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Sent: Monday, February 11, 2008 7:13 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50300

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Thank you for your comment, Patricia Snow.

The comment tracking number that has been assigned to your comment is WWECD50300. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 11, 2008 07:12:28PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50300

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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 12, 2008

West-wide Energy Corridor PDEIS
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To whom it may concern:

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Statement (DPEIS) for the Designation of Energy Corridors on Federal Land in 11 Western States. The Oregon Department of Fish and Wildlife (department) has a number of comments on the DPEIS. Our comments are divided into general PDEIS comments and corridor specific comments.

In preparing its comments, the department considered mapped information on deer winter range, sage grouse leks, Conservation Opportunity Areas (COA's in the Oregon Conservation Strategy, 2006) and known occurrences for rare species identified by the Oregon Natural Heritage Information Center (ORNHIC).

General Comments

The department based its review and recommendations for the DPEIS on the following applicable Oregon revised statutes (ORS) and administrative rules (OAR).

ORS 496.012 Wildlife Policy
ORS 496.171 through 496.192 Threatened and Endangered Wildlife Species
ORS 498.301 through 498.346 Screening and By-pass Devices for Water Diversions or Obstructions
ORS 506.109 Food Fish Management Policy
ORS 509.140 Placing Explosives in Waters
ORS 509.580 through 509.910 Fish Passage; Fishways; Screening Devices; Hatcheries Near Dams

OAR Chapter 635, Division 100 provides authority for adoption of the State sensitive species list and the Wildlife Diversity Plan, and contains the Oregon Endangered Species Rules and the State list of threatened and endangered fish and wildlife species. Information, fish and wildlife species listed under the State Endangered Species Act can be found on the department's website at:

http://www.dfw.state.or.us/wildlife/diversity/threatened_endangered.asp. Also, information on the State sensitive species list for fish and wildlife is available on the department's website at:
http://www.dfw.state.or.us/wildlife/pdf/sensitive_species.pdf.

OAR Chapter 635, Division 415 classifies habitat into six categories and establishes a mitigation goal for each category. Under this rule, the department recommends that a project developer identify the appropriate habitat category for all project areas, provide the basis for each category selection, and then propose appropriate mitigation for the project-impacted areas, all subject to department review. A copy of the department's Fish and Wildlife Habitat Mitigation Policy can be found on the department's website at: http://www.dfw.state.or.us/lands/mitigation_policy.asp.

OAR Chapter 635, Division 425 contains requirements for in-water blasting. In the event that a project requires in-water blasting, an in-water blasting permit would be required from the department. An application for an in-water blasting permit must include the information necessary to meet the requirements of ORS 509.140 and OAR 635-425-0000 through 635-425-0050 and be submitted to the department for approval. An application for an in-water blasting permit must be submitted 90 days prior to the date of blasting. An In-water Blasting Permit Application form is available on the department's website at:
http://www.dfw.state.or.us/lands/inwater/inwater_app.pdf.

The department is concerned that designation of an energy corridor under the DPEIS will limit the ability of resource agencies to provide comments on future projects. The department understands that agencies will not be able to suggest alternate routes in order to avoid impacts to sensitive species once the corridors are established. Because of this we have described as much site specific information as we can in these comments. These comments are based on a projected impact, additional specific comments will be provided by the department when the corridors begin to be utilized. 50300-001

The proposed corridors are on federal lands. It is not clear if there has been any attempt to coordinate these locations with state and local governments or with private landowners who may be impacted once the projects move off federal land.

Timing of activities needs to be considered in big game winter ranges. The department requests that pipelines be buried any time the corridor crosses big game winter range. The Final PEIS should include a disturbance band assessment for sage-grouse along the corridor routes in sage-grouse areas of eastern Oregon. As a general comment, pipelines should be buried. Other mitigation techniques to minimize impacts should include facility clustering, i.e. keeping facilities as close together as possible. Once the corridors are disturbed, the department is concerned with the replacement of native species with 50300-002

invasive, non-native species. There needs to be long-term maintenance of the corridors to address invasive species.

If the segment alignments proceed as proposed, the department will request mitigation for wildlife habitat that is adversely affected according to the department's Fish and Wildlife Habitat Mitigation Policy. The department recommends minimizing the disturbance of riparian corridors at all river crossings and Conservation Opportunity Areas (COAs). The department also recommends that all disturbed riparian areas be replanted. Fish passage issues will need to be addressed at all stream crossings. Any horizontal directional drilling (HDD) needs to occur during the specific time period recommended in the Oregon inwater timing guidelines (http://www.dfw.state.or.us/lands/inwater/inwater_guide.pdf). The department recommends closing road access for access roads constructed for corridor development. The width of the development disturbance in the corridor should be minimized to the extent possible. Also, the energy development should be coupled with existing development as impacts will increase with new corridors.

At any location where a proposed corridor goes through winter range, the department requests that access roads be gated and locked to limit public access. The department requests that anti-perching devices be placed on any vertical structures that are constructed as part of the energy corridors. The department recommends that anytime a proposed energy facility crosses a river or wetland that it be placed underground to minimize impacts. Frac out considerations also need to be addressed for HDD including geological site testing prior to drilling demonstrating a high probability for success, restrictions on toxic chemical additives to drilling material (bentonite), incident clean-up equipment on site prior to drilling, immediate notification to Oregon Emergency Response System if an incident occurs, as well as documentation of fish and amphibian use in the area prior to drilling/trenching to be conducted by a certified consultant. Determination of overall response (clean-up, mitigation, compensation requirements) to a frac out will be determined jointly by the governing landowner and department staff.

50300-002 (cont.)

Habitats need to be classified at the time a specific project is proposed in accordance with the department's Fish and Wildlife Habitat Mitigation Policy. At that time, the department will recommend surveys depending on the habitat types present. Species are assumed to be onsite unless shown otherwise if the appropriate habitat is present.

The existing mitigation discussion is not adequate. The Final Programmatic Environmental Impact Statement will need to include a more thorough discussion of impacts and potential mitigation options. One of the possibilities should include long-term funding for habitat restoration.

In reviewing the potential effects of the proposed corridor on spotted owls, the department considered a 1.3-mile buffer added to each side of the corridor to accommodate owl impacts. On the west side of the Cascades there are at least 19 mapped owl territories directly impacted by the proposed corridor plus one additional potentially active site. Some of these sites are directly in the corridor, others are immediately adjacent but all are within the 1.3-mile buffer.

50300-002 (cont.)

Alternatives analysis

The alternatives analysis relies on the position that designation of energy corridors does not result in environmental impacts because designation, in and of itself, results in no immediate effect. The reliance on site selection and general development issues, and subsequent review on specific design impacts only when more information is available on the specific development, results in minimal opportunities to consider alternatives with far fewer associated impacts. The designation of the Right-of-Ways (ROWs) essentially leads to irretrievable commitment of resources and will constrict the options to manipulate or maneuver the footprint because each segment is intimately dependent on the next. Other options, such as maximum use of renewable energies should be assessed as a viable alternative.

50300-003

Lack of state jurisdictional authority

The PDEIS relies heavily on the uncertain establishment of local state and jurisdictional entities to regulate land use activities, stating "local and project-specific impacts will be evaluated in the future at the individual-project level, and site specific impacts will be addressed during individual project reviews".

The authority of the State of Oregon to regulate activities on non-federal public lands is severely restricted and is primarily limited to fish passage, take of listed plant species, and wetland fill/removal. Lacking a National Environmental Policy Act (NEPA) or Endangered Species Act (ESA) corollary, there is no legislative policy requiring state and local agencies to review all projects that may have a negative impact on the environment. Therefore, there is no requirement to consider the likely environmental consequences before approving or denying any proposal associated with non-federal land use adjacent to or between federally-managed corridor segments. It is quite possible that any future action associated with program development will escape more detailed environmental review.

50300-004

Because the designation of federal energy corridors is related to and dependent on the subsequent development of energy corridors on non-federal lands, it is imperative that any proposed action that is associated with, crosses, or may impact non-federal land is

thoroughly evaluated in the federal process. Such potential effects should be identified and assessed in the FPEIS. 50300-004 (cont.)

Analysis of impacts to wildlife is lacking for the majority of sensitive or species of special concern wildlife.

The list of species that occur and could be impacted by program development is limited to federal-listed or candidate-for listing under the ESA and ignores the vast majority of species that have not received federal designation under the Act, specifically, species considered sensitive or of special concern. In addition to the species and habitats protected under the ESA, other wildlife species and habitats that should be considered in the NEPA evaluation include State-listed and State-sensitive-species and priority species and habitats as defined within the Oregon Conservation Strategy (Strategy). The Strategy provides a comprehensive list that should be evaluated in context of the proposal. Those species identified in the PDEIS have received only superficial impact analysis or generalized treatment, as typified in the statement [Page 3-201 paragraph 1], "…few population-level impacts would be expected where corridor segments would be located on currently disturbed or modified lands such as existing ROWs and rangelands". Lacking site-specific analysis, such statements lack quantification, especially when the proposed designations greatly exceed current utility footprints. 50300-005

Some species are especially vulnerable to localized impacts (e.g., western pond turtle, Taylor's checkerspot butterfly, Fender's blue butterfly, streaked horned-lark). As an example, the affected environment contains over two-dozen northern spotted owl nesting territories that are directly and indirectly impacted by the proposed corridor. Other species, such as the bald eagle, occur along nearly the entire length of the proposed corridor. It is essential that the NEPA analysis identify the types of impacts that may occur to those species identified as occurring or having the potential to occur in the action area and make reasonable predictions as to the likelihood that impacts can be effectively mitigated.

Analysis of impacts to priority habitats is lacking

The PDEIS appropriately recognized the numerous direct and indirect impacts associated with the land-disturbing activities associated with potential development of a pipeline corridor, but again, no sufficient analysis was conducted to identify the specific habitats that may be affected, nor was there any quantification of impacts. Some of the habitat types that would be affected are irreplaceable, such as oak woodland and savanna. If efforts to avoid these and other priority habitats were taken it is not apparent from the document, nor have mitigation measures been identified that would mitigate such impacts. 50300-006

Mitigation for project impacts to fish and wildlife must be integrated into project planning.

Mitigation for the program's direct, indirect, and cumulative impacts should be planned and funded as an integrative package, to include acquisition, development, restoration and operation, maintenance, and management for the life of the project. Many of the areas potentially affected by this proposal have been designated as COAs or utilized in previous mitigation or conservation efforts, adding to the successive losses already anticipated through program development. Mitigation ratios should be reflective of this and in adherence with the Fish and Wildlife Habitat Mitigation Policy.

50300-007 (cont.)

Inadequate assessment of indirect effects of program implementation on terrestrial habitats, resident fish, and wildlife; cumulative effects need more consideration

The PDEIS generalizes its assessment of potential impacts and consequently does not evaluate site-specific issues associated with potential individual energy projects. The PDEIS recognizes that more thorough quantitative impact analyses would be conducted at the project level if an application to use a designated corridor were received by the sponsoring agencies, specifically, by applying project-specific reviews under federal laws and regulations such as the NEPA, The Clean Water Act, and Section 7 of the ESA.

50300-008

This proposal essentially bypasses the thorough assessment required of a NEPA analysis and relies instead upon a later, more detailed review. However, this segmented approach will likely result in overall minimization of impacts, particularly the relationship between short-term uses of the environment and maintenance of long-term ecological productivity; irreversible and irretrievable commitments of resources; and secondary/cumulative effects of implementing the proposed action. In addition, substantial adverse impacts resulting from the establishment of energy infrastructure enables secondary growth to occur in the form of transportation corridors and housing.

NEPA and climate change

Federal and state administrators are increasingly requiring greenhouse gas (GHG) issues to be evaluated in the proposals they review. This heightened concern is likely driven by numerous factors, including the U.S. Supreme Court's recent ruling in Massachusetts v. EPA that declared that the harms associated with climate change are serious and well recognized and that GHGs like carbon dioxide are pollutants subject to regulation under the Clean Air Act 127 S. Ct. 1438 (2007). Implementation of the energy corridor proposal may either directly or indirectly increase GHG emissions. The PDEIS fails to fully evaluate, disclose or mitigate GHG emissions resulting from the reasonably foreseeable effects of the proposal.

50300-009

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Cumulative effects

The alignment of the proposed energy corridor is only shown on federal land, however, in reality, the alignment of the corridor will span across private land as well. It is impossible to assess cumulative impacts to natural resources across the length of the proposed corridor. Assessing cumulative effects to natural resources is necessary in order to determine adequate avoidance, minimization and mitigation strategies. 50300-010

Point source data

Although it is important to identify specific locations of threatened and endangered (T & E), sensitive and Strategy species, it is an incomplete data set. It is necessary to determine habitat types and associated species composition to accurately determine natural resource impacts and adequate mitigation. Habitat types include freshwater aquatic habitat, grasslands, early to late successional mixed conifer forests, oak woodlands, riparian habitat and wetlands. The department recommends that the Fish and Wildlife Habitat Mitigation Policy be followed to mitigate impacts to fish and wildlife habitat caused by the proposed energy corridors. 50300-011

Habitat fragmentation

The Willamette Valley is located between the Cascade Mountain Range and the Coast Mountain Range. A variety of wildlife species utilize the Willamette Valley as a travel corridor between the Cascades and the Coast Range. The introduction of the energy corridor would further fragment Willamette Valley habitats and would result in a loss of connectivity for wildlife movement. The department recommends that alternative alignments that follow currently impacted areas, such as other energy corridors and Interstate 5, be used. 50300-012

Buffer size

The department recommends that the monitoring area for fish and wildlife is increased to a minimum of 1.5 miles from the edge of the energy corridor boundary on either side to determine impacts to T&E, sensitive and Strategy species. For example, spotted owl activity sites require a minimum 1.3 mile buffer to minimize adverse impact to the species. Identification of fish and wildlife species in this buffer is necessary to minimize impacts from the energy corridor. 50300-013

Avoidance of Conservation Opportunity Areas

The department recommends that the proposed energy corridor alignments avoid all mapped Strategy COAs. These areas have been identified through the Strategy as priority areas for conservation and restoration. 50300-014

Federal, state, county laws and regulations

The department recommends that the project comply with all federal, state and county laws and regulations that are in place for natural resource protection in the implementation of the energy corridor. Specifically, the project should be in compliance with the Endangered Species Act, Migratory Bird Treaty Act and Clean Water Act. 50300-015

Alternative alignment

Due to the detrimental impacts that would result from implementing the energy corridors, alternative alignments that follow currently impacted areas are strongly recommended. Other impacted areas could include current energy corridors and Interstate 5. 50300-016

Segment Specific Comments

Segment 16-24. This segment should follow existing Road 95. Important resources in this segment include sage-grouse, pronghorn, and kit fox habitat. The proposed alignment is near bighorn sheep habitat in the Trout Creek and Blue Mountains. It may be possible to do habitat enhancement in this area for habitat impacts.

