Sent: Wednesday, February 13, 2008 12:10 PM

To: mail corridoreisarchives

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50350

Thank you for your comment, Linda Carson.

The comment tracking number that has been assigned to your comment is WWECD50350. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:09:53PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50350

First Name: Linda Middle Initial: A Last Name: Carson

Organization: Anza-Borrego Foundation

Address: PO Box 2001 City: Borrego Springs State: CA

Country: USA Email: linda@theabf.org

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

Comment Submitted:

Our organization, a land trust, has added over 42,000 acres of land to Anza-Borrego Desert State Park in its 40 year history. Most of this land is state designated wilderness and many thousands of acres were acquired through the generosity of owners who wished to see their property preserved in pertuity. This corridor designation would set a terrible precedent in de-designating state wilderness and also impacting our ability to acquire lands from generous donors. I urge you to carefully study all impacts, both environmental and others, of this proposed designation.

50350-001

Sent: Wednesday, February 13, 2008 12:18 PM

mail corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50351

Thank you for your comment, Nancy Camp.

The comment tracking number that has been assigned to your comment is WWECD50351. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:17:23PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50351

First Name: Nancy Middle Initial: K Last Name: Camp Address: P. O. Box 396 City: Carey State: ID Zip: 83320 Country: USA

Email: whtnancy@svskylan.net

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

Comment Submitted:

I attended an Open House in Carey put on by North Western Energy, an investor-owned utility and one of the largest providers of electricity and natural gas in the northwest quadrant of the United States. In the name of moving into the future, this private company is planning to run 500kV power lines on 130-foot towers between southeastern Montana and southwestern Idaho. They have identified this area as being a geographical area that faces potentially serious challenges for electricity delivery in the near future. One of the proposed routes for their transmission line runs across from Arco north of Carey to Shoshone, the other runs east of Craters of the Moon down to American Falls, then turns west. The company, who claims to be in the planning stages of this project, is working locally with Power Engineers.

This plan is wreaking havoc on the lives of people along a corridor that runs between 350 and 390 miles. The route crosses mostly private property and property owners fear condemnation, diminished property values, health issues and ugliness. They also feel that the company is not taking their fears seriously as allowing this project to disrupt their lives includes no benefit to them, their immediate communities or the state of Idaho. I have lived in Idaho for 27 years. Coming from the Chicago area, where I witnessed mass destruction of our Nation's farmlands in the name of moving into the future by burying precious topsoil under acres of shopping malls and subdivisions, I am sensitive to the protection and management of public lands. I am acutely aware of the unique qualities of Blaine County within the social and political system that is Idaho. And in this instance, I am glad to see a potential for the big guns of an educated and aesthetically oriented community to come into play to keep this thing out of my back yard. But, really, it shouldn't be in anyone's back yard.

For me personally, one of the most disturbing things that came up at the meeting was a plea from several locals to run this thing through the Craters of the Moon National Monument. In 1924, President Calvin Coolidge signed a proclamation creating Craters of the Moon National Monument and in 2000 President Bill Clinton approved an expansion of the existing monument. National Monument status identifies historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest and brings them under the protection of the US Federal government. Defiling a national treasure is not an appropriate option.

50351-001

Like everyone else, I was reeling from the proposals that were presented at North Western Energy's open house. I was stunned by the company's supposition that everyone who is personally affected by their plan would be happy to give up their lands and their livelihoods for the greater good of a corporate endeavor that devastates the communities it steam rolls, then sells the power it carries to the highest bidder and that may not be Idaho. At one point, the representatives of the project suggested that we all write to our legislators about running the power corridor through public lands. Of course they would like all of us to request that the environmental review process be diminished solely for their benefit.

50351-003

I would like to suggest that we do write to our legislators, but with an eye to a different outcome. Time has come to demand tax breaks and incentives that will allow and encourage individual homeowners to become more self sufficient with solar and other renewable resources. Let's move toward making fewer demands on the existing system rather than accepting corporate America's greedy vision of bigger and more. Only by doing this can as we move into a future where we are not held hostage by proposals such as the one North Western Energy is presenting to our community at this time. We may be able to make this project move over or temporarily go away, but that does nothing to solve the problem in the long run.

50351-004

Nancy Camp Carey, ID

Sent: Wednesday, February 13, 2008 12:27 PM

To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50352

Attachments: STOP_THE_WEST-WDE_ENERGY_CORRIDOR22008_WWECD50352.doc



STOP_THE_WEST-IDE_ENERGY_CORR

Thank you for your comment, Louise Pape.

The comment tracking number that has been assigned to your comment is WWECD50352. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:26:48PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50352

First Name: Louise Last Name: Pape

Organization: www.ClimateToday.org Address: P O Box 297

Address: P O Box 297 City: Los Ojos State: NM Zin: 87551

State: NM Zip: 87551 Country: USA

Email: LouisePape@aol.com

Privacy Preference: Don't withhold name or address from public record Attachment: C:\Documents and Settings\Louise\My Documents\GLOBAL WARMING\ACTIONS\PERSONAL

\STOP THE WEST-WIDE ENERGY CORRIDOR22008.doc

STOP THE WEST-WIDE ENERGY CORRIDOR as designed.

a. The West-Wide Energy Corridor needs to be rethought to best provide for large solar and wind installations. We must convert our energy sources to renewables that make sense- not hoping for nuclear solutions or "clean" coal that are both far too risky. New concentrated solar with flat collectors is now economically feasible and less costly than parabolics.	50352-001
b. New technology allows for safe underground transmission lines that avoid the serious disruption of land that overhead transmission lines create. High Voltage DC cables can just follow our highways with underground lines that are not vulnerable to weather disruption such as severe winds and lightning. Following our highways means we do not need to destroy more large areas of land . These cables can go for a thousand miles without any more loss of power than the initial loss of roughly 10% to 15%. Only compact converter stations are needed. HVDC cables can also go safely under water.	50352-002
c. To meet the challenges of Peak Oil and climate change, we must not continue to plan for continuous power increases. Energy efficiency and conservation can provide a major portion of our energy needs without adding even one more coal or nuclear power plant. Also distributed, local renewable energy can provide another major portion of our energy needs.	50352-003
 d. Adding more disruption to our western landscapes for over 6,000 miles and nearly 3 million acres has serious ecological impacts. 	50352-004
e. We do not need additional pipelines for oil and gas. Our supplies are running out, and prices are rising, with more spikes inevitable. The latest automobile shows clearly indicate that our cars will be converting to plug-in electricity in the relatively near future since the hoped for biofuels can not meet our current needs and have already raised the price of food for people around the world.	50352-005

Wednesday, February 13, 2008 12:31 PM Sent:

mail_corridoreisarchives To:

Energy Corridor Draft Programmatic EIS Comment WWECD50353 Subject:

Thank you for your comment, Robert Jones.

