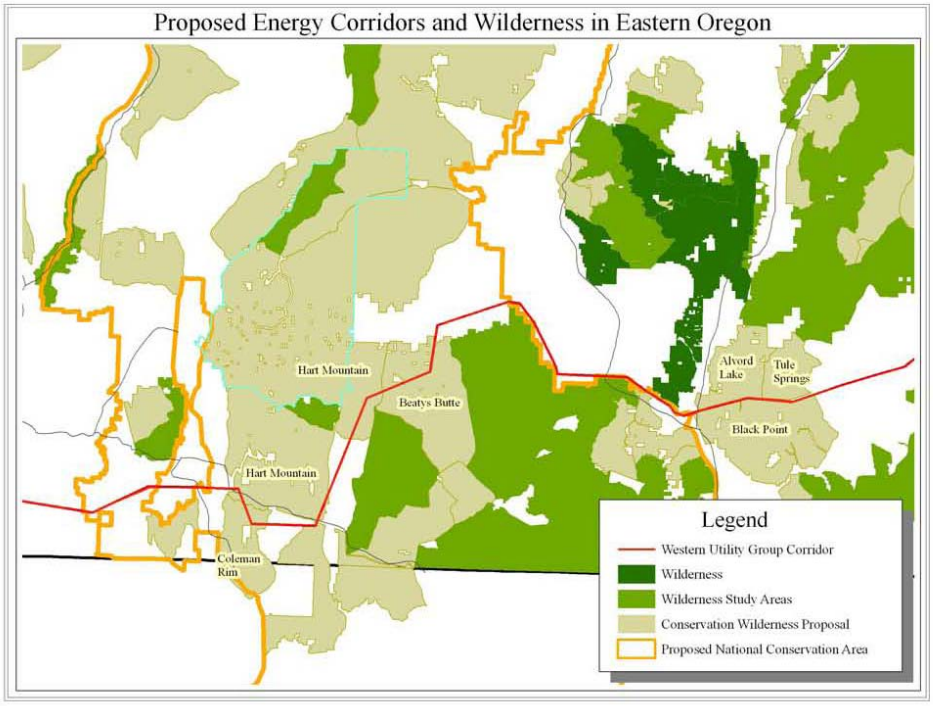
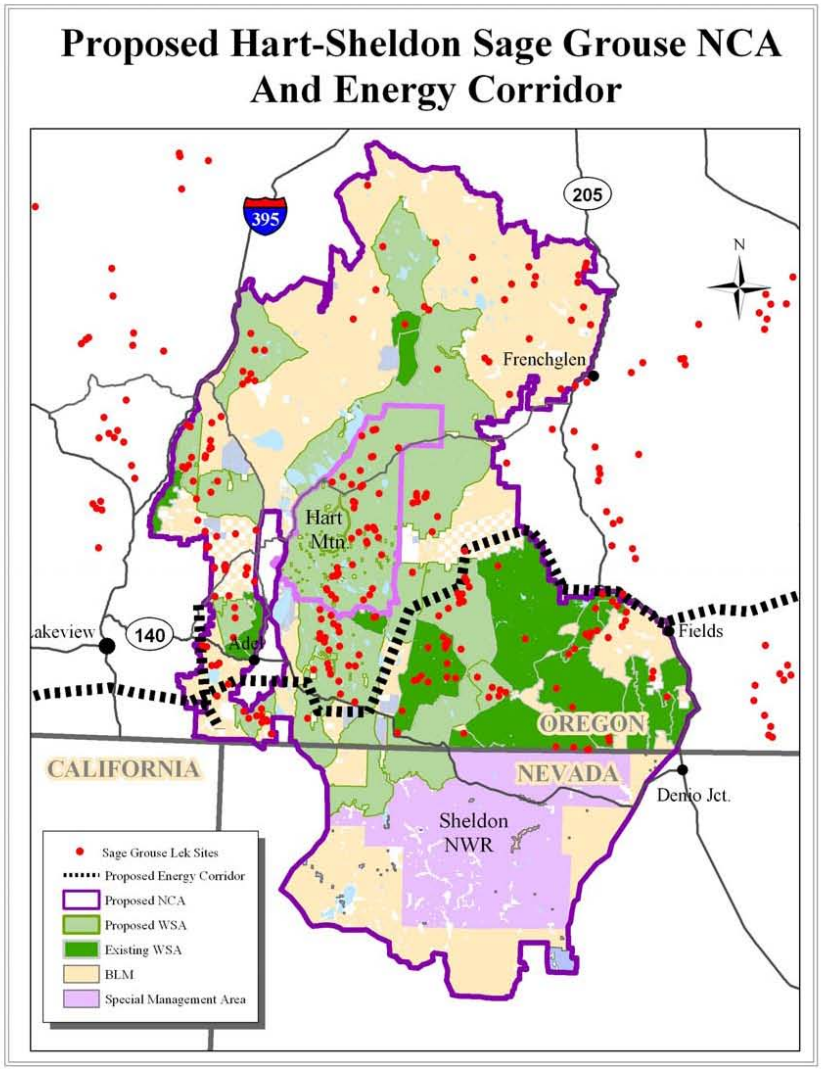

Proposed Energy Corridors and Wilderness in Eastern Oregon
Hart Mountain
Beatys Butte
Hart Mountain
Coleman Rim
Alvord Lake
Tule Springs
Black Point
Legend
Western Utility Group Corridor
Wilderness
Wilderness Study Areas
Conservation Wilderness Proposal
Proposed National Conservation Area

EXHIBIT 2


Proposed Hart-Sheldon Sage Grouse NCA
And Energy Corridor
395
205
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Frenchglen
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akeview
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OREGON
CALIFORNIA
NEVADA
Denio Jct.
Sheldon
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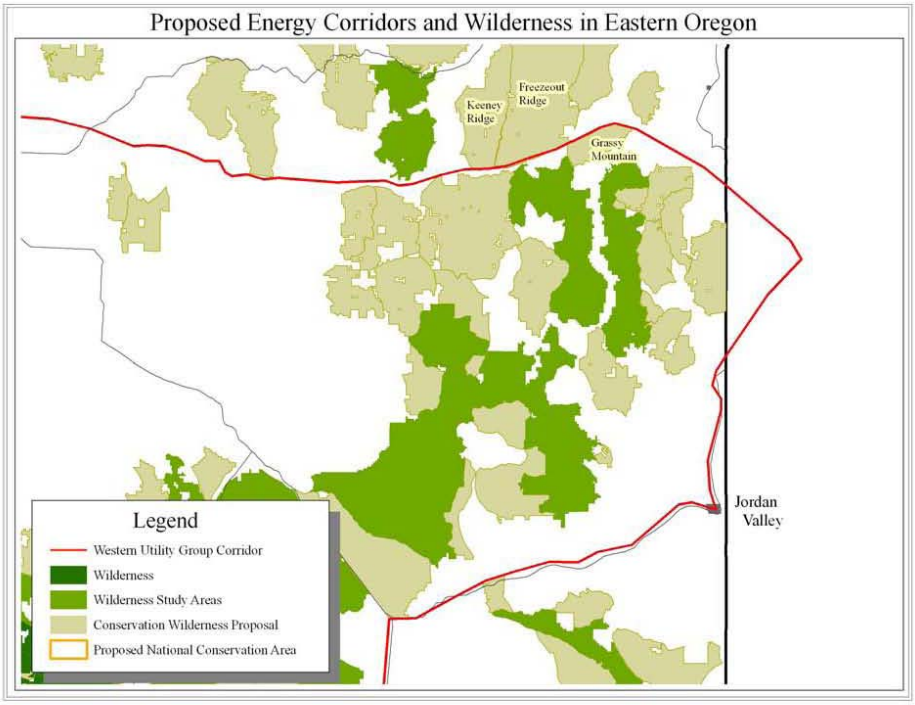
Sage Grouse Lek Sites
Proposed Energy Corridor
Proposed NCA
Proposed WSA
Existing WSA
BLM
Special Management Area

EXHIBIT 3



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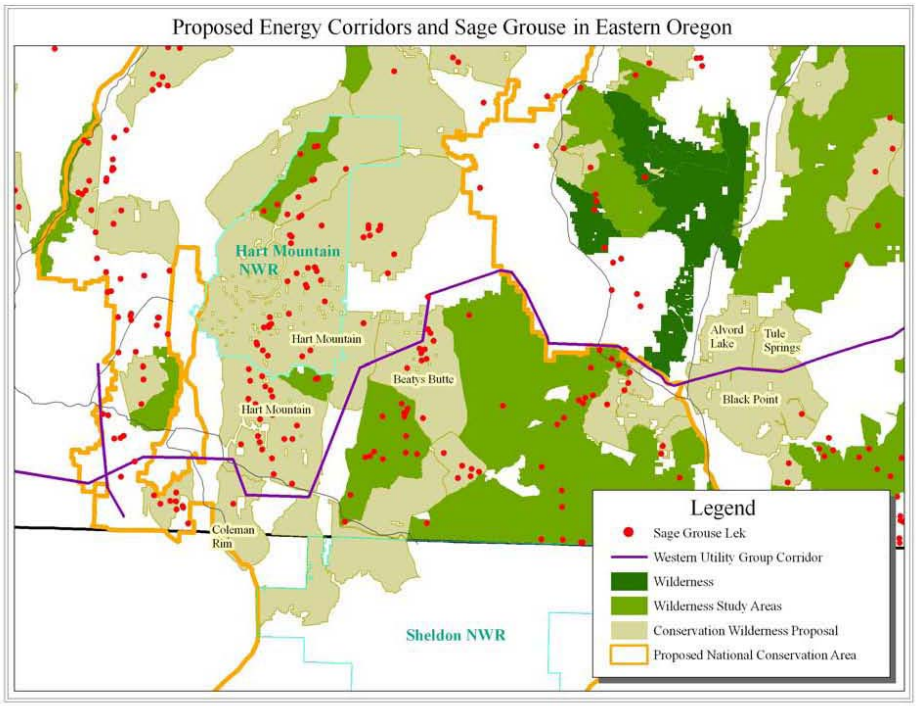


