From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:44 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50400

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WWECD50400. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:43:44AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50400

First Name:
Middle Initial:
Last Name:
Organization:
Address:
City:
State: UT
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:
The private land of my ranch is located in both Millard and Juab Counties of Utah. I make my living growing hay and raising livestock. The current Federally-proposed route for the West-wide Energy Corridor (WWEC) does not appear to cross my private land, but it would involve adjoining private land to the west. In the event that such a WWEC route was relocated eastward or widened in the future, it would wreck my ranch, destroy me financially, and negatively affect my family's rural lifestyle…very negatively. None of this is necessary, as a better route for the WWEC has been proposed by the Millard County Commissioners. If only someone would listen, there is a good place for the WWEC to the west of the City of Delta. Can you hear me, now? 50400-001

According to Utah State University's Economics Department , the Federal Government owns 75% of the land in Millard County, Utah., and The State of Utah owns 9% (see note #1). This means that of the total of 4,216,960 acres in Millard County, no more than 16% is in private hands. These numbers suggest that the government already has more than its fair share of Millard county, unless maybe the United States turned into a socialist paradise while nobody was looking.

The Bureau of Land Management recently made the following announcement (see note # 2): "Salt Lake City, Utah—January 15, 2008—The Department of Energy, the Department of the Interior's Bureau of Land Management (BLM) and the U.S. Forest Service will host a public hearing on Thurs., Jan. 17, to gather comments on the Draft Programmatic Environmental Impact Statement (PEIS) proposing to designate energy corridors on FEDERAL lands in the West" (emphasis added by me).

The current Federally-proposed WWEC route through Millard County would require the seizing of 8,500 acres of private land. The Federally-proposed WWEC route would bisect a populated and productive part of Millard County with a virtual no-man's land that is at least 3,500 feet wide. There is, obviously, plenty of Federal land on which to site the WWEC west of the City of Delta. Why not plan this project the way the BLM has announced that it must be planned, namely, by utilizing Federal land? Well, maybe the wrong people 50400-002

are making the recommendations. Maybe that's why I had never heard of the WWEC prior to reading about it in the February 6, 2008, issue of the Millard County Chronicle Progress. Maybe that's why this whole thing stinks of a land grab by at least one Federal agency that has repeatedly demonstrated that it already has far more land to manage that it is capable of protecting. But I digress.

50400-002 (cont.)

The private lands of my ranch sit under four miles of the IPP-Mona high voltage transmission lines. I have a half mile of Rocky Mountain Power lines across another portion of my land. I have three miles of Union Pacific Railroad tracks across my land. I think I have a little experience with the effects of large easements on a private property owner. Recently, Rocky Mountain Power's thugs actually broke through my locked gate to install yet another power line across my property (the line that parent company Pacificorp's Vice President, William Aquinto, subsequently ordered removed when he found out about the crime). In short, easements are the method of choice for an undesirable party to obtain absolute possession of another's land at a bargain price. The only thing left for the true owner is to continue paying the property taxes on the land he can no longer use. This would be even more true in the case of the WWEC, as the security required for such an ambitious project would, in fact, necessitate exclusion of the property owner.

50400-003

The Federally-proposed WWEC route would devastate the many families whose land would be affected by this unnecessary taking. The economy of Millard County would be damaged, and continue to be damaged, by both the loss of many productive farms and the ugly gash cut through the county by the Federally-proposed WWEC route. On the positive side, any Federal agency that backs this ridiculous proposal to not exclusively utilize Federal lands just might escape charges of conflict of interest (go ahead, call it greed), especially if nobody looks too close at the frivolous nature of their objections to an alternate route. In fact, none of the trumped-up objections cannot be affordably mitigated (that is, if the objections could even be found to have merit in the first place). There apparently needs to be a good deal more oversight on the WWEC, and since the WWEC was authorized by elected representatives, the precise routing of this important project must likewise include their involvement and oversight. This oversight, at local, state, and Federal levels, is obviously required to ensure that the energy corridor is routed to utilize only Federal land, as authorized. Let's all get busy and do the right thing.

50400-004

50400-005

Note #1:
Economics Department

Millard County Agriculture Profile

E. Bruce Godfrey, Extension Specialist
Craig Poulson, Millard County Agent
Dale Baker and Spencer Parkinson, Research Assistants
Area: 6,589 square miles (4,216,960 acres)
Population: 12,455 (U.S. Census Bureau Estimate, 2003) County seat: Fillmore Location
Millard County borders Nevada on the west. It is in the center of the western border of Utah.
Land Ownership
The land ownership within the county is divided as follows:
Millard County Land OwnershipFederal75%State9%Private13%Water Covrd3% Source: (Utah County Fact Book, 2002) The majority of the federally-owned ground is under the jurisdiction of the U.S. Forest Service (USFS) and the Bureau of Land Management (BLM). The state owned ground is primarily under the jurisdiction of the Utah School and Institutional Trust Land Administration (SITLA). Portions of the state owned land are wildlife preserves. The private ground is primarily farm ground and grazing areas.
The 2002 Census of Agriculture indicated that there were 444,941 acres in farms or ranches in the county with an average size of 689 acres and an average value of $814 per acre. The county had 162,484 acres in cropland of which 87,588 acres were harvested and 91,695 were irrigated. The value of livestock and crops produced was listed at $113,100,000.
Agricultural Snapshot
Millard County is one of the primary agricultural production regions in the state. In 2003 county production statistics (2004 Utah Agricultural Statistics), the county ranked first in production of alfalfa hay. It was second in production of honey. The county ranked

third in production of corn both for silage and for grain and was fourth in barley production.
Millard County had the second largest inventory of milk cows. It had the third largest inventory of "All cattle and calves" and the fourth largest number of beef cows. Millard County was ranked fourth in both Cash Receipts from Livestock Production as well as Crops Production. See http://extension.usu.edu/files/publications/Millard%20county%20profile.pdf

Note #2:
Public Invited to Comment on Draft Proposal for Energy Corridors on Federal Lands
Contact: Mike DeKeyrel, BLM (801) 539-4105
FR Notice of Availability
http://corridoreis.anl.gov

Salt Lake City, Utah—January 15, 2008—The Department of Energy, the Department of the Interior's Bureau of Land Management (BLM) and the U.S. Forest Service will host a public hearing on Thurs., Jan. 17, to gather comments on the Draft Programmatic Environmental Impact Statement (PEIS) proposing to designate energy corridors on federal lands in the West.
The hearing in Salt Lake City will be held at the Hilton Airport, 5151 Wiley Post Way, and will include two sessions, one from 2 to 5 p.m. and another from 6 to 8 p.m.
Representatives from the three agencies will be present at each session to hear comments from those attending. In most cases, comments being made at the hearings will be available in real-time Webcasts and for later on-demand replay. Information on Webcasts is available on the project Web site http://corridoreis.anl.gov.
The Draft PEIS is available for review at libraries and BLM and Forest Service field offices in the 11 western states, at the agencies' Headquarters in Washington, D.C., and in electronic form (PDF) online at the project Web site http://corridoreis.anl.gov.
Members of the public wishing to participate may register in advance to provide oral comments at one of the hearings on the Web site or you may register onsite the day of the hearing.
As directed by Congress, in Section 368 of the Energy Policy Act of 2005, the Departments of Agriculture, Commerce, Defense, Energy and the Interior are proposing to designate corridors on Federal land for locating future oil, natural gas and hydrogen pipelines and electricity transmission and distribution infrastructure in the West. These corridors would be the agency-preferred locations where pipelines and transmission lines may be sited and built in the future.
Designating such corridors would improve inter-agency coordination in reviewing and approving energy transport projects proposed for Federal lands, and reduce environmental effects and conflicts with other uses of Federal lands. Individual projects proposed for these corridors would undergo further, project-specific environmental analysis before being granted permits or rights-of-way.
The public may also submit comments in written form to this mailing address: Westwide Corridor DEIS; Argonne National Laboratory; 9700 S. Cass Ave., Bldg. 900, Mail Stop 4; Argonne, IL 60439. Written comments also may be faxed (toll free) to 1-866-542-5904 or submitted electronically using the email form on the project Web site http://corridoreis.anl.gov. All comments must be received by February 14, 2008 to receive full consideration.
Written comments and those submitted orally at public hearings will be given equal weight when revising the Draft PEIS into a final document. The Records of Decision on the Final PEIS will amend relevant land use plans for lands managed by the BLM and the Forest Service.
Hearing facilities are wheelchair accessible. Please call (202) 586-1056 if you need other accommodations in order to attend the hearing.

Last updated: 01-16-2008

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 1:04 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50401

Thank you for your comment, Judy Larquier.