The comment tracking number that has been assigned to your comment is WWECD50353. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:30:45PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50353

First Name: Robert Middle Initial: W Last Name: Jones Address: P. O. Box 396 City: Carey State: ID Zip: 83320 Country: USA

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

Comment Submitted:

To whom it may concern:

I would like to make the following comments about the t EIS for establishment of the National Corridors here in my community. I live in Carey, Idaho

I believe that:

I believe that:	50353-001
Corridors should run on federal land	30333-001
 All companies participating in building power lines should be restricted to established corridors and not start branching out all over the landscape. 	50353-002
It is time to put even existing cables under ground.	50353-003
 I believe that the government respect private property. I believe that the government respect migration corridors 	50353-004
Thank you,	50353-005

Robert W. Jones Carey, ID

corridore isweb master@anl.gov From:

Sent: Wednesday, February 13, 2008 12:35 PM

mail_corridoreisarchives; corridoreiswebmaster@anl.gov To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50354

080213 LWA Information Brief for WWEC-PEIS WWECD50354.doc Attachments:



080213_LWA_Infor

mation_Brief_f...
Thank you for your comment, Lee Rickard.

The comment tracking number that has been assigned to your comment is WWECD50354. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:34:58PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50354

First Name: Lee Middle Initial: J Last Name: Rickard

Organization: University of New Mexico

Address: OVPRED

Address 2: MSC05 3480

Address 3: 1 University of New Mexico

City: Albuquerque State: NM Zip: 87131-0001 Country: USA

Email: lrickard@unm.edu

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

Attachment: C:\Data Files\#LWA\200 Project Office\High Voltage Line\080213 LWA Information

Brief for WWEC-PEIS.doc

Sirs:

The University of New Mexico (UNM) is taking this opportunity to advise you of a project that UNM is carrying out on the Plains of San Agustin under a contract with the Department of the Navy. The environmental requirements of this project are such that we want to ensure coordination with the WWEC activity.

Beginning in FY 06, the Office of Naval Research (ONR) has funded UNM to develop the Long Wavelength Array (LWA), a major scientific instrument for astrophysics and space physics, with its initial implementation on the Plains of San Agustin. To date, ONR has provided \$7.32M for this project. The total project cost is estimated at \$33M. In this work, UNM acts as the executive agent for a consortium that also includes the University of Texas at Austin, the Naval Research Laboratory, Los Alamos National Laboratory, Virginia Polytechnic Institute and State University, and the University of Iowa.

The LWA project will provide high-precision, synoptic views of the ionosphere and solar weather events, and of a panoply of astrophysical phenomena, by means of a next generation radio telescope with imaging power 2-3 orders of magnitude better than current or past capabilities below the broadcast FM bands (specifically, 10 to 88 MHz). The full LWA would be a premier international facility both for conducting fundamental research in space physics and astrophysics and for educating and training students from New Mexico and the rest of the US, so that they can achieve future scientific advances in these fields.

Furthermore, the LWA's unparalleled capabilities for observing space weather and ionospheric phenomena will make it a critical resource for the Navy and other DoD and National programs. It will study events that may have a significant impact on the performance of GPS, the Wide-Area Augmentation System, and DoD communications systems, and will provide data to support systems to predict their occurrence and extent. These phenomena also affect space-based systems for geo-locating tactical RF emitters, space-based radars used for imaging through foliage for mapping underground structures, and over-the-horizon radars used for very precise long-range target detection and tracking.

The LWA will be an array of 53 "stations", each a 100-m diameter field of 256 antennas that acts as an individual telescope. Linked by data fibers, the stations will be combined to synthesize an instrument ~400 km across. The current configuration of stations is shown in the accompanying figure. As the design of the full instrument is being completed, UNM is beginning construction of an intermediate array, a 16 station full-scale proof of principle that enables tests of complex imaging through the ionosphere and simultaneous tests of the applicability of the resulting ionospheric information to scientific and operational problems. The 16 station sites for this Long Wavelength Intermediate Array (LWIA) have been selected by a long and difficult process that considers imaging performance requirements, ready access to power and communications, geography of terrain, and low levels of radio frequency interference (RFI).

The issue of RFI is of particular importance. At its frequencies of operation, and at the exquisite levels of sensitivity required for its astronomical measurements, the LWA requires that the environmental level of RFI be very low. The decision to locate it in a region centered on the

Plains of San Agustin was the result of a lengthy process of evaluation (begun in July 2002) in which the characteristics of environmental RFI were among the primary deciding factors.

High voltage transmission lines are a common source of RFI. Studies done by the National Radio Astronomy Observatory, in the context of the construction of the Very Large Array, have shown that such transmission lines produce undesirable levels of RFI within the LWA operating band at stand-off distances of less than 8 miles. In addition, other industrial equipment frequently associated with the pipelines that might be put in these corridors can also cause RFI.

We note in particular that planned WWEC development along the I-25 corridor may represent a problem for LWA stations that have been located along that corridor in order to have access to the major data transmission fiber that parallels it.

Given the existing investment from the Navy, the tailoring of the project budget to requirements rooted in the suite of selected station sites, and the grave difficulty in finding an alternative configuration of locations to avoid the energy corridors, it is essential that we coordinate with the WWEC project to avoid RFI that would be potentially harmful or even fatal to the LWA project. Because the LWA represents a major element in the educational and research missions of the University of New Mexico, such conflict would quite likely be detrimental to the public welfare of the state.



Current planned antenna station locations for the Long Wavelength Array

50354-001 (cont.)

corridoreiswebmaster@anl.gov From:

Wednesday, February 13, 2008 12:42 PM Sent:

mail_corridoreisarchives; corridoreiswebmaster@anl.gov To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50356

energy_corridor_WWECD50356.doc Attachments:



energy_corridor_W
WECD50356.doc...
Thank you for your comment, Michele Strand. The comment tracking number that has been assigned to your comment is WWECD50356. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:41:27PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50356

First Name: Michele Middle Initial: L

Last Name: Strand Address: 2235 Tierra Heights Road

City: Boulevard State: CA Zip: 91905 Country: USA

Email: michelestrand@yahoo.com

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

Attachment: C:\Documents and Settings\Michele\My Documents\Blvd\energy corridor.doc

February 13, 2008

cancer.

Energy Corridor Draft Program / EIS Comment

My objection to the energy corridor is as follows:

I live within the boundaries of segment 115-238 of the proposed Energy Corridor.