There currently is an urban interface around McDermitt. To avoid existing mule deer migration routes, it would be beneficial to migrating animals to locate the energy corridor to the east of Highway 95. 50300-017

Segment 24-228. The alignment in this area parallels existing Highway 95. The department requests that the corridor distance be split on either side of the highway. There is an existing wildlife corridor at Highway 95. 50300-018

Segment 7-24. This segment follows an existing gravel county road. There are several important resources that could be affected by energy facilities in this segment including kit fox, sage-grouse, pronghorn, and mule deer. There is a bighorn sheep population on the Harney County side of the corridor. Where the proposed corridor crosses Whitehorse Ranch, it is very close to Lahontan cutthroat trout (CTT) habitat. Lahontan CTT are state and federally listed as threatened. The department requests that the alignment not go south of the road. In addition, the department requests that the alignment completely avoid Borax Lake. The lake supports the only known population of Borax Lake chub, a 50300-019

state and federally listed endangered species. There are also snowy plover nesting sites one mile north of the existing powerline. The department recommends that the corridor be moved to the south side of the road near Borax Lake to avoid impacts to this sensitive resource.

This area is also an important migration corridor for bighorn sheep and antelope. This resource needs to be avoided as much as possible. Any unavoidable impacts will need to be mitigated for.

This proposed alignment, and any construction that follows it needs to allow for movement of pronghorn and other wildlife species. Any proposed use of the corridor needs to follow the existing road as close as possible. In addition, there should be seasonal construction closures.

At site location 36 S, 31E, Section 6, the proposed corridor passes near the important resource of Beatty's Butte. The department recommends that the corridor go north and west of Beatty's Butte rather than dog-ear as proposed.

The department recommends that the corridor follow Highway 140 rather than south as proposed. On the west slope of Warner Valley, the department requests that access be restricted.

50300-019 (cont.)

Where the corridor crosses Goose Lake Valley, the department requests that anti-perching structures be used. The area is critical for migratory shorebirds. The department request that anti-strike devices be used on any above-ground structures in the Goose Lake and Warner Valleys.

This segment of the proposed corridor intersects with numerous COAs. The segment goes through the Warner Mountains, Pueblo Mountains, Warner Basin, Hart Mountain, Basque Hills and Alvord Lake Basin COAs. In addition, any segment crossing intervening private land would go through the Lost River COA., the Thomas Creek COA and potentially the Goose Lake COA.

Key species in the Warner Basin COA are the American white pelican, the black-necked stilt, snowy egret, western snowy plover, Foskett Spring speckled dace, Warner sucker, and Warner Valley redband trout. Key habitats are aquatic, riparian and wetlands.

Key species in the Hart Mountain COA are the ferruginous hawk, sage grouse, Swainson's hawk, Alvord chub, Catlow Valley redband trout, Sheldon tui chub, pronghorn antelope and pygmy rabbit. Key habitats are aquatic aspen woodland, big sagebrush shrublands, riparian, and wetlands.

For the Basque Hills COA, key species are ferruginous hawk, sage grouse, Swainson's hawk and pygmy rabbit. Key habitats include aspen woodland, big sagebrush shrublands and wetlands.

The Alvord Basin key species are long-billed curlew, sandhill crane, Alvord cutthroat trout, Borax Lake chub, Catlow tui chub, Catlow Valley redband trout, Lahonton cutthroat trout, and Malheur mottled sculpin. Key habitats include aquatic, aspen woodland, big sagebrush shrublands, riparian and wetlands.

Key species in the Warner Mountains COA are the great gray owl, olive-sided flycatcher, sandhill crane, Goose Lake redband trout, and Warner Valley redband trout. Key habitats are aquatic aspen, ponderosa pine woodlands and riparian. 50300-019 (cont.)

The Lost River COA key species are the sandhill crane, waterfowl, yellow rail, Lost River sucker and shortnose sucker. Key habitats are aquatic, riparian, and wetlands.

The Thomas Creek COA supports Goose Lake lamprey, Goose Lake redband trout, Goose Lake sucker, Goose Lake tui chub, Modoc sucker, pit roach, pit sculpin, and pit-Klamath brook lamprey. Key habitats are aquatic and riparian.

Segment 7-11. There is an important interstate deer migration route in this segment from Goose Lake Valley to Lost River. As with all identified deer winter range, the department requests that there be no obstructions placed that could inhibit migration movements. The department recommends ramps over any open trenches in winter ranges every ¼ mile during migration periods. There is an important waterfowl area near Bonanza. Where the alignment crosses Sprague River there is critical habitat for sucker that needs to be avoided. The river also is historic habitat for bull trout.

The Sycan River is a Wild and Scenic River and a sensitive habitat area. Paulina Marsh is also a sensitive habitat site and waterfowl area. The area where the proposed alignment crosses Highway 20 is winter range for big game including antelope. 50300-020

This segment of the proposed corridor goes through the western edge of the Squaw Ridge COA, as well as the Sycan Marsh and Sycan River COAs. In addition, the corridor going through intervening private land would intersect with the Sprague River COA.

The Sycan Marsh COA's key species are American white pelican, great blue heron, horned grebe, sandhill crane, white-faced ibis, yellow rail and bull trout. The key habitat is wetlands.

The Sycan River COA's key species are three-toed woodpecker, bull trout, pit-Klamath brook lamprey and American marten. Key habitats are aquatic, riparian, and wetlands.

The Sprague River COA's key species are sandhill crane, waterfowl, yellow rail, Klamath basin redband trout, Klamath largescale sucker, Lost River sucker, pit-Klamath brook lamprey and shortnose sucker. Key habitats are aquatic, riparian and wetlands.

The Squaw Ridge COA's key species are ferruginous hawk, sage grouse, Swainson's hawk and pygmy rabbit. Key habitats are big sagebrush shrublands and wetlands.

50300-020 (cont.)

Segment 11-228. In this segment, the corridor is proposed south of an existing powerline. The department recommends that the corridor be placed between Highway 20 and the existing powerline. From Highway 27 to Hampton there is antelope migration. Any structure in this area should be underground. At Hampton there is a pressure point for elk crossing.

The proposed alignment should avoid Chickahomny Reservoir. There is a significant amount of wetland habitat near Silvies Creek that should be avoided. The proposed alignment crosses a number of isolated streams with redband trout. These streams should be avoided. At the Riverside Wildlife Area, there are bighorn sheep. Dry Creek has redband trout. Pronghorn and mule deer migrate north and south in this area. There is the potential for bighorn sheep at the Owyhee Reservoir that should be avoided.

50300-021

This segment of the proposed corridor would intersect the Middle Owyhee River COA, the Silvies River COA and the Badlands COA. Key species in the Middle Owyhee River COA are Columbia spotted frog, ferruginous hawk, sage grouse and Swainson's hawk. Key habitats are aspen woodland, big sagebrush shrublands and riparian.

Key species in the Silvies River COA are Oregon Great Basin redband trout, black-necked stilt, Franklin's gull and sandhill crane. Key habitats are aquatic, riparian, wetlands and wet meadows. Species and habitats in the Badlands COA are described elsewhere.

Segment 11-103. This segment has golden eagles, sage-grouse leks and considerable big game animal movement in addition to the Rimrock Springs Wildlife Area that should be avoided.

Further north in segment 11-103, it appears that the corridor would cross the Deschutes River at Shears Falls. A crossing at Shears Falls would not be feasible.

50300-022

This segment of the proposed corridor goes through the Badlands COA. Key species include the ferruginous hawk, juniper-associated songbirds and mule deer. Key habitats are old-growth western juniper. The northern portion of this alignment goes through the Lower Deschutes River COA. Key species are ferruginous hawk, Lewis' woodpecker,

bull trout, summer steelhead and sagebrush lizard. Key habitats are aquatic grasslands, riparian and wetland, and sagebrush shrub-steppe. 50300-022 (cont.)

Segment 4-247 (Douglas County) The proposed alignment crosses within ½-mile of an existing bald eagle nest. The proposed corridor should be more than ½-mile away from any existing bald eagle nest. Fish runs in the streams and rivers that will be crossed by the proposed alignment in this area include Oregon chub (federally listed as endangered), steelhead, coho salmon, and cutthroat trout.

Waterways that would be affected by the proposed corridor alignment include:

1. Crossing on O'Shea Creek would impact limited spawning areas for coho salmon, winter steelhead and cutthroat trout. This area of spawning is important due to an existing dam that precludes anadromous fish use just upstream of the proposed crossing location.
2. Crossing on the Mainstem South Umpqua River would impact limited mainstem fall chinook salmon spawning sites.
3. Crossing on the Mainstem North Umpqua River would impact limited adult spring chinook and summer steelhead summer refuge areas as well as juvenile salmonid summer refuge sites.
4. Streams that flow north-south (or south-north) that would experience impacts beyond a single crossing include: Starvout Creek and tribs., Russel Creek and tribs., Canyon Creek and tribs., Packard Gulch, South Myrtle Creek, North Myrtle Creek, Frozen Creek, Melton Creek, South Fork Deer Creek and tribs., Oak Creek and tribs., Jackson Creek, Foster Creek, Calapooya Creek and tribs., and Elk Creek and tribs. 50300-023

The proposed corridor would intersect with two COAs. The King Mountain COA's key species are southern torrent salamander, blue-gray gnatcatcher, Lewis' woodpecker, white-headed woodpecker, coho salmon, and summer and winter steelhead. The key habitats are grasslands and oak savanna, late successional mixed conifer forests and pine-oak woodlands. The Umpqua River COA's key species include horned lark, purple martin, coho salmon, Pacific lamprey, summer steelhead, Umpqua Oregon chub, winter steelhead, Columbia white-tailed deer, common king snake, and northwestern pond turtle. Key habitats are aquatic, grasslands and oak savanna, pine-oak woodlands and riparian areas.

There is at least one spotted owl site within the proposed corridor and a potentially active spotted owl site just south of Cow Creek. Cow Creek itself supports fall chinook steelhead, coho, lamprey, and Umpqua chub, and clouded salamanders. There is winter refuge habitat in the upper stretches of Cow Creek as well as pond turtle habitat.

Just south of Canyonville, there is a spotted owl site in the proposed corridor. In addition, the corridor intersects with four spotted owl buffer areas. The radius of the northern spotted owl home range is identified as 1.3 miles. Canyon Creek and the West Fork

Canyon Creek support populations of coho salmon and cutthroat trout. Four spotted owl buffer areas are potentially affected in the South Umpqua area. Columbia white-tailed deer are found in the area near Mill Town Hill. For Columbia white-tailed deer, the department recommends minimizing impacts to oak woodland and savanna habitat, creating forage corridors and minimizing ground disturbance.

In Lane County there is a bald eagle nest immediately west of Cottage Grove which is directly in the corridor on private lands. Row River supports pond turtles which are a state sensitive species.

In Lane County, the proposed corridor would intersect with the West Eugene COA. Key species in this COA are waterfowl, Fender's blue abutter fly, and the northwestern pond turtle. Key habitats are aquatic, grasslands, oak savanna, oak woodlands, wetlands and wet prairie.

Oregon chub, a federal endangered species is found in the Willamette River. The proposed corridor intersects the Willamette River Floodplain COA. This COA supports the following key species: foothill yellow-legged frog, riparian birds, coho salmon, spring chinook salmon, Oregon chub, winter steelhead and northwestern pond turtle. The Willamette River floodplain also supports painted turtles, another state sensitive species. The key habitats are aquatic, bottomland hardwoods and riparian.

50300-023 (cont.)

The McKenzie River is an important system for bull trout, spring chinook and Oregon chub. There is also a spotted owl buffer that would be affected in Lane County.

The Calapooia River is important for winter steelhead and pond turtles. In addition, there has been a significant amount of riparian vegetation restoration along the Calapooia that should be avoided by energy corridors. The proposed corridor would intersect with the Calapooia River COA. Key species in the Calapooia River COA are riparian birds and winter steelhead. Key habitats are aquatic and riparian. The proposed corridor also intersects with the One Horse Slough – Beaver Creek COA. Key species include foothill yellow-legged frog, northern red-legged frog, chipping sparrow, slender-billed nuthatch and willow flycatcher. Key habitats include aquatic, grasslands and oak savanna, oak woodlands, riparian, and wetlands and wet prairie.

Just south of Crabtree Creek there is a long-legged myotis site. In addition, Crabtree Creek supports winter steelhead, and spring chinook as well as band-tailed pigeons.

Any time the proposed corridor crosses a major waterbody, it could affect great blue heron colonies.

The proposed corridor intersects with the Kingston Prairie COA. Key species are the western meadowlark, Bradshaw's lomatium, Oregon larkspur, white-topped aster and Willamette daisy. Key habitats are grasslands and oak savanna, oak woodlands, riparian and wetlands and wet prairie. The Lower and North Santiam COA is also intersected by the proposed corridor. Key species include riparian birds, Oregon chub and winter steelhead. Key habitats include aquatic, floodplain forests, riparian, wetlands and wet prairie.

50300-023 (cont.)

Segment 5-201. In the northern Willamette Valley, the proposed alignment goes through the Forest Park COA. Forest Park is over 5,000 acres of contiguous forest, making it the largest forested natural area within city limits in the United States. Key species include the olive-sided flycatcher and cutthroat trout. Key habitats include aquatic, late successional conifer forests and riparian. Forest Park provides habitat for more than 112 bird and 62 mammal species. Strategy species identified in Forest Park include pileated woodpeckers, northern red-legged frogs, Cope's giant salamander, Oregon slender salamander, western toad, American marten, fisher, and the olive-sides flycatcher. Due to the potential detrimental impacts to fish and wildlife and associated habitats in Forest Park, the department strongly recommends that the energy corridor avoid an alignment through the park.

The habitat is comprised of early to late successional mixed conifers, including Douglas-fir, grand fir and western red cedar, red alder and big leaf maple. The Strategy identifies late successional conifer forests as a strategy habitat. The Strategy identifies goals to protect and develop habitat that has been identified as important to species of conservation concern, expand existing late successional patches in larger areas and maintain connectivity.

50300-024

There are two known fish-bearing streams in Forest Park. Balch Creek supports an isolated population of 2,000 to 4,000 cutthroat trout, which may contain a genetically unique population. The main stem of Miller Creek supports sea-run cutthroat trout which move freely to and from the Multnomah Channel. Coho salmon, cutthroat trout and steelhead have also been identified in the lower basin of Miller Creek. Miller Creek provides essential spawning habitat for salmonids.

Forest park also serves as a wildlife corridor, providing migration, cover, nesting and foraging habitat for a variety of wildlife species. A natural vegetated corridor links the northwest end of the park to other natural areas and the Coast Range. Preserving travel corridors is important to maintain dispersal, migration, as well as, maintaining genetic and biodiversity for wildlife species.

Due to the large, contiguous characteristic of Forest Park, it is host to a large diversity of avian species. Maintaining large, contiguous areas is important to maintain species

diversity for birds and mammals. The impacts to wildlife and associated habitats from an energy corridor through Forest Park would result in direct habitat loss and habitat fragmentation. Habitat fragmentation would result in connectivity loss of the wildlife corridor, a potential decrease in wildlife diversity and a potential loss of genetic diversity

The proposed corridor should avoid impacts to the eagle roost site at Rocky Point. The proposed corridor intersects with the Clatskanie River COA. Key species include chum salmon, coastal cutthroat trout, coho salmon, fall chinook salmon, wither steelhead and Columbia white-tailed deer. Key habitats include aquatic, freshwater wetlands and riparian. The corridor also intersects the Columbia-Clatskanie COA. Key species include the species listed for the Clatskanie River COA as well as the olive-sided flycatcher. 50300-024 (cont.)