The comment tracking number that has been assigned to your comment is WWECD50401. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:04:09AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50401

First Name: Judy
Last Name: Larquier
Address:
City:
State: NV
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:

I am opposed to the current draft plans placing transmission lines across 11 Western states. I believe the plan favors coal-fired power plants versus locating power lines closer to areas rich in renewable resources. 50401-001

Additionally, the current plans place transmission lines too close to sensitive wild lands such as the Desert National Wildlife Refuge. The impact to wildlife and the fragile ecosystem must be a top priority. We must protect these areas from unnecessary degradation. 50401-002

I urge the state Energy Department and all other agencies to rethink these plans and put more effort into supporting ways to develop and transport clean energy. 50401-003

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 1:58 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50402

Thank you for your comment, Diana Lindsay.

The comment tracking number that has been assigned to your comment is WWECD50402. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 01:57:33AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50402

First Name: Diana
Middle Initial: E
Last Name: Lindsay
Address: 2645 Seattle Drive
City: El Cajon
State: CA
Zip: 92020
Country: USA
Email: dianalindsay@hotmail.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:

I am opposed to designating portions of 11 counties in California and Arizona as part of the national energy corridor because part of this designated corridor is not federal land. It includes both state park and private lands. A designated national energy corridor would allow Sempra/SDG&E to force de-designation of State Wilderness lands in the construction of the Sunrise Powerlink if they apply for federal energy corridor status. If allowed, this de-designation of wildereness status would set a bad precedent by doing something never done before -- designation of wilderness status. 50402-001

I am asking for a complete and thorough study of all impacts for any corridor that is being considered. The current proposal is inadequate. 50402-002

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: Thursday, February 14, 2008 3:15 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50403

Thank you for your comment, gidon singer.

The comment tracking number that has been assigned to your comment is WWECD50403. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 03:15:12AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50403

First Name: gidon
Middle Initial: t
Last Name: singer
Address: 7484 ice station zebra
City: ob
State: CA
Zip: 92107
Country: USA
Email: gidonsinger@gmail.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Subject: West-wide Energy Corridor
To whom it may concern,
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.

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; 50403-001

- 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; 50403-002

- projects are subjected to best management practices to limit damage to other resources, recreation and views: agencies should make their Interagency Operating Procedures mandatory; 50403-003

- risks to federal and other affected lands are realistically and thoroughly assessed, so 50403-004

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; 50403-004 (cont.)

- once appropriate locations are identified, projects on federal lands are presumptively limited to those corridors: agencies should limit projects on federal lands to corridors; 50403-005

- 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; 50403-006

- 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 50403-007

- 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. 50403-008

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.

Sincerely,
Gidon Taylor Singer & Family

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 9:36 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50404

Thank you for your comment, Kent Christopher.

The comment tracking number that has been assigned to your comment is WWECD50404. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 09:35:48AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50404

First Name: Kent
Middle Initial: L
Last Name: Christopher
Address: 136 Birch Ave.
City: Rexburg
State: ID
Zip: 83440
Country: USA
Email: grouse13_klc@msn.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I reviewed maps of the proposed energy corridor routes. In southeast Idaho, these routes pass directly through the middle of the best remnant patches of sagebrush-steppe ecosystems. Sage grouse will populations will be hurt. These lines could tip the ballance of sage grouse toward extinction and certain ESA listing. It is not responsible, reasonable, or in the public best interest to further fragment critical sage grouse habitat like this. There are better alternatives, like along I15, than to destroy our natural resource heritage like this. Especially in the areas around Crooked Creek and Medicine Lodge Valley, please keep the energy corridors out of these last remaining key sage grouse habitat areas. It should be considered a criminal and unethical act to route these corridors through key remnant sagebrush-steppe habitats in southeast Idaho and elsewhere.

50404-001

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 9:50 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50405

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WWECD50405. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 09:50:01AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50405

First Name:
Middle Initial:
Last Name:
Address: 2011
City:
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:
As a property owner in southwest Colorado in the area of the proposed Energy Corridor, I must register my objections to this plan. Those of us with property in this area value the natural and untouched beauty of Dolores County. While I appreciate the necessity of energy to people who live there, but it seems counterproductive to the goal to which we should all strive to use sustainable energy resources. 50405-001 50405-002

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: Thursday, February 14, 2008 9:54 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50406

Thank you for your comment, Mary Ekelund Ekelund.

The comment tracking number that has been assigned to your comment is WWECD50406. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 09:53:56AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50406

First Name: Mary Ekelund
Middle Initial: E
Last Name: Ekelund
Address: P. O. Box 1052
City: Borrego Springs
State: CA
Zip: 92004
Country: USA
Email: mekelund272@hotmail.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I am not in favor of designating portions of 11 counties as part of the national energy corridor because part of this designated corridor is not federal land. It includes both state park and private lands. A designated national energy corridor would allow Sempra/SDG&E to force de-designation of State Wilderness lands in theconstruction of the Sunrise Powerlink - something never done before, setting a bad precedent for all wilderness lands, for both state and federal. We demand a complete and thorough study of all impacts for any corridor that is being considered. The current proposal is inadequate. 50406-001 50406-002

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: Thursday, February 14, 2008 9:58 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50407

Thank you for your comment, Paul Larson.

The comment tracking number that has been assigned to your comment is WWECD50407. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 09:58:07AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50407

First Name: Paul
Middle Initial: A
Last Name: Larson
Address: P. O. Box 1052
City: Borrego Springs
State: CA
Zip: 92004
Country: USA
Email: plarson272@hotmail.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
I am not in favor of designating portions of 11 counties as part of the national energy corridor because part of this
designated corridor is not federal land. It includes both state park and private lands. A designated national energy corridor would allow Sempra/SDG&E to force de-designation of State Wilderness lands in the construction of the Sunrise Powerlink-something never done before, setting a bad precedent for all wilderness lands, for both state and federal. We demand a complete and thorough study of all impacts for any corridor that is being considered. The current proposal is inadequate.

50407-001

50407-002

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: Thursday, February 14, 2008 10:07 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50408

Thank you for your comment, Terry Langford.

The comment tracking number that has been assigned to your comment is WWECD50408. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 10:07:14AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50408

First Name: Terry
Middle Initial: A
Last Name: Langford
Address: 7588 San Remo Tr
City: Yucca Valley
State: CA
Zip: 92284
Country: USA
Email: terry@ranchospringsrealty.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 of Los Angeles 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.

50408-001

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 10:16 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50409

Thank you for your comment, Katalin Cowan.

The comment tracking number that has been assigned to your comment is WWECD50409. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 10:15:22AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50409

First Name: Katalin
Last Name: Cowan
Address: 26071 Sky Drive
City: Escondido
State: CA
Zip: 92026
Country: USA
Email: kati@packtrain.com
Privacy Preference: Don't withhold name or address from public record

Comment Submitted:
Subject: Energy Corridor PEIS: Comment Period Closes Thursday, Feb. 14

MY husband and I are not in favor of designating portions of 11 counties as part of the national energy corridor because part of this designated corridor is not federal land. It includes both state park and private lands. A designated national energy corridor would allow Sempra/SDG&E to force de-designation of State Wilderness lands in the construction of the Sunrise Powerlink—something never done before, setting a bad precedent for all wilderness lands, for both state and federal. We demand a complete and thorough study of all impacts for any corridor that is being considered. The current proposal is inadequate. 50409-001 50409-002

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: Thursday, February 14, 2008 10:28 AM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50410

Attachments: RFF_Corridors_Draft_PEIS_Comment__080214_WWECD50410.pdf

RFF_Corridors_Draf
t_PEIS_Comme...

Thank you for your comment, Shalini Vajjhala.

The comment tracking number that has been assigned to your comment is WWECD50410. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 10:28:14AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50410

First Name: Shalini
Middle Initial: P
Last Name: Vajjhala
Organization: Resources for the Future
Address: 1616 P Street NW
City: Washington
State: DC
Zip: 20036
Country: USA
Email: shalini@rff.org
Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Users\Shalini\Documents\RFF Corridors Draft PEIS Comment 080214.pdf

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

RESOURCES
FOR THE FUTURE

February 14, 2008
Re: Comment on West-Wide Energy Corridor Draft Programmatic EIS

Shalini Vajjhala, Anthony Paul, Richard Sweeney, and Karen Palmer, all researchers at Resources for the Future, respectfully submit the following comments for consideration. The findings and recommendations summarized in this letter are based on RFF discussion paper 08-06 "Green Corridors: Linking Inter-Regional Transmission Expansion and Renewable Energy Policies."[1] Our research on modeling the relationship between transmission constraints and renewables policy suggests that where federal agencies ultimately decide to site new transmission corridors could have a significant impact on the location and cost of renewable electricity going forward. Conversely, parallel policy decisions, such as state mandates and federal proposals for Renewable Portfolio Standards (RPS), stipulating the level and location of new renewable generation could substantially affect the location and duration of inter-regional transmission congestion, which in turn drives corridor prioritization. This strong interrelationship is important not only for the current western corridor locations, but also more generally for future corridor designations that might be considered. For these reasons we believe it is important for corridor designation processes to take into account current and future renewable generation policy objectives, above and beyond the locations of renewable resource potential, when identifying and prioritizing new energy corridors. This comment briefly describes our approach to jointly modeling transmission and renewables policies, and summarizes our key findings and recommendations based on two main research questions:

50410-001

- How do the amounts and locations of projected transmission congestion vary under state versus national RPS? [Effects of state and national RPS on inter-regional power flows]
- How might incremental transmission capacity additions in congested areas change the way that state/national RPSs are met? [Impacts of corridors on renewable resource use]

Background on Transmission and Renewables: Policy Gaps and Overlaps

A wide variety of policy measures have been advanced over the last decade to promote transmission investment; among these are the designation of corridors on federal lands in the western U.S. and identification of National Interest Electric Transmission Corridors (NIETC)

[1] An online version of this discussion paper is forthcoming in March 2008 (www.rff.org).