WATER – I utilize water from sole source groundwater resources. My well pumps water out of the ground and I drink it. Natural gas, oil, fuel, and hydrogen lines will contaminate my and my neighbors' drinking water.	50356-001
FIRE – Eastern San Diego County is just about the only part of San Diego that hasn't burned in the last 5 years. We are ripe for a fire storm and have very little fire fighting coverage in our small, backcountry community. We rely on firefighter volunteers and are not covered 24/7. Overhead electrical transmission lines are being blamed for starting several of the October 2007 Wild Fires that ravaged San Diego County. Overhead electrical transmission lines will start a fire and burn down my house, my neighbors' houses, the businesses and schools.	50356-002
PROPERTY VALUE – My home value will decrease because no one will want to live near this corridor – I certainly don't!	50356-003
NATURE/VIEWS – I bought a home way out "in the sticks" because of the beautiful views and wildlife. This corridor will ruin my views and kill or scare away the wildlife.	50356-004
HEALTH – I have heard of research that shows living near power lines can cause cancer. I am afraid that if you build power lines near my house that I will get	50356-005

Sent: Wednesday, February 13, 2008 12:54 PM

mail_corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50357

Thank you for your comment, Helen James.

The comment tracking number that has been assigned to your comment is WWECD50357. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:54:24PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50357

First Name: Helen Middle Initial: H Last Name: James

Organization: HOA Lone Cone Ranches

Address: 2625 Colorado Ave

City: Durango State: CO Zip: 81301 Country: USA

Email: rainbow@durango.net

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

Comment Submitted:

This area is twenty miles from any town, and a beautiful, placid, valley with magnificent mountain view. It already has a minor power line through the ranch properties. All of us who own at least 35 acres here bought them for solitude, country life with wildlife, unobstructed views, fresh air, and peace. We traded lack of mail delivery, telephone service, all weather roads, cable TV, shopping convenience, etc. for this tranquil valley life. We are bordered by a State wildlife area. Perhaps that is an optional location... if it presents no harm to the inhabitants there. Thanks for the opportunity to be heard and, I hope, actually have our concerns attended.

50357-001

corridore isweb master@anl.gov From:

Wednesday, February 13, 2008 12:55 PM Sent:

mail_corridoreisarchives; corridoreiswebmaster@anl.gov To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50358

Attachments: energy corridor comment-1 WWECD50358.doc



energy_corridor_co

mment-1_WWEC...
Thank you for your comment, William Barton.

The comment tracking number that has been assigned to your comment is WWECD50358. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:54:38PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50358

First Name: William Last Name: Barton

Organization: The Native Forest Council

Address: PO Box 2190

City: Eugene State: OR Zip: 97402 Country: USA

Email: bill@forestcouncil.org

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

Attachment: C:\Documents and Settings\seattle\My Documents\billb\energy corridor\energy

corridor comment-1.doc

12 February 2008

The Native Forest Council, Comment and Protest

To whom it may concern,

After reviewing the West-Wide Energy Corridor Programmatic Environmental Impact Statement, the citizens who comprise The Native Forest Council have concluded that the **Agencies should adopt the No Action Alternative**.

The document is clearly geared to a pre-determined vision of an energy future for this nation that is not shared by many of its citizens and taxpayers. The plan creates over 6,000 miles of energy corridors that then are restricted for other possible uses, some of which are higher and better uses of these lands, such as wilderness. This is in direct conflict with the General Welfare of our nation. The industrial, municipal and other agencies that are responsible for energy infrastructure are not required to use these corridors and would probably often choose routes that are not located on these corridors. This allows not only the corridor's footprint but also that of whatever projects are done outside the designated corridors.

The huge size of the corridors defies logic. As we move into the era of declining oil and other fossil fuels, common sense says that smaller, local, and renewable energy sources are going to be our best bet for a workable future. Corridors averaging 3,500 feet wide, ranging to over 26,000 ft wide are grossly oversized and inspire curiosity as to what the real reason for these corridors is. It has the appearance of some sort of land grab.

Locking this much land into a restricted use designation makes no sense. Energy infrastructure should be thoughtfully and carefully placed, one project at a time, using all the best environmental and economic science, fully costed accounting including all externalities, and a strong moral and ethical basis as the criteria of the choices made. Wholesale designation of lands in

a program like this can lead to generations of problems. Look no farther than the revested Oregon and California Railroad lands in Oregon to see what kind of divisive and litigious results come from attempts to mandate long term exploitive use of large tracts of public lands for any contested or prescribed purposes.

We urge the Agencies not to place these hundreds of thousands of acres of public property into jeopardy as designated energy corridors. We encourage you to take a moral and ethical stand for the life, lands and liberty of the people of the United States.

Mindful, thoroughly considered and transparent action will produce workability for generations to come. Mindlessly prescribing huge tracts of public land to a vague and indeterminate future is a recipe for disaster.

Thank you for your consideration.

Bill Barton Field Operations Director The Native Forest Council 50358-001 (cont.)

corridoreiswebmaster@anl.gov From:

Wednesday, February 13, 2008 12:58 PM Sent:

mail_corridoreisarchives; corridoreiswebmaster@anl.gov To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50359

comments_WWECD50359.wps Attachments:



comments_WWECD 50359.wps (9 KB)... Thank you for your comment, Hubert Quade. The comment tracking number that has been assigned to your comment is WWECD50359. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 12:58:10PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50359

First Name: Hubert Middle Initial: E Last Name: Quade Address: PO Box 248 City: Lewisville State: ID Zip: 83431 Country: USA

Email: hquade@srv.net

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

Attachment: C:\Documents and Settings\HP Administrator\My Documents\comments.wps

I disagree with the route and any construction of the proposed energy corridor because it will be going threw last remaining sage grouse habitats that are already under strain from other developements and looses in the area. I have photos that show power line Sage Grouse stricks in the area already as documentation to the negative impact of power lines in Crooked Creek area. Idaho Fish and Game also has data showing power lines negative effects to Sage Grouse.

50359-001

power lines negative effects to Sage Grouse.

Allowing the energy corridors to go threw these areas will only aid in getting the Sage Grouse listed on the Endanger spieces list and cause more restrictions for eveyone including energy developers. Every effort must be made to keep Sage Grouse from getting listed, not help it along. If this energy corridor must be built, do it only along interstate 15 threw Idaho or best of all, not at all. Sincerly, Hubert Quade

corridoreiswebmaster@anl.gov From:

Wednesday, February 13, 2008 2:00 PM Sent:

mail_corridoreisarchives; corridoreiswebmaster@anl.gov To:

Energy Corridor Draft Programmatic EIS Comment WWECD50361 Subject:

JKM_comments_final_vers_WWECD50361.doc Attachments:



JKM_comments_fin

al_vers_WWECD5....
Thank you for your comment, John Moore.