This portion of the proposed energy corridor alignment travels through essential over-wintering big game habitat. Over-wintering habitat is a limiting factor for big game populations in this area. Impacts to over-wintering big habitat would include direct habitat loss and fragmentation. The department recommends that an alternative alignment be explored to avoid impact to this habitat.

Segment 230-248. A spotted owl site is within the proposed corridor. The segment intersects two big game winter range segments. Timing should be restricted for construction in big game winter range. The corridor intersects habitat for Cope's giant salamander as well as the big-eared bat.

There is a spotted owl site at Shotgun Creek that should be avoided. The Coburg Hills support important oak habitat that should be avoided. The Mohawk River has significant flooding issues that need to be avoided by the proposed corridor. There is a spotted owl site within the proposed corridor in this area as well. 50300-025

This portion of the proposed corridor intersects the Mt. Hood Area COA. Key species in this COA are Cascade torrent salamander, Cascades frog, coastal tailed frog, Cope's giant salamander, Larch Mountain salamander, Oregon slender salamander, bufflehead, northern goshawk and coastal cutthroat trout. Key habitats include late successional Douglas-fir forests.

Segment 227-249 This is an existing electricity corridor with above ground transmission lines in place. It is adjacent to Lookingglass Creek which harbors an important population of ESA-listed bull trout. The corridor is adjacent to all of the known spawning habitat for this population, which is a concern. It is also spawning and rearing habitat for ESA-listed steelhead and for spring chinook which are being reintroduced into the stream. The corridor crosses Summer Creek, a tributary to Lookingglass that has had some spawning by bull trout and is a steelhead spawning stream. 50300-026

To protect the populations of bull trout, steelhead and spring chinook in Lookingglass Creek, the corridor boundary should be from the existing power lines and to the north so it does not get into the canyon. This would avoid most of the habitat issues with these listed populations, which would make the process more streamlined if additional utilities were to be placed in the corridor. 50300-026 (cont.)

250-251 Stream segments affected by this corridor include the Burnt River and Alder Creek, a tributary. There is already a transportation corridor here, Interstate 84, and there are multiple existing electrical lines and gas lines. The parcels of public land involved are relatively small. The Burnt River harbors a population of redband trout and other native species including suckers, dace, shiners, northern pikeminnow, chiselmouth and sculpins. Little is known about the fish populations in this basin. 50300-027

Thank you for the opportunity to comment on the PDEIS. If you have any questions please contact me at (503) 947-6089.

Sincerely,

Patricia Snow
Land and Water Use Coordinator
Wildlife Division

C: Adam Bless, ODOE

From: corridoreiswebmaster@anl.gov
Sent: Monday, February 11, 2008 8:21 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50301

Thank you for your comment, Peter Greathouse.

The comment tracking number that has been assigned to your comment is WWECD50301. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 11, 2008 08:20:35PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50301

First Name: Peter
Last Name: Greathouse
Address:
City:
State: UT
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:
I believe that the corridor should avoid private ground as much as possible. In areas where there is a great deal of public ground, the corridor should remain on the public ground. As the corridor is supposed to be for the public good it should utilize the public ground which is to be used for the public.

There are areas (at least Millard County, Utah) where the proposed corridor goes directly through private ground. There is not much private ground in the county (maybe 20%). The corridor should utilize an alternative plan that would by-pass the private ground and more fully utilize the public ground. 50301-001

Going through private ground could devastate local economies and drive farmers and ranchers out of business.

Also going through the private ground could cause a host of safety issues, as this is where the citizens live. Every time the corridor closely parallels or crosses a public road, the risk for public safety increases. I have seen a car hit a power pole and shear the pole off. This could knock out power, knock the power line onto the ground, or lead to serious injuries and death. By avoiding these areas, risk is drastically reduced. 50301-002

The corridor should also stay away from wells, streams, rivers, lakes, reservoirs, and the like. Pipelines have been known to leak. If a petroleum pipeline were to leak in one of these areas, the results would be devastating. If it leaked into the underground aquifer, it would contaminate drinking water and irrigation water. If it leaked into any water source used for irrigation, the water could not be used, crops would dry up and die. If the water was contaminated and used for irrigation, it could spread the contamination over thousands of acres and destroy the productive fields. 50301-003

This corridor should stay on public ground. It should avoid private ground wherever possible, even if the corridor is slightly longer. It should avoid going through populated areas, no matter how highly or sparsely populated. 50301-004

Thank you for considering my comments.

From: corridoreiswebmaster@anl.gov
Sent: Monday, February 11, 2008 8:31 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50302

Attachments: westwide_energy_corridor_eis_WWECD50302.doc

westwide_energy_corridor_eis_W...

Thank you for your comment, David DelSordo.

The comment tracking number that has been assigned to your comment is WWECD50302. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 11, 2008 08:30:41PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50302

First Name: David
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Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Docs\westwide energy corridor eis.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.

Subject: West-wide Energy Corridor
Date: 2/11/2008

I am concerned about the scope and scale of the analysis. I do not believe that the complex issues related to the designation of energy corridors can be done in one document for the entire western US. I believe the analysis should be done on a statewide basis at most. 50302-001

I am also concerned that the proposed designations in the Department of Energy's Draft Programmatic EIS (PEIS) will have significant impacts to wildlife habitat, cultural resources, recreation opportunities, and many other resources on federal lands across the west. Once designated, the corridors will cover 6,000 miles and almost 3 million acres of public lands. With large-scale buildup likely within these corridors, public involvement in the planning process is crucial to ensure that the designation of these corridors is a positive step for our public lands. 50302-002

By taking the responsibility to move forward with a process to designate large swaths of our federal lands as places for oil, gas and hydrogen pipelines, and power lines, the government also took on the responsibility of doing it right. This would involve ensuring that:

- new pipelines or powerlines are actually needed: agencies should analyze the potential to meet growing energy demands through increased energy efficiency, distributed generation and maximizing the use of the existing power grid through technology upgrades before turning to additional or wider corridors on our public land; 50302-003

- federal lands are necessary locations and special or sensitive public lands are avoided altogether: agencies should continue analyzing impacts to special public lands and moving corridors to avoid them. The agencies should use analysis provided by conservation groups to move corridors out of special places like Grand Staircase-Escalante National Monument and the dozens of other outstanding units which the proposed corridors would cross; 50302-004

- projects are subjected to best management practices to limit damage to other resources, recreation and views: agencies should make their Interagency Operating Procedures mandatory; 50302-005

- risks to federal and other affected lands are realistically and thoroughly assessed, so that those risks can then be avoided or minimized: agencies should analyze cumulative impacts to both federal lands and state, private, and tribal lands which will be impacted when the corridors are connected; 50302-006

- once appropriate locations are identified, projects on federal lands are presumptively limited to those corridors: agencies should limit projects on federal lands to corridors; 50302-007

- consideration is given to improving access for renewable energy, such as wind and solar: agencies should take the opportunity to reduce our dependence on fossil fuels, limit the effects of climate change and help build a sustainable energy future for the West by seriously evaluating alternatives to maximize use of renewable energy; 50302-008

- avoid wild areas pending designation: wildlands included in recently-introduced wilderness bills (such as those in Oregon, Washington, Colorado, and California) will also be impacted by the proposed corridors. Analysis of such impacts has not been completed yet, but as agencies are provided with relevant information they should consider moving or modifying corridors. Wild and Scenic Rivers that have been deemed eligible or suitable for designation should also be avoided; and 50302-009

- alternatives are 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. 50302-010

By adopting the changes above, the agencies can guarantee the protection of our priceless publicly-owned wildlands and ensure a sustainable, clean energy future for all Americans.

Thank you for your time and attention to my comments,
David DelSordo

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 10:16 AM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50303

Attachments: Comments_on_368_DPEIS_WWECD50303.doc

Comments_on_368
DPEIS_WWECD503.

Thank you for your comment, Adam Bless.

The comment tracking number that has been assigned to your comment is WWECD50303. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 10:16:02AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50303

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

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

February 12, 2008

Oregon Department of Energy
Comments on the draft Programmatic Environmental Impact Statement (DPEIS) for Energy Corridors in the 11 Western States

The Oregon Department of Energy (ODOE) is pleased to comment on DOE/EIS-0386, the draft programmatic environmental impact statement (DPEIS)on designation of energy corridors on federal land in the 11 western states.

ODOE has been an active participant in the USDOE's implementation of the federal Energy Policy Act of 2005 (EPAct). As a member of the Western Interstate Energy Board, we participated in the compilation of western congestion studies that served as input to the National Electric Transmission Congestion study, which USDOE issued under EPAct section 1221. We attended the Portland scoping meeting for this DPEIS in November of 2005, and provided scoping comments in writing.

Our comments on the DPEIS are:

1. The DPEIS is too generic. The DPEIS describes the designation of over 100 energy corridors on federal land (11 in Oregon alone) but provides little insight into how each corridor was selected. Section 1 describes a process in which USDOE identified congestion areas and transmission bottlenecks, created a conceptual network of transmission corridors that might address those congestion areas, invited stakeholders to suggest corridors, and then chose certain corridors based on a combination of resource impacts and the availability of existing right of way. This appears to be a reasonable approach. However, the discussion does not describe why these particular corridors were selected over other alternatives. The PEIS should have more description of the individual corridors and should describe how each was selected. In particular, the PEIS should describe: 50303-001

    i What congestion or transmission bottleneck each corridor is expected to solve
    ii What alternatives were considered for solving that particular congestion area or bottleneck?
    iii What objective criteria, if any, did the agencies use in designating specific corridors?

2. The DPEIS is an impressive compilation of facts, figures and statistics, but it does not help stakeholders understand how these facts and figures were applied in choosing corridors. Facts and figures are presented in the aggregate (i.e. – total acreage of a certain resource) and are not useful for weighing benefits and impacts in any specific location. Instead of presenting aggregate data for the entire state, USDOE and BLM could have used a more corridor based approach so that stakeholders could comment meaningfully on the corridors that they are interested in. 50303-002

3. We understand that, as stated in the DPEIS, the action proposed here only results in modification to the action agencies' land management plans, and does not approve of any energy project. We further understand that specific projects in these corridors will require their own EIS. However, we still expect the action agencies to perform enough "due diligence" on these proposed corridors to ensure that none are proposed in places where energy facilities simply should not be located. For example, in our scoping comments of November 2005, ODOE said:

   > "***Within designated federal energy corridors, USDOE should specify well defined protected areas that are not suitable for transmission line routing. ODOE acknowledges that some new transmission across federal lands should be considered in the future. However, within those federal lands there are particularly valuable or sensitive areas that should be avoided and should be formally protected. These protected areas would act as islands within the larger corridors. In Oregon, we have done this by rule. USDOE should designate protected areas as part of the PEIS. ***"

   50303-003

   In short, even a programmatic EIS should include a fatal flaw analysis. We hope that this type of analysis was done, but the DPEIS does not describe such an analysis in any depth, other than to exclude certain obvious areas.

4. The DPEIS at text box 2.24 states that specific projects will be evaluated using a "tiered" approach. ODOE concurs with the tiered approach in principal. However, the DPEIS contains so little specific information about the potential environmental impacts of energy projects on specific corridors that it is useless as a tiering document. When actual transmission projects are proposed on those corridors, each project will require a complete EIS essentially from scratch. They should not be able to take any credit for environmental impacts disclosed in this PEIS, because the PEIS is written in such a generic fashion. The Final PEIS should make this clear. 50303-004

5. The alternatives analysis in the DPEIS is inadequate. The DPEIS presents only two alternatives, (a) the no action alternative and (b) the designation of all the corridors described. However, these are not the only two alternatives. There are 10 or 11 (depending on how you count them) proposed corridors in Oregon and over 100 corridors in the 11 western states. The action agencies could designate some of them, all of them, none of them, or any combination. Each corridor is, in effect, a separate alternative. It is unrealistic to reduce the entire set of alternatives to a simple choice between "all the corridors" and "none of the corridors". ODOE realizes that a separate alternative analysis for each of the nearly 100 proposed corridors would make a large PEIS even larger. However, the "all or nothing" approach in the Draft PEIS is inadequate. 50303-005

6. ODOE is particularly concerned about the fact that action agencies will not analyze alternatives to specific projects that are proposed within the federal corridors. We learned this at the public comment meeting in January 2008. As noted in comment (4) above, the DPEIS does not analyze alternatives to individual corridors; it only analyzes the "no action" alternative and the "action" of designating all corridors, with nothing in between. If action agencies do not analyze alternatives to specific projects, then this means that at no time will a site specific alternatives analysis be performed for any proposed project. 50303-006

7. The interagency operating procedures (IOP's) described at section 2.4 look reasonable. However, the DPEIS does not explain how they will be enforced. The DPEIS cites no statute or rule that ensures their implementation. As presented, they appear to simply be a list of good practices. The DPEIS should clarify how the list of actions and steps at section 2.4 will apply to the EIS's that will be produced for energy projects. 50303-007

8. In our scoping comments of November 2005, ODOE made the following statements:

    a. Once designated, federal corridors designated under section 368 will likely drive the routing of transmission facilities on private land as well, because the corridors on private land must match up with the corridor on federal lands. For this reason, in analyzing the impact of corridors on federal lands, USDOE should also take into account the impacts on surrounding private lands as well.

    b. Siting experience in Oregon teaches us that where there are transmission facilities, fixed energy facilities will follow. For example, the location of every new generating facility in Oregon in the last 10 years was chosen based on proximity to transmission. Therefore, impacts considered in the PEIS should consider the impacts of the generation facilities that the transmission lines will serve.

    c. Much of the federal land in Oregon either is in agricultural use or borders private land that is in agricultural use. Much of the private land bordering federal land in Oregon is zoned for "Exclusive Farm Use". In addition to the impacts on cultural resources, habitat, socioeconomic impacts, public safety, and environmental justice, USDOE should inventory the agricultural uses in the areas proposed for consideration as energy corridors, and should consider the impacts on agriculture on affected and adjacent lands. 50303-008

    Comments (a), (b), and (c) above should be addressed in the cumulative impacts analysis in the DPEIS. However, the DPEIS is limited in scope to only the federal lands. In the opening paragraph of Chapter 4, the DPEIS quotes the cumulative impact definition at 40 CFR 1508: "***results from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person takes such other actions***" Based on this definition, a complete cumulative impacts analysis would include impacts on adjacent private lands and generation facilities that are proposed to take advantage of the newly available transmission. Both of these outcomes are reasonably foreseeable. By limiting its consideration to the transmission facilities on federal lands only, the DPEIS takes too narrow an interpretation of the requirement to consider cumulative impacts.