1616 P St. NW Washington, DC 20036-1400 Tel 202-328-5000 fax 202-939-3460 info@rff.org www.rff.org

across the country. Although both of these types of corridors have been put forward as critical interventions to modernize an aging transmission system, their effectiveness could be seriously undermined by parallel policies designed to shift the landscape for new generation investment. Some of the policies with the greatest potential impacts on the grid are RPS mandates designed to increase renewable electricity generation capacity and production of electricity from these facilities. These mandates have been enacted widely at the state level and proposed at the federal level, and require that utilities generate or purchase a minimum percent of electricity from renewable sources.

As of this study (August 2007), RPSs with binding targets have been enacted or renewed in 24 states and the District of Columbia, and three states (Missouri, Virginia, and Vermont) have established voluntary programs and renewable energy goals.[2] In addition to the state standards already in place, efforts have also been made on Capitol Hill to pass up to a 20% national RPS. Several bills with provisions for a federal renewable electricity standard have been proposed in the 110th Congress.[3] Despite these advances, transmission line siting difficulties, costs, and uncertainties are still major barriers to renewable energy investment and financing.

RPSs are intended to overcome some of these barriers by effectively reshuffling the order in which different electric generation facilities are dispatched, bringing new, previously uncompetitive renewable generators online in place of marginal fossil fuel based generators. However, the current configuration of the transmission grid, based largely on fossil fuel generation infrastructure, still offers only limited access to many remote areas of high renewable resource potential distributed across the country. Although it is acknowledged that any reconfiguration of the supply side of the electric power sector to accommodate large-scale, grid-connected renewable energy development will have repercussions for transmission investment and congestion, transmission policies and renewable policies have yet to be evaluated jointly. This comment presenting selected RPS and transmission scenario modeling results to highlights how the intersection of these two types of policies could drive significant shifts in inter-regional electricity trading and renewable resource development over time.

Policy and Technology Scenarios: HAIKU Electricity Market Simulation Model

Our study focuses on the relationship between renewables policy, specifically RPSs, and inter-regional transmission capacity, in order to understand 1) how transmission congestion

---

[2] Hawaii has also enacted an RPS; however this is outside the scope of our modeling effort. There is tremendous heterogeneity in the structure of renewable electricity mandates, and state-specific rules determine if and how utilities can meet renewable electricity requirements using within-state or imported electricity from a combination of renewable energy sources, most commonly wind, solar, biomass, geothermal resources. RPSs vary in the degree of flexibility in which technologies are allowed and which must be used in certain amounts by specific dates.

[3] Federal RPS provisions are included in Senate Bill S.1419 and House Bill H.R. 2950, both titled The Renewable Fuels, Consumer Protection, and Energy Efficiency Act of 2007, placed on the calendar in the Senate by Senator Reid in May 2007 and introduced in the House by Representative Wilson in June 2007. Similar proposals have been developed by Senator Bingaman, Representative Udall, and others.

could vary under state versus national renewable energy policies and 2) how transmission capacity additions could change the way that renewable electricity standards are met at these two different scales. To forecast the influence of each of these types of policies on the other, we first examine the effects RPSs have on the grid at two key levels of geographic aggregation, the regional level (as a proxy for modeling state RPS policies) and the national level. In general, demand for transmission will depend upon where renewable energy emerges under each type of policy; however, state policies are likely to drive renewable development in a more dispersed manner and shift the demand for grid capability differently than a single national policy. As a result, incremental transmission capacity additions simulated for each of these renewables policy scenarios are also likely to have different impacts on generation capacities, locations, and types.

The energy supply analysis in this research was conducted using a detailed simulation model of the electricity sector known as Haiku, which is maintained by Resources for the Future (RFF). The Haiku model is a deterministic, highly parameterized model that calculates information similar to the National Energy Modeling System (NEMS) used by the Energy Information Administration (EIA), and the Integrated Planning Model (IPM) developed by ICF Consulting and used by the U.S. Environmental Protection Agency (EPA). In this study the Haiku model was used to simulate four main scenarios of renewables policies and inter-regional transmission capability expansions.

The first is the State RPS baseline scenario, which represents a business as usual scenario in which the current state RPS policies are in force and no additional RPS at the national level is in place. The second is the National RPS scenario, which assumes that all current state level RPS policies remain in place with a 20% National RPS also enacted by a target date of 2025. The final two scenarios correspond to transmission expansions to the point of full congestion abatement across the country. These scenarios are called State RPS Unconstrained and National RPS Unconstrained because in each the transmission grid is incrementally expanded to alleviate all inter-regional power transmission congestion.[4] This transmission expansion algorithm is intended to identify where transmission capacity additions have the greatest impact on renewable energy capacity additions and locations under both the state and national RPS scenarios.

Summary of Results

Table 1 provides a snapshot of results in 2020 for the four main modeling scenarios outlined above. In both the state and national RPS cases, the addition of transmission capacity lowers average national electricity and REC prices. At the regional level, there is significant variability in regional average electricity prices under these scenarios. Overall, grid expansion lowers electricity prices in net importing regions and raises them in net exporting regions.

[4] Capacity is added in the model at all points where baseline inter-regional trading is constrained up to 85% of total inter-regional transmission capacity for greater than 10% of the year. Each increment is a multiplier of the baseline, and all new capacity is modeled as coming on-line in 2020 and anticipated by Haiku for new generation additions.

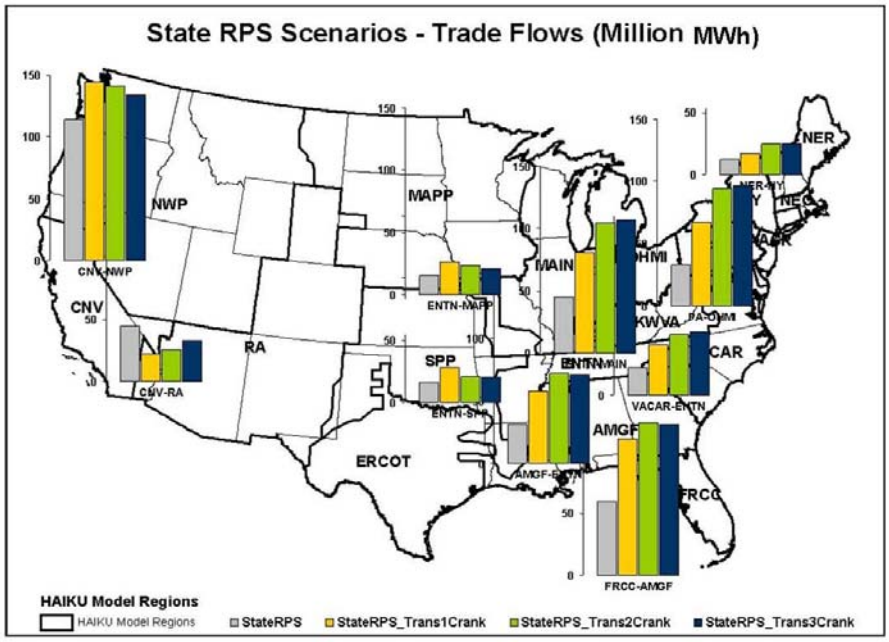
	State RPS Baseline	State RPS Unconstrained	National RPS Baseline	National RPS Unconstrained
Demand (BkWh)	4,636	4,659	4,621	4,643
Generation (BkWh)				
Conventional	4,156	4,157	3,868	3,896
Renewable	737	763	1006	1010
Generation Capacity (GW)				
Conventional	979	969	929	927
Renewable	198	216	326	339
CO2 Emissions (10^6 tons)	3,016	3,069	2,802	2,901
RPS (% achieved)	9%	10%	15%	15%
REC Price ($/MWh)	-	-	$11.94	$9.08
Electricity Price ($/MWh)	$67.91	$66.86	$68.76	$67.61

Table 1. Total demand, generation, capacity, emissions RPS, and national average REC and electricity prices for state and national RPS baseline and unconstrained scenarios in 2020.