The comment tracking number that has been assigned to your comment is WWECD50361. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 01:59:39PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50361

First Name: John Middle Initial: K Last Name: Moore Address:

City: State: CA Zip: Country: USA Email:

Privacy Preference: Withhold address only from public record

Attachment: C:\aaj\conserv\Energy Corridors Westwide PEIS\JKM\JKM comments final vers.doc

Needed improvements in the PEIS and in proposed designations

after all designated for the conservation of specified natural values

rectice improvements in the r E15 and in proposed designations	
The essential deficiency in the PEIS, its failure to use site-specific information to adequately support designation of individual corridors, is discussed below in a separate section.	50361-001
Figures 2.2-4 and 1.1-2 and accompanying text present an absolutely minimal account of potential energy sources and transmission constraints in the 11 western states. Surely DOE must have much more detailed information about reasonably foreseeable energy development than this, and this information must have influenced the development of the proposed action. The PEIS should include a substantially more detailed overview of the types of potential sources and also the transmission constraints. Ranges of predicted greenhouse gas emissions from the types of sources likely to be connected to specific demand centers through designated corridors are an environmental effect of great concern that should be much more thoroughly described and analyzed in the PEIS.	50361-002
Certainly, sections 2.5.1 through 2.5.8 properly reject many of the other alternatives considered for detailed study. Some of these alternatives, if not augmented by additional corridors, would likely have provided significantly inadequate sets of corridors. Alternatives involving increased utilization, which were worthy of analysis though possibly not complete solutions, were rejected because the authorizing legislation was defective in ignoring possibilities of increased utilization. However, the single action alternative is insufficient because the PEIS ignores the possibility of less extensive and less damaging networks of corridors. The PEIS does not explain why smaller networks would not serve the purpose and need as well. Surely two or more near-optimal corridor networks which differ significantly could be specified.	50361-003
Existing transmission corridors and rights-of-way and transportation corridors have already been sacrificed to meet transmission and transportation needs. Designating these corridors, as the PEIS often proposes, will tend to minimize the total area sacrificed to these uses and take advantage of environmental studies already conducted along these corridors. The PEIS should enunciate the policy that future transmission facilities will be restricted to the designated corridors to the maximum extent feasible.	50361-004
However, the proposed corridors are frequently much wider than the existing sacrificed zones. I suggest adopting policies which encourage location of projects close to the edge of the expanded corridor which is next to existing facilities - of course with due regard for separations necessitated by safety. Such policies would benefit the environment by tending to minimize the additional sacrificed area.	50361-005
Additional categories of sensitive areas should be avoided: 1) Wilderness Study Areas 2) areas proposed for wilderness designation in pending legislation 3) other areas proposed by citizen groups for wilderness designation 4) National Conservation Areas, for example the Snake River-Birds of Prey NCA, which are	50361-006

Potential conflicts of each corridor with requirements of the Endangered Species Act and National Historic Preservation Act and measures to avoid these conflicts should be identified in detail in the PEIS. Initially ensuring overall compliance of each corridor with these requirements would be far superior to piecemeal compliance by individual projects.	50361-007
Mandatory Best Management Practices to provide a high degree of assurance that transmission projects will minimize damage to the environment should be specified in the PEIS.	50361-008
The PEIS states that land use plan amendments will specify the centerline and width and allowed transmission modes of the designated corridors. The land use plans that are being amended contain management prescriptions, standards, and guidelines applicable to the corridor areas. Would the corridor designation amendments automatically override some or all of these existing management prescriptions, for example visual quality objectives? Will the ROD's for the amendments provide details of the modifications of existing management in addition to the corridor specifications? Corridor designation amendments that override existing management will not have been subject to any meaningful public process.	50361-009
The PEIS fails to adequately support designation of corridors	
The PEIS claims to provide environmental analyses adequate to support designation of individual corridors in agency land management plans, but in fact these analyses are so generalized that they cannot be used to support designation of individual corridors. Therefore, the PEIS is fatally deficient with respect to its fundamental purpose.	50361-010
The PEIS contains virtually no site-specific information. It provides only general catalogs for the 11 western states of affected environments, what environmental effects <u>might</u> be caused by transmission projects, what constraints on projects <u>might</u> have to be imposed, and what mitigations for these effects <u>might</u> be employed. The PEIS asserts that these general catalogs are equivalent to the "hard looks" required by NEPA precedents, but these assertions are not credible.	50361-011
NEPA documents for specific projects cannot be tiered to a document so completely lacking in specificity. In contrast, current Forest Service Land Management Plans are site-specific and tiering NEPA documentation for specific Forest Service projects to them is plausible.	50361-012
Contrast the analyses of the PEIS with the analyses that agencies would perform to support designation of individual corridors land management plans. Those analyses would utilize all the available detailed site-specific information on the affected environments within the corridors and on adjacent public lands. The analyses would document foreseeable environmental effects on the environment of the corridors and constraints on projects that potentially would be necessary to avoid adverse environmental impacts, and recommend potential mitigations for environmental impacts.	50361-013
The PEIS proposes arbitrary corridor widths which do not consider topography, patterns of intermixed public and private land ownership, existing development, and the likelihood that	50361-014

corridors of the proposed widths would ever be required by reasonably foreseeable facilities. If reasonably foreseeable facilities were unlikely to occupy corridors of the proposed widths, the corridors could be narrowed and impacts lessened. Existing locally-designated corridors as wide as two miles have been incorporated into the proposed network, without any explanation of why such extraordinarily wide corridors are, or were ever, needed. This comment does not imply that existing corridors narrower than the standard should be widened.	50361-014 (cont.)
Corridor 6-15 across Donner Summit from Reno to California's Central Valley is an excellent example of a corridor of arbitrary 3500' width, which very likely is not consistent with numerous local constraints. It passes through areas with complexly intermixed public and private ownership, significant residential, business, and recreational development, and many other constraints. Intensive dispersed recreational use occurs within and across the corridor, which is close to the southern boundary of the Castle Peak potential wilderness. The PEIS does not describe or analyze any of these constraints.	50361-015
The PEIS states that local staffs of land management agencies were consulted to inform preparers of the PEIS about constraints on the proposed corridors and needed modifications, but the PEIS text does not supply any information about these constraints and modifications. The scale of the "large-scale" maps in the PEIS is so small that the maps provide useful information about the modifications only if the corridors were shifted by miles. Apparently these constraints and modifications will have to be rediscovered when environmental documents for future transmission projects in the corridors are prepared.	50361-016
At best the PEIS can serve as a very expensive checklist for preparation of specific project documentation and a source of generalized text to insert in that documentation. One wonders if a briefer and much less costly document could not have satisfied these needs.	50361-017
Modification of the designated corridors to satisfy newly discovered local constraints will be a very demanding task for both agency personnel and for interested citizens. Making more thoroughly considered designations in the first place would be much better.	50361-018
NEPA documents that would adequately support designation	
Programmatic EIS's for a single corridor or group of related corridors analyzing all relevant local information can provide efficient and adequate initial environmental analyses for those corridors which documentation for individual projects can tier to. The groups of related corridors would obviously be rather arbitrary, but that would not preclude useful analyses. Such programmatic EIS's would alert proponents of proposed projects to environmental impacts, constraints, and mitigations and would be preferable to repetitive piecemeal analyses of individual projects in a corridor. Environmental documentation for projects in the corridors could appropriately be tiered to such programmatic EIS's.	50361-019
The only satisfactory WESTWIDE solution for the inadequacies of this PEIS is preparing a revised document which would essentially be equivalent to a collection including all the programmatic EIS's for a single corridor or group of related corridors.	50361-020