9. Expanding on the above comment, the proposed federal corridor in Oregon west of the Cascades is particularly incomplete. There is no possible corridor in western Oregon that allows for one continuous, unbroken path from north to south, because so much of the land is private. The corridor presented in the DPEIS is actually a "dotted line" with alternating segments of public and private land. Any facility in this corridor would actually cross more private land than public. A BLM representative told us that "the federal agencies only have the authority to analyze federal lands". However, when the federal action inevitably affects so much private land, analysis of the impacts on the private land is allowed under the "reasonably foreseeable" language in 40 CFR 1508. The PEIS should also explain why this corridor is needed, and what energy supply problem it will solve. 50303-009

10. The public comments process to date has been disappointing. ODOE attended the pubic hearing in Portland, Oregon. No one from the action agencies gave any presentation, summarizing what was proposed or explaining the process used in selecting the corridors. Stakeholders were simply given a chance to make formal comments. Although personnel from the federal agencies were present, there was no opportunity to ask questions, request an explanation, or engage in any dialogue. Some members of the public spoke for the record. From their comments, it was clear that most members of the public see the designation of all proposed corridors as a done deal. For reviewers and other stakeholders who came hoping to gain some insight about the corridor selection process and objectives, the public meeting was a lost opportunity. We believe USDOE and BLM should have scheduled more focused meetings with more opportunity for dialogue. 50303-010

11. We are disappointed that the US Geological Survey is not a cooperating agency. For any specific energy projects in corridors in Oregon, the PEIS should specify that action agencies will consult with USGS and the Oregon Department of Geology. 50303-011

12. Because the DPEIS presents data in the aggregate and says little about the individual corridors, it is very difficult to comment on individual corridors. However, we are curious about the reasoning behind 5 specific corridors in Oregon:

    a. As noted above, corridor 4-247 is not a corridor at all, but a "dotted line" of federal lands, separated by large stretches of private land. None of the transmission studies identify a north to south path, west of the Cascades, as a congestion path. Please explain what energy problem this corridor would solve. 50303-012

    b. Corridors 18-246 and 230-248 cross the Northern Oregon Cascades. We agree that some transmission path must cross the Cascades to connect the resource areas in the East with the load centers in the West. However, the PEIS should explain how the federal agencies selected these two particular paths across the Cascades, as opposed to other possible paths. Corridor 230-248, in particular, seems to match the route of the proposed Palomar pipeline, currently under FERC review. The PEIS should explain if this federal corridor was designated specifically for that line. The PEIS should explain what energy bottleneck these corridors solve. 50303-013

c. Corridor 227-249, which crosses the Wallowa range, does not appear to begin or end near any particular resource or load. The PEIS should explain its purpose. 50303-014

13. Because the land affected by these corridors is primarily habitat land, ODOE is not commenting on the environmental impacts of any specific corridors at this time, but we defer to the Oregon Department of Fish and Wildlife and support their comments. 50303-015

14. Oregon statutes at ORS 469.300 *et seq.* make it clear that a Site Certificate from the Oregon Energy Facility Siting Council is required even for energy projects on federal land. Such projects must meet all of the Oregon siting standards at Oregon Administrative Rules Chapter 345 Division 22, 23 and 24. And, all such projects must go through the public siting process described at OAR Chapter 345 Divisions 15 and 21. Please note that the Oregon siting process for "linear" energy facilities includes an alternatives analysis, even though the corresponding federal agency might not require one. Any projects on federal land must comply with all federal permitting requirements and environmental impact requirements imposed by the federal agency. However, these federal requirements are in addition to, not instead of, state standards. In some cases, this might result in a joint federal EIS-state siting process. The DPEIS should clarify that state siting requirements apply in addition to the federal ones. 50303-016

15. Despite the many concerns raised above, ODOE concurs generally with (a) the value of energy corridors in the right locations to facilitate transmission development, promote development of renewable sources and strengthen the grid; and (b) the creation of a unified process for granting right of way of federal land. 50303-017

16. We support the general approach to selecting corridors that is described in section I of the DPEIS. We note that DOE first considered the congestion areas and transmission bottlenecks identified in the National Congestion Study that USDOE issued under section 1221. DOE next asked for suggested corridors from transmission providers in the public and private sectors. DOE consulted with NREL to identify load centers and regions rich in renewable resources like wind and solar. DOE then consulted with natural resource agencies to identify areas that should be off limits. Finally, the action agencies looked for opportunities to make use of existing rights of way. In general, this seems like a sound approach. 50303-018

ODOE appreciates the opportunity to comment and is happy to work directly with the federal agencies in refining the federal corridors and reviewing any specific energy projects that may be proposed on them.

Sincerely,

Adam Bless
Senior Energy Facilities Analyst
Oregon Department of Energy

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 11:01 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50304

Thank you for your comment, John Phillips.

The comment tracking number that has been assigned to your comment is WWECD50304. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 11:01:02AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50304

First Name: John
Middle Initial: F
Last Name: Phillips
Address:
City:
State: OR
Zip:
Country: USA
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Privacy Preference: Withhold address only from public record

Comment Submitted:
Do not allow energy corridors. They are invasive. PUT THE $$$ into alternative solar, wind, hydro R & D. IT will start an economic boom of world wide proportions with us at the head of the line!

50304-001

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: Tuesday, February 12, 2008 12:05 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50305

Thank you for your comment, Nancy Cole.

The comment tracking number that has been assigned to your comment is WWECD50305. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 12:04:36PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50305

First Name: Nancy
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Last Name: Cole
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State: OR
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Privacy Preference: Withhold address only from public record

Comment Submitted:
As a taxpayer I object to the corridor siting in southern Jackson County, OR and northern Siskiyou County, CA. Around the Cascade Siskiyou National Monument it flies in the face of Presidential Proclamation in that one of the main protections offered by CSNM is to wildlife migration east-west. But that's the least of my concerns. 50305-001

The entire Siskiyou Pass area along I-5 is famously unstable and difficult, if not impossible, to access during winter storms. The Interstate was sited there because of political clout, instead of along a more stable and suitable route, essentially route 97 east of the Cascades, and as a result is along earthquake fault lines and considerable shifting and slumping. On our property is a telecommunications repeater sited there because the telephone lines were crushed and cut by shifting as they moved across this mountain pass. Interstate 5 on Siskiyou Pass and along Anderson Grade is one of, if not the, longest 6% grade on the interstate system and very dangerous. Despite this it carries huge amounts of toxic material. An accident on either the energy corridor (or some wing nut with a rifle) could easily result in catastrophe, not only because a main interstate transportation corridor would be impacted but because that interstate corridor is so narrow that nearby residents would be inescapably affected. 50305-002

Building along this route would be the most expensive and chancy construction choice, much more so than the flatter, less steeply-graded routes east of the Cascades on the high plateau.

Because the corridors are so wide, and the federal land is so checkerboard, massive amounts of private land condemnation would also be involved, involving as much as 1/5 of the width of the Colestin Valley and a good chunk of the Southern Rogue Valley. Ashland, at the south end of Rogue Valley, is primarily dependent on tourism so your proposed route would have enormous and deleterious effects on that economy. 50305-003

The main, and almost only, business sites from Ashland to Medford in Phoenix and Talent are along Hwy 99, which is the extension of your proposed route, so condemnation would involve either crushing or significantly damaging the main business economy of that corridor. 50305-004

The emergency services available in the Colestin Valley are minimal, and the Interstate 5 Siskiyou Pass is periodically shut down because of huge winter storms (4400 feet at the highway Pass) -- in fact, only a week or so ago traffic was completely stopped for almost a day and weekend before last ODOT officials were begging people not to drive the route except in an emergency. Getting any emergency services to a pipeline or powerline accident would be problematic. 50305-005

Spills or emissions would affect two watersheds, both containing sensitive commercial fishing species, the Rogue and the Klamath. An enormous powerline would be going through already tinderbox forested areas. This is a dangerous and expensive choice for routing. 50305-006

Someone sitting in an office somewhere looking at maps thought this was a good idea, but I suggest you talk to road engineers, traffic and fire safety specialists, ODOT and CALTRANS about the Interstate 5 Siskiyou Pass route before proceeding further with this siting. You couldn't have picked a more problematic location than going over those mountains and through two narrow valleys (one with major air quality problems because of inversions during winter, one with no adequate roads for large-scale human egress during serious emergencies such as fire). 50305-007

I urge you to reject this route and start over either by crossing the Cascades to the north of the Rogue Valley or staying East of the Cascades altogether where it is flatter, less populated, less traveled, less unstable and less dangerous. 50305-008

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: Tuesday, February 12, 2008 12:24 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50306

Attachments: Energy_Corridor_comments_WWECD50306.doc

Energy_Corridor_co
mments_WWECD...

Thank you for your comment, Clay Fitch.

The comment tracking number that has been assigned to your comment is WWECD50306. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 12:23:58PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50306

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Attachment: M:\Political Affairs\Energy Corridor comments.doc

Comment Submitted:
Signed document has also been submitted via United States Postal Service

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 12, 2008

Westwide Corridor PEIS
Argonne National Laboratory
9700 South Cass Avenue
Building 900, Mail Stop 4
Argonne, Illinois 60439

Subject: Programmatic Environmental Impact Statement

We appreciate the opportunity to review the proposed energy corridor designations at the hearing held in Elko, Nevada on February 5, 2008. We commend the Agencies for undertaking the effort to designate infrastructure routes and share the hope that these provisions will move industries forward in meeting the future energy needs of the region. 50306-001

We are concerned however, by what appear to be the attributes of a corridor in which we have an existing 69 kV overhead transmission line from Oasis, Nevada to West Wendover, Nevada. This segment is designated as 44-239 and is coded on both the "Eleven-State Map of Proposed Energy Corridors" and the "Nevada Draft Map of Proposed Section 368 Energy Corridors and Rights of Way on Federal Lands" as "underground only". The personnel available at the hearing thought that the designation was requested for "visual resource management" purposes but were unable to identify a specific view or explain the need for approximately thirty miles of restriction. To our knowledge, the existing 69 kV line has operated without incident or complaint since its construction in 1962.

Map "D5" of the "Full Sensitive Resource Analysis Map Set" would seem to indicate that the resource being considered is the California Trail. It does not appear that any other portions of the California Trail, including the area by the California National Historic Trail Interpretive Center near Elko, Nevada, are in need of similar protection. The "Schematic Design Report" for the Interpretive Center identifies twelve wayside sites for development in Phase One and an additional twelve wayside sites for Phase Two. Even though interpretive signage has long been in place at the Pilot Peak Interchange of Interstate 80, the plan anticipates no waysides on the east side of Silver Zone Pass. On the west side of Silver Zone Pass, the corridor is north of Interstate 80 while the proposed Silver Zone Pass Wayside is south of Interstate 80 and the identified trail route is further south yet. That being the case, designating section 44-239 for "underground only" seems arbitrary, unnecessary and unduly burdensome. 50306-002

The "underground only" designation is inconsistent with both current and historical use and is unwarranted by the non-descript terrain. We therefore respectfully request that the "underground only" designation be removed from segment 44-239.

Should you require additional information, please feel free to contact me by calling (775) 752 - 3328 or by sending email to cfitch@wrec.coop.

Sincerely,

Clay R. Fitch
Chief Executive Officer

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 1:42 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50308

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WWECD50308. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 01:41:55PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50308

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

Comment Submitted:
Renewable Energy is an important and necessary thing for our future. However, renewable energy must be produced and distributed in such a way as to protect the unique and priceless environment in and around Joshua Tree National Monument, one of our country's crown jewels. The environmental and visual damage done by above ground power lines through the proposed area is unacceptable and must be rejected. A more environmentally friendly route must be found to protect this fragile and beautiful desert. 50308-001

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: Tuesday, February 12, 2008 2:05 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50309

Thank you for your comment, Arthur Beckes.

The comment tracking number that has been assigned to your comment is WWECD50309. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 02:04:40PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50309

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Country: USA
Email: starkraven@blackfoot.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
We need to use less energy and make conservation our goal in all areas of life, if we want the human race to continue. Care about your children and your children's children? Please think about it. 50309-001

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: Tuesday, February 12, 2008 2:19 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50310

Attachments: Draft_Energy_Corridor_PEIS_Comments_B&W,_Walz_to_Argonne_Ntl_Lab,_2-14-08_WWECD50310.pdf

Draft_Energy_Corridor_PEIS_Com...

Thank you for your comment, Barbara Walz.

The comment tracking number that has been assigned to your comment is WWECD50310. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 02:18:27PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50310

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Attachment: R:_NEW ENVSHR\Administrative\Reader Files\Kim\Draft Energy Corridor PEIS Comments B&W, Walz to Argonne Ntl Lab, 2-14-08.pdf

Comment Submitted:
See attached comments

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.

TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
1100 W. 116TH AVENUE • P.O. BOX 33695 • DENVER, COLORADO 80233 • 303-452-6111

February 14, 2008

West-wide Energy Corridor PEIS
Argonne National Laboratory
9700 S. Cass Ave., Bldg. 900, Mail Stop 4
Argonne, IL 60439

RE: Tri-State Generation and Transmission Association, Inc. Comments to the Draft Programmatic Environmental Impact Statement (PEIS) for the Designation of Energy Corridors on Federal Land in 11 Western States (DOE/EIS-0386)

Tri-State Generation and Transmission Association, Inc. (Tri-State) appreciates the opportunity to comment on the Draft PEIS for the Designation of Energy Corridors on Federal Land. Tri-State is a wholesale electric power producer/supplier that serves 44 rural electric cooperatives and public power districts in Colorado, Nebraska, New Mexico and Wyoming. Tri-State's member distribution systems serve nearly 561,000 metered customers (translating to a population of more than 1.2 million people). Tri-State's 250,000-square-mile member service territory includes all or parts of 56 of Colorado's 64 counties, all or parts of 27 counties throughout New Mexico, all or parts of 20 counties in western Nebraska, and all or parts of 14 counties in central and northern Wyoming. Tri-State's transmission system includes approximately 5,096 miles of high-voltage transmission line and 135 substations and switching stations.

Tri-State applauds the efforts of the lead federal agencies, the Department of Energy (DOE) and the Bureau of Land Management (BLM), as well as the cooperating federal agencies, the U.S. Forest Service (USFS), the Department of Defense (DOD), and the Fish and Wildlife Service (FWS), to designate corridors on federal land in the 11 Western states for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities (energy corridors), as required by Section 368 of the Energy Policy Act of 2005 (EPAct Section 368). Tri-State appreciates the careful analysis of the environmental impacts; attempt to designate federal energy corridors on federal land in 11 western states, and incorporation of the designations into land use and resource management plans. Tri-State understands that a joint determination was made in an effort to address and designate priority corridors to help streamline the process for the permitting and construction of energy transmission facilities. This action was developed to assist in the efficient and cost-effective transmission of energy resources being generated in the western United States while minimizing environmental impacts. 50310-001

Given the aforementioned acknowledgement and appreciation of efforts, Tri-State is concerned that the practical effect of the Draft PEIS, if finalized without further changes, will not decrease but dramatically increase National Environmental Policy Act (NEPA) and engineering requirements, and delay critical infrastructure projects needed for safe, continuous, reliable delivery of energy resources to the public. Tri-State believes the Draft PEIS should be revised in several critical respects to properly align the proposed PEIS approach with the real purpose behind EPAct Section 368, namely expediting the processing and construction of actual energy 50310-002

project rights-of-way (ROW) within the designated energy corridors. Tri-State respectfully requests that the federal land management agencies consider the following factors and suggestions for improving the Draft PEIS prior to preparation of the Final PEIS. 50310-002 (cont.)

1. Siting and Permitting

The siting and permit application process is costly and time-intensive. Most utility transmission routes run through a mixture of private, state, Tribal, and federal lands that are managed by different land management agencies, each with its own set of rules and procedures for granting ROWs. Each agency has its own land use restrictions, and energy corridors may not address each agency's issues. Permitting requirements are subject to regional or site-specific agency procedures.