EXHIBIT 5

Ruby Pipeline Project

EXHIBIT 6

Bronco Pipeline Project

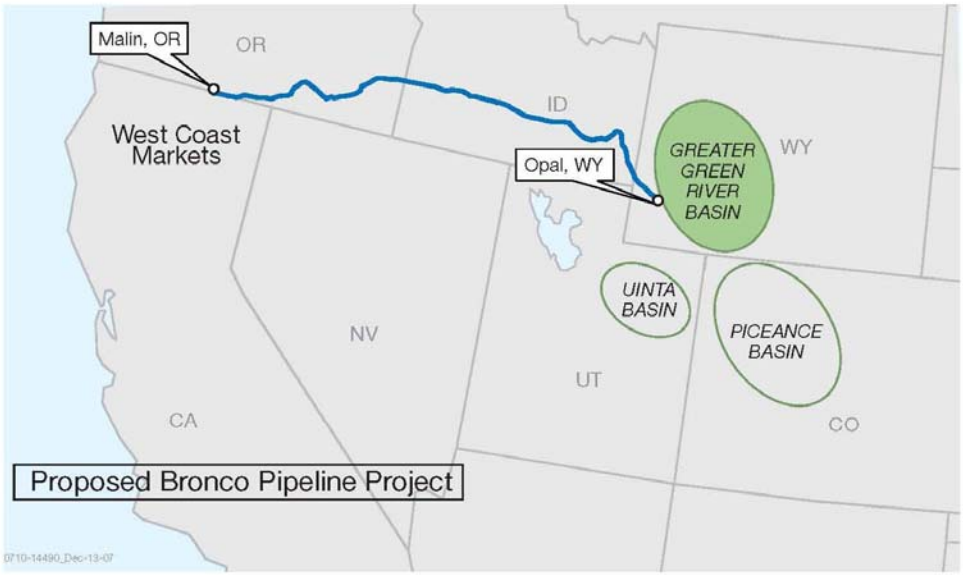


EXHIBIT 7

BC-Northern CA Transmission Project

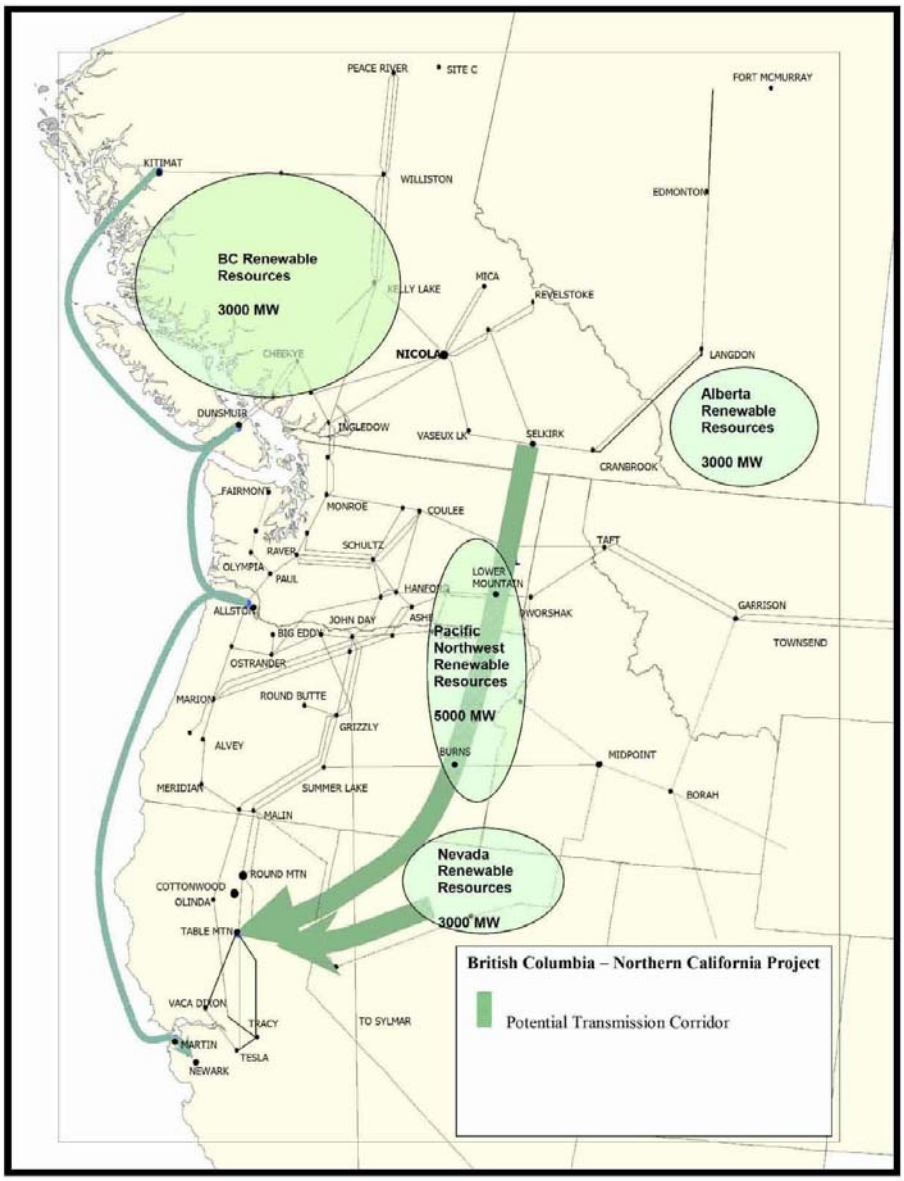
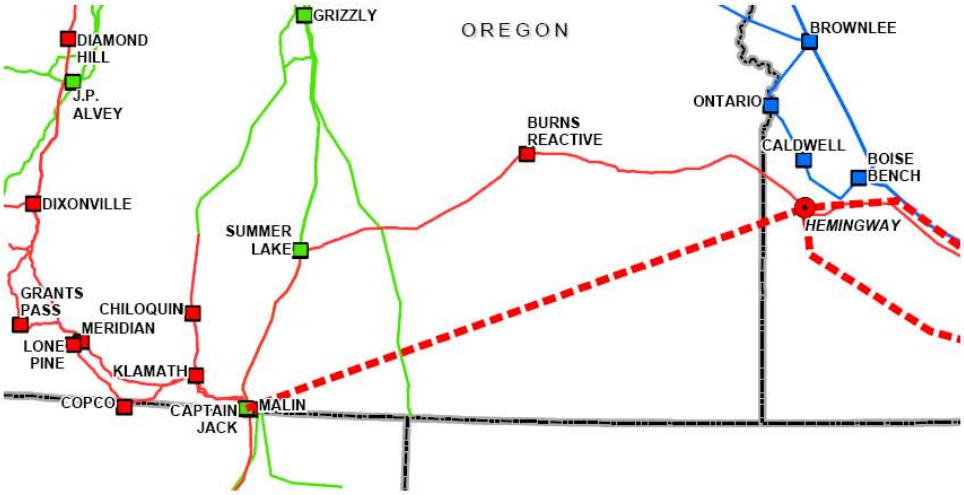


EXHIBIT 8

Northern Lights Celilo Project

EXHIBIT 9

PacifiCorp Hemingway—Captain Jack Project



APPENDIX

Excerpts from Oregon Natural Desert Association's Wilderness Inventory Recommendations for Lakeview BLM District

Hart Mountain proposed WSA

The purpose of this report is to present new information documenting that the area in question meets wilderness criteria and therefore qualifies for interim protection as a Wilderness Study Area. This information differs significantly from the information provided in the BLM's prior inventory.

The area:

The Hart Mountain proposed WSA totals approximately 424,570 acres and is bordered on the south by highway 140, on the east by Beatys Butte Road and private property, on the west by Hart Lake and unit 1-122 (which did not meet wilderness characteristics), and on the north by the road to Frenchglen (BN-PN on our map).

This is a multi-agency proposal involving both BLM and the U.S. Fish and Wildlife Service. A large portion of this proposal consists of Hart Mountain National Antelope Refuge, which has not been inventoried for wilderness characteristics and qualities. All information presented in this report is new and pertinent.

The Hart Mountain proposed WSA also consists of the following BLM units:

- 1-115, which was divided into two subunits, 1-115a and 1-115b, in BLM's November, 1980 Final Intensive Inventory Decisions. Both subunits were eliminated because they did not have outstanding opportunities for solitude or primitive and unconfined recreation.
- 1-123, which was eliminated from further wilderness review in BLM's April, 1979 Wilderness Proposed Initial Inventory because the area did not appear natural.
- 1-124, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the size and shape of the unit did not offer outstanding opportunities in solitude or primitive and unconfined recreation.
- 1-125, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the area appeared unnatural, while opportunities for solitude or recreation were not outstanding.
- 1-127, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the area appeared unnatural, while the units shape and size did not allow for outstanding opportunities for solitude or primitive and unconfined recreation.
- 1-128, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the area appeared unnatural, while the narrow shape and size did not allow outstanding opportunities in solitude or primitive and unconfined recreation.
- 1-129, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because they are appears unnatural, while the small size and narrow shape did not allow for outstanding opportunities in solitude or primitive and unconfined recreation.

- 1-130, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the area does not appear natural, while the area did not have outstanding opportunities for solitude or primitive and unconfined recreation
- 1-132, which is Guano Creek WSA and was recommended for wilderness designation by BLM in their October, 1991 Wilderness Study Report.
- 1-131, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the area did not offer outstanding opportunities in solitude or primitive and unconfined forms of recreation.
- 1-133, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the area did not offer outstanding opportunities in solitude or primitive and unconfined forms of recreation.
- 1-134, which was eliminated from further wilderness review in BLM's November, 1980 Final Intensive Inventory Decisions because the area did not offer outstanding opportunities in solitude or primitive and unconfined forms of recreation.
- An unknown unit to the south of 1-128, which has not been previously inventoried. All information presented here is new and pertinent.

This report will demonstrate that Hart Mountain proposed WSA does in fact meet wilderness criteria.

Wilderness characteristics:

I. Hart Mountain proposed WSA meets the minimum size criteria, and the units within are contiguous with each other.

The Hart Mountain proposed WSA totals approximately 424,570 acres and is bordered on the south by highway 140, on the east by Beatys Butte Road and private property, on the west by Hart Lake and unit 1-122 (which did not meet wilderness characteristics), and on the north by the road to Frenchglen (BN-PN on our map). Within this area, there are no roads that bisect the area.

BLM's wilderness policy states that a "way" maintained solely by the passage of vehicles does not constitute a road. If a "way" is used on a regular and continuous basis, it is still not a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is NOT a road. A road, by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use."

Unit 1-130 was separated from unit 1-125, an unknown unit north of 1-125, 1-128, 1-129, and 1133 by routes 1125-1130, 1128-1130, 1129-1130, and 1130-1133, respectively. 1125-1130 appears to have been maintained in the past, but it hasn't been maintained recently making it is an unmaintained, rocky way (photos DV 1, 5). This route eventually turns into 1128-1130, which is an unmaintained, rocky way (photo DV 7, 10, 11). 1129-1130 is an unmaintained, rocky, way (photo DV 14), which becomes so overgrown it is nearly imperceptible (photo DV 22). 1130-1133 is an unmaintained, rocky, rutted way (photo DV 21, 50). Unit 1-130 also contains routes 1130b. 1130b is an unmaintained, rocky, rutted, overgrown, nearly impassable way (photos DV 4, 12). Because these ways are not being maintained by mechanical means to

ensure regular and continuous use, unit 1-133 is contiguous with units 1-125, an unknown unit north of 1-125, 1-128, 1-129, and 1-133, and it is a roadless area.