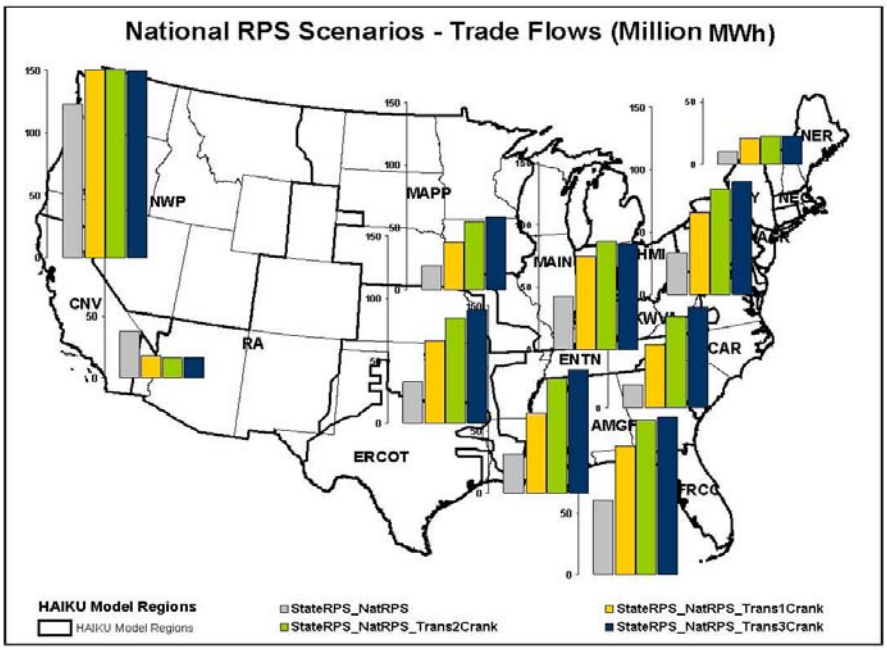
Based on the key research questions outlined in the introduction, our findings fall into two main categories. The first category highlights shifts in power flows based on the impacts of state and national RPS policies on the transmission grid. Figures 1 and 2 illustrate these results, where each bar on the individual regional power flow graphs indicates the change in total inter-regional electricity trading over three incremental transmission expansions. The national RPS map (Fig. 2) reveals that there is a major increase in electricity trading and inter-regional transmission relative to the state scenarios (Fig. 1). In light of the renewable resource potential in the western states and the expected expansion of renewable generation in the region, these changes are especially prominent into California. The major results to note here are as follows:

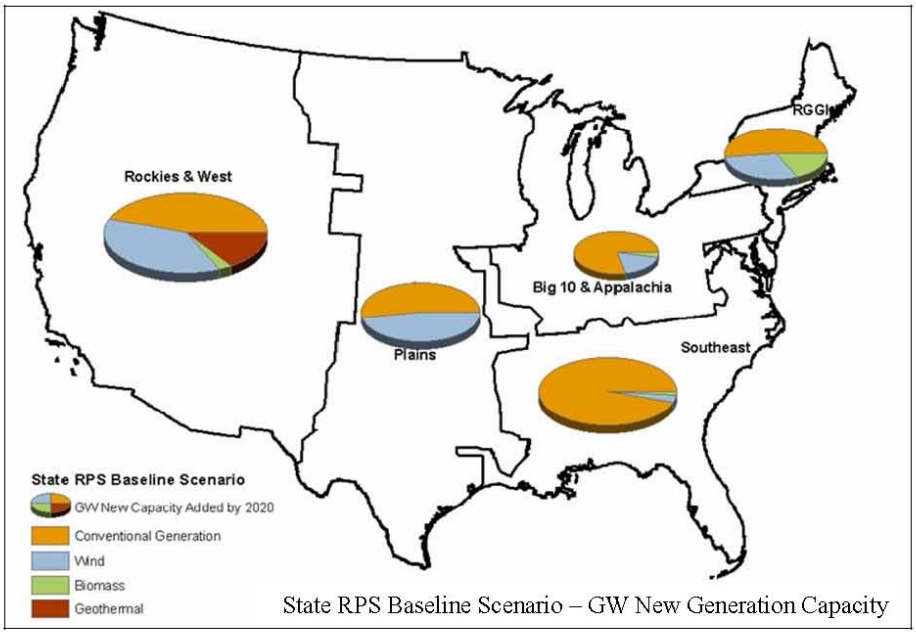
1. Power flows between Northern California and the Pacific Northwest are almost triple the total flows between Southern California and neighboring southwestern states.
2. Power flows into Northern California increase over the baseline as transmission capacity is expanded under both the state and national RPS scenarios. In contrast, power flows into Southern California decrease relative to the baseline with added transmission.
3. Inter-regional electricity transmission increases significantly under a National RPS relative to State RPSs alone, especially from the plains states to the southeast.

The second category of results focuses on shifts in resource use (renewable and fossil) with additional transmission capacity. Figures 3-6 highlight these results and reveal that a national RPS policy in the absence of grid expansion will result in significant levels of biomass generation capacity in the Southeast. In contrast, a national RPS with grid expansion will shift this biomass renewable capacity to wind power additions in the central and northern plains states instead. In other words, a failure to expand the capability of the southeastern states to import wind power from the plains states will result in more biomass capacity construction in the southeast to replace the inaccessible wind power from the plains and to meet the national RPS targets for renewable generation.

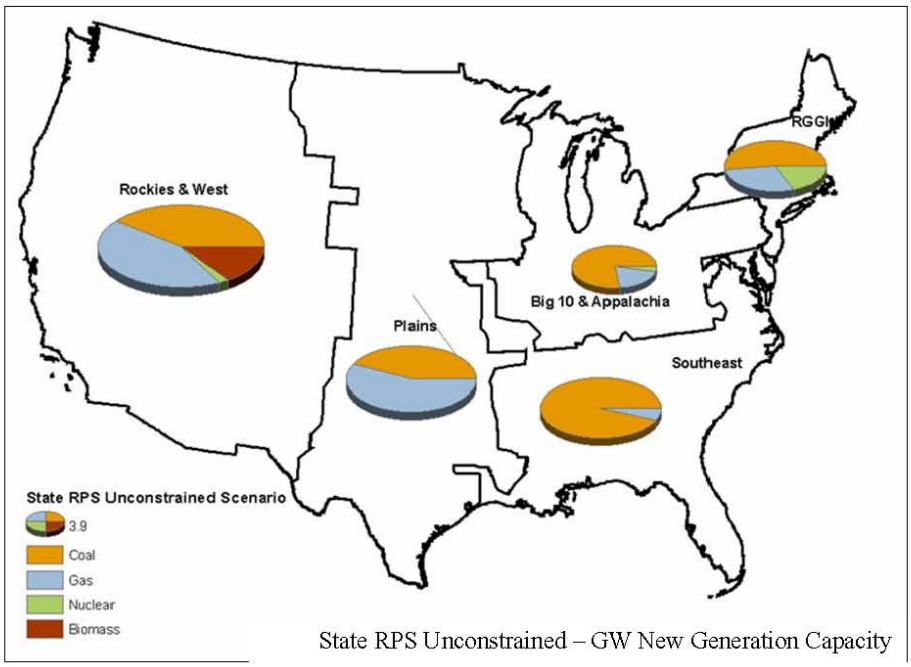


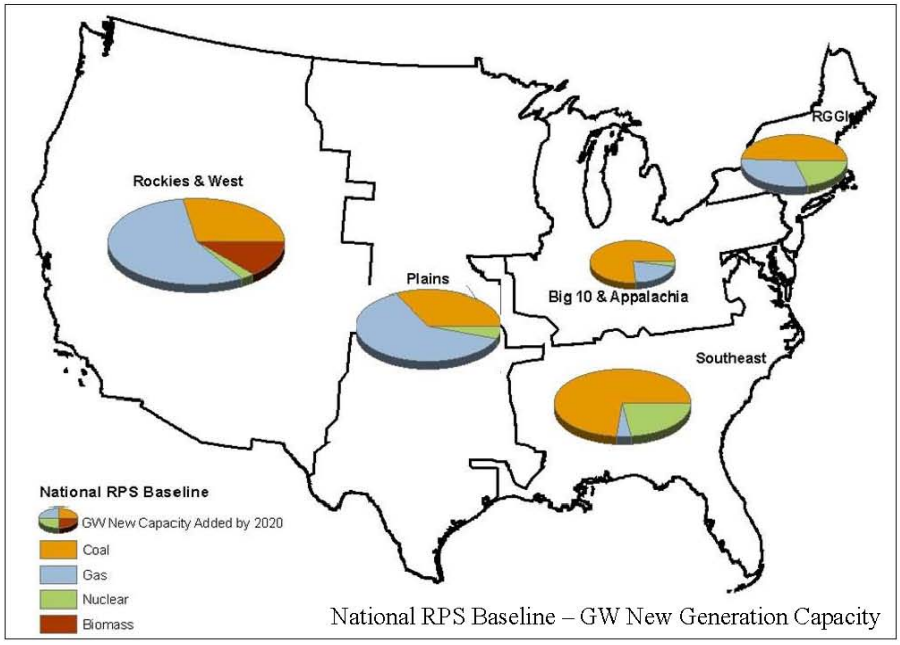
Figs. 1 (top) and 2 (bottom): Changes in inter-regional electricity trading with incremental transmission expansions from state and national RPS baselines.