I regret to have to observe that I made many of these comments at a scoping meeting arranged by the California Energy Commission in the spring of 2006; these comments were obviously not heeded. A PEIS prepared as those comments recommended would be a much better document.

Details of the PEIS

The PEIS emphasizes the existence of and maps "locally-designated" corridors designated in land-use plans. Looking at the spaghetti of electrical and natural gas transmission facilities depicted in figure 1.1-1, it is evident that quite a large proportion of their rights-of-way crosses federal public lands. Consider, for example, the figure 1.1-1 rights-of-way in the state of Nevada, which is over 85% in federal ownership. Overlaying federal ownership on figure 1.1-1 would provide very useful and thought-provoking information.

50361-021

Are some of these rights-of-way "de facto" corridors that have not been designated in land-use plans? For example, corridors 18-224, 110-233, and 44-110 under the proposed action include short isolated segments that are existing corridors and other segments that are not. Why are only the isolated segments labeled as existing corridors? A lengthy explanation by project personnel at a public meeting did not clear up this mystery.

50361-022

The maps in the PEIS are inadequate

Readers need maps which are much more detailed than the "large-scale" (1" = 5 miles?) maps in the PEIS to be to be reasonably informed about the locations and effects of the proposed corridors. The "large-scale" maps do not include enough information to enable readers to relate the corridors to natural and cultural features on the ground. Citizens interested in the management of federal lands are often familiar with and rely on Forest Service visitor maps (scale 1" = 2 miles) and BLM surface management status maps (scale 1:100000), which locate many natural and cultural features of interest not shown on the GIS maps. The land survey grid of townships, ranges, and sections on these maps are a useful coordinate system.

50361-023

The project's GIS files and ArcReader software are available to interested citizens who have high-speed internet connections and sufficiently powerful computers. Obviously these requirements are a significant barrier to widespread use of the GIS files. Even though my computer has 1 GB of RAM and a 3.4 GHz CPU, ArcReader appears to perform sluggishly, suggesting that ArcReader would not perform satisfactorily on many desktop computers — another significant barrier to widespread use. In fact 1 GB of RAM is the minimum recommended by ESRI. If future projects similarly provide access to GIS files, these limitations should be mentioned on the project webpages to warn prospective users aboutwasting time downloading unusable files. Stating on the webpage whether the "typical" installation of ArcReader is capable of processing the GIS files, or whether the "complete" installation is required, would also be helpful to prospective users.

50361-024

There are many useful layers of spatial information in the GIS files, but the complete land survey grid of townships, ranges, and sections is not among them, so far as I could determine. Including a complete land survey grid layer in the GIS files would greatly facilitate comparisons with

USFS maps, BLM maps, and topographic maps. Township and range boundaries are too coarse a coordinate system for such comparisons.

50361-025 (cont.)

Wednesday, February 13, 2008 2:04 PM Sent:

mail_corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50363

Thank you for your comment, Phillip Carskaddan.

The comment tracking number that has been assigned to your comment is WWECD50363. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 02:03:31PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50363

First Name: Phillip Middle Initial: S Last Name: Carskaddan Address: PO Box 2703 City: Borrego Springs State: CA Zip: 92004-2703 Country: USA

Email: elderfossil@att.net

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

Comment Submitted:

I am a volunteer a ABDSP as well as a member of the Paleontology Society. I have also regularly donated to The Anza Borrego Foundation to purchase Park inholdings.

ABDSP is a treasure & a jewel. It must be protected for all future generations. We owe that to them. To put a power line thru wilderness area is wrong for 2 reasons: wilderness 50363-001land should be protected in perpetuity. And by encroaching on wilderness area, we are setting a terrible precedent.

I most strongly urge that the power line be sited outside of ABDSP, for me & for all of humanity.

Wednesday, February 13, 2008 2:20 PM Sent:

mail_corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50364

Thank you for your comment, Sari Higfield.

The comment tracking number that has been assigned to your comment is WWECD50364. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 02:20:01PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50364

First Name: Sari Middle Initial: M Last Name: Higfield Address: 1530 MacFarland Ave Address 2: P. O. BOX 491 City: Indian Springs State: NV Zip: 89018 Country: USA Email: highfields44@gmail.com

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

Comment Submitted:

I have lived in Indian Springs sence 1964. I am in favor of moving the energy corridor around the mountian range South of Indian Springs. I have 40 acres of land, that is affected.

50364-001

Thank you,

Sari Highfield

Wednesday, February 13, 2008 2:29 PM Sent:

mail_corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50365

Thank you for your comment, Russell Highfield.

The comment tracking number that has been assigned to your comment is WWECD50365. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 02:28:41PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50365

First Name: Russell Middle Initial: D Last Name: Highfield Address: 1530 MacFarland Ave Address 2: P.O. Box 491 City: Indian Springs State: NV Zip: 89018

Country: USA Email: highfields44@gmail.com

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

Comment Submitted:

I am in favor of the corridor being moved south of Indian Springs in line with the Valley 50365-001 Electric power line.

From: corridoreiswebmaster@anl.gov Wednesday, February 13, 2008 2:32 PM Sent:

mail_corridoreisarchives To:

Energy Corridor Draft Programmatic EIS Comment WWECD50366 Subject:

Thank you for your comment, Joan Rosen.

The comment tracking number that has been assigned to your comment is WWECD50366. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 02:31:47PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50366

First Name: Joan Middle Initial: D Last Name: Rosen Address: P.O. Box 2106 City: Borrego Springs State: CA Zip: 92004 Country: USA

Email: desert.rosen@earthlink.netI

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

Comment Submitted:

RE: Opposition to POwerlink Proposal

If this proposal is approved it would lock us into obsolete technology of major power generation. Small scale site- specific generation is more preferable. That would preclude the need of energy corridors that distroy irreplable landscape. This is why I strongly oppose the powerlink proposal!