Draft PEIS, Chapter 1, Section 1.3, Page 1-11: Proposed Action to Address the Purpose and Need.

States, "The proposed corridor designations would not approve any site-specific activities or projects or prejudge the environmental impacts of individual projects.", and, "Similarly, if the Agencies decide to amend related land use plans, this also would not authorize any site-specific activities."

The proposed energy corridor designations would not approve any site-specific activities or projects or prejudge the environmental impacts of individual projects. Each year, the federal government processes thousands of use and occupancy applications for transmission and distribution facilities, administers thousands of ROW authorizations, and processes thousands of new and renewal applications. The new PEIS would analyze more than 330 million acres of federal land in the 11 Western states affecting hundreds of forests, rangelands, mountains, wetlands, and floodplains. 50310-003

It is the federal intent that developing energy corridors would force a more proactive Agency approach by having set options for moving energy across federal lands through the use of corridors. The Agencies are expected to streamline federal permitting and siting practices using a multi-agency mechanism and designating energy corridors while adhering to a comprehensive NEPA document that can be used and relied upon by all Agency field-level staffs.

The Agencies will also be required to implement corridor planning and expedite applications to construct or modify facilities within new corridors and incorporate the designated corridors into the relevant agency land use and resource management plans two years after the designation. The Agencies will be tasked with administering permits for upgraded and new infrastructure needed to meet the expanding needs for energy transportation throughout the Western states.

Tri-State is concerned that projects would still be evaluated on a case-by-case basis with NEPA and engineering reviews, and would still be costly, time-consuming and restrained by already resource-constrained local agencies. 50310-003 (cont.)

2. Renewable Energy Delivery Will Be Limited

Draft PEIS, Chapter 2, Section 2.2.1, Steps 1, 2 and 3, Pages 2-13 to 2-25. – Siting Energy Corridor Locations.

States, "Energy corridors were located to provide for the West-wide transport and distribution of energy (electricity, oil, natural gas, and hydrogen) between supply and demand areas in the 11 western states while avoiding sensitive resources and land use and regulatory constraints to the fullest extent possible. If developed with energy transport projects, the corridors would also aid in alleviating congestion problems associated with electricity transmission in the West."

ROW grants for electric transmission lines must have the ability to be issued outside of designated corridors. Energy supply needs regularly surface that do not follow specific corridors. New renewable energy resources such as geothermal, wind and solar power, and utility supply portfolio mandates in various Western states are in the planning stages and may be coming on line in the near and foreseeable future, for instance. Western utilities need to make sure that the transmission line routing and permitting process is not encumbered or complicated more than it already is at the present time. 50310-004

Energy development is becoming more prevalent as a result of increasing energy costs and interest in wind resource development. Large portions of resource areas are deemed unsuitable for wind energy development. Changes in visual resource management designations across federal lands, and more restrictions on development activities may effect wind development which serves as counterproductive in today's political climate. Also, by closing large blocks of federal land to wind development, the burden for development will shift to private land. Corridors closed to wind energy development have not been scientifically assessed for high quality wind and development potential. Areas suitable for wind development are not believed to exceed current demand for wind energy. Demand for wind development research is expected to increase across the Western states. To preclude corridors for wind development would be detrimental to the development of renewable energy resources.

Draft PEIS, Chapter 2, Section 2.5, Pages 2-34 to 2-38. – Other Alternatives Considered for Detailed Study, and ES-14.

States, "A number of alternatives for energy corridor designation were suggested during scoping. These alternatives are:

- *Designating all existing energy corridors and ROWs in the 11 western states as federal energy corridors;*
- *Upgrading existing energy transport facilities within existing energy corridors and ROWs for greater transport capacity or efficiency, before new federal energy corridors are designated;*
- *Locating designated energy corridors only in areas adjacent to federal highways and major state and municipal roads;*
- *Designating energy corridors on national park lands and DOD facilities;*
- *Designating as energy corridors existing, under way, or planned energy transport project ROWs (as identified by energy providers), including individual inter- and intrastate corridors connecting very specific supply and demand area locations throughout the West;*
- *Environmentally friendly alternatives that called for increasing energy efficiency or conservation by energy users instead of designating corridors; and*
- *Preliminary corridors identified in the corridor siting process.*

50310-005

These alternatives, which were considered but eliminated from further study, were each examined with regard to how well they would meet the purpose and need of Section 368, how well they would support designation of federal energy corridors, and how they would address the energy transmission issues of the electricity transmission grid in the West."

Tri-State believes that although not all alternatives can be applied, the alternatives that were eliminated are vital to the continued, safe operation and delivery of power. Tri-State and utility groups requested as part of the scoping period, that all existing utility corridors be incorporated into the PEIS energy corridors. The existing corridors were not, however, incorporated into the Draft PEIS.

In some cases, existing utility corridors in current resource management plans are essential for siting energy facilities currently under consideration, as well as, future projects designed to transport energy to load centers in the Rocky Mountain West. Care must be taken to ensure significant supply by including wind energy development in large resource areas. It should be noted that some specific provisions and/or management prescriptions will adversely affect the use of existing corridors for transmission of energy and generation of wind power.

Developing new corridors which would allow routing of energy facilities across resource areas would avoid incremental impacts to historic trails, but could prove detrimental to a number of other resources, such as wildlife, that would otherwise be avoided by use of existing corridors. 50310-005 (cont.)

Additional alternative corridors should be identified and evaluated designed with management prescriptions that truly reflect principles of multiple uses. Such corridors should be allowed to be utilized by future energy facilities and without mitigation measures, such as height restrictions that may preclude the use of existing corridors. 50310-006

3. Viewshed and Visual Resources Issues

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-50, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives– Resource: Visual Resources.

States, "There would be no direct impacts to visual resources on federal and nonfederal lands from designating Section 368 energy corridors on federal land and amending land use plans."

There are gaps in some of the proposed energy corridors where existing facilities are now occupying those corridors. Tri-State understands that one explanation for this decision is the view held by local field officials that too many lines in a corridor presented an unsightly viewshed. Viewshed was reportedly stated as a reason that wind development was precluded from uses in corridors. It is understood that viewshed analysis would be part of the site-specific analysis at the time of ROW application. To preclude certain corridors from multiple uses, including wind energy, due to viewshed issues is something that would be required to be reviewed again under NEPA. 50310-007

The following experience serves to illustrate the shortcomings Tri-State sees from the approach taken in the Draft PEIS. In Volume 1, Executive Summary and Main Text, Page 2-24, the Preliminary Energy Corridors show a potential 368 Corridor exiting Western Wyoming and directly entering Southeastern Idaho. This corridor contains existing transmission lines transmitting necessary power from Wyoming to Idaho and further into the Pacific Northwest. In the final PEIS mapping, Volume III, Part 2, State Base Map Series, the preliminary corridor referenced above is not shown. Per Step 3 in the Energy Corridor siting, the local Field Offices reviewed and submitted environmental reasons as to why the corridors should or should not be shown. In the particular corridor in the Kemmerer Field Office, a higher class of visual impact outlined in their respective RMP was a given reason as to why the corridor was eliminated, even though existing transmission lines occupied the corridor. In the RMP, there was no reason given as to why the visual impact classification was raised to an exorbitant, unrealistic classification.

4. Undergrounding of Transmission Lines and Structures

The Colorado Draft Map of Proposed Section 368 Energy Corridors and Rights of Way on Federal Lands State Base Map Part 2 corridor (132-133 and 73-133) designates this particular area as underground only.

In some instances, the original corridor designation does not state an underground requirement in the land use plan of the BLM. The state corridor is part of the original corridor which does not have any underground restrictions. Also, there is a disconnected gap in corridor 132-133 in Garfield County, CO of which the connection points are not identified. This would seemingly present siting and permitting issues in that a connection point would have to be identified and pursued with either private landowners, the affected federal land manager, or alternative routes. If an alternative route was forced, then the designated corridor would not be utilized, thus making the corridor.

The cost of undergrounding extra high voltage transmission lines is significant. The significant increase in cost is due to underground cable costs and supporting infrastructure requirements, such as underground concrete systems and ductbanks. Underground cable can cost twenty-six times more than overhead cable and beyond. Concrete ductbanks can cost more than four times that of overhead support structures. An overhead line can be repaired relatively quickly with standard line materials. An underground line repair would have to be done by specialized contractors who may or may not be readily available when an outage occurs. The repair of a failed underground splice or termination would take a significantly greater amount of time during which the circuit would not be available to support loads. This would result in transmission line outages which would have a direct impact on safe, continuous, and reliable electric service to all effected end users. 50310-008

Some utilities require a minimum 40 to 50-foot wide easement for installation of an underground transmission line. This width of easement is necessary to accommodate underground construction activities, heat dissipation and construction of the line during operations, and any necessary repair and maintenance activities.

In siting multiple facilities in a mutual corridor, the utility must maintain proper clearances between natural gas and water lines per National Electric Safety Code standards to avoid induced corrosion and incompatibility (i.e., water and electricity). Also, maintenance performed on water or gas lines could affect underground electric transmission systems.

5. Expediting the Application Process

Draft PEIS, Chapter 1, Section 1-2, Pg 1-8: Existing Administrative Challenges to Federal Rights-of-Way Authorization.

States, "At present, some of the barriers to infrastructure development in the western states include inconsistent agency procedures for granting ROWs; inconsistent agency views on whether proposed energy infrastructure projects would address near- or long-term energy needs; a lack of coordination among agencies that administer contiguous tracts of land when responding to applications for a ROW across their respective jurisdictions; and the lack of coordination within agency offices regarding the appropriate geographic locations of corridors or ROWs."

Tri-State appreciates that the Agencies would include uniform interagency operating procedures for reviewing applications for energy ROWs within designated energy corridors. It is stated that the Agency will designate a federal point-of-contact (POC) who will represent the Agencies in matters regarding ROW applications in a designated energy corridor. This POC would be a liaison between the applicant and Agency.

Draft PEIS, Chapter 1, Section 1.4, Page 1-12 and 1-13.

*States, "The Proposed Action of designating Section 368 corridors does **not**:*

1. *Guarantee that a specific project would be approved in a designated energy corridor. The Agencies must review each project-specific application and conduct an appropriate environmental review for each project;*
2. *Limit an Agency's discretion to deny a ROW or other permit within the designated energy corridor or elsewhere;*
3. *Alter an Agency's internal procedures for review and approval of site-specific projects as facilitated through an appropriate interagency POC;*
4. *Establish energy corridors on nonfederal lands;*
5. *Preclude any proposal for a project outside of a Section 368 designated corridor.*
6. *Limit proponents to applying for permits solely within designated corridors."*

50310-009

Although well-intentioned, Tri-State is concerned that the expediting process will not streamline the land use authorization precisely for the non-guarantees listed given above. Permittees are still subject to site-by-site review, the Agency still has discretionary authorization in each regional office, and the Agency's internal procedures are not nullified just because a corridor will be utilized. As the NEPA process is required regardless of corridor designation on a project-by-project basis, potential exists for permitting agencies to view energy corridor designation as a pre-requisite for permitting. This effectively creates another step in the permitting process, potentially elongating, not streamlining the permitting of needed transmission infrastructure. Federal agencies should clearly outline to their staff that, while the

energy corridor designation process (and associated PEIS) may ultimately assist efficient permitting of facilities, NEPA processes are stand-alone processes that are the ultimate decision-making tool to consider environmental and other impacts. Until a tie between energy corridors and the NEPA process is explicitly defined and implemented, projects currently in the NEPA permitting process should be given the support and consideration they need to timely construct needed infrastructure. 50310-009 (cont.)

6. ROD and Next Federal Actions

Upon signing Records-of-Decision (RODs), the BLM, FS, FWS, and, if applicable, the DOD would amend their respective affected land use plans to incorporate the corridor designation. Corridor designation on these federal lands would be defined by a centerline and width to accommodate future proposed energy transport projects.

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-53, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives– Resource: Socioeconomic Resources.

States, "There would be no direct socioeconomic impacts on federal lands from designating Section 368 energy corridors on federal land and amending land use plans. Corridor designation could have effects on property values and future land use on nonfederal lands adjacent to or between the designated corridors on federal lands. The nature of the effects would depend on the current and future land use of the nonfederal lands." 50310-010

Tri-State disagrees. These energy corridors would be designated only on federal lands, not private lands. Applicants would be required to identify preferred project-specific routes across federal land and prepare for gaining authorization across private lands. Project applicants would secure authorizations across private lands in the same manner that they currently do, independent of the application process for corridors on federal lands. Acquiring easements across private lands may be more difficult if set corridors must be followed. Some private landowners simply do not want utilities to travel across their parcels and this is a major siting constraint. This may disallow flexible options to move preferred routes off certain private lands, which is inevitable due to designated federal corridors.

7. Proposed Action Alternative

Draft PEIS, Chapter 2, Section 2.2, Page 2-2: 50310-011

States, "A corridor width of 3,500 feet was selected by the Agencies for the Section 368 energy corridors (Text Box 2.2-2). This width would provide sufficient room to support multiple

energy transport systems.", and, "For example, assuming an operational ROW width of 400 feet, about 9 individual 500-kV transmission lines could be supported within a 3,500-footwide corridor. Alternately, as many as 35 liquid petroleum pipelines (each consisting of a 32-inch-diameter pipe and a 100-foot construction ROW) or 29 natural gas pipelines (42-inch-diameter pipe and 120-foot construction ROW) could be supported within a 3,500-foot-wide corridor."

Tri-State appreciates the acknowledgement that such developments are unrealistic, but is also concerned with the hypothetical nature of planning multiple use corridors and widths, of which planning is not based on factual research of specific requirements associated with specific industries. There would be approximately 6,055 miles of energy corridors designated in the West for multimodal energy transport. The corridor widths could be as wide as 3,500 feet, unless specified otherwise because of environmental or management constraints or local designations. Energy corridor widths proposed during scoping ranged from as narrow as 60 feet to more than 5 miles. The smaller suggested widths would be able to support little more than a single energy project, while the larger widths would be difficult if not impossible to apply throughout the West because of regional environmental, physical, and/or regulatory constraints. 50310-011 (cont.)

Permittees face topographic, environmental, and regulatory constraints for ROW widths of just 75 to 100 feet. The statement that a 3,500-foot width could be placed on most federal lands while avoiding many sensitive resources and areas is not a realistic assumption. Each project application will be scrutinized by project-specific analyses within the corridors and by regional staff. Regional stipulations and requirements are not currently uniform or consistent and are not expected to become consistent after the mandate corridors are in place. Tri-State's members are concerned with the blanket assumption that an operational ROW width of 400 feet would support about 9 individual 500-kV transmission lines which could be supported within a 3,500-foot-wide corridor. Most projects are subject to independent issues and constraints.

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-55, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives– Resource: Health and Safety.