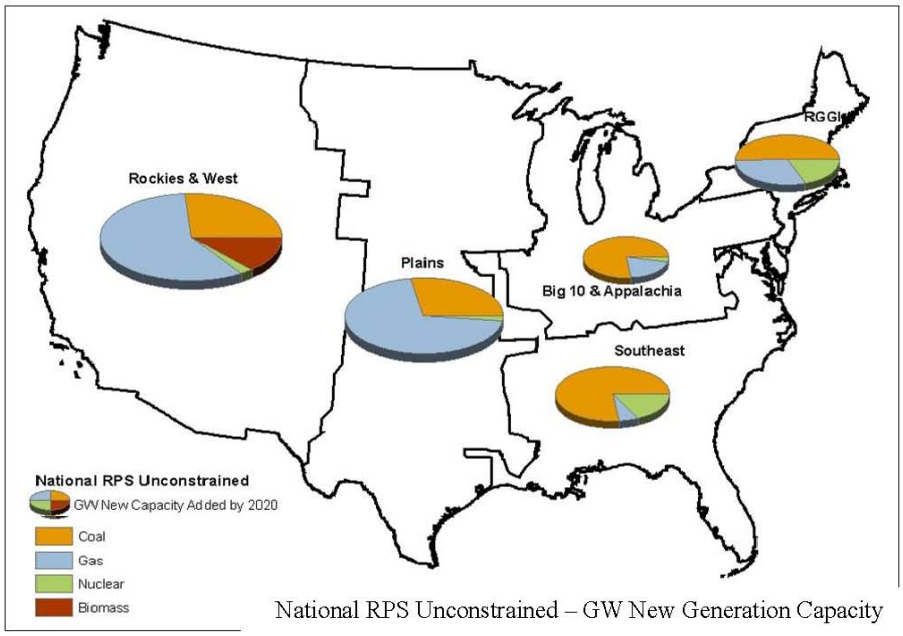


Figs. 3 (top) and 4 (bottom): Shifts in renewable and fossil generation capacity (resource use) under state RPS baseline and state RPS unconstrained scenarios in 2020.





Figs. 5 (top) and 6 (bottom): Shifts in renewable and fossil generation capacity (resource use) under national RPS baseline and national RPS unconstrained scenarios in 2020.



Policy Implications and Recommendations

The results highlighted in this comment have several implications for the West-wide Corridors designations and future corridors siting processes. First, it is critical to note that state renewable electricity mandates, federal RPS proposals, and current corridor designations are not well-matched policies. The West-wide Corridor Draft PEIS maps indicate several more designations connecting Southern California to neighboring states in the Southwestern U.S. than corridors into Northern California. This is in sharp contrast to our results, which suggest that even with existing state RPSs the greatest inter-regional trading in the West will be centered on Northern *not* Southern California. 50410-002

Second, we recognize the importance of grid expansion in general; however, we recommend that as part of the designation process federal agencies consider prioritizing corridors, such as those into Northern California. California imports power from its neighbors, and is expected to continue to do so into the foreseeable future[5]. Table 1 shows projected inter-regional power trades between the three western regions under our four scenarios. It is evident that power flows into the state will swamp all other inter-regional trading in the western states and that the majority of power imported by California (CNV) will come from Pacific Northwest (NWP) whether a National RPS is in place or the transmission grid is expanded to alleviate congestion.[6] As a result, we see opportunities for priority setting that extend beyond the preliminary designations identified through the current corridor siting process. 50410-003

Importer	Exporter	State RPS Baseline	Unconstrained State RPS	National RPS	Unconstrained National RPS
CNV	NWP	115.1	140.6	124.8	153.7
CNV	RA	44.7	28.1	37.3	18.0
NWP	CNV	1.6	1.6	1.6	1.6
NWP	RA	3.0	3.0	3.0	3.0
RA	CNV	0.0	0.0	0.0	0.0
RA	NWP	5.3	1.4	5.8	5.9

Table 2. Projected inter-regional power trading in 2020 between western regions [BkWh].

Finally, we recommend that future corridors designation processes more systematically account for the parallel implications of grid expansion and renewables policies, such as RPS mandates, in addition to evaluating renewable resource potential. As our results show, a National RPS promotes major plains states renewables development and shifts power flows to the Southeast, where no corridors exist. Corridors focused on existing congestion *alone* are unlikely to serve key areas of future growth/demand, especially when considering development of renewable energy capacity. This study highlights opportunities for improved policy coordination. 50410-004

[5] This study models a 33% RPS for CA, which is the voluntary RPS level, above and beyond the 20% mandatory standard to evaluate the implications of the most ambitous renewable energy targets for the region as a whole.

[6] The enactment of National RPS will increase the congestion on the lines to California from the north and east while decreasing the congestion on the lines to California from the Southwest (RA). An expansion of the transmission grid nationwide would further congest the lines into California from NWP while simultaneously reducing congestion on the lines into California from the Southwest (RA).

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 10:35 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50411

Thank you for your comment, Sally Theriault.

The comment tracking number that has been assigned to your comment is WWECD50411. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 10:34:55AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50411

First Name: Sally
Last Name: Theriault
Privacy Preference: Withhold address only from public record

Comment Submitted:
As a citizen of San Diego County, I am adamantly opposed to the designation of a National Energy corridor through southern California. Such a corridor would threaten State Wilderness lands and set a dangerous precedent that is unacceptable to those of us who value the existence (and sanctity) of wilderness areas. More work should be done to investigate energy options and local production of energy! 50411-001 50411-002

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: Thursday, February 14, 2008 10:38 AM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50412

Attachments: WestCorridorsDEISComments-Feb2008-FNL_WWECD50412.doc

WestCorridorsDEIS Comments-Feb2...

Thank you for your comment, Beth Kaeding.

The comment tracking number that has been assigned to your comment is WWECD50412. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 10:37:48AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50412

First Name: Beth
Last Name: Kaeding
Organization: Northern Plains Resource Council
Address: 220 South 27th Street, Suite A
City: Billings
State: MT
Zip: 59101
Country: USA
Email: beth@northernplains.org
Privacy Preference: Don't withhold name or address from public record
Attachment: E:\NPRC\WestCorridorsDEISComments-Feb2008-FNL.doc

Comment Submitted:
see attached letter

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.

NORTHERN PLAINS
RESOURCE COUNCIL

West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Ave.
Building 900, Mail Stop 4
Argonne, IL 60434

February 14, 2008

To whom it may concern,

Northern Plains Resource Council (Northern Plains) appreciates the opportunity to comment on the West-wide Energy Corridor draft environmental impact statement (DEIS). Northern Plains is a Montana grassroots conservation and family agricultural organization that organizes Montana citizens to protect our water quality, family farms and ranches, and unique quality of life. We have more than 2,000 members, many of whom are farmers and ranchers who could be directly affected by the proposed energy corridors. The proposed energy corridors raise serious concerns about direct impacts to agricultural lands, the rights of landowners, and how such corridors may perpetuate centralized, carbon-and other pollutant-emitting energy systems, which we now understand are seriously harming the Earth's climate.

That said, Northern Plains does support the concept of corridors. If planned and implemented properly, corridors create opportunities to harness multiple industry proposals for energy transmission into discrete, well-defined, and studied areas in order to minimize adverse impacts. Our concern is that this proposal has not undergone a thorough review that involves the local citizens who would be affected by the corridors. Furthermore, this proposal does not consider the energy corridor in its entirety, rigorously explore alternatives to the proposed energy corridors, consider cumulative impacts, set conditions for the approval for rights-of-way on public and private lands, or require future rights-of-way to be located within the energy corridors. 50412-001

Of the eleven states included in the proposal, Montana has the second fewest miles of proposed corridors (102 miles). However, this does not reflect the full impact that the proposal would have in Montana. To connect the 102 miles of the proposed energy corridors located across the state, more than 1,000 additional miles of corridors would need to be built. But because the DEIS only considers the energy corridors on federal lands, the enormous and varied impacts as well as the cumulative effects to hundreds of thousands of acres of state, tribal, and private lands are not revealed or considered. 50412-002

The DEIS should include analysis of the other affected lands. Though this would require the collaborative efforts of the various state, local, and tribal entities affected, the full picture that

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would result would be worth the effort. Furthermore, the federal government should have solicited input directly from the owners of private lands targeted for the completed corridors. Individuals whose property could be negatively impacted by transmission lines and/or pipelines should be made fully aware of the proposal.

50412-002 (cont.)