Unit 1-133 was separated from unit 1-129 and Guano Creek WSA by routes 1129-1133 and 132133, respectively. 1129-1133 is an unmaintained, rocky, overgrown way (photos DV 20, 33). 132-133 is an unmaintained, rocky, rutted, washed out way (photos DV 36-39, 46). Unit 1-133 also contains routes 1133a and 1133b. 1133a is an unmaintained, rocky way (photo DV 42). 1133b is an unmaintained, overgrown way (DV 45). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-130 is contiguous with unit 1-129, Guano Creek WSA, and 1-133 (see above), and it is a roadless area.

Unit 1-129 was separated from Guano Creek WSA and 1-128 by routes 129-132 and 1128-1129, respectively. 129-132 appears to have been bladed at one time, but it has since deteriorated into an unmaintained, rocky, overgrown way (photo DV 31). 1128-1129 is an unmaintained, rocky, washed out, overgrown, nearly impassable way (photo DV 13, EL 39, 40, 44, 45). Unit 1-129 also contains routes 1129c, 1129d, and 1129e. 1129c is an unmaintained, overgrown way (photo DV 16). 1129d is an unmaintained, overgrown way (photo DV 17). 1129e appears to be an access to a reservoir (photo DV 27). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-129 is contiguous with Guano Creek WSA, unit 1-128, and unit 1-130 (see above), and it is roadless.

Guano Creek WSA, or unit 1-132, was separated from unit 1-131 by PS-1132. This is an unmaintained, rutted way (photo DT 39). Because this way is not being maintained by mechanical means to ensure regular and continuous use, unit Guano Creek WSA is contiguous with units 1-131 and 1-133 (see above), and it is roadless.

Unit 1-131 was not separated from Hart Mountain National Antelope Refuge by a hard boundary. Actually, it appears this boundary is purely subjective. Unit 1-131 only contains one way, PSt. This is a way because the only access to it was from PSt and PSu, which are unmaintained, overgrown ways (photos DN 49, 51, respectively). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-131 is contiguous with Hart Mountain National Antelope Refuge and Guano Creek WSA, and it is roadless.

Unit 1-128 was separated from the unknown unit by route ML-1128. ML-1128 is an unmaintained, rocky way as it runs north from the private property (photos EL 27, 28, 29, 33, 35), while it is a nearly impassable way running east from the private property (photos EL 46, 47, 48, 50). Unit 1-128 also contains route 128a. 128a is an unmaintained, overgrown way (photo EL 30). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-128 is contiguous with units 1-129 (see above) and the unknown unit, and it is roadless.

The unknown unit was separated from unit 1-124, 1-125, and 1-127 by ML-1124, ML-1125, and BS-ML, respectively. ML-1124 is a road when it comes off of 1123-1125 (photo EL 2), but it becomes an unmaintained, overgrown, extremely rocky way after it passes the reservoirs (photos EL 10, 14). ML-1125 is also a road as it comes off of 1123-1125 (photo EL 3), but soon

becomes an unmaintained, overgrown, nearly impassable way (photo EL 19, 22; DV 6). BS-ML is an unmaintained, extremely rocky way (photos EH 18, 20, 22). The unknown unit also contains routes MLa and MLc. MLa, even though it is labeled as a BLM road, is an unmaintained, rocky way (photo EL 34). MLc is so rocky that it is impassable (photo EL 8). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, the unknown unit is contiguous with units 1-124, 1-125, 1-127 and 1-128 (see above), and it is roadless.

Unit 1-124 was separated from unit 1-123 and 1-127 by 1123-1124 and BS-1124, respectively. 1123-1124 is an unmaintained, rocky, rutted way (photos EH 32, 36). BS-1124 is an unmaintained, extremely rocky way (photos EH 10, 11, 12, 13). Unit 1-124 also contains routes 1124b and 1124c. 1124b is an unmaintained, overgrown way (photo EH 6). 1124c is an unmaintained, overgrown, barely discernable way (photo EL 15). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-124 is contiguous with units 1-123, 1-127, and the unknown unit (see above), and it is roadless.

Unit 1-125 contains routes 1125a, 1125b, and 1125d. 1125a is an unmaintained, rocky, rutted way (photo EL 16). 1125b is an unmaintained, overgrown, rocky way (photo EH 37). 1125d is an unmaintained, overgrown way (photo DV 2). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-125 is contiguous with the unknown unit and unit 1-130 (see above), and it is roadless.

Unit 1-123 contains routes 1123a and 1123b. 1123a is an unmaintained, overgrown way (photo EH 28). 1123b is an unmaintained, overgrown way (photo EH 30). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-123 is contiguous with units 1-122, the unknown unit to the south of unit 1-123, and unit 1-124 (see above), and it is roadless.

Unit 1-134 was separated from unit 1-131 by PS-1134. This is an unmaintained, rocky way (photo DT 40). Also, unit 1-134 is not separated from the Hart Mountain National Antelope Refuge by a hard boundary. Actually, it appears that the boundary is purely subjective. Unit 1134 also contains routes 1134a, 1134a2, and 1134b. 1134a is an unmaintained, overgrown way (photo DT 5). 1134b is an unmaintained, very overgrown way (photo DT 6). 1134a2 is an unmaintained, overgrown way (photo DT 12). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-134 is contiguous with units 1131, 1-135 (see above), and the Hart Mountain National Antelope Refuge, and it is roadless.

Unit 1-127 is not separated from Hart Mountain National Antelope Refuge by a hard boundary. In fact, it is a subjective boundary. Unit 1-127 also contains routes BSi, BSj, and BSk. BSi is an unmaintained, rocky, rough way (photo DP 19). BSj is an unmaintained, rocky, rough way (photo DP 26). BSk is an unmaintained, overgrown, barely discernible way (photo DP 28). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-127 is contiguous with Hart Mountain National Antelope Refuge and units 1-124 and the unknown unit to the south (see above). It is also roadless.

Unit 1-115 was noted by BLM to be separated into two subunits by a road. However, we did not find any roads throughout the entirety of unit 1-115. This report examines the unit as a whole.

Unit 1-115 was not separated from the Hart Mountain National Antelope Refuge by a hard boundary. In fact, it appears to be a purely subjective boundary. Unit 1-115 also contains routes 1115a, 1115b, 1115d, 1115d1, 1115f, 1115e3, and 1115e4.. 1115a is an unmaintained, overgrown way (photos DR 13, 28, 29). 1115b is an unmaintained, overgrown ways (photo DR 16, 27). 1115d is an unmaintained, overgrown way (photos DR 10, 14, 15; DM 32). 1115d1 is an unmaintained, overgrown way (photos DR 7). 1115f is an unmaintained, overgrown, nearly impassable way (photos DR 11; DM 36). 1115e3 is an unmaintained way used only for a reservoir (photo DM17). 1115e4 is an unmaintained, nearly impassable way (photo DM 12). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-115 is contiguous with Hart Mountain National Antelope Refuge and should be viewed as one unit instead of two separate subunits because it is roadless.

Hart Mountain National Antelope Refuge contains routes BSa, BSb, BSc, BSd, BSg, BSg1, BSh, BSi, BSj, BSk, BSm, BSn, BSp, PSa, PSc, PSd, PSh, PSi, PSL, PSm, PSn, PSq, PSr, PSs, PSt, PSo, and PN-PS. BSa is considered part of the western boundary to Hart Mountain WSA, but it is an unmaintained, overgrown way (photos DP 7, 8, 11). BSb is actually a trail that leads to an overlook (photo DP 65). BSc is an unmaintained way (photo DP 66). BSd is an unmaintained, rocky, overgrown way (photo DP 62). After the hotsprings campground, the route becomes BSg, which is an unmaintained, rutted overgrown way (photo DP 58, 42, 43). BSg1 is an unmaintained, overgrown way (photo DP 59). BSh starts out as a road as it comes off of BS-PS (photo DP 37); however, it turns into an unmaintained, overgrown way shortly thereafter (DP 39, 41). Also, BSh is only open seasonally as can be seen in photo DP 39. BSi is an unmaintained, overgrown, nearly impassable way (photo DP 22). BSj is an unmaintained, rocky way (photo DP 26). BSk is an unmaintained, overgrown, barely visible way (photo DP 28). BSm is an unmaintained, overgrown, barely visible way (photo DP 12). BSn is road that leads to a private inholding (photo DP 45) and can be cherry stemmed. BSp is an unmaintained, overgrown way (photo DP 49). PSa is an unmaintained, overgrown way (photos DN 3, 8). PSc is an unmaintained, extremely rocky, overgrown way (photo DN 2). PSd is an unmaintained, overgrown way (photo DN 1). PSh is an unmaintained, overgrown way that is only open seasonally (photo DN 13, 26). PSi is an unmaintained, overgrown way (photo DN 20, 42). PSL is an unmaintained, overgrown way (photo DN 37, 38). PSm is an unmaintained, overgrown way (photo DN 33, 34, 36, 40; DT 5 (which is labeled 1134a on map)). PSn is an unmaintained, overgrown way that dead ends after approximately two miles (photos DN 27, 32). PSq is an unmaintained, overgrown way (photo DN 43). PSr is an unmaintained, overgrown way (photo DN 45). PSs is an unmaintained, overgrown, rocky way (photo DN 46). PSt is an unmaintained, overgrown way (photo DN 49). PSo is an unmaintained way (photo DN 35; DT 40). PN-PS starts out fairly well defined (photos DM 3, DN 6), but is becomes an unmaintained overgrown way shortly thereafter (photo, DN9; DM1).

Within Hart Mountain proposed WSA, there are a few maintained roads. BSe is a maintained road (photo DP 54) that leads to the hotsprings campground and can be cherry-stemmed to this point. BSe2 and BSe3 are small branches off of BSe that lead to various camping sites (photos DP 57, 56, respectively). BS-PS is a road until photo point DP 37, but it turns into an

unmaintained, rutted way shortly thereafter (photo DN 47, 55). Because BSe and BS-PS do not bisect the area, these roads can be cherry stemmed.

Because the above ways are not being maintained by mechanical means to ensure regular and continuous use Hart Mountain National Antelope Refuge is contiguous with units 1-115, 1-127, 1-131, and 1-134 (see above), and it is not bisected by roads.

Hart Mountain proposed WSA consists of units 1-115, 1-123, 1-124, 1-125, 1-127, 1-128, 1-129, 1-130, 1-131, 1-132, 1-133, 1-134, and an unknown unit to the south of 1-128, and forms a contiguous area approximately 424,570 acres in size.

II. Hart Mountain proposed WSA is primarily affected by the forces of nature.

The unknown unit and Hart Mountain National Antelope Refuge have never been inventoried making all information presented in this report new a pertinent. The unknown unit to the south of unit 1-128 contained a reservoir (photos EL 6, 9) and private land, but they are not included in the wilderness because they have been cherry stemmed. Hart Mountain National Antelope Refuge contains a developed spring, pit toilet, camping sites, other developments associated with the refuge, and the Order of the Antelope building. However, these developments have all been cherry-stemmed and are not found within the wilderness.