States, "There would be no direct health and safety impacts on federal and nonfederal lands from designating Section 368 energy corridors on federal land and amending land use plans." 50310-012

Tri-State disagrees. It is crucial that appropriate separation distances between the different pipelines and electric transmission lines in proposed energy corridors be considered before designating multiple uses within one corridor. The basis for the separation distance should include the safety and reliability impact of each facility upon the other facilities, not just historical or previously used separation distances. The National Electric Safety Code (NESC)

and separation distances for electric transmission lines should be incorporated into corridor restrictions. A rational evaluation based on the types of events that may cause a loss of multiple facilities in a common corridor, and the impact of the loss and its consequences should be conducted. The loss of multiple transmission lines in a common corridor can expose major metropolitan areas to a significant risk of rolling black-outs due to lack of diversity and corridor separation. 50310-012 (cont.)

Draft PEIS, Chapter 2, Section 2.2.2, Page 2-25.

States, "In some cases, the corridor adjustments proposed by managers and staff from adjacent federal land management units resulted in discontinuities in corridor alignments between adjacent federal lands."

Tri-State members have long expressed concern that a maximum corridor width of less than one mile would be suboptimal from a reliability perspective, and not wide enough to accommodate multiple facilities in general and transmission lines in particular. It is vital that utility corridors be wide enough to provide the flexibility needed to avoid environmentally sensitive areas, address engineering, technical and vegetation management constraints, and allow lines to be built with sufficient separation to reduce the risk of simultaneous outages of multiple lines. The 3,500 foot width would be narrower than many previously designated corridors, and would not meet the aforementioned criteria. The proposed 3,500 foot maximum width, in many cases, will be insufficient to enable future location of facilities and rights-of-way in a manner that is most efficient, most compatible with local topography, and minimizes environmental effects. Tri-State again proposes a one-mile standard width and the option for utilities to request a wider corridor as necessary to address these concerns. Further justification for such a width was included in the BLM 1980 management plan for the California desert Conservation Area and mentioned in the 1993 *Western Regional Corridor Study* prepared by Tri-State and endorsed by the then Chief of the U.S. Forest Service and the Director of the Bureau of Land Management. 50310-013

Equally important, Tri-State is concerned that many of the corridors previously requested by Tri-State members during the PEIS scoping process and incorporated into the Draft PEIS will nonetheless be inadequate to meet the expanding needs for energy transportation throughout the Western states. Tri-State encourages the federal agencies preparing the Final PEIS to include additional corridors and modifications to proposed corridors as identified by Tri-State members and other utilities that rely on these corridors. Those utilities know where additional energy facilities most likely have to be located to meet future energy supply transportation requirements. It is vital that the energy corridors recognize both regional and local needs as well as broader Western needs.

Tri-State suggests that the DOE incorporate all previously designated, existing electric transmission line corridors, and man-made linear features on federal lands as energy corridors.

This should also include all transmission elements identified and referenced in the November 7, 2005 "Report to Congress: Corridors and Rights-of-Way on Federal Lands," by the U.S. Department of Agriculture, U.S Department of the Interior, U.S. Department of Energy, and Council on Environmental Quality. The preliminary maps issued by the federal agencies and included in the Draft PEIS do not include already existing corridors as corridors to be carried forward. Corridors that are currently permitted by the federal land management agencies, BLM, and USFS, should be included (see Attachment A.). 50310-014

8. Land Use Plan Amendments and Interagency Permitting Coordination

Draft PEIS, Chapter 2, Section 2.6.4, Page 2-43, TABLE 2.6-1 Summary of Potential Environmental Impacts of Designating Section 368 Energy Corridors on Federal Lands and Amending Federal Land Use Plans, and Generic Environmental Impacts of Constructing and Operating Energy Transport Projects under the Two Alternatives– Resource: Land Use.

States, "The proposed corridor designations would not approve any site-specific activities or projects or prejudge the environmental impacts of individual projects.", and, "Similarly, if the Agencies decide to amend related land use plans, this also would not authorize any site-specific activities."

Designation of energy corridors under the Proposed Action would require the amendment of Agency-specific land use plans to incorporate the designated corridors. The plan amendments for the Proposed Action would include the identification of specific energy corridors by centerline, width, and compatible energy uses, and restrictions (such as, electricity transmission with a restricted tower height). Tower height is determined on a case-by-case basis and restrictions on height would be inappropriate for most electric transmission projects. 50310-015

Tri-State is concerned that new transmission facilities proposed outside of the designated corridors may be rejected in the early permitting stages due to location outside a designated corridor. It should be noted that utility transmission will not always follow previously identified corridors, as delivery is dependant on load centers and delivery needs. It is understood that new transmission facilities would be highly scrutinized by federal agencies, and in some cases may require approval or review at the national level before a ROW use is granted outside of the designated corridors. Tri-State also understands that existing corridors that could be designated and used for multiple purposes, may encumber, restrict, or introduce safety concerns for continuous operations, maintenance, and delivery of reliable energy.

Tri-State is concerned that there will be cases where adjoining service territory states of Colorado, New Mexico, and Wyoming have identified proposed corridors that do not meet each of the needs of Tri-State and other utilities that share state boundaries, thereby making the

permitting process more time-consuming and restrictive, if not impossible, due to environmental and permitting constraints. 50310-015 (cont.)

Tri-State appreciates the opportunity to comment and urges that serious consideration be given to our recommendations in preparing the Final PEIS. Intense scrutiny is needed in order to continuously provide energy, through conventional generation or renewable resources, which is vital to the health and safety of its vast spectrum of consumers.

Sincerely,

for Barbara A. Walz
Vice President
Environmental

cc: Mac McLennan
Jon Beyer
Mark Murray

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 2:35 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50311

Attachments: Draft_Programmatic_EIS_Comments_2-11-08_WWECD50311.pdf

Draft_Programmatic
_EIS_Comment...

Thank you for your comment, Ray Brush.

The comment tracking number that has been assigned to your comment is WWECD50311. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 02:34:52PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50311

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Zip: 59701
Country: USA
Email: ray.brush@northwestern.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\m04325\My Documents\My Files\PEIS Final Report\Draft Programmatic EIS Comments 2-11-08.pdf

Comment Submitted:
Attached are NorthWestern Energy's comments. The maps that should be attached to the letter will follow in subsequent comments, since only one file can be attached to a comment.

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.

NorthWestern Energy

Michael R. Cashell
Chief Transmission Officer
40 E. Broadway
Butte, MT 59701
Telephone: (406) 497-4575
Facsimile: (406) 497-2150
Michael.Cashell@northwestern.com

NorthWestern Corporation
d/b/a NorthWestern Energy
40 E. Broadway
Butte, MT 59701
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Facsimile: (406) 497-2150
www.northwesternenergy.com

January 28, 2008

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

RE: Draft Programmatic EIS Comments

To Whom It May Concern:

NorthWestern Energy (NWE) is one of the largest suppliers of electricity and natural gas in the Upper Midwest and Northwest, serving more than 640,000 customers in Montana, South Dakota, and Nebraska. NWE currently owns, operates, and maintains approximately 7000 miles of electric transmission, 50 kV and above, and approximately 2000 miles of natural gas transmission in Montana.

NWE appreciates the efforts of the Department of Energy, Department of Agriculture, and the Department of Interior in developing the Draft Programmatic Environmental Impact Statement, Designation of Corridors on Federal Land in the 11 Western States (DOE/EIS-0386) (PEIS). NWE supports the Proposed Action discussed in the Draft PEIS that includes identification of energy corridors and the adoption of interagency operating procedures. NWE offers the following comments on the Draft PEIS: 50311-001

- NWE requests that the routes for the Mountain States Transmission Intertie (MSTI) project shown on the attached map be considered for designated corridors where they cross federal land. This designation will be very helpful in developing this project. 50311-002
- For Montana, the corridors on the Individual State Maps did not match the corridors on the Large Scale Map. Portions of corridor 51-204 north of Helena, Montana were left off the Large Scale maps. 50311-003
- The PEIS tends to stress electric transmission development even though the corridors in Montana are marked as multi-modal. The designated corridors are placed where electric transmission right-of-ways already exist. 50311-004
- NWE had suggested in its earlier comments that corridors should also be designated parallel to its existing natural gas pipelines (map attached) to help facilitate expansion of those facilities to serve local area loads. The natural gas pipeline capacity will be of greater concern when more natural gas fired generation is added to the NWE electrical system. 50311-005
- NWE had expressed in its earlier comments that it would like to see an expedited environmental permitting process for facilities located within a designated corridor. However, the Draft PEIS states that a project located within a designated corridor would be subject to each agency's Endangered Species Act (ESA) process. NWE requests this be reconsidered and a joint approach be taken by the agencies in evaluating the environmental permits relative to the ESA. This would be a significant incentive to get projects to locate within the designated corridors. 50311-006
- Even though the report indicates that state agencies were involved in the PEIS process, it is not clear if any work was done to try to align the corridors across federal lands with proposed or existing corridors on state and private land adjacent to the federal lands. Were the corridors across federal lands aligned with corridors across state lands? 50311-007

- NWE had urged in its earlier comments that the PEIS process for designating corridors should be ongoing to modify existing designated corridors or establish new designated corridors. The Energy Policy Act (EPAct) of 2005, Section 368(c) anticipated that this will become an ongoing process. The report does not indicate whether or not this process will be ongoing. Will this be addressed in the interagency operating procedures or the Record of Decision? 50311-008
- The next step in the process appears to be a Record of Decision (ROD) from each agency. When can one expect the RODs to be completed? 50311-009
- Once the RODs are completed, it appears that the land use plans for affected agency will be updated and uniform interagency operating procedures will be developed. When will this occur? Will the public have input into these processes? 50311-010

If you have any questions, please contact either Rick Walsh, Manager Environmental Permitting, at (406) 497-3917, Ray Brush, Manager Regional Transmission Policy, at (406) 497-4278, or Marc Mullowney, Manager Gas Construction and Maintenance, at (406) 497-2385.

Thank you for this opportunity to comment on the Draft PEIS.

Sincerely,

Michael R. Cashell
Chief Transmission Officer

Attachments:
NWE Natural Gas Transmission Map
MSTI Alternative Routes Map

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 2:48 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50312

Attachments: DC_West-wide_Energy_Corridor_comments_WWECD50312.doc

DC_West-wide_Ene
rgy_Corridor_c...

Thank you for your comment, David Cothran.

The comment tracking number that has been assigned to your comment is WWECD50312. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 02:48:05PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50312

First Name: David
Middle Initial: B
Last Name: Cothran
Address: 1211 Colestin Rd.
City: Ashland
State: OR
Zip: 97520
Country: USA
Email: dcothran@hotmail.com
Privacy Preference: Don't withhold name or address from public record
Attachment: /Users/davidcothran/Desktop/David/Documents/Misc/DC West-wide Energy Corridor comments.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.

In response to the West-wide Energy Corridor DEIS

David Cothran
1211 Colestin Rd
Ashland, OR 97520

February 12, 2008

As a resident of the Colestin Valley, along the proposed route for Corridor #4-247, a part of the West Wide Energy Corridor, I would like to take this opportunity to go on record as opposing the current proposal for this corridor.

First, and most importantly, the Colestin Valley is a very poor site for a corridor of this kind. The valley is geologically unstable, subject to major earth movements, very steep below the Siskiyou crest and frequently affected by severe weather. The valley has only volunteer emergency services, which are already overtaxed by the demands from the I-5 transportation corridor. The presence of I-5 itself, with its heavy loads of hazardous cargo, is another factor that argues strongly against siting the Energy Corridor in the Colestin valley. 50312-001

The Colestin Valley also possesses numerous natural assets, including wildlife habitat, scenic vistas and public recreation opportunities, which would experience severe negative impacts from the construction and presence of the energy corridor.

In my opinion the planning and public comment phases of this proposal have been deeply flawed. The existing "corridor" of public lands (only 62% of the proposed corridor in Oregon) appears to be nothing but a patchwork of unrelated parcels, which must be linked by state and private lands that may be difficult or impossible to acquire and which, in many cases, have conflicting management priorities. The process of informing and soliciting comment from the public has also left much to be desired. Available maps of the local corridor are vague and misleading. And as a resident of the Colestin Valley, I am dismayed that this is the first time my neighbors and I have been informed about the proposed project. 50312-002

Finally, I do not support this approach to management of our national energy resources and their distribution. Huge centralized projects of this kind will benefit only the current energy industry, not the people of the United States who need investment in alternative generation and conservation strategies. My home in the Colestin is completely off-grid. This, not giant "West Wide Corridors", should be the future of energy development in our country. 50312-003

Thank you for your attention,

David Cothran

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 2:57 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50313

Thank you for your comment, Donna Thomas.

The comment tracking number that has been assigned to your comment is WWECD50313. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 02:57:04PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50313

First Name: Donna
Last Name: Thomas
Address: P.O. Box 813
Address 2: 54350 Golden Bee Dr
City: Morongo Valley
State: CA
Zip: 92256
Country: USA
Email: thomasruby2@verizon.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Our federal government needs a whole paradigm change in its thinking on renewable energy. Especially in California, renewable energy can be generated locally, even in and especially in large urban areas like Los Angeles. There is no need to designate WWEC's for long distance transmission. I object to several aspects of the Energy Policy Act of 2005, including Section 368, which allows desecration of federal lands (that is public lands, and I am the public), and Section 1221, which allows eminent domain powers to take private land to connect the unncessary transmission lines on public lands. If left unchecked, our federal government is going to destroy our beautiful California desert with long distance transmission lines and solar and wind energy projects that are unnecessary as the needed electricity can be generated locally in urban areas. 50313-001

I am most opposed to any attempt by the Los Angeles Department of Water Power to add a new Green Path North energy corridor through pristine desert and desert communities. Any attempt by LADWP to insert a new energy corridor into the WWEC Draft PEIS process should be denied outright. 50313-002

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: Tuesday, February 12, 2008 3:13 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50314

Thank you for your comment, Mac Donofrio.

The comment tracking number that has been assigned to your comment is WWECD50314. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 03:13:06PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50314

First Name: Mac
Last Name: Donofrio
Address: 144 Daly Ave.
City: Hamilton
State: MT
Zip: 59840
Country: USA
Email: macdonofrio@earthlink.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

Dear Reviewers of the Comments,

This letter is in response to the Energy Corridor Draft Programmatic EIS. Please include these comments in your official record.

The Department of Energy's plan to claim hundreds of thousands of acres of public land across the west for future energy transmission is short sighted.

Transmission lines, pipelines, etc. should be considered and studied on a case by case basis. The environmental and human impacts are too varied to be addressed in mass. Please slow down the planning process and evaluate one corridor at a time as the perceived need arises. 50314-001

Thank you.

Mac Donofrio
144 Daly Ave.
Hamilton, Montana 59840
macdonofrio@earthlink.net

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: Tuesday, February 12, 2008 3:17 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50315

Thank you for your comment, Lorene Wilhelm.

The comment tracking number that has been assigned to your comment is WWECD50315. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 03:16:32PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50315

First Name: Lorene
Last Name: Wilhelm
Address: 22335 Dolomite Hills Dr.
City: Ashburn
State: VA
Zip: 20148
Country: USA
Email: lorene@wilhelmfamily.net
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I am very much concerned with the proposed corridor route going through farm land in Millard County, Utah. I own property there and am looking to purchase more and know how fragil the environment is. I feel it would decrease property value and be extremely unsafe due to the irrigation practices of that area. I fully agree with the alternate route of following the IPP existing corridor. 50315-001

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: Tuesday, February 12, 2008 3:25 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50316

Thank you for your comment, Robin Kobaly.