50412-003

Furthermore, Northern Plains believes that any corridor plan must protect the rights of landowners. Any landowner affected by the energy corridors should be able to negotiate the placement of a right-of-way on his/her own property. Compensation for landowners and community members whose lands are used for rights-of-way should be at fair market value and should include the value of the remaining property not crossed but devalued by the transmission lines and/or pipelines. Additionally, we believe that easements should be used in place of rights-of-way. In the case of an easement, the land will revert back to the original owner when the easement is no longer needed.

50412-004

Transmission infrastructure is costly both in economic terms as well as in its impacts on people and the natural environment. Thus, new transmission infrastructure should only proceed after other options have been exhausted. We encourage the Department of Energy (DOE) to evaluate the opportunities to upgrade and expand existing transmission infrastructure through the application of state-of-the-art technology, including new conductor materials, sensing and control systems, and improved transformer and system control technologies. Furthermore, we encourage the DOE to investigate the potential of reducing the need for new transmission capacity by increasing the use of distributed renewable energy generation.

50412-005

50412-006

Furthermore, the DOE, Bureau of Land Management (BLM), and cooperating agencies should focus on only truly needed corridors. The parallel corridors running between Montana and Idaho (segments 50-203 and 50-260) seem redundant. An alternative proposal that is limited to one corridor in that area would save money and reduce impacts to landowners and the natural environment.

50412-007

Northern Plains believes that DOE, BLM, and cooperating agencies should consider the cumulative impacts of the proposed corridors. These corridors will obviously connect to power plants and other generation sources, and their creation will guide the siting of future energy development. We ask the agencies to study the impacts to air quality and climate change associated with the resulting energy development. Global climate change is one of the most serious challenges our nation and our world currently face, and it would be irresponsible to proceed with an energy corridor plan that does not consider these impacts.

50412-008

Northern Plains believes that energy corridors should connect clean, renewable energy sources. The DOE, BLM, and cooperating agencies should consider emissions-based corridors (EBCs). Federal agencies have the ability to set reasonable conditions of approval for rights-of-way on public lands, and EBCs would require that future rights-of-way approvals do not exceed standards for carbon dioxide (CO_2) emissions per unit of energy produced (preferably equivalent to those of a combined-cycle natural gas plant or 1,100 lbs. of CO_2 per Mwh). Energy corridors greatly impact public and private lands and, thus, they should move us toward a clean, sustainable energy future.

50412-009

Finally, to the extent practicable, Northern Plains asks that the DOE require the use of designated corridors for future rights-of-way applications in order to avoid duplicative rights-of-way and unnecessary impacts to sensitive areas. To not do so, would limit the benefits of creating energy corridors. 50412-010

Sincerely,

Beth Kaeding

Beth Kaeding
Chair

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 10:46 AM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50413

Attachments: comments_WWECD50413.wps

comments_WWECD
50413.wps (9 KB)...

Thank you for your comment, Margaret Quade.

The comment tracking number that has been assigned to your comment is WWECD50413. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 10:45:38AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50413

First Name: Margaret
Middle Initial: M
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

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.

Dear Sirs,

I strongly disagree with the route and construction of the proposed energy corridor because it will be going threw last remaining Idaho and Montana sage grouse habitats that are already under strain from other developments and looses in the area.

Recent photos show power line Sage Grouse strikes in the area already as documentation to the negative impact of power lines in Crooked Creek area. Idaho Fish and Game data shows power lines negative effects to Sage Grouse. 50413-001

Allowing the energy corridors to go threw these areas will only aid in getting the Sage Grouse listed on the Endanger species list and cause more restrictions for everyone including energy developers.

Every effort must be made to keep Sage Grouse from getting listed. Not help Sage Grouse get listing.

If this energy corridor/power lines must be built, do it only along interstate 15 threw Idaho or best of all, Do not build the power line structures 50413-002

Sincerely, Margaret Quade

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 10:50 AM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50414

Attachments: Horizon_Comment_Letter_to_WWEC_PEIS_021408_WWECD50414.pdf

Horizon_Comment_
Letter_to_WWEC...

Thank you for your comment, Valerie Schafer.

The comment tracking number that has been assigned to your comment is WWECD50414. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 10:50:01AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50414

First Name: Valerie
Last Name: Schafer
Organization: Horizon Wind Energy
Address: 53 SW Yamhill
City: Portland
State: OR
Zip: 97204
Country: USA
Email: valerie.schafer@horizonwind.com
Privacy Preference: Don't withhold name or address from public record
Attachment: Z:\Common\GenDev\05_Transmission\Western Region Transmission\Planned New Transmission Paths\West-Wide Energy Corridor Program (WWEC)\Horizon Comment Letter to WWEC PEIS 021408.pdf

Comment Submitted:
Please see Horizon Wind Energy's comments, attached in the PDF document.

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.

Horizon Wind Energy

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Horizon Wind Energy
Comments to the
West-wide Energy Corridor DEIS
February 14, 2008

Background

Horizon Wind Energy ("Horizon") is one of the nation's largest wind energy firms: a developer, builder, owner, and operator of wind power projects. Together with its parent company, Energias de Portugal (EDP), we are the 4th largest owner of wind energy projects in the world. Horizon is proud to have developed more than 2000 megawatts (MW) of operating wind farms in Minnesota, Iowa, Pennsylvania, Oklahoma, New York, and Washington, Illinois, Texas, and Oregon, and is also developing a portfolio of more than 9000 additional MW in over a dozen states.

As a major stakeholder in any policy regarding wind energy, Horizon is an active participant in the development of local, state, regional, and national policies affecting wind energy across the US. Regarding renewable energy on public lands, Horizon was an active participant in the development of the Bureau of Land Management's Wind Energy Policy and presented invited testimony about the progress of the implementation of the Energy Policy Act of 2005's (EPAct 2005) Development of Renewable Energy on Federal Lands at the July 11, 2006 Hearing before the Senate Committee on Energy and Natural Resources. In addition, Horizon currently holds wind energy testing Rights-of-Way (ROWs) at over a dozen locations across the country with the Bureau of Land Management and a wind energy testing special use permit with the US Forest Service (USFS).

Comments

Horizon commends the federal government for actively addressing transmission infrastructure inadequacies, which present one of the greatest challenges to future renewable energy development.

1. The development of renewable resources is a priority in the West, as demonstrated by several recent and encouraging developments:
   - Passage of renewable energy standards in Oregon, Montana, Washington, Nevada, Arizona, California, Colorado, and New Mexico
   - The Clean and Diversified Energy Initiative introduced by the Western Governors Association in 2006
   - Commitments to renewable resources in numerous utilities' integrated resource plans

50414-001

2. Unlike many fossil fuel power projects where fuel can be transported or piped to the power plant site, wind developers must develop our projects where it's windy. This means that wind projects are especially challenged getting the power to the grid as the project may or may not be located nearby existing transmission lines, and yet there is a reliability benefit to the grid system by dispersing wind projects.

3. The more geographically dispersed wind project locations are, the more the wind patterns (wind is an intermittent resource) diversifies, thus increasing reliability to the grid. The development of additional transmission lines will allow more geographically diverse projects with unique output profiles to interconnect, thereby facilitating regional efforts to integrate greater amounts of wind onto the grid.

4. Another limiting factor affecting the development of these projects is the present lack of available transmission capacity. The addition of new transmission lines, and therefore more transmission capacity, in the West will facilitate the meeting of the West's renewable portfolio goals.

50414-001 (cont.)

Conclusion

The WWEC federal initiative will encourage and "fast-track" the permitting of new transmission facilities on federal lands. The more transmission lines that are built, and the more quickly those transmission lines come online, the more it will facilitate renewable energy development by increasing the transmission locations and capacity. This initiative will have a positive impact on the current challenges of getting large quantities of renewable energy to electricity users.

Horizon appreciates the opportunity to comment provided by the US Department of Energy, US Department of the Interior: Bureau of Land Management, US Department of Agriculture: Forest Service, US Department of Defense, and Congress. Thank you for continuing to advance the issue of transmission infrastructure growth in the United States, a key theme in our quest for energy security.

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 11:04 AM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50415

Attachments: West-wide_energy_corridor_WWECD50415.doc

West-wide_energy
_corridor_WWEC...

Thank you for your comment, gloria mills.

The comment tracking number that has been assigned to your comment is WWECD50415. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 11:04:18AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50415

First Name: gloria
Middle Initial: a
Last Name: mills
Address:
City:
State: NM
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record
Attachment: C:\Documents and Settings\defaultuser\My Documents\West-wide energy corridor.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.