50366-001

Sent: Wednesday, February 13, 2008 2:35 PM

To: mail_corridoreisarchives

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50367

Thank you for your comment, Lloyd Stradley.

The comment tracking number that has been assigned to your comment is WWECD50367. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 02:34:23PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50367

First Name: Lloyd Last Name: Stradley

Address: 2875 Idlewild Drive #106

City: Reno State: NV Zip: 89509 Country: USA

Email: lloyd stradley@patagonia.com

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

Comment Submitted:

Agencies need to make this process more transparent to the public - with detailed maps and various alternatives. Without alternatives, we can only comment on what we don't like about the proposed plan.

50367-001

Special or sensitive public lands need to be avoided altogether. Specific to our region - the 223-224 and 37-232 lines that are in the Desert National Wildlife Refuge and the 232-233 line that impacts the Delamar Mountains and Meadow Valley Range Wilderness Areas.

50367-002

The corridors will fragment the habitat of the threatened desert tortoise and the desert bighorn sheep. Scientists say that wildlife habitat suffers from roads and powerlines. The wildlife refuge is a wildlife refuge, not a power corridor.

50367-003

The cumulative impact of these energy corridors need to be analyzed for federal, state, private, and tribal lands that will be impacted when the corridors are connected. There is no such analysis currently.

50367-004

An alternative needs to be developed that links up the corridors to Nevada's high quality geothermal, solar, and wind sources. Public lands should not be supporting new coal plants and last century's energy policy. America needs a forward thinking energy policy that moves the country toward the use of renewable energy sources and away from fossil fuels

Sent: Wednesday, February 13, 2008 3:38 PM

To: mail_corridoreisarchives

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50368

Thank you for your comment, Alfred Wilhelm, Jr.

The comment tracking number that has been assigned to your comment is WWECD50368. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 03:37:27PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50368

First Name: Alfred Middle Initial: D Last Name: Wilhelm, Jr

Organization: Colonel, USA (ret)

Address: City: State: VA Zip: Country: USA Email:

Privacy Preference: Withhold address only from public record

Comment Submitted:

I have reviewed the proposed energy corridor through Millard County, Utah and the proposal of the Millard County Board of Supervisors to have the existing IPP corridor be substitued for the proposed corridor. I heartily concur with the use of the IPP corridor. While not a local resident, I have become very familiar with the county through frequent visits with friends and family there. As a result I am planning to make an investment there. As a trained engineer with long exposure to such projects in East Asia, I am convinced that the current proposal would be environmentally unsound, generate a potential health hazard and have significant potential for seriously damaging property values of currently very productive land in the out years. Energy corridors always have a potential risk associated with them. To place that risk upon residential and agricultural areas should be avoided, even if the costs of a safer alternative are higher. Millard County has suggested a reasonable and probably more effective alternative.

50368-001

Wednesday, February 13, 2008 3:45 PM Sent:

mail_corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50369

Thank you for your comment, Linda Ross.

The comment tracking number that has been assigned to your comment is WWECD50369. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 03:44:56PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50369

First Name: Linda Last Name: Ross Address: City: State: CA Zip: Country: USA Email:

Privacy Preference: Withhold address only from public record

Comment Submitted: STAY the **** AWAY from Morongo Basin, CA.

NO one wants your *** here!

50369-001

Sent: Wednesday, February 13, 2008 3:53 PM

mail corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50370

Thank you for your comment, Patrick Joyce.

The comment tracking number that has been assigned to your comment is WWECD50370. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 03:52:44PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50370

First Name: Patrick Last Name: Joyce Address: 1150 The Strand

City: Reno State: NV Zip: 89503 Country: USA

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

Comment Submitted:

This has been a large impact proposal that hasn't gotten enough coverage. Agencies need to make this process more transparent to the public - with detailed maps and various alternatives. Without alternatives, we can only comment on what we don't like about the proposed plan.

50370-001

The corridors will fragment the habitat of the threatened desert tortoise and the desert bighorn sheep. Scientists say that wildlife habitat suffers from roads and powerlines. The wildlife refuge is a wildlife refuge, not a power corridor. Something as simple as building power lines , pipelines, or burying them is extremely invasive and destructive to natural habitat.

50370-002

The cumulative impact of these energy corridors need to be analyzed for federal, state, private, and tribal lands that will be impacted when the corridors are connected. There is no such analysis currently.

50370-003

Wednesday, February 13, 2008 4:05 PM Sent:

mail corridoreisarchives To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50371

Thank you for your comment, Wesley Cater.

The comment tracking number that has been assigned to your comment is WWECD50371. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 04:04:23PM CDT

Energy Corridor Draft Programmatic EIS Draft Comment: WWECD50371

First Name: Wesley Middle Initial: E Last Name: Cater

Organization: California State Park Rangers Assn.

Address: 70-200 Dillon Rd. #20 City: Desert Hot Springs,

State: CA

Zip: 92241 Country: USA

Email: wescater@cs.com

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

Comment Submitted:

We are opposed to designating a powerline corridor through San Diego County and the ten other counties being considered. There does not exist proof that San Diego Gas and Electric Company needs the addition power lines, adequate lands exist withing their area of distribution to construct power plants. Also nuclear power needs to be considered to augment need for additional power. (Cost should not be a consideration.) Power lines should never be constructed through an existing State Parks ie: Anza Borrego Desert.

50371-001

50371-002

Sent: Wednesday, February 13, 2008 4:33 PM

To: mail_corridoreisarchives

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50372

Thank you for your comment, Loucinda Ablin.

The comment tracking number that has been assigned to your comment is WWECD50372. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 04:32:24PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50372

First Name: Loucinda Middle Initial: E Last Name: Ablin Address: POB 925 City: Joshua Tree State: CA Zip: 92252 Country: USA

Email: lablin@century21mirage.com

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

Comment Submitted:

Energy for the Twentyfirst Century must evolve into truly renewable resources and the old methodology of building bigger grids and devastating our land by scraping and putting up huge power towers is of the past. The San Diego region is poised on the brink of a new energy future, and the path it charted determined in large part the success of its people, its economy and its ability to provide a cleaner, more secure energy supply for generations to come.