Units 1-123, 1-125, 1-127, 1-128, 1-129, and 1-130 were all previously eliminated because they did not appear to be primarily affected by the forces of nature. Units 1-123, and 1-125 contained seedings, while units 1-125, 1-127, 1-128, 1-129, and 1-130 contained ways and reservoirs. However, many changes have occurred over the past 24 years making these developments appear more natural.

The seedings in units 1-123 and 1-125 are starting to become inundated with native vegetation, which gives it a natural appearance (photo EH 39). The ways found within units 1-125, 1-127, 1-128, 1-129, and 1-130 are becoming overgrown to the point where they have little impact to the landscape (see Section I). There are a few reservoirs found throughout the region, but most do not have a cumulative impact to the entirety of the area because they are small (photos DV 3, 19, 44; EH 32; EL 1), are screened by topography (photos DV 15, 23; EH 29, 33, 35; EL 11), or they are old lakebeds that have just been bermed at one end (photos DV 27; EH 19).

Because many of the manmade developments are excluded from the proposed WSA boundary or deteriorated making them appear more natural in the landscape, they do not have a cumulative impact to the area. This is especially true when looking at the proposed WSA as a whole. Therefore, the Hart Mountain proposed WSA appears in a generally natural condition and impacted primarily by the forces of nature (photos DN 17, 18, 25; DP 30; DV 25, 34, 35, 40; EH 7, 8, 9, 14, 17, 23, 24, 31, 38; EL 12, 13, 18, 20, 21, 51, 56, 57).

In addition, pronghorn (photo EL 32), loggerhead shrike, burrowing owl, golden eagle, northern harrier, American kestrel, canyon wren, golden crowned sparrow, black-billed magpie, song sparrow, chukars, bushtits, townsend's solitaire, red-tailed hawk, California quail, northern flicker, say's phoebe, western scrub jay, common raven, American robin, mountain chickadee,

rock wren, mountain bluebird, sage thrasher, yellow-rumped warbler, white-crowned sparrow, horned lark, sage grouse, coyote, badger, mule deer, wild horses, jack rabbits, Becker's white butterfly, and a pygmy short-horned lizard were seen, which add a natural feeling to the area.

III. Hart Mountain proposed WSA provides outstanding opportunities for solitude and primitive recreation.

Most of the units within the Hart Mountain proposed WSA were eliminated due to lacking outstanding opportunities in solitude or primitive and unconfined recreation. Units 1-115, 1-130, and 1-133 were to flat or had exposed slopes. Units 1-124, 1-125, 1-127, 1-128, 1-129, 1-131, and 1-134 were too narrow or too small. However, each of these units was mentioned to have some opportunities for primitive or unconfined recreation, such as hunting, hiking, backpacking, wildlife observation, photography, and horseback riding.

Because the units are now contiguous with each other and with Hart Mountain National Antelope Refuge (see Section I), the above reasons for elimination are no longer valid. Sights and sounds of others can easily be avoided because the Hart Mountain proposed WSA (424,570 acres) is longer too narrow or too small. There are still many flat areas and exposed slopes, but they do not dominate the entirety of the proposed WSA and one could easily find areas that have topographic and vegetative screening.

For the same reasons, the primitive and unconfined forms of recreation that were listed by the BLM are outstanding in the proposed WSA. Because the area is so large, the recreation that can be found is no longer confining (photos DN 23; DR 17, 24; EL 55).

Therefore, Hart Mountain proposed WSA has outstanding opportunities for solitude and primitive and unconfined forms of recreation. The steep cliffs of Hart Mountain (photos DP 1, 5, 6, 9, 10, 13, 34), the varied topography (photos DM 12, 14; DN 15, 53, 54; DP 35, 50, 51, 52, 60; DR 18; DV 25, 30, 34, 35, 40, 49; EH 7, 8, 9, 12, 17, 31, 34; EL 4, 5, 12, 20, 21, 51, 52, 56, 57), the juniper and mahogany mountain stands (photos DN 48; DP 19, 30; EH 23, 24, 38; EL 13, 14, 18, 54), the cultural artifacts (photos DN 14, 16, 39; DR 19), the many lake beds (photos DR 21; EH 28, 30), and the multitude of pronghorn, sage grouse, and other wildlife (photos DN 5, 21, 22; DP 44; DR 6; EL 32) would easily allow Horseback riders, hikers, backpackers, hunters, photographers, and wildlife viewers to experience outstanding opportunities in solitude and primitive and unconfined forms of recreation.

XIII. Hart Mountain proposed WSA has supplemental values that would enhance the wilderness experience and should receive wilderness protection.

The Hart Mountain proposed WSA has a multitude of supplemental values including Guana Creek WSA, High Lakes ACEC, and habitat for many Federal Species of Concern.

Guano Creek WSA was noted in BLM's October, 1991 Wilderness Study Report to contain, "rare plants and native plant communities, paleontological resources, and habitat for the Sheldon tui chub and sage grouse." Pg 82.

The High Lakes ACEC has cultural, wildlife, and botanical values. The Lakeview RMP FEIS notes that the area contains, "High Density of rock art sites up to 7,000 years old. Diversity of plants and animals, especially cultural plants. Bureau sensitive plant found in the area. Evidence of long-term relationship of Tribal people and landscape. Critical sage grouse habitat." pg 2-58. In addition, the areas classic basin and range geology would also be great for rock hounds and geologic study, while the area is also home to some of the last quality sagebrush habitat found in the U.S.

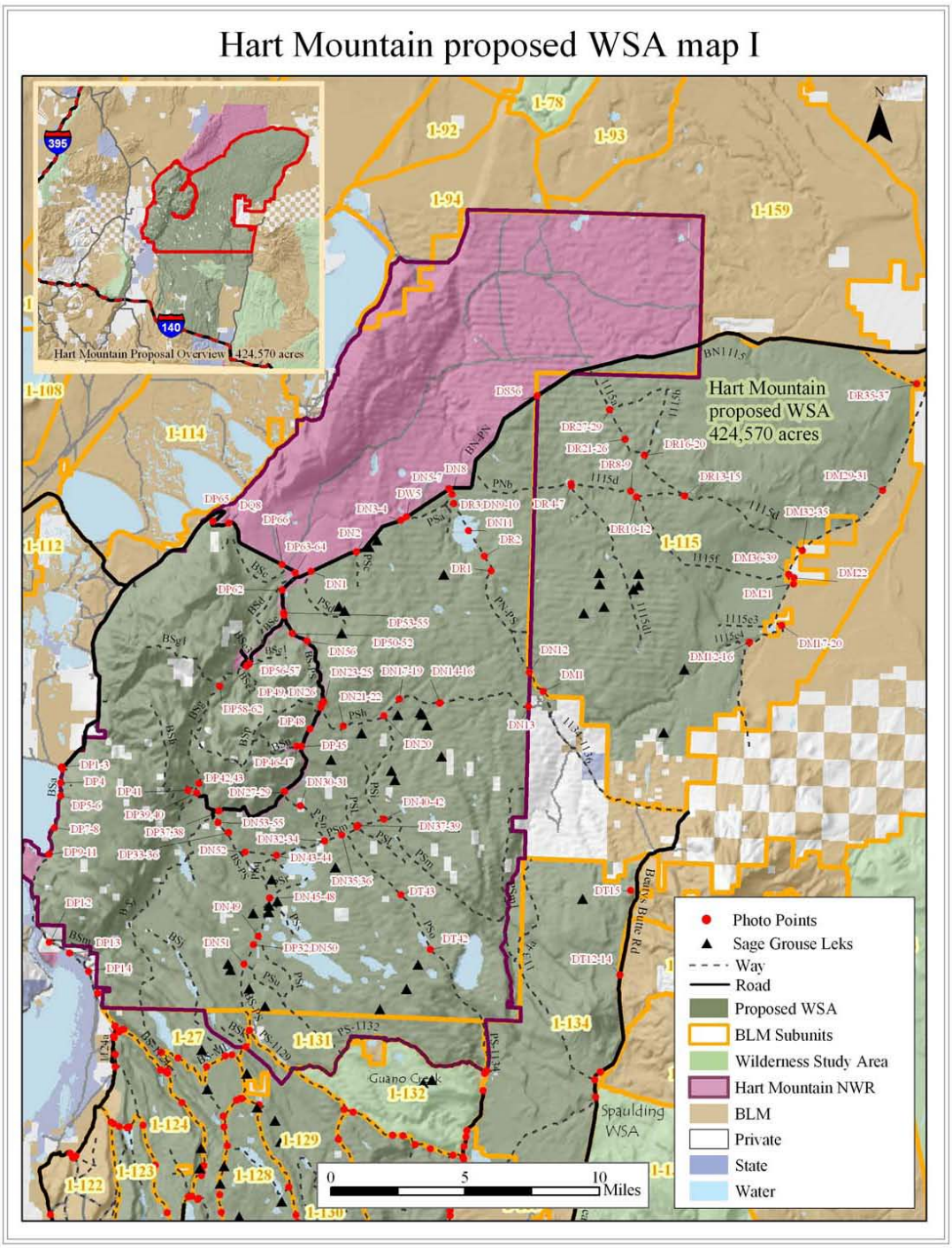
In addition, the Greater Sage Grouse is a species of concern throughout its range with a population that is on a significant downward trend. Habitat fragmentation is one of the primary causes of this decline. The Hart Mountain proposed WSA provides prime habitat for this species as it is home to 63 known Sage Grouse Leks (see map). This area may also be home to the Pygmy Rabbit, California Bighorn Sheep, Burrowing Owl, and Peregrine Falcon, which are Federal Species of Concern.