Gentlemen, **January 19, 2008**

I cannot express strongly enough my opposition to the proposed West-wide energy corridor. It not only fails to fulfill essential requirements of the National Environmental Policy Act, it also fails to fully disclose and to notify the affected parties. PLEASE visit the website: http://corridoreis.anl.gov/ for more information and a map of the proposed corridor. 50415-001 50415-002 50415-003

It appears that the lines would be visible across all the now "open" and beautiful vistas we now enjoy in Placitas. 50415-004

I also cannot emphasize enough the financial impact to the value of our homes. As a forty (40) plus year resident of NM, it has long been my desire to live in Placitas. We finally moved here last year, and it seems a constant barrage of threats to the privacy and beauty we enjoy. Our adjacent BLM lands have a herd of wild horses on them as well as foot trails and open space and have been threatened by many alternate "plans" for their use. 50415-005 50415-006

It is also my great concern that the way government packages are "run through" without considering the investment made by residents, they just look at the area as a "grid on the map". It does not set well with most that we could be facing the forfeiture of our home at worst, or living with the unsightly infrastructure of wires and pipes taking the place of the gorgeous view and wildlife that we now enjoy. 50415-007 50415-008

I feel this is a major threat to us financially, our homes being our largest investment, that the home values would plummet if the plan was allowed to proceed. 50415-009

Not only unsightly, wire tower structures and even underground piping can be a potential health threat. I think it would be unfair to subject us needlessly to this type of development when there are areas to the North that might be less likely to intrude on our quality of life. 50415-010 50415-011

Thank you for your consideration and help with this matter.
Gloria Mills

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 11:10 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50416

Thank you for your comment, Michelle Reott.

The comment tracking number that has been assigned to your comment is WWECD50416. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 11:09:30AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50416

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Comment Submitted:

Analyze more than one alternative, including alternatives with energy efficiency and renewable energy scenarios and those that maximize the use of existing power lines through upgrades. 50416-001

Analyze the environmental impacts now instead of waiting until right-of-way applications are filed. 50416-002

Consider more cumulative impacts of the corridors, including impacts on air quality and climate change (especially if the corridors are targeted for more coal plants in the region) and impacts to private, state, and tribal lands where a corridor "ends." 50416-003

Consider conditioning future right-of-way approvals within corridors such that each new connecting power source does not exceed the carbon dioxide and other emissions of a combined-cycle natural gas plant (roughly 1,100 lbs. of CO2 per megawatt-hour of produced energy). 50416-004

Ensure that future transmission projects are required to be within designated corridors "to the maximum extent practicable" to maximize the full benefit of the corridors, while still allowing appropriate flexibility. 50416-005

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 11:10 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50417

Thank you for your comment, Timothy Reynoldds.

The comment tracking number that has been assigned to your comment is WWECD50417. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 11:10:24AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50417

First Name: Timothy
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Address: 4276 E 300 N
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State: ID
Zip: 83442
Country: USA
Email: trec@onewest.net
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Comment Submitted:
The proposed corridor goes through the center of Idaho's best stronghold for sage grouse. This species is being re-evaluated for listing as threatened or endangered. Powerlines have been shown to have negative impacts on grouse in at least three ways: (1) grouse collide with power lines (2) birds of prey use power poles as hunting perches, resulting in increased predation on grouse [particularly during the breeding season]and(3)a myriad of negative impacts due to habitat fragmentation. Approval of this corridor location will simply not be good for grouss. Following I-15 would be more responsible and less invasive. 50417-001

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 11:25 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50418

Thank you for your comment, .

The comment tracking number that has been assigned to your comment is WWECD50418. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 11:24:46AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50418

First Name:
Last Name:
Address:
City:
State: CA
Zip:
Country: USA
Email:
Privacy Preference: Withhold name and address from public record

Comment Submitted:
No to Sunrise Powerlink.
I am not in favor of designating portions of 11 counties as part of the national energy corridor because part of this designated corridor is not federal land. It includes both state park and private lands. A designated national energy corridor would allow Sempra/SDG&E to force de-designation of State Wilderness lands in the construction of the Sunrise Powerlink-something never done before, setting a bad precedent for all wilderness lands, for both state and federal. We demand a complete and thorough study of all impacts for any corridor that is being considered. The current proposal is inadequate. 50418-001 50418-002

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: Thursday, February 14, 2008 11:36 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50419

Thank you for your comment, Randy Erickson.

The comment tracking number that has been assigned to your comment is WWECD50419. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 11:35:52AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50419

First Name: Randy
Last Name: Erickson
Address:
City:
State: NM
Zip:
Country: USA
Email:
Privacy Preference: Withhold address only from public record

Comment Submitted:
The plan is flawed and should be withdrawn. Consider the following:

> The plan only dedicates corridors on federal land. There is NO
> consideration
whether the private land between those segments of federal land will be a wise or even feasible location for expanded energy infrastructure. Pipelines and transmission lines require corridors, not segments of corridors, so the plan fails in its basic mission of expediting the location of energy infrastructure. 50419-001

> Although the federal government has issued a Plan that only shows corridors on federal land, the fact is that the corridor will cross private property as well. Federal officials have presented maps in meetings that identify corridors on private lands ("hypothetical, for planning purposes only"). The usual way of acquiring such land is by eminent domain. But there is no disclosure in the Plan that massive eminent domain is in the wings. This is fundamentally misleading. While government has the right to take private land with just compensation, the government should openly disclose it. 50419-002

> The corridors are 3500 feet wide and may contain all kinds of energy transmission and distribution infrastructure. There is NO consideration whether dedication of land to such industrial uses is appropriate adjacent to residential properties. A plan influences land uses far into the future, yet this Plan states that it has no environmental impact. The Plan fails to consider or disclose the most basic impact of a plan—its effect on existing and future land uses — and the significance of these effects on private property and the greater community. 50419-003

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 11:43 AM
To: mail_corridoreisarchives
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50420

Thank you for your comment, Donna Tisdale.

The comment tracking number that has been assigned to your comment is WWECD50420. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 11:42:52AM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50420

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

Comment Submitted:
At our regular meeting held on February 7, 2008, the Boulevard Planning Group voted unanimously to submit these comments in follow-up to our preliminary comments submitted previously.

The document fails to establish one particular need for the project in each geographic area. Multiple transmission lines for multi-modal uses are proposed for the 11 western states, but an identifiable need for each modal use has not been completed for each geographic region. 50420-001

The document also fails to establish the States right in determination of greenhouse gas emissions by allowing transmission corridors for natural gas. California is trying to lower greenhouse gas emissions (Global Warming Solutions Act) and the proposed programmatic EIS would allow a Federal agency decision to override a State decision on a particular project. The Federal Government should not be allowed to override a State's recognized, legitimate, and regulatory authority. 50420-002

The document also states that the purpose of the energy corridors is to …improve reliability, relieve congestion, and enhance the capability of the national grid to deliver energy. The California Public Utility Commission recently published the Draft Environmental Impact Statement/Environmental Impact Report for the Sunrise Powerlink. The proposed project is a 500kv electric transmission line to bring renewable and/or other energy resources into San Diego County. The Draft EIR/EIS identified five alternatives to the proposed project. Among those were "In-Area All-Source Generation" and "In-Area Renewable Generation", both of which would meet the proposed project goals, ranked higher than the proposed transmission line project. 50420-003

This document fails to identify VALID alternatives to meet the purpose as is stated in the programmatic EIS. The only other alternative listed for this EIS is the no project alternative and that is completely unacceptable for an environmental document. We do support the "no project" as the preferable alternative.

The alternatives that were eliminated failed to look at renewable resources within each of the metropolitan areas listed in the document. One particular alternative could be the use of solar renewables in the metropolitan areas like Phoenix which that gets almost 300 cloudless days per year. New micro wind turbines designed for roof installation are now available for use on commercial, industrial, and residential structures. A combination of these and other alternatives could eliminate the need for major transmission lines which are vulnerable to fire storms and other destructive forces of both nature and terrorists. 50420-004

Section 368 and this document also fail to address that each energy corridor that is routed through federal land which is already being managed by a land use management plan will require each one of those management plans to be amended. The PEIS states that if an agency has an existing land use management plan, it would simply be amended by signing a Record of Decision for this PEIS. Amending each management plan to allow multi-modal uses or even one modal use will and should trigger the use of the National Environmental Policy Act to affect the change. It will also require each management plan to be revised and reviewed with public comment. Appendix A lists 20 pages of management plans that would be affected. The use of this PEIS will not only lengthen the process, but added taxpayer costs to revise each and every management plan will have to be realized. 50420-005 50420-006

The PEIS calls for multi-modal use through the Ocotillo-Coyote Wells Sole Source Aquifer. The segment 115-238 traverses known faulting within this sole source aquifer. Significant contamination to the sole source aquifer can occur with multi-modal use. Active seismic activity occurs within this sole source aquifer. Seismic movement can rupture pipe lines and release contaminants to this Sole Source Aquifer. 50420-007

This PEIS does not discuss groundwater ramifications or mitigation measures for blasting within groundwater dependent areas such as eastern San Diego County. Blasting may typically occur during transmission structure construction and may adversely affect groundwater wells in fractured rock. Most groundwater wells in fractured-rock aquifers are typically uncased across water bearing fractures. Blasting could loosen fractured-rock layers or sediments. This could result in changed flow patterns of groundwater or wells that become silted up. This could be a particular problem within the Campo-Cottonwood Sole Source Aquifer, along segment 115-238 in Eastern San Diego County, where transmission/pipeline corridors are proposed to be sited. 50420-008

The PEIS also fails to recognize insects as endangered species. There is no mention of species such as the Quino Checkerspot Butterfly that inhabits the area along the 115-238 segment where there is protected habitat. 50420-009

The PEIS also fails to recognize the geologic formations of the Imperial Valley to contain abundant fossil assemblages from ancient Lake Cahuilla and other even older lacustrine deposits. There is no mention of these deposits or many cultural resources left behind from the Native Americans who inhabited the shores of this ancient lake. Please see the Salton Sea Ecosystem Restoration Program Final Programmatic Environmental Impact Report for more information on this subject. 50420-010

The potential for virtually unlimited expansion is also a major concern in these highly scenic open space areas which are valued for their visual, cultural, and other resources.Based on all the above, we support the No Project Alternative. 50420-011 50420-012

# # #

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

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:04 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50421

Attachments: Utility_Corridor_PEIS_cmnts_WWECD50421.pdf

Utility_Corridor_PEIS_cmnts_WW...