San Diego Smart Energy 2020 paves the way for a shift from reliance on fossil fuels and imported power to an array of local solutions that include energy efficiency measures with emphasis on high efficiency air conditioning systems; common-sense weatherization and conservation; the proven technology of solar photovoltaic (PV) panels, for large commercial use as well as on homes; small, highly efficient natural gas-fired power plants that generate both power and heating/cooling; adoption of smart grid procedures that improve the efficiency of the grid by monitoring and controlling the flow of electricity on a continuous basis; and the widespread institution of green building design priciples. San Diego Smart Energy 2020, the strategic energy plan for San Diego County provides a working blueprint of realistic methods to reduce greenhouse gases from power generation by 50 percent over current levels by 2020 while increasing the total electricity supply from renewable energy resources and miximizing locally generated power. The plan is economically feasible for residents and businesses alike. If Mayor Villagaroisa truly wants to impact the Los Angeles Region in a positive way, he needs to look south to San Diego for the answer. Not devastating our Natural Resources and Preserves to power broker energy while using double speak of "Green" "Renewable" and "Alternative" and pushing the corporate welfare agenda. And, in closing... I am opposed to the mayor of Los Angeles and the LADWP's stated notion that the Mojave Desert is somehow Los Angeles' back yard and their resultant omnipotent attitude that allows them to think they can destroy another geographic portion of California as they did in the Owens Valley is not only narcissistic but criminal. We the people need your leadership to develop and maintain rational energy policy that is based on conservation and local generation of energy and STOP GREEN PATH NORTH. Thank you for the opportunity to comment.

corridore isweb master@anl.gov From:

Sent: Wednesday, February 13, 2008 4:37 PM

mail_corridoreisarchives; corridoreiswebmaster@anl.gov To:

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50373

UtilityCorridor_NWFcmts_2008_WWECD50373.pdf Attachments:



UtilityCorridor_NWF cmts_2008_W...

Thank you for your comment, Ben Deeble.

The comment tracking number that has been assigned to your comment is WWECD50373. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 04:36:32PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50373

First Name: Ben Middle Initial: D Last Name: Deeble

Organization: National Wildlife Federation Address: 240 N. Higgins Ave. #2

City: Missoula State: MT Zip: 59802 Country: USA

Email: deeble@nwf.org

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

Attachment: S:\Energy issues\UtilityCorridor_NWFcmts_2008.pdf

Comment Submitted:

See attached .pdf, 4 pgs.



NATIONAL WILDLIFE FEDERATION®

Northern Rockies Natural Resource Center

240 N Higgins, #2 • Missoula, MT 59802 • Tel: 406-721-6705 • Fax: 406-721-6714 • www.nwf.org

February 14, 2008

LaVerne Kyriss, DOE and Kathryn Winthrop, BLM c/o Argonne National Laboratory 9700 S. Cass Avenue Building 900, Mail Stop 4 Argonne, IL 60439

RE: Comments on West-wide Energy Corridor Programmatic Environmental Impact Statement

Dear Ms. Kyriss and Ms. Winthrop:

The National Wildlife Federation appreciates this opportunity to comment on designation of an energy corridor through Montana. We have reviewed the West-wide Energy Corridor Programmatic Environmental-Impact-Statement (PEIS)-designation-process currently underway.

The NWF has been involved for over 25 years in Montana in wildlife and habitat conservation, particularly emphasizing the conservation of Threatened and Endangered species, many of which are found along your proposed routes.

We have concerns about both direct and indirect impacts to wildlife and habitats, as the corridor designation is the first significant federal action facilitating the installation of over 6000 miles of energy infrastructure and the disturbance of a minimum of 2.9 million acres (PEIS p. 3-189). We have concerns about the process, contents and omissions of the PEIS.

Process- lack of cumulative or programmatic analysis, and "fast-track" approval

The stated purpose for the preparation of a programmatic EIS is to develop a document with an adequate level of analysis of program-wide impacts, such as cumulative impact analysis, to allow tiering of subsequent project-level analyses to the programmatic EIS, thus not having to revisit program-wide impacts for each project-level analysis.

We recommend that the PEIS undertake some cumulative impact analysis, such as taking a hard look at the likelihood that coal fired electricity will be the primary source of power transported by powerlines within the west-side energy corridors, if designated. This type of analysis is not being conducted in the impact analysis of the Montana-Alberta Tie Line, a project-level EIS, so it stands to reason that such analysis must be conducted at the programmatic level.

Proposed utility and power line projects within the areas designated will be subject to "fast-track" approval, bypassing state-level processes for locating transmission infrastructure, overriding federal environmental laws, and enabling federal condemnation of private land for new high voltage transmission lines. By facilitating utility corridors and power line construction without a detailed analysis of the environmental impacts and without full consultation with appropriate resource and land management agencies, DOE's proposed corridor designation could have devastating impacts on ecosystems, wildlife habitats and populations, and water quality. Moreover, because coal is the primary means of electrical generation within areas that would be served, the designation will promote increased production of coal fired electricity, thus worsening global warming pollution.

50373-002

Among the most significant environmental impacts resulting from corridor designation will be habitat fragmentation, increased greenhouse gas emissions caused by an increased production of coal, the introduction of invasive species, avian mortality, decreased water quality where roads are constructed and waterways are traversed including increased sedimentation and erosion, pollution from herbicides along power line rights-of-ways, and decreased realty value of properties within the view shed and footprint of the corridors.

Endangered Species Act Consultation

The PEIS shows at Table 3.8-6 a list of 495 species (including 19 in Montana) which are listed under the Endangered Species Act, or proposed or candidates for listing in the 11 Western states where the energy corridors could be designated. To our knowledge, no consultation has occurred with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) for any of these 495 species.

Under § 7(a)(2) of the ESA, no federal agency may authorize, fund, or otherwise carry out any action that is likely to jeopardize the continued existence of a listed species. Accordingly, a federal agency must "review its actions at the earliest possible time to determine whether any action *may affect* listed species or critical habitat." 50 C.F.R. § 402.14(a) (emphasis added). If this "may affect" provision is triggered, the action agency must consult with (and comply with all attending requirements of) the U.S. Fish and Wildlife Service ("FWS") and/or the National Marine Fisheries Service ("NMFS"), depending upon the species involved.

50373-003

In a formal consultation under § 7, FWS evaluates the effects of the proposed agency action and determines whether the action may proceed under the ESA. See 50 C.F.R. § 402.14. The consultation process is the ESA's single most important tool for protecting vulnerable species, and it often results in modification of proposed agency actions. The process results in a biological opinion that provides comprehensive information about the effects of the proposed action and serves as the vehicle for delivering FWS' judgment about whether the proposed action complies with the substantive requirements of § 7(a)(2) and thus may proceed.

Research reveals many cases in which plaintiffs have successfully challenged an agency's "failure to consult" in connection with a broad programmatic initiative or regulation. The cases fall into two general categories – "nationwide permits" issued by the Corps under the Clean Water Act and programmatic policy initiatives undertaken by land management agencies.