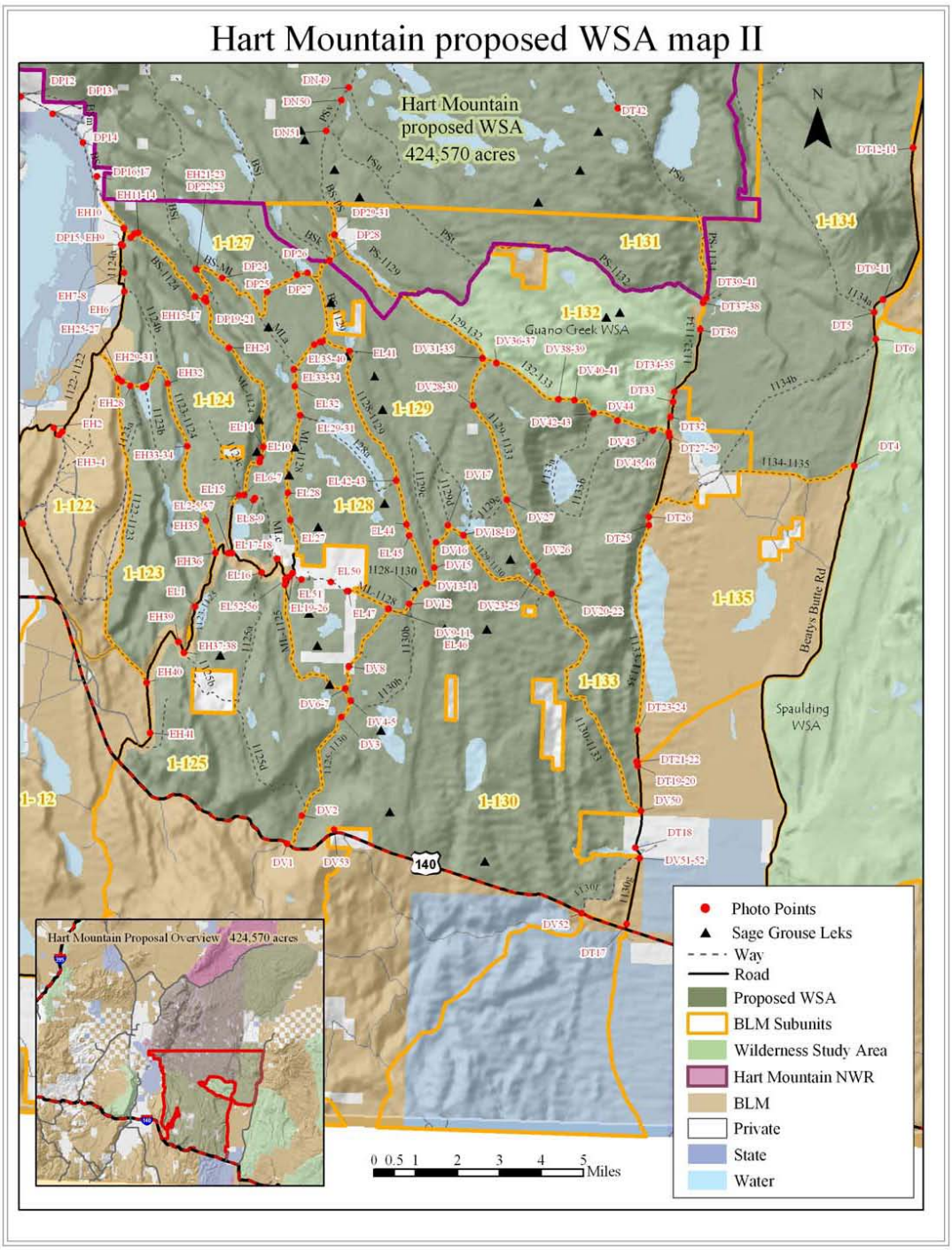
Summary:

This proposal contains lands within the Hart Mountain National Antelope Refuge, which have never been inventoried for wilderness characteristics. All information regarding these lands is new and pertinent information.

The BLM land was not recommended for WSA designation based on the original determination the units did not appear in a natural condition and did not offer outstanding opportunities for solitude and a primitive or unconfined type of recreation. Because many changes have occurred to the landscape since BLM's original inventory in the late 1970's, these original determinations have to be amended.

We have provided new information, including geo-referenced digital images, documenting that the proposed Hart Mountain WSA meets wilderness criteria. The proposed WSA is roadless, is in an apparently natural condition, contains outstanding opportunities for solitude and recreation, and possess supplemental values. This area deserves to be designated as a Wilderness Study Area.


Hart Mountain proposed WSA map I
Hart Mountain Proposal Overview 424,570 acres
Hart Mountain proposed WSA 424,570 acres
Photo Points
Sage Grouse Leks
Way
Road
Proposed WSA
BLM Subunits
Wilderness Study Area
Hart Mountain NWR
BLM
Private
State
Water
0 5 10 Miles
Guano Creek
Spaulding WSA
Barrs Butte Rd
N


Hart Mountain proposed WSA map II
Hart Mountain proposed WSA 424,570 acres
Guano Creek WSA
Spaulding WSA
Beatys Butte Rd
1-122
1-123
1-124
1-125
1-127
1-128
1-129
1-130
1-131
1-132
1-133
1-134
1-135
1- 12
140
Hart Mountain Proposal Overview 424,570 acres
0 0.5 1 2 3 4 5 Miles
Photo Points
Sage Grouse Leks
Way
Road
Proposed WSA
BLM Subunits
Wilderness Study Area
Hart Mountain NWR
BLM
Private
State
Water

Spaulding [Beaty Butte] proposed WSA Addition

The purpose of this report is to present new information documenting that the area in question meets wilderness criteria and therefore qualifies for interim protection as a Wilderness Study Area. This information differs significantly from the information provided in the BLM's prior inventory.

The area:

The Spaulding proposed WSA Addition totals approximately 121,485 acres and is bordered on the south by road 6156 and highway 140, on the west by Spaulding WSA and Beaty's Butte Road, on the north by private property, and east by Beaty's Butte Road.

The Spaulding proposed WSA Addition consists of the following units:

- 1-136, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the small size of the unit did not allow for outstanding opportunities in solitude or recreation.
- 1-137, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the unit had a considerable portion that was not in an apparently natural condition, and the steep hills, low vegetation, and small size of the unit did not allow for outstanding opportunities for solitude or primitive and unconfined recreation.
- 1-138, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the low vegetative cover and small size of the unit did not allow for outstanding opportunities in solitude or primitive and unconfined recreation.
- 1-140, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the small size of the unit did not allow for outstanding opportunities in solitude or primitive and unconfined recreation.
- 1-142, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the low vegetative cover and small size of the unit did not allow for outstanding opportunities in solitude or primitive and unconfined recreation.
- 1-143, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the low vegetative cover, broad flat expanses, and lack of any geographic feature in the unit did not allow for outstanding opportunities in solitude or primitive and unconfined recreation.
- 1-145, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the extremely flat terrain and small size of the unit did not allow for outstanding opportunities in solitude or primitive and unconfined forms of recreation.
- An unknown BLM unit northeast of unit 1-145, which has not been previously inventoried. All information presented in this report is new and relevant.
- An unknown BLM unit just south of unit 1-145, which has not been previously inventoried. All information presented in this report is new and relevant.

This report will refute each of the preceding rationale and demonstrate that Spaulding proposed WSA Addition does in fact meet wilderness criteria. If designated as a WSA, it would increase the Spaulding WSA from 68,895 acres to approximately 190,380 acres.

Wilderness characteristics:

I. Spaulding proposed WSA Addition is contiguous with designated lands, and the units within are contiguous with each other.

The Spaulding proposed WSA Addition totals approximately 121,485 acres and is bordered on the south by road 6156 and highway 140, on the west by Spaulding WSA and Beaty's Butte Road, on the north by private property, and east by Beaty's Butte Road. Within this area, there are no roads that bisect the area.

BLM's wilderness policy states that a "way" maintained solely by the passage of vehicles does not constitute a road. If a "way" is used on a regular and continuous basis, it is still not a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is NOT a road. A road, by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use."

Unit 1-136 was separated from units 1-137 and 1-142 by routes 1136-1137 and 1136-1142, respectively. 1136-1137 is an unmaintained, overgrown way (photos DL 1, 6, 12). 1136-1142 is an unmaintained, overgrown way (photos DL 14, 17, 19). Unit 1-136 also contains routes 1136a, 1136b, 1136b1 and 1136c. 1136a is an unmaintained, overgrown way (photos DL 4, 5). 1136b is an unmaintained, overgrown way (photo DL 18). Because 113b1 branches off of way 1136b, it is a way. 1136c is an unmaintained, overgrown way (photo DL 21). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-136 is contiguous with units 1-137 and 1-142. Unit 1-136 is also a roadless area.

Unit 1-137 was separated from units 1-138 and 1-142 by 1137-1138 and 1137-1142, respectively. Route 1137-1138 is an unmaintained, overgrown, rocky way (photo DL 41), while 1137-1142 is and unmaintained, overgrown way (photos DL 13, 39). Within unit 1-137, only route 1137a exists. 1137a is an unmaintained, overgrown, rutted way (photos DL 43, 44). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-137 is contiguous with units 1-136 (see above), 1-138, and 1-142. It is also a roadless area.

Unit 1-138 was separated from units 1-142, 1-143, and Spaulding WSA by 1138-1142, 11381143, and 1134d, respectively. 1138-1142 is an unmaintained, overgrown, rutted way (photos DL 34, 38). 1138-1143 is an unmaintained, overgrown, rutted way (photo DL 35, DU 20), which is very hard to access from road 6156 because the way ends at a reservoir (photo DU 19). 1134d is partially a fenceline way (photo DT 7), and after a short distance, it turns into an unmaintained, overgrown way that is nearly impassable (photo DT 8). There are no other roads/ways within unit 1-138. Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-138 is contiguous with units 1-137 (see above), 1-142, 1-143, and Spaulding WSA. Unit 1-138 is also a roadless area.

Unit 1-142 was separated from unit 1-143 by 1142-1143. 1142-1143 is an unmaintained, overgrown, rutted way (photos DL 23, 30, 31, 33). Unit 1-142 also contains routes 1142a, 1142a1, 1142b, 1142c, and 1142c1. Because 1142a and 1142a1 can only be accessed by way 1137-1142 (see above), they are also ways. 1142b is an unmaintained, overgrown, impassable way (photo DL 37). 1142c and 1142c1 are unmaintained, overgrown ways (photo DL32; 1142c is on the right, while 1142c1 is on the left in the picture). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-142 is contiguous with units 1-136 (see above), 1-137 (see above), 1-138 (see above), and 1-143. Unit 1-142 is also a roadless area.

Unit 1-143 was separated from Spaulding WSA by 1138-1143. 1138-1143 is an unmaintained, overgrown, rutted way (photo DL 35, DU 20), which is very hard to access from road 6156 because the way ends at a reservoir (photo DU 19). Unit 1-143 also contains routes 1143b, 1143c, and 1143-1144. 1143b is an unmaintained, overgrown, rutted way (photos DL 27, 29). Because 1143c can only be accessed by ways 1138-1143 and 1134d (see above), it is also a way. 1143-1144 is an unmaintained, overgrown way (photos DU 14, 15). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-143 is contiguous with units 1-138 (see above), 1-142 (see above), and Spaulding WSA. Unit 1-143 is also a roadless area.

Unit 1-145 was separated from Spaulding WSA, unit 1-140, and an unknown unit to the northeast by 1139-1145, 1140-1145, and SF-1145, respectively. 1139-1145 is maintained solely by vehicle traffic, which does not meet a definition of a road. It is an unmaintained, rutted way (photos DU 35, 37, 38, 39). 1140-1145 is an unmaintained way (photo DU 40), and this lack of maintenance is exemplified near a spring where the way totally disappears (photo DU 45). SF1145 shows no indication of improvement or maintenance and is being maintained solely by vehicle traffic, which does not make it a road. Therefore, SF-1145 is an unmaintained, rutted, overgrown way (photos DU 30, 31, 33). Unit 1-145 also contains route SFa. This is an unmaintained way (photos DU 36, 47). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-145 is contiguous with Spaulding WSA, unit 1-140, and the unknown unit to the northeast. Unit 1-145 is also a roadless area.