The comment tracking number that has been assigned to your comment is WWECD50316. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 03:25:13PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50316

First Name: Robin
Last Name: Kobaly
State: CA
Zip: 92256
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:
I am a professional botanist with a Masters Degree in botany. I served as a botanist with the U.S. Bureau of Land Management for 21 years, serving nine years as California Desert District Botanist at the Palm Springs Field Office, and as Preserve Manager of Big Morongo Canyon Preserve for nine years. I have conducted surveys for rare and endangered plant species throughout San Bernardino and Riverside Counties over a period of twenty years, and therefore, I am very familiar with the biological aspects contained within the project area.

I have had a long career in land conservation and land management with the BLM, and have extensive experience in public education, both through my federal government service and as Executive Director of The SummerTree Institute, an environmental educational non-profit corporation based in Morongo Valley.

Two frustrations continue to haunt me:

1. While we have conducted extensive research in forests, rain forests, chaparral habitats, etc., we are just now becoming aware of the delicate balance that allows our desert ecosystem to survive in such extreme climatic conditions. It takes very little to upset this fragile balance. Our lack of awareness has resulted in the loss of incredibly valuable resources, including ancient desert plants whose individual lifetimes span many hundreds to several thousands of years. Our lack of awareness, and therefore our lack of protection, has resulted in the destruction of tens of thousands of valuable long-lived desert plants which are the ecological anchors of our desert habitats. We are inadvertently losing not only the impressive diversity that our desert habitats contain, but also losing the opportunity to incorporate long-lived desert plants into landscape plans and designs throughout our desert developments. Extremely long-lived desert plants currently being removed could instead be retained to preserve desert soils from erosion due to wind and rain, provide valuable wildlife corridors, provide maintenance-free landscaping with no additional irrigation needed, and enhance the esthetics of our landscape while increasing the property value of the land. But instead, we are destroying this natural asset, one lot at a time.

50316-001

2. Too much of the desert's destruction is a direct result of a lack of public knowledge and awareness. I have championed desert studies and public education throughout

my career. Now, by developing and maintaining educational programs into which The SummerTree Institute has invested well over one hundred thousand dollars, I am focusing my efforts on addressing those frustrations. Our current educational programs include "Discovering the Ancients" , a student field research/educational curriculum program in conjunction with Joshua Tree National Park (www.discoveringtheancients.org), and our "Saving the Ancients" program (www.summertree.org/savingAncients.htm), a community awareness project.

Several themes continue to play out in our Hi-Desert landscape –

a. Our desert landscape has taken many thousands of years to establish itself, with much of the vegetation comprised of plants over one hundred years of age.

b. One careless land development action or misguided project can destroy thousands of years of carefully achieved ecological balance.

c. New threats now challenge our deserts, including extreme droughts due to climate change, changing fire regimes, increased nitrogen load in soils due to air pollution that favors non-native, invasive plants, and the spread of invasive plants which increases fire frequency and intensity, etc.

Until we really know the tipping points for life in our deserts, we must proceed with extreme caution and study. We do a great disservice to our citizens, our children, our wildlife, our ancient native plants, and our landscape if we continue to rapidly and carelessly "develop the desert."

LADWP's Green Path North Project is just another example of leaping into a massive project before we know the real costs to our fragile desert environment. Potential impacts from this power-line project cutting through undeveloped wildlands in its currently proposed route include significant damage to long-lived native plants, potential damage to endangered and sensitive plant species, impacts to critical habitat for bighorn sheep, damage to watershed features, and increased fire hazards in rural areas from downed power-lines in areas of extreme winds and dry brush, among other environmental, socioeconomic, and cultural impacts.

50316-001 (cont.)

Especially since there is a more direct, pre-existing energy corridor to this power-line route, it would be irresponsible to damage pristine wilderness when there is an established, viable alternative route across land that has already been altered for this use. Each individual ancient plant (including creosote bushes, Mojave yuccas, lord's candles, junipers, etc.) that would be spared within the proposed, currently undeveloped corridor would be utilized and valued by many generations of wildlife throughout the normal thousand-year or more lifespan of these individual plants. These ancient desert plants that were able to become firmly established during a more desirable climatic period hundreds to thousands of years ago may not be able to reestablish themselves here for generations, if ever, depending upon the length of future droughts, increased temperature regimes, increased fire frequency, etc. The effect of removal of these ancient plants is extremely long-term and significant for the viability of the plant community, the wildlife, the soil, and even the people who seek the desert landscape for renewal, recreation, and inspiration. Native desert plants removed nearly 70 years ago by General Patton's troops in the Desert Theatre (Desert Center, etc.) still have not recovered from military maneuvers conducted across our brittle desert soils, and every jeep pass and tank track is still visible today.

Our own great-grandchildren will be able to enjoy the same individual plants growing today in the once-proposed "Green Path" corridor if we take a stand now to protect them from needless destruction tomorrow.

Thank you for your consideration of these comments.

Sincerely,

Robin Kobaly

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 3:27 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50317

Attachments: e2952-2_WWECD50317.pdf

e2952-2_WWECD5
0317.pdf (1 MB)

Thank you for your comment, Ray Brush.

The comment tracking number that has been assigned to your comment is WWECD50317. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 03:27:07PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50317

First Name: Ray
Middle Initial: W
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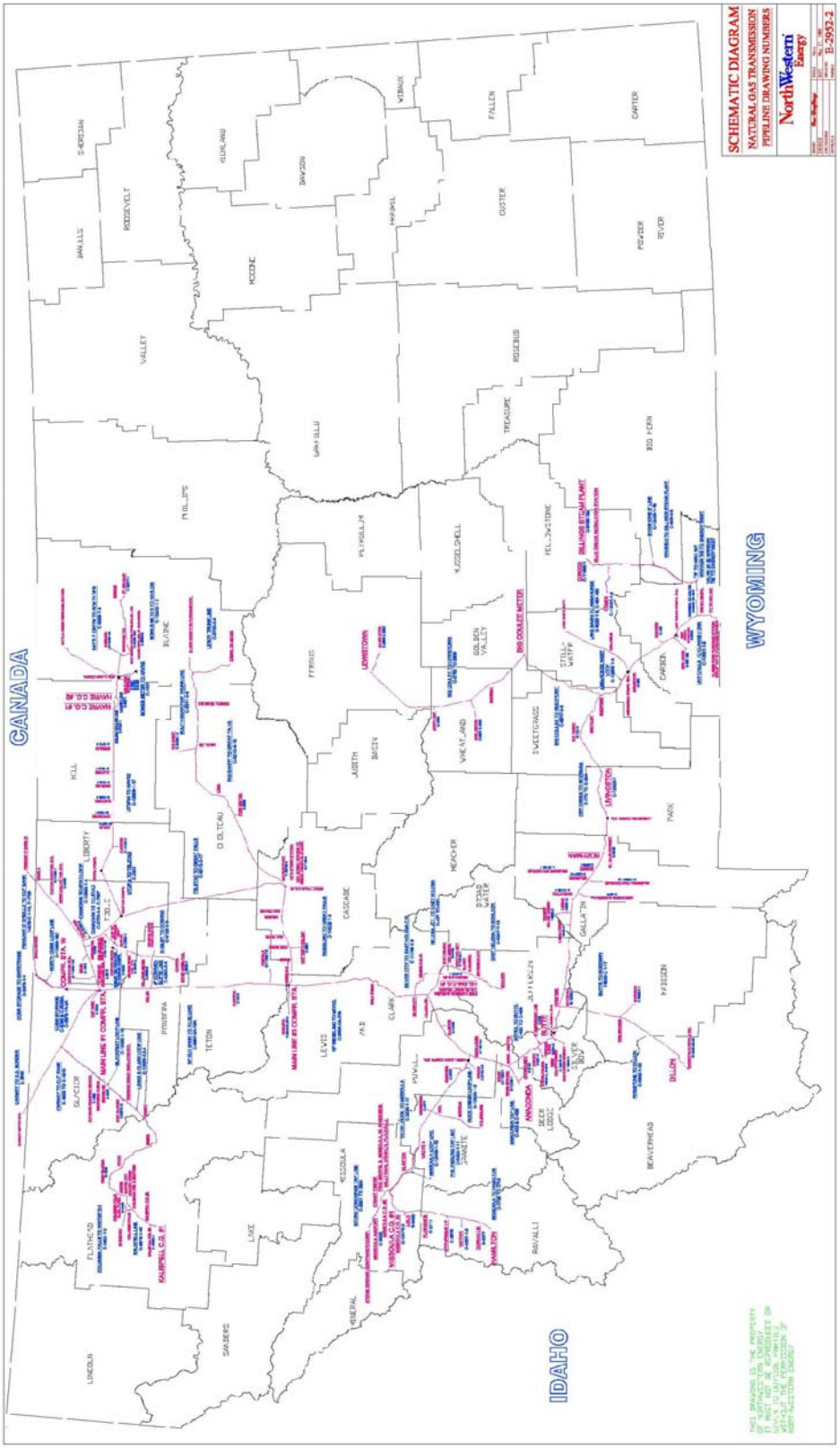
State: MT
Zip: 59701
Country: USA
Email: ray.brush@northwestern.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\m04325\My Documents\My Files\PEIS Final Report\e2952-2.pdf

Comment Submitted:
Attached is the gas transmission map of the NorthWestern Energy system in Montana that was referred to in our earlier filing today.

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.


SCHEMATIC DIAGRAM
NATURAL GAS TRANSMISSION
PIPELINE DRAWING NUMBERS
NorthWestern Energy
B-2993-2
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From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 3:29 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50318

Attachments: MSTI_Corridors_WWECD50318.pdf

MSTI_Corridors_W
WECD50318.pdf ...

Thank you for your comment, Ray Brush.

The comment tracking number that has been assigned to your comment is WWECD50318. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

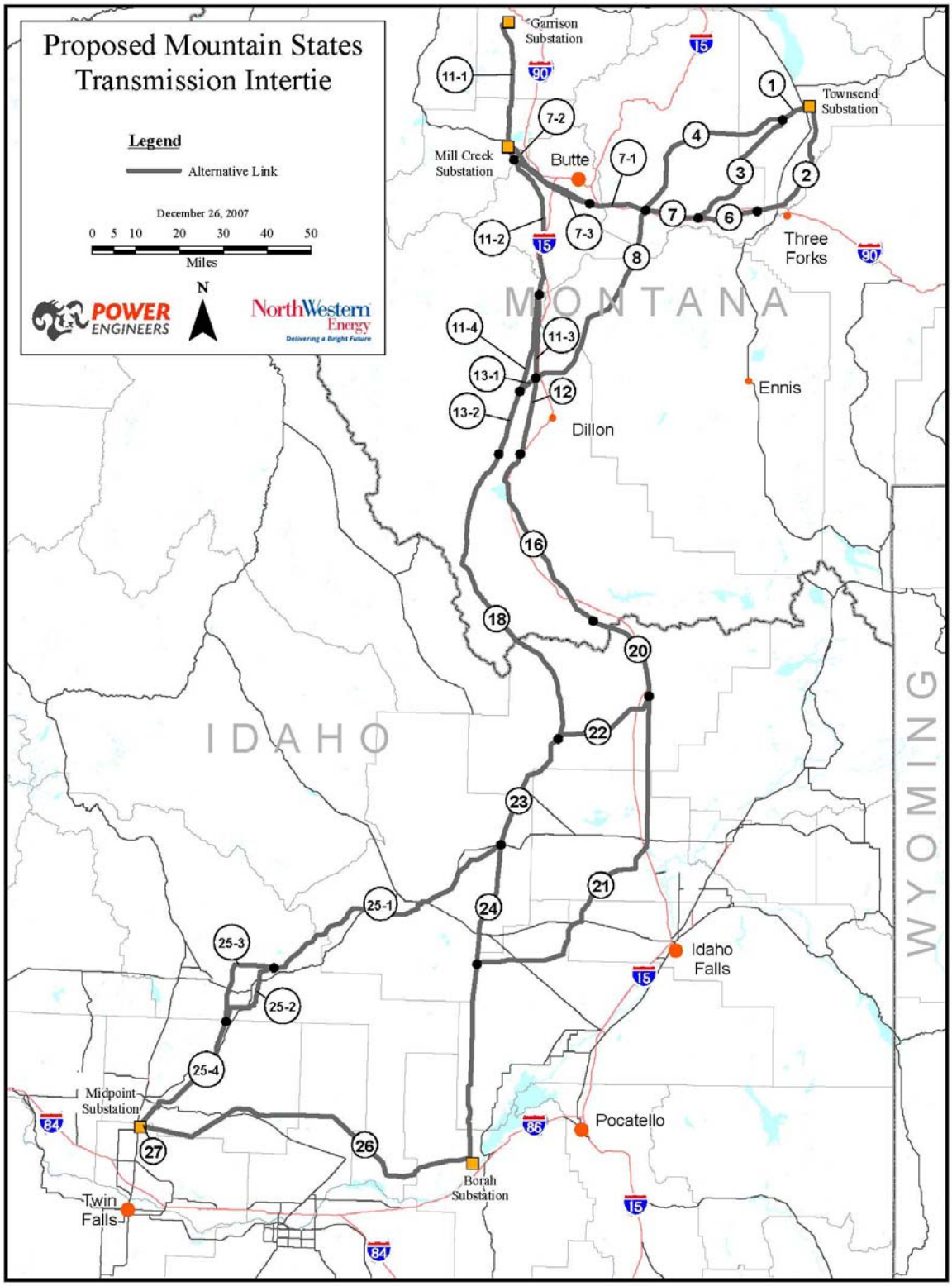
Comment Date: February 12, 2008 03:28:40PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50318

First Name: Ray
Middle Initial: W
Last Name: Brush
Address: 40 E. Broadway
City: Butte
State: MT
Zip: 59701
Country: USA
Email: ray.brush@northwestern.com
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\m04325\My Documents\My Files\PEIS Final Report\MSTI Corridors.pdf

Comment Submitted:
Attached is a map of the proposed MSTI corridors referred to by our previous filing.

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.


Proposed Mountain States Transmission Intertie
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Alternative Link
December 26, 2007
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NorthWestern Energy
Delivering a Bright Future
Garrison Substation
Townsend Substation
Mill Creek Substation
Butte
Three Forks
MONTANA
Ennis
Dillon
IDAHO
WYOMING
Idaho Falls
Pocatello
Midpoint Substation
Borah Substation
Twin Falls
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3
4
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27

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 3:41 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50319

Thank you for your comment, Samuel Austin.

The comment tracking number that has been assigned to your comment is WWECD50319. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 03:41:08PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50319

First Name: Samuel
Last Name: Austin
Address: 1809 E. Millbrook Road
City: Salt Lake City
State: UT
Zip: 84106
Country: USA
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
The Draft EIS did not consider a reasonable range of alternatives as required by law. Only one corridor alignment was considered with no consideration of alternative alignments. The purpose of the programmatic document is, in part, to facilitate the selection of the energy corridor such that future projects will fall within a selected corridor. These future site specific actions will be looking specifically within the corridor selected in the programmatic document, and will not be analyzing alternative alignments. Since alternative alignments will not be considered at the site specific stage, a reasonable range of alternatives should have been considered in the programmatic document. 50319-001

The Draft EIS did not evaluate and describe the connected actions and the impacts that would occur on non-federal lands by designating an energy corridor. The very nature of an energy corridor assumes the corridor to be continuous. Whether it be a pipeline, transmission line, fiber optics, etc. it must be contiguous to work. Therefore, it is not presumptuous to conclude that non-federal lands falling between federal parcels within the designated corridor will also be developed for similar purposes. It is also safe to assume that the corridor will follow a straight line with consideration given to topographic and other natural features. The Draft EIS should evaluate and describe the impacts of these connected actions. 50319-002

Please re-draft and re-issue for public comment.