In a series of cases, courts have found that land management agencies have violated the consultation requirement when engaging in large-scale programmatic initiatives like (and often including) those discussed below in the context of NEPA. See Washington Toxics Coalition v. EPA, 413 F.3d 1024 (9th Cir. 2005) (EPA registration of 54 pesticide active ingredients that might have affected endangered species); Pacific Rivers Council v. Thomas, 30 F.3d 1050, 1050-54 (9th Cir. 1994) (challenge to several national forest plans); Lane County Audubon v. Jamison, 958 F.2d 290 (9th Cir. 1992) (similar); California ex rel. Lockyer v. United States Dep't of Agric., 459 F.Supp.2d 874 (N.D. Cal.2006) (challenge to recision of roadless rule; court noted that the fact that consultation would be limited to impacts at the programmatic level does not excuse the duty to consult); Citizens for Better Forestry v. United States Dep't of Agric., 2007 U.S. Dist. LEXIS 27419 (N.D. Cal., Apr. 21, 2006) (general challenge to relaxation of environmental safeguards regarding timber cutting in national forests)

50373-003 (cont.)

Based on these authorities, if DOE fails to engage in § 7 consultation with the USFWS and the NMFS before finalizing the corridor designation, there is a good chance of successfully overturning the designation. Section 7 prohibits agencies from making "irreversible or irretrievable commitments of resources" during the pendency of the consultation process. *NRDC v. Houston*, 146 F. 3d 1118, 1125 (9th Cir. 1998).

PEIS fails to address impacts to Sage-Grouse

Greater sage-grouse are considered a sensitive species by both the BLM and the USFS, and have been petitioned for listing under the ESA with a decision due from the U.S. Fish and Wildlife Service by May 2009. It will take concerted effective action to prevent further declines and potential addition of greater sage-grouse to the federal Endangered Species list.

The PEIS has failed to consult with the USFWS on sage-grouse, or to conduct any programmatic-level analysis of impacts to sage-grouse, even through the corridor designations will occur all across sage-grouse habitat in Montana, Wyoming, Colorado, Idaho, Nevada, Utah, Oregon and Washington.

Furthermore, the PEIS contains an extended discussion of sage-grouse, but fails to address one of the most fundamental impacts, the phenomenon of "avoidance" by sage-grouse of habitat with newly installed tall structures, an impact which greatly exceeds the area impacted directly by the project footprint (Text Box 3.8-2). Based on initial surveys and what is known from California and Nevada where the impacts of utility lines on sage-grouse have already been assessed, we have strong concerns about some of the potential proposed routing of lines (Atamian et al. 2006; Bi-State Plan 2004; Ellis 1984; Hall and Haney 1997; Lammers and Collopy 2005; Sierra Pacific Power 2003). For example, in northern California overhead power lines have had a negative effect on lek attendance and strutting activity has ceased on all leks within one mile of a power line, while other lines also are believed to be impacting populations (Bi-State Plan 2004).

50373-004

Several mechanisms converge to affect sage-grouse when tall structures are erected in their habitats. Sage-grouse may:

- during periods of low visibility (dusk/dawn, fog, smoke, rain, etc.) collide in flight with both the wires and towers, causing direct injury and mortalities;
- face elevated levels of predation and harassment from raptors, which more effectively hunt from the elevated perches provided by the utility line structures;

as a result of predator pressure, or instinctively, be displaced from the habitat around the utility lines over large areas, reducing habitat value for lekking, nesting, brood rearing, and wintering;

In addition, sage-grouse habitat may/will be:

- effectively "partitioned" and fragmented when grouse are unwilling to fly past, walk under, or in other ways use habitat adjoining utility lines, towers, pipelines, and new roads;
- reduced by the direct footprint of the towers and associated roads.

Furthermore, the "suggested management practices" related to sage-grouse and energy transport facilities developed by the BLM (Text Box 3.8-2) are wholly voluntary. Thus the PEIS, while citing these practices, does not suggest how often, or even if, these practices will be implemented (or effective) in conserving sage-grouse habitat or populations. This represents a failure to take a hard look at the reasonable foreseeable impacts of energy corridor designation on sage-grouse.

Because much of the non-forested portions of Beaverhead Co., MT and Madison Co., MT are occupied sage-grouse habitat, the best-case scenario for habitat integrity and population maintenance would be complete suspension of plans to site new utility corridor projects here.

However, lacking this, then avoidance of sage-grouse lek sites, nesting habitat, winter habitat, and migratory corridors is most likely the best approach to avoiding impact to the region's grouse population. To maximize the avoidance of crucial sage-grouse habitat in southwest Montana, if corridor designation occurs, any new energy corridor must be sited within the Interstate 15 corridor. As such, we strongly recommend that the utility corridor not be designated along route 50-260 as depicted in the Montana State Base Map Series, because this is a crucial habitat for sage-grouse lekking, breeding, migration, and wintering. Route 50-260 is also important habitat for other wildlife in this region. It will be appropriate to seek special mitigation for utility routes and projects which do not avoid crucial wildlife areas.

We appreciate the opportunity to comment on the West-wide Energy Corridor PEIS. Please add the National Wildlife Federation as interested stakeholders to your mailing list for announcements and public review of any future documents related to this project.

Sincerely,

Ben Deeble, staff 240 N. Higgins Ave. #2 Missoula, MT 59802

deeble@nwf.org

50373-004 (cont.)

From: corridoreiswebmaster@anl.gov
Sent: Wednesday, February 13, 2008 4:43 PM

To: mail_corridoreisarchives

Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50374

Thank you for your comment, Laura Robbins.

The comment tracking number that has been assigned to your comment is WWECD50374. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 13, 2008 04:42:28PM CDT

Energy Corridor Draft Programmatic EIS

Draft Comment: WWECD50374

First Name: Laura Last Name: Robbins

Email: foothillstudio@comcast.net

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

Comment Submitted: To whom it may concern,

I would like to state several reasons as to why Federal land should not be used for the proposed energy corridor:

Corridors crucial to the healthy genetics of wild animals will be disrupted and possibly destroyed.

It would be fiscally wiser to direct attention and money into alternative energy research. Creating an energy corridor that is only supporting the existing and environmentally damaging sources of energy is short-sighted, with consequences that may be irreversible.

50374-002

Proposed and existing wilderness study areas need to be identified and avoided. Appropriate environmental studies have not been done to allow this administrative action to take place.

50374-003

The general public has not been informed, or educated regarding this proposal to the extent that serves our country.

50374-004

Thank you for your consideration, Laura Robbins 16 Dos Hermanitas Placitas, New Mexico 87043