Unit 1-140 was separated from Spaulding WSA by 1139-1140. This route is being maintained by vehicle traffic, which does not make it a road. Therefore, 1139-1140 is an unmaintained, overgrown way (photos DU 41, 52). Unit 1-140 also contains routes 1140a, 1140b, 1140c, and 1140e1. 1140a is a way because it can only be accessed by way 1139-1140. 1140b is a way because all routes leading to it are ways. Also, we tried to get photos of 1140b, but we could not access it because there were too many cows were in the way. 1140c is an unmaintained, overgrown way (photo DU 50). 1140e1 is an unmaintained, overgrown way (photo DU 51). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, unit 1-140 is contiguous with Spaulding WSA and unit 1-145 (see above). Unit 1-140 is also a roadless area.

There is a small, unknown BLM unit to the south of unit 1-145 and southeast of unit 1-140. This unit was separated from unit 1-140 by SF-1140 and from unit 1-145 by SF-1145a. SF-1140

appears to have been bladed at one time in the past (photo DU 49). However, it has been some time since maintenance has occurred because SF-1140 is starting to become overgrown. Moreover, it becomes a way by the time it reaches photo point DU 43-45. Because SF-1140 does not dissect the unit, we can cherry stem it to the private inholding without impacting the naturalness of the proposed addition. SF-1145a is an unmaintained, rocky, overgrown way (photos DU 43, 46). This unknown unit also contains route 1140e. This is an unmaintained, overgrown way (photos DU 44, 48). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, this unknown unit is contiguous with units 1-140 and 1-145. It is also a roadless area.

To the northeast of unit 1-145 is an unknown BLM unit. This unit was separated from Spaulding WSA by SFa. This is an unmaintained, overgrown way (photos DU 22, 23, 24, 34). Because these ways are not being maintained by mechanical means to ensure regular and continuous use, this unknown unit is contiguous with units 1-145 (see above) and Spaulding WSA. It is also a roadless area.

Units 1-136, 1-137, 1-138, 1-140, 1-142, 1-143, 1-145, and two unknown units combine to form a roadless area approximately 121,485 acres in size. As the units are not separated from the Spaulding WSA, it would increase the area of the WSA from 68,895 acres to approximately 190,380 acres.

II. Spaulding proposed WSA Addition is primarily affected by the forces of nature.

Unit 1-137 was eliminated from wilderness review in BLM's November, 1980 Wilderness Final Intensive Inventory Decisions because the western and southern portions of unit were not in a natural state. The unit was said to have contained 3.5 miles of ways, 4 miles of fenceline, and 2 small reservoirs. It was also noted that these manmade features were noticeable throughout 30 percent of the unit. Unit 1-137 still has a way running through the unit (1137a) and a reservoir (photo DL 11 – although this is on private property), but because this unit is now a part of a larger contiguous unit totaling 190,380 acres, these manmade features no longer have a cumulative impact on the area. Furthermore, all the other units within the Spaulding proposed WSA Addition, including Spaulding WSA, were noted to be primarily affected by the forces of nature. By having only a small portion of one unit to not appear primarily affected by the forces of nature would not affect the overall area of the Spaulding WSA Addition. Therefore, the Spaulding proposed WSA Addition is primarily affected by the forces of nature (photos DL 7, 8, 22, 24, 25, 36; DU 28, 42).

Several other attributes documented during this inventory added to the naturalness of the area. Native sagebrush, bunchgrass, mountain mahogany, willow, and rabbitbrush showed that that area is primarily affected by the forces of nature. Additionally, several species of wildlife, such as golden eagle, loggerhead shrike, pronghorn, sage grouse, northern harrier, chukar, and black-tailed jack rabbit, were seen during this inventory and added a natural feeling to the area.

III. Spaulding proposed WSA Addition provides outstanding opportunities for solitude and primitive recreation.

Units 1-136, 1-137, 1-138, 1-140, 1-142, 1-143 and 1-145 were all eliminated from further wilderness review in BLM's November 1980 Wilderness Final Intensive Inventory Decisions because they did not offer outstanding opportunities in solitude and recreation.

Units 1-136, 1-137, 1-138, 1-140, and 1-142 were noted by the BLM to have some form of solitude and recreation. 1-136 was noted to have moderate opportunities for solitude, while offering hiking, photography, wildlife observation, and hunting opportunities. 1-137 was noted to offer potential hiking, hunting, wildlife observation, and photography opportunities. 1-138 was noted to have hiking and scenic opportunities. 1-140 was noted to have hunting, trapping, hiking, and horseback riding opportunities. 1-142 was noted to have some secluded spots where one could be isolated and opportunities for hunting, hiking, horseback riding, photography, and wildlife observation. However, these opportunities were not outstanding because these units were too small. Now that these units are all contiguous with one another and with Spaulding WSA forming a roadless area approximately 190,380 acres, small size is no longer an issue. Each of the above opportunities easily becomes outstanding.

Units 1-143 and 1-145 were noted by BLM to be too flat to allow for any solitude or primitive and unconfined recreation. However, it is mentioned in H-6310-1 Wilderness Inventory and Study Procedures handbook that, "do not assume that simply because an area or portion of an area is flat and/or unvegetated, it automatically lacks an outstanding opportunity for solitude…Consideration must be given to the interrelationship between size, screening, configuration, and other factors that influence solitude." p14 Because this these units are now contiguous with other units and Spaulding WSA, it doesn't matter that these areas lack topography. In fact, these areas add diversity to the Spaulding proposed WSA Addition for both wildlife habitat and recreation opportunities.

When looking at the entirety of Spaulding WSA Addition, one can easily find outstanding opportunities for solitude and recreation. The diverse topography of the area would easily allow visitors to avoid the sights and sounds of others, while offering outstanding opportunities for hiking, horseback riding, photography, sightseeing, wildlife viewing, hunting, and camping (photos DL 2, 3, 7, 8, 9, 10, 12, 17, 19, 22, 24, 25, 36, 42; DU 28, 42, 45). Moreover, the outstanding opportunities for solitude and recreation found in the addition would further enhance the wilderness characteristics found in Spaulding WSA.

XXI. Spaulding proposed WSA Addition has supplemental values that would enhance the wilderness experience and should receive wilderness protection.

The BLM noted in their inventory that the area probably has archeological values. This is probably the case since lithic scatter was found on the ground in many places. The springs within the unit add ecological value because of the habitat they provide wildlife. Beatys Butte and the neighboring Catlow Rim and Hawks Mountain provide scenic value to the area.

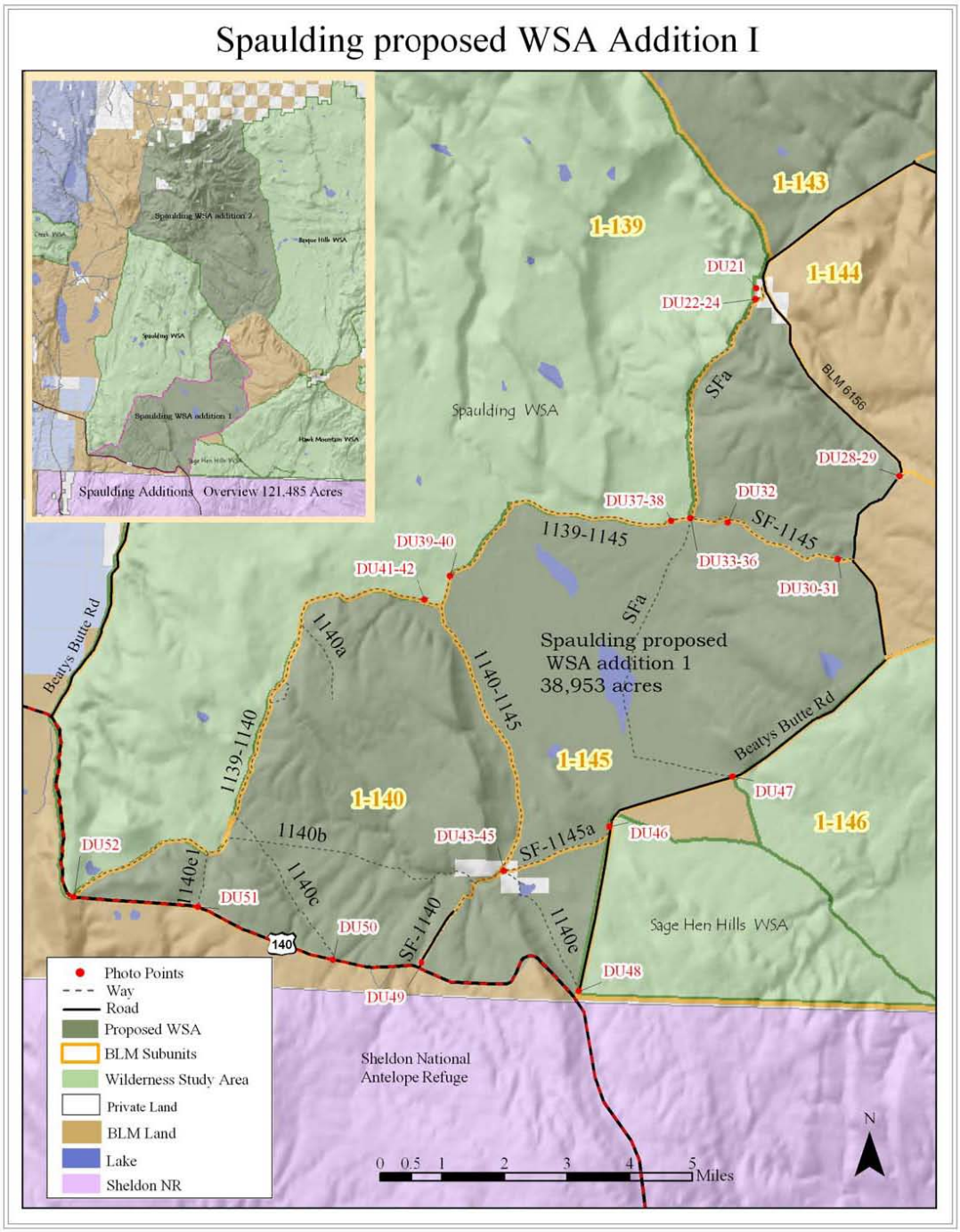
The Greater Sage Grouse is a species of concern throughout its range with a population that is on a significant downward trend. Habitat fragmentation is one of the primary causes of this decline. The Spaulding proposed WSA Addition provides prime habitat for this species as it is home to eleven known Sage Grouse Leks (see map). This area may also be home to the Pygmy Rabbit,