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: Tuesday, February 12, 2008 5:08 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50320

Attachments: Westwide_Energy_Corridor_DEIS_cmt_WWECD50320.doc

Westwide_Energy_
Corridor_DEIS_...

Thank you for your comment, Doug Heiken.

The comment tracking number that has been assigned to your comment is WWECD50320. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 05:07:48PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50320

First Name: Doug
Last Name: Heiken
Organization: Oregon Wild, formerly Oregon Natural Resources Council
Address: PO Box 11648
City: Eugene
State: OR
Zip: 97440
Country: USA
Email: dh@oregonwild.org
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Documents and Settings\netcorps\My Documents\!nSnych\Comments\Misc. comments\Westwide Energy Corridor DEIS cmt.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.

PO Box 11648, Eugene OR 97440
541-344-0675, fax 541-343-0996
dh@oregonwild.org
http://www.oregonwild.org/

DATE: 12 Feb 2008

TO: http://corridoreis.anl.gov/involve/comments/index.cfm

Subject: Comments on the Westwide Energy Corridor DEIS

Dear Corridor EIS team:

Please accept the following comments from Oregon Wild, formerly Oregon Natural Resources Council, concerning the Westwide Energy Corridor DEIS. Our mission is to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. We need to protect areas that remain ecologically intact while restoring areas that have been degraded. This EIS appears to be a product of an outdated view of our nation's energy needs. Massive centralized energy infrastructure and 3 million acre scale of ecological destruction that are contemplated in this EIS is directly contrary to kind of decentralized energy development and ecological restoration that are needed to reduce and mitigate predicted global climate impacts.

The proposed action involves: 6,055 miles of multi-modal energy corridors up to 3,500 feet wide, covering 2.9 million acres in 11 western states. In Oregon, there would be 591 miles of corridors (446 miles on BLM and 145 miles on USFS), covering 238,000 acres (206 miles would be 3,500' wide, 358 miles would be 1,500' wide). In Oregon, 1 national scenic trail, 3 wild & scenic rivers and 2 roadless areas would be impacted by these energy corridors. Designation of the proposed energy corridors would require the amendment of as many as 165 land management plans for the federal lands where the corridors are located.

1. **The DEIS must disclose the effects of connected actions involved non-federal lands**. The DEIS maps just show the federal land portion of the corridors, but conveying liquid, gas or electrons requires *continuous* corridors that cross non-federal lands. The continuous corridor routes are "connected actions" per NEPA and the full and cumulative impacts of these continuous corridors must be disclosed. To discuss discontinuous corridors seems like a strange joke and a waste of everyone's time. 50320-001
2. **Disclose the risk of multi-modal energy corridors.** The EIS needs to more fully describe the adverse impacts of multi-modal energy corridors. Volatile liquids and gasses and sparking electricity do not mix. These combined facilities are also target 50320-002

rich environments for terrorism and vandalism. These issues need to be more fully disclosed and considered in the EIS. 50320-002 (cont.)

3. **Permanently removing vegetation from overly wide energy corridors would likely violate the Clean Water Act and the Endangered Species Act**. Corridors would likely be permanently maintained with little or no vegetation. When such corridors cross streams and rivers the water will be exposed to unnatural levels of sunlight and warm correspondingly. Thousands of miles of streams are already water quality limited because of water that is too warm for cold-water fish species like salmon and trout. Devegetated slopes lack soil cohesion normally provided by the roots of trees and shrubs so they are at a higher risk of landslides that can not only cause serious public safety hazards but also dump large quantities of detrimental sediment into streams and rivers. Many cold water fish species are listed as Threatened due in part to warm water and chronic sediment impacts. Implementing these corridors will violate the CWA anti-degradation requirement and the ESA requirement to conserve listed species. 50320-003

4. **Consider the cumulative impacts with power production alternatives**. Energy distribution cannot be separated from the impacts of energy production. This EIS must consider alternative pathways for US energy production and the comparative impacts of those alternatives (including their energy corridor consequences). In essence, this EIS must be preceded by the development of a rational national energy policy. 50320-004

5. **Decentralize energy production**. Centralized energy production and the energy corridors that serve them are red hot targets for terrorism, vandalism, etc. These centralized facilities and corridors must be recognized as an anachronism of a pre-911 mind-set. The EIS must consider alternatives that would encourage decentralized energy generation and energy consumption at or near the place of production so as to reduce the need for so many new energy corridors, while simultaneously reducing vulnerability to terrorism, market instability, etc.

    a. The EIS needs to account for technology change and how that interacts with price and market changes. New technologies will allow more co-location of energy production and consumption thereby removing the need for lots of new energy corridors. 50320-005

    b. The EIS needs to account for changing energy prices and market changes and how those interact with technology changes. Higher prices and energy supply uncertainty in foreign countries will stimulate technological development toward more co-location of energy production and consumption thereby removing the need for lots of new energy corridors.

    c. The EIS needs to account for the risks of alternative energy futures and their degree of vulnerability to terrorism, vandalism, market instability, etc.

6. **Use principles of "systems science" to make strategic changes that improve reliability**. We don't need to build a zillion miles of new energy corridors to achieve reliability objectives. A few simple improvements in connectivity might do it. Use strategic links between sub-systems to achieve "improved reliability," "relieve 50320-006

congestion," and "enhance the capability of the national grid to deliver electricity." Consider network structure and inter-node connectivity. See Amory and Hunter Lovins' book "Brittle Power." http://www.rmi.org/sitepages/pid1011.php

50320-006 (cont.)

7. **The EIS should focus on connecting large populations, not facilitating suburban expansion or bedroom communities in rural areas**. Compact urban growth forms should be encouraged. The consequences of sprawl should be factored into the NEPA analysis.

50320-007

8. **Prevent Weeds.** Widespread soil disturbance, especially in long linear corridors are perfect vectors for weeds and disease. Corridor maintenance also aggravates the spread of weeds.

50320-008

9. **Conserve Soil**. Displacement and compaction of soils during construction and maintenance are a major concern.

50320-009

10. **Minimize Roads**. Roads are one of the most damaging impacts to ecosystems because they compact soil, divert water, cause erosion and sedimentation, fragment habitat, and serve as a vector for weeds. Don't forget to consider both the impacts of corridor construction and corridor maintenance.

50320-010

11. **Protect Water Quality**. Water quality impacts will be caused by pipelines, steep slopes, roads, and stream crossings. We've witnessed absolutely horrendous practices where directional drilling under streams ends up blowing drilling mud into sensitive stream habitats. The EIS must consider the problem of Off-Highway Vehicles that trespass on energy corridors and especially enjoy ripping up steep slopes that then erode into streams. Do not analyze best-case scenarios. Be realistic.

50320-011

12. **Impose Seasonal Restrictions**. Construction and maintenance should be limited to dry seasons, especially in sloped areas.

50320-012

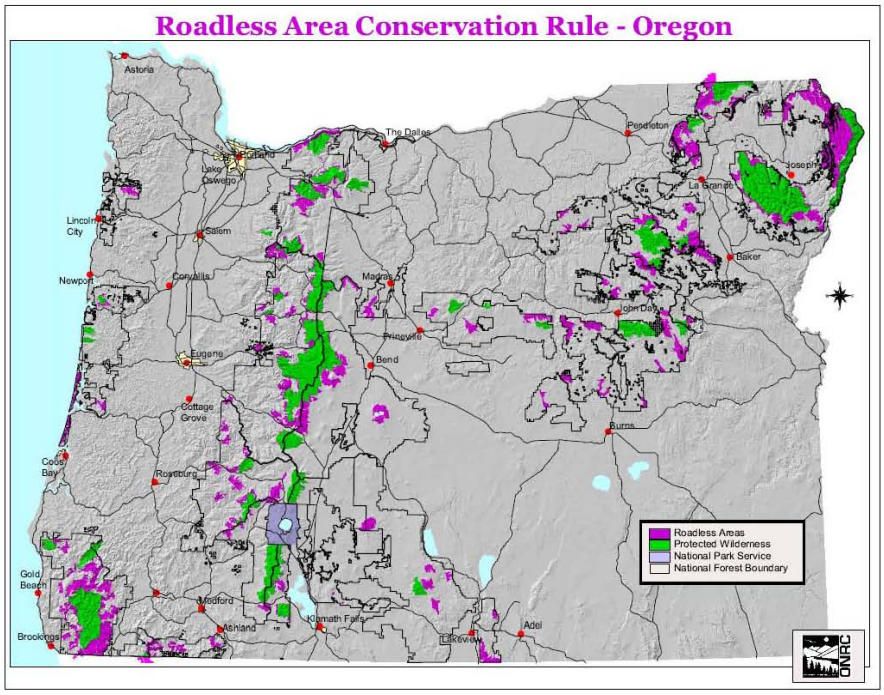
13. **Protect roadless and unroaded areas in both forested and rangeland-grassland-desert settings**. Large habitat blocks were once abundant and are now rare. Energy corridors should not bisect existing large blocks of habitat. The EIS team should use GIS technology to identify and map all unroaded polygons larger than 1,000 acres and describe the impact of building and maintaining corridors through them. The EIS team should refer to the USDA Forest Service November 2000 Roadless Area Conservation FEIS. The EIS should consider the impacts of energy corridors on all the recognized values of roadless and unroaded areas, including:

50320-013 (cont. on next page)

(1) High quality or undisturbed soil, water, and air;
(2) Sources of public drinking water;
(3) Diversity of plant and animal communities;
(4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
(5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
(6) Reference landscapes;
(7) Natural appearing landscapes with high scenic quality;
(8) Traditional cultural properties and sacred sites; and
(9) Other locally identified unique characteristics.

50320-014

Here is a map of just the inventoried (>5,000 acre) forested roadless areas in Oregon. We urge the energy corridors avoid these and all other forested and non-forested roadless areas larger than 1,000 acres in the state.



50320-013 (cont.)

14. **Minimize fire hazards**. Vegetation management in energy corridors typically results in the growth of dense, stunted plants with interlocking branches (fuel) close to the ground that are relatively more prone to intense fire compared to native vegetation. The long linear shade of energy corridors can also tend to spread wild fire because there is not much to break up the continuity of the unfavorable fuel structures. Energy corridors also increase the risk of fire ignitions due to increase road access and the fact that power lines also interact with smoke to cause arcs that can ignite vegetation.

50320-015

15. **Prevent Wildlife Mortality**. The EIS should adopt alternatives that avoid and minimize direct mortality from collisions with power lines, pipelines, service vehicles, etc.

50320-016

16. **Minimize habitat loss and fragmentation**. Energy corridors cause habitat fragmentation though soil compaction, vegetation alterations, noise disturbance, physical impediments to migration, etc. Many types of energy corridors are essentially permanent clearcuts with all the negative impacts associated with clearcutting.

50320-017

17. **Prepare analysis useful for future site-specific EISs.** Site-specific impacts are huge. This Programmatic EIS will not obviate the need for site-specific EISs.

50320-018

18. **Is this really a site-specific EIS, if so , the analysis must be thorough?** The legislation requires the agencies to identify the centerline and width of the corridors. This is no longer a programmatic EIS. The agencies must take it upon themselves to conduct a full site-specific analysis of every corridor so identified, or leave open the possibility that future site-specific analysis can result in site-specific decisions to alter corridor routes, widths, and compatible uses.

50320-019

Sincerely,

Doug Heiken

From: corridoreiswebmaster@anl.gov
Sent: Tuesday, February 12, 2008 5:16 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50321

Thank you for your comment, Michael Denty.

The comment tracking number that has been assigned to your comment is WWECD50321. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 05:15:19PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50321

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Comment Submitted:
In considering new energy transmission corridors on Public Lands in the West it would seem to make good sense and good planning to consider both actual and potential alternative energy sites.E.g. wind farms ,geothermal, hydroelectrical installations both actual and potential. 50321-001

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: Tuesday, February 12, 2008 5:34 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50323

Thank you for your comment, Paul Sheldon.

The comment tracking number that has been assigned to your comment is WWECD50323. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 05:33:36PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50323

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Comment Submitted:
The proposed energy tranmission corridors must avoid our most sensitive landscapes and wildlife habitats, be limited in number and scope, and facilitate the connection of renewable energy sources to the power grid. 50323-001

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: Tuesday, February 12, 2008 5:40 PM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50324

Thank you for your comment, Brenna Bell.

The comment tracking number that has been assigned to your comment is WWECD50324. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 12, 2008 05:40:05PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50324

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

Comment Submitted:
To whom it may concern,

I am writing on behalf of Willamette Riverkeeper (WRK), a Portland, Oregon based non-profit whose mission is to make the Willamette River watershed healthy for fish & wildlife, and safe for fishing and swimming, forever and for all. The proposed corridor designations in the Department of Energy's Draft Programmatic EIS (DEIS) will have significant impacts to wildlife habitat, water quality, cultural resources, recreation opportunities, etc. in the Willamette River watershed and on lands across the west. Once designated, the corridors will cover 6,000 miles and almost 3 million acres of public lands. The impacts of the pipelines and transmission lines on the natural ecosystems cannot be underestimated. 50324-001

Currently, western Oregon is facing proposed natural gas pipelines whose route coincides with the West-wide Energy Corridor. Through reviewing that proposal, WRK has come to understand the major environmental and economic impacts of building pipelines. If the impacts of one such pipeline project create such environmental harm, what would be the cumulative impact if all of the proposed energy corridors were utilized? 50324-002

In the Final Environmental Impact Statement for the project, the federal government needs to analyze the actions connected to the energy corridor designation: that is, what are the projected environmental, cultural and economic impacts associated with actually building energy transmission infrastructure in all these corridors? As reasonably foreseeable future actions connected with the corridor designation, these impacts must be included in the FEIS. 50324-003

Also, it is imperative that the FEIS include a robust range of alternatives, specifically including an alternative that analyzes putting federal resources into creating locally sourced, alternative energy and thus obviating the need for such corridors. 50324-004

Finally, if the FEIS determines that there is a need for such corridors, WRK requests that 50324-005

they avoid sensitive watersheds and are sited to have the most minimal impact possible to public lands, especially wild areas pending designation such as wildlands included in recently-introduced wilderness bills and Wild and Scenic Rivers that have been deemed eligible or suitable for designation should also be avoided. 50324-005 (cont.)

Designating a new, extensive network of energy corridors across our public lands ties us to an out-dated and inefficient model of centralized energy production and transmission. It is time for resources to be directed to decentralized energy production that does not require extensive and highly impactful energy infrastructure on public lands. 50324-006

Thank you for your consideration of these comments, and we look forward to reviewing the FEIS.

Brenna Bell, Esq.
Staff Attorney
Willamette Riverkeeper

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.