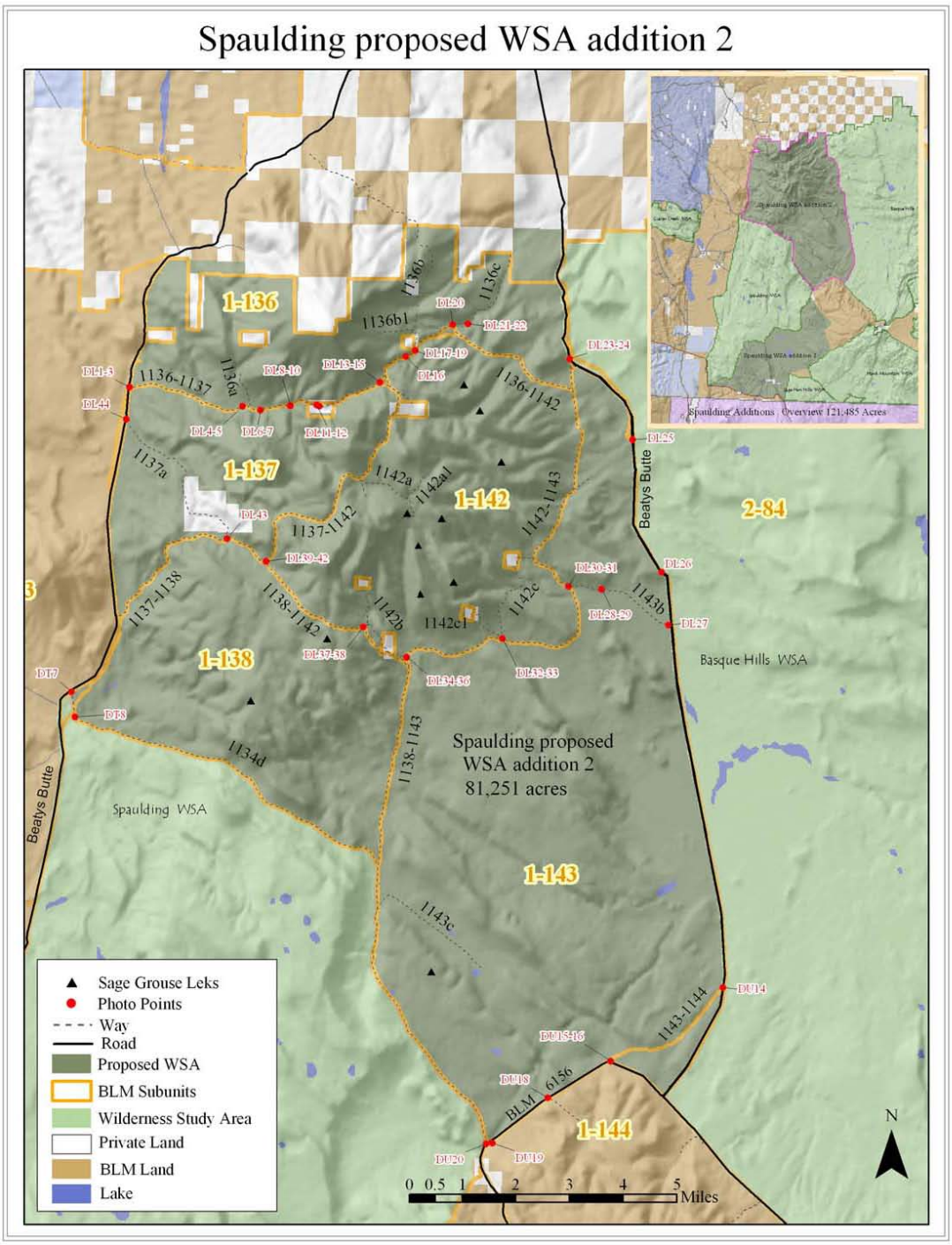
California Bighorn Sheep, Burrowing Owl, and Peregrine Falcon, which are Federal Species of Concern.

Summary:

This area was not recommended for WSA designation based on the original determination that part of one unit did not appear in a natural condition, while other units did not offer outstanding opportunities for solitude or primitive and unconfined recreation. Because many changes have occurred to the landscape since BLM's original inventory in the late 1970's, these original determinations have to be amended.

We have provided new information, including geo-referenced digital images, documenting that the proposed Spaulding WSA Addition meets wilderness criteria. The Addition is roadless, is not separated from the Spaulding WSA by roads, is in an apparently natural condition, contains outstanding opportunities for solitude and recreation, and possesses supplemental values, especially when combined with the Spaulding WSA. This area deserves to be designated as a Wilderness Study Area.


Spaulding proposed WSA Addition I
Spaulding Additions Overview 121,485 Acres
Spaulding WSA
Spaulding proposed
WSA addition 1
38,953 acres
1-139
1-140
1-143
1-144
1-145
1-146
DU21
DU22-24
DU28-29
DU32
DU33-36
DU30-31
DU37-38
DU39-40
DU41-42
DU43-45
DU46
DU47
DU48
DU49
DU50
DU51
DU52
SF-1145
SF-1145a
SF-1140
SFa
1139-1145
1140-1145
1139-1140
1140a
1140b
1140c
1140e
1140e1
BLM 6156
Beatys Butte Rd
Sage Hen Hills WSA
Sheldon National
Antelope Refuge
140
Photo Points
Way
Road
Proposed WSA
BLM Subunits
Wilderness Study Area
Private Land
BLM Land
Lake
Sheldon NR
0 0.5 1 2 3 4 5 Miles
N


Spaulding proposed WSA addition 2
1-136
1-137
1-142
1-143
1-144
1-138
2-84
1136a
1136b
1136b1
1136c
1136-1137
1136-1142
1137a
1137-1142
1137-1138
1138-1142
1138-1143
1142a
1142a1
1142b
1142c
1142c1
1142-1143
1143b
1143c
1143-1144
1134d
DL1-3
DL4-5
DL6-7
DL8-10
DL11-12
DL13-15
DL16
DL17-19
DL20
DL21-22
DL23-24
DL25
DL26
DL27
DL28-29
DL30-31
DL32-33
DL34-36
DL37-38
DL39-42
DL43
DL44
DT7
DT8
DU14
DU15-16
DU18
DU19
DU20
Beatys Butte
Basque Hills WSA
Spaulding WSA
Spaulding proposed
WSA addition 2
81,251 acres
Spaulding Additions Overview 121,485 Acres
BLM 6156
Sage Grouse Leks
Photo Points
Way
Road
Proposed WSA
BLM Subunits
Wilderness Study Area
Private Land
BLM Land
Lake
0 0.5 1 2 3 4 5
Miles
N

Coleman Rim proposed WSA

The purpose of this report is to present new information documenting that the area in question meets wilderness criteria and therefore qualifies for interim protection as a Wilderness Study Area. This information differs significantly from the information provided in the BLM's prior inventory.

The area:

The Coleman Rim proposed WSA totals approximately 35,985 acres and is bordered on the south by road CR-SN, on the west by road 1121-1126 and 1126m, on the east by road CR-1126, and on the north by highway 140.

The Coleman Rim proposed WSA consists of the following units:

- 1-126/CA-020-1010, which was eliminated in BLM's November, 1980 Final Intensive Inventory Decisions because the works of man were substantially noticeable in the northern part of the unit, while the unit overall did not offer outstanding opportunities for solitude and primitive and unconfined recreation.

The information provided in this report will demonstrate that each of the preceding rationale is no longer accurate or applicable and demonstrate that Coleman Rim proposed WSA does in fact meet wilderness criteria.

Wilderness characteristics:

I. Coleman Rim proposed WSA meets the minimum size criteria, and the units within are contiguous with each other.

The Coleman Rim proposed WSA totals approximately 35,985 acres and is bordered on the south by road CR-SN, on the west by road 1121-1126 and 1126m, on the east by road CR-1126, and on the north by highway 140. Within this area, there are no roads.

BLM's wilderness policy states that a "way" maintained solely by the passage of vehicles does not constitute a road. If a "way" is used on a regular and continuous basis, it is still not a road. A vehicle route that was constructed by mechanical means but is no longer being maintained by mechanical methods is NOT a road. A road, by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use."

Coleman Rim proposed WSA contains routes 1126a, 1126b, 1126b1, 1126c, 1126d, 1126g, 1126j, 1126k, 1126k1, 1126k2, 1126k3, 1126L, 1126n, 1126p, and 1121j. Although this appears to be many routes, several of these are less than 2 miles long, while others were so overgrown they were hard to find. 1126a is an unmaintained way (photo EJ 45). 1126b is an unmaintained, overgrown way (photos EJ 4, 5). 1126b1 is an unmaintained, overgrown way (photo EJ 2). 1126c is an unmaintained, overgrown way (photos EJ 3, 9). 1126d is an unmaintained, rutted

way (photo EJ 53). 1126g is an unmaintained, overgrown way (photo EJ 12). 1126j is an unmaintained way (photo EJ 15). 1126k is an unmaintained, overgrown, rarely used way (photo EQ 4). 1126k1 is an unmaintained, impassable way (photo EJ 32). 1126k2 is an unmaintained, rocky way (photo EJ 33). 1126k3 is an unmaintained way (photo EJ 34). 1126L is an unmaintained way (photo EQ 5). 1126n is an unmaintained, overgrown way (photo EQ 13). 1126p is an unmaintained, partially overgrown way (photo EQ 10). 1121j is an unmaintained, rutted way (photo EJ 50).

Because these ways are not being maintained by mechanical means to ensure regular and continuous use, Coleman Rim proposed WSA is a roadless area.

II. Coleman Rim proposed WSA is primarily affected by the forces of nature.

The BLM noted in their inventory that the northern end of unit 1-126/CA-020-1010 did not appear in a natural condition, while the southern portion appeared to be primarily affected by the forces of nature.

BLM noted that the northern part of unit 1-126/CA-020-1010 did not appear generally natural because of 26 miles of ways. This inventory found that these ways did not have a significant impact on the naturalness of the area. They are becoming overgrown and do not have a substantial impact on the landscape (see Section I). Furthermore, the broken terrain and rolling hills of Coleman Rim prevents visitors from noticing these ways (photos EJ 2, 3, 9, 15, 45, 50, 53). Therefore, the ways in the northern part of Coleman Rim proposed WSA do not have a cumulative impact on the area making the entirety of the area appear primarily affected by the forces of nature (photos EJ 2, 3, 9, 15, 45, 50, 53 (background); EQ 1, 2, 3, 6, 7, 8, 9).

III. Coleman Rim proposed WSA provides outstanding opportunities for solitude and primitive recreation.

BLM noted during the initial inventory that Unit 1-126/CA-020-1010 was eliminated from further review because the eastern part of the unit consisted of rolling to flat terrain that did not offer outstanding opportunities for solitude and primitive and unconfined recreation. However, BLM also mentioned that the rim on the western portion of the unit and a small side canyon, which breaks the rim just south of the Nevada border, would offer some opportunity for solitude and hiking.

Because unit 1-126/CA-020-1010 consists of a wide array of topography, BLM's original assessment is not accurate. Coleman Rim readily offers outstanding opportunities in solitude and primitive and unconfined recreation. Visitors can easily experience an outstanding sense solitude in the canyons, along the top of the rim, or in the rolling hills (photos EJ 3, 9, 45, 50, 53 (background); EQ 1, 2, 3, 6, 7, 8). Furthermore, juniper can be found in areas of the proposed WSA, which further adds to an outstanding sense of solitude (photos EJ 2, 15; EQ 9) because of the screening they provide. The canyons, Coleman Rim, and the rolling hills offers outstanding opportunities for hikers, sightseers, backpackers, and horseback riders. The junipers, sagebrush, and native bunchgrasses provides outstanding wildlife habitat. This habitat makes wildlife viewing and hunting outstanding within the proposed WSA. Even the ways that run through the

eastern portion of the unit are great access routes to the proposed WSA and can be enjoyed by horseback riders and hikers.

Because of these reasons, it is easy to see that Coleman Rim proposed WSA offers outstanding opportunities in solitude and primitive and unconfined recreation.

IX. Coleman Rim proposed WSA has supplemental values that would enhance the wilderness experience and should receive wilderness protection.

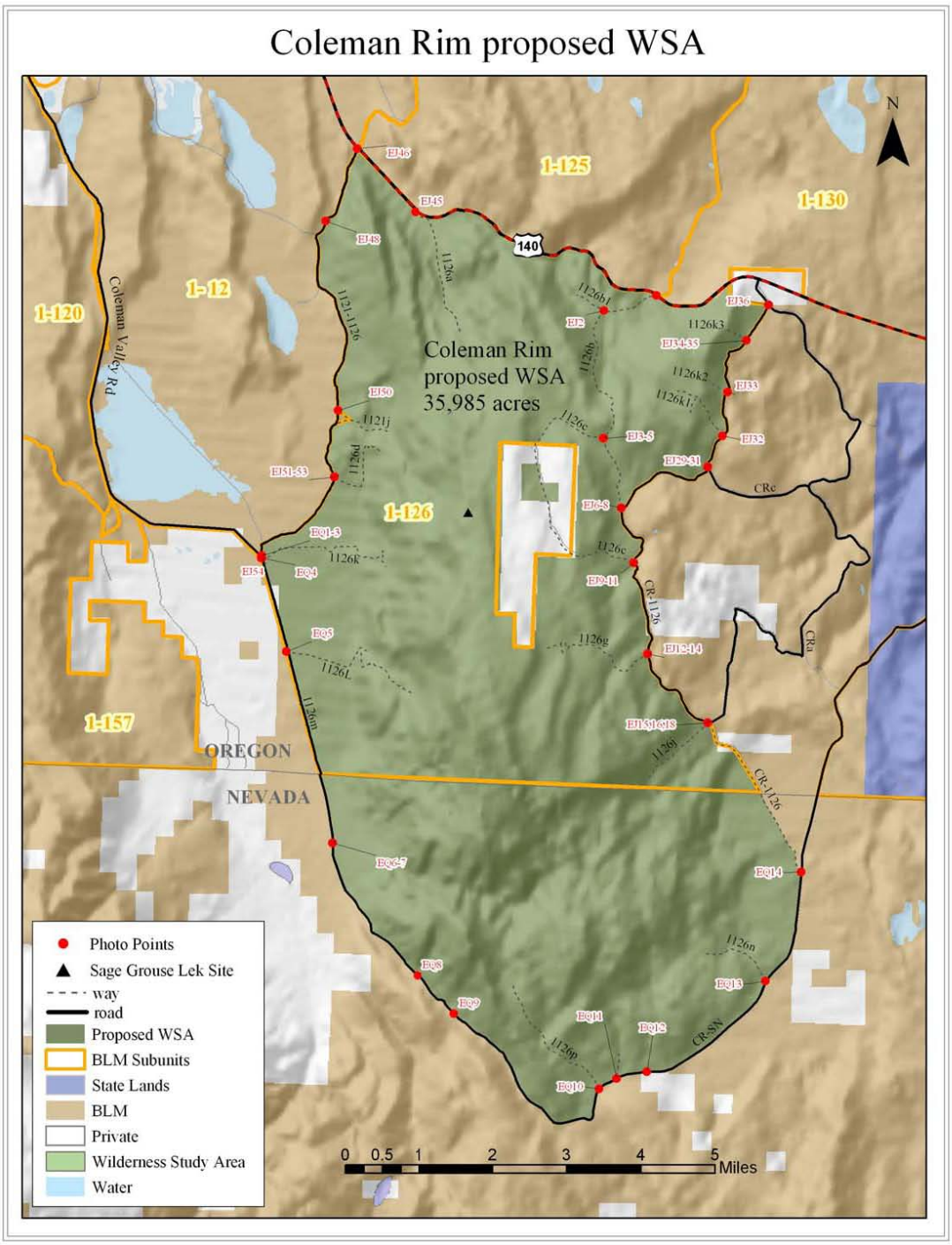
Coleman Rim proposed WSA contains the Spanish Lakes RNA, which has botanical and wildlife values. The Lakeview RMP FEIS mentioned that the Spanish Lakes RNA contains a, "Diversity of salt desert scrub communities with limited distribution in LRA and Northern Great Basin" Pg 2-58. The BLM also noted during their inventory that the area has some archeological value.

The Greater Sage Grouse is a species of concern throughout its range with a population that is on a significant downward trend. Habitat fragmentation is one of the primary causes of this decline. The Coleman Rim proposed WSA provides prime habitat for this species as it is home to at least one known Sage Grouse Leks (see map). This area may be home to the Pygmy Rabbit, California Bighorn Sheep, Burrowing Owl, and Peregrine Falcon, which are Federal Species of Concern.

Summary:

This area was not recommended for WSA designation based on the original determination that part of the unit did not appear in a natural condition, while all of it did not offer outstanding opportunities for solitude or a primitive and unconfined type of recreation. Because this area offers diverse terrain, including the grandiose Coleman Rim, and because many changes have occurred to the landscape since BLM's original inventory in the late 1970's, these original determinations have to be amended.

We have provided new information, including geo-referenced digital images, documenting that the proposed Coleman Rim WSA meets wilderness criteria. The proposed WSA is roadless, is in an apparently natural condition, contains outstanding opportunities for solitude and recreation, and possesses supplemental values. This area deserves to be designated as a Wilderness Study Area.


Coleman Rim proposed WSA
N
Coleman Rim
proposed WSA
35,985 acres
1-120
1-12
1-125
1-130
1-126
1-157
OREGON
NEVADA
Coleman Valley Rd
140
CRe
CRa
CR-1126
CR-8N
Photo Points
Sage Grouse Lek Site
way
road
Proposed WSA
BLM Subunits
State Lands
BLM
Private
Wilderness Study Area
Water
0 0.5 1 2 3 4 5
Miles

From: corridoreiswebmaster@anl.gov
Sent: Friday, February 08, 2008 8:40 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50274

Attachments: COMMENTS_WWEC_PEIS_Fin_WWECD50274.pdf

COMMENTS_WWEC
'EIS_Fin_WWECD50

Thank you for your comment, Larry Rodgers.

The comment tracking number that has been assigned to your comment is WWECD50274. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 8, 2008 08:39:50PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50274

First Name: Larry
Last Name: Rodgers
Organization: Eastern Navajo Land Commission
Address: PO Box 1950
City: Crownpoint
State: NM
Zip: 87313
Country: USA
Email: Lasar98@yahoo.com
Privacy Preference: Don't withhold name or address from public record
Attachment: F:\ENLC\COMMENTS_WWEC_PEIS_Fin.pdf

Comment Submitted:
Please refer to the attachment one of two.

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

COMMENTS REGARDING THE WWEC PEIS

LARRY RODGERS, EXECUTIVE DIRECTOR
EASTERN NAVAJO LAND COMMISSION
CROWNPOINT, NEW MEXICO

The Eastern Navajo area has perhaps the most complicated land ownership mixture than any open land area in the western United States. The attached map shows the "checkerboard"-effect of land status making up the fifth geographic "agency" of the Navajo Nation. This 3.7 million-acre area in northwestern New Mexico is home to over 35,000 people; a shear majority – approximately 94% - is American Indian, specifically Navajo.

The corridor plan (80-130 Segment) between Farmington and Bernalillo, New Mexico will involve Navajo lands in the northeastern part of the Eastern Navajo Agency, impacting residents of Huerfano, Nageezi, Counselor, Pueblo Pintado, and Torreon Chapters. Several Navajo land users and livestock permittees will be impacted. A specific map produced by the Albuquerque BLM Rio Puerco Field Office showing the 80-130 Segment should have been placed in the PEIS. This checkerboard area needs to be better understood by the federal government, public, and other interest.

All legal and technical applications, fair market rates, and social costs must be rightfully acknowledged, coordinated and processed with the Navajo Nation authorities. This assurance should also be afforded to those individual Navajo allotment owners whom also stand to be impacted by the designation.

Following are several points important to the subject at hand.

1) Reciprocal thought process and policy consideration: The Federal Government should better understand the development needs of local Native American communities. Navajo communities are in dire need of community facilities and economic development. Sparsely distributed housing need essential services as running water, sanitation, and electric power. The overwhelming federal requirements for clearances of local land use, environmental assessments, archeological clearances, legal surveys, and appraisals are daunting tasks for communities to achieve without adequate human and fiscal resources. The federal government needs to consult with Tribal governments in reducing this administrative burden. There should be separate, appropriate requirements for local public infrastructure projects and should not be treated the same as large commercial and industrial clearance needs. 50274-001

2) The federal government agencies, other than the BIA and IHS, need to understand the land ownership complications in Eastern Navajo and consult with the Navajo Nation in identifying a "management area boundary" so that revised policy, program implementation/services, and resource management are efficiently coordinated between participating agencies of Navajo Nation, BIA, BLM, and the State of New Mexico. This effort should also identify areas of redundancy and relief of certain requirements so that development projects can be implemented under minimal strenuous conditions.

3) Given the two options of the PEIS, it is favorable to support the "designation" alternative rather than the "no action" alternative. It is understandable that future development of infrastructure systems would be better facilitated through the designated corridors than perhaps tailored through the normal ROW assignments. The concept can be equated with the need for interstate highway planning of yesteryear for National emergency response purposes. Given the American energy needs, it is predictable that massive energy transport facilities and delivery structures will be needed. 50274-002

4) Especially in the interest of future energy demands, the federal government needs to maintain it's government-to-government relations with Tribal governments. The Navajo Nation possesses great amounts of energy resources and massive land across which raw or produced energy can be transported. Internally, the Navajo Nation needs an energy policy reflective of current conditions to appropriately complement external designations. In one instance, there is no option for the Navajo Nation; conversely, but optimistically, a progressive Navajo alternative would yield intangible positives. 50274-003

Cordially submitted:
June 02, 2007 - Red Rock Chapter; Gallup, NM
February 08, 2008 – Crownpoint, NM