Thank you for your comment, Ben Deeble.

The comment tracking number that has been assigned to your comment is WWECD50421. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:03:43PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50421

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Privacy Preference: Don't withhold name or address from public record
Attachment: H:\Ben's SG 2007_Aug\Local Working Group-Dillon \Utility_Corridor_PEIS_cmnts.pdf

Comment Submitted:
See .pdf attached

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

SAGE GROUSE
MONTANA LOCAL WORKING GROUPS

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 Local Working Group (LWG) for Sage-grouse Conservation for southwest Montana was briefed at our recent meeting in Dillon about various proposals to route large 500 kilovolt (kV) utility lines through southwest Montana, and we have also reviewed some aspects of the West-wide Energy Corridor Programmatic Environmental Impact Statement designation process currently underway.

The LWG is an official group of agencies (BLM, MDFWP, NRCS, USFS, DNRC) and stakeholders (landowners, hunters, conservationists) authorized under Montana's 2004 Sage-grouse Management Plan for implementing conservation measures in this region. We are working in an area where current sage-grouse populations are significantly lower than those observed 25-30 years ago. It will take concerted effective action to prevent further declines and potential addition of the species to the federal Endangered Species list.

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).

50421-001

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.

50421-001 (cont.)

Because much of the non-forested portions of Beaverhead and Madison counties 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.

50421-002

To maximize the avoidance of crucial sage-grouse habitat in southwest Montana, designation of any new utility corridor must occur through constraining siting to 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.

The I-15 corridor is already heavily impacted by other infrastructure, subdivision, and native rangelands have been converted to active agriculture. As such, it has much lower value to sage-grouse and other sensitive shrub-steppe species. Generally, the I-15 corridor has little documented current use by sage-grouse, with the exception of the area around Monida Pass where terrain may funnel migrating grouse towards the interstate. The same phenomenon has been observed in adjoining passes like Bannack Pass on the south rim of Big Sheep Basin and the Snowline area. It will be appropriate to seek special, and likely very costly, mitigation for line routes which do not avoid crucial wildlife areas.

50421-003

We appreciate the opportunity to comment on the West-wide Energy Corridor PEIS. Please add us as representatives of the Southwest Montana Local Working Group as interested stakeholders to your mailing list for announcements and public review of any documents related to this project.

Sincerely,

Ben Deeble, Sage-Grouse LWG co-chair
240 N. Higgins Ave. #2
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deeble@nwf.org

References

Atamian, Michael, Chris Frey, and James Sedinger 2006. Dynamics of Greater Sage-Grouse (*Centrocercus urophasianus*) Populations in Response to Transmission Lines in Central Nevada , Progress Report: Year 4 Department of Natural Resources and Environmental Sciences University of Nevada – Reno, 1000 Valley Road, Reno, NV 89512

Bi-State Plan (Bi-State Local Planning Group). 2004. Greater Sage-Grouse Conservation Plan for the Bi-State Plan Area of Nevada and Eastern California. First edition. Bi-State Local Planning Group. (June 2004) (available at www.ndow.org/wild/sg/plan/SGPlan063004_L.pdf).

Bureau of Land Management. 2001. Falcon to Gondor 345kv Transmission Project: Environmental impact statement and resource management plan amendments. Bureau of Land Management. Battle Mountain, Nevada USA.

Ellis, K.L. 1984. Behavior of lekking sage grouse in response to a perched Golden Eagle. Western Birds 15:37-38.

Hall, F., and E. Haney. 1997. Distribution and trend of sage grouse (*Centrocercus urophasianus*) in relation to overhead transmission lines in Northeastern California. California Department of Fish and Game. Unpublished Report.

Lammers, Wendy M. and M.W. Collopy, 2005. The response of avian predators to a new high voltage transmission line in northern Nevada. Dept. of Nat. Resources and Envt. Sci., University of Nevada, Reno. Final Report. 87pp.

Sierra Pacific Power Company. 2003. Ft. Churchill to Buckeye 120 kV Transmission Line Project Vegetation Survey Report. Prepared by JBR Environmental Consultants (Reno, NV) for Sierra Pacific Power Company. Reno, NV. June 6, 2003.

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:09 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50422

Attachments: SCL_Comments_PEIS_Final_WWECD50422.pdf

SCL_Comments_PEIS_Final_WWECD5...

Thank you for your comment, Steven Kern.

The comment tracking number that has been assigned to your comment is WWECD50422. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:08:50PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50422

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Privacy Preference: Don't withhold name or address from public record
Attachment: C:\Energy Expert Services\SCL 2005 TXRX Services\DOE Section 368 Corridors\SCL_Comments_PEIS_Final.pdf

Comment Submitted:
Seattle City Light (SCL) offers the attached comments on the Draft Programmatic Environmental Impact Statement, Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386) issued October 2007 (hereinafter referred to as "Draft PEIS"). SCL appreciates the opportunity to review and comment on this important step in implementing the provisions of Section 368 of the Energy Policy Act of 2005 (EPAct).

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.

Seattle City Light
Comments on EPAct Section 368
Federal Energy Corridor Designations
Draft Programmatic Environmental Impact Statement

February 14, 2008

West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439
http://www.corridoreis.anl.gov/

Seattle City Light (SCL) offers the attached comments on the Draft Programmatic Environmental Impact Statement, Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386) issued October 2007 (hereinafter referred to as "Draft PEIS"). SCL appreciates the opportunity to review and comment on this important step in implementing the provisions of Section 368 of the Energy Policy Act of 2005 (EPAct).

Signed:

_____
Steven D. Kern
Power Supply and Environmental Affairs Officer
Seattle City Light

1. Comment Summary

Fundamentally, transmission system capacity and security is of paramount importance to all electric utilities, and the process for securely maintaining and upgrading transmission system infrastructure may be affected favorably by the proposed energy corridor designations. Designated corridors across Stevens and Stampede passes in Washington are vitally important to SCL because these corridors are part of the West of Cascades-North flowgate[1] which Bonneville Power Administration (BPA) uses to deliver power to Seattle City Light (SCL) and other Puget Sound Area utilities. In particular, the Boundary hydroelectric project in Eastern Washington, and the Federal Columbia River System projects provide a significant amount of energy and capacity to SCL throughout the year.[2] Also, most of the new wind energy resources that are coming on-line are located in Eastern Washington, while the largest demand is in the Puget Sound region in Western Washington. 50422-001

Many of the existing electric transmission corridors in the Northwest are constrained; have been subject to reduced capacity limits affecting transmission usage for years; and contain aging facilities that will need replacement.[3] Recent extended maintenance outages of transmission facilities in these corridors have emphasized the magnitude of outage impacts on Puget Sound Area utilities. To maintain continuous reliable service to SCL and other utilities, transmission system replacements can only be accomplished by constructing sufficient parallel facilities prior to de-energization of the existing facilities. Given these factors, additional space may be required along existing corridors, as designated in the report, not only for increased capacity but to maintain existing levels of service.

Furthermore, additional corridor designations need to be analyzed in the context of helping to facilitate delivery of new renewable energy resources in the Pacific Northwest and throughout the Western Interconnection. The demand for access to renewable resources to meet state and other mandates for reducing carbon emissions is now a key consideration in utility resource planning. 50422-002

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1 Flowgate is a term used to define one or more parallel circuit elements that may be subject to a simultaneous power transfer limit. See BPA's Congestion White Paper for a detailed description of flowgate congestion in the Northwest.

2 Puget Sound Area utilities include Seattle City Light, Puget Sound Energy, Snohomish County PUD and numerous small requirements customers of Bonneville Power Administration.

3 While BPA has not projected a date for replacement of the 500kv and 345kV facilities in these corridors many of these facilities were constructed in the 1950s and 1960s. Generally the average service life of this type of transmission facility is 50 years. SCL is keenly aware of BPA's current crisis with spacer-damper and corroded insulator replacements on these circuits. BPA estimates that this work will take about 10 years to complete. New facilities of equal or greater capacity are likely to take at least ten years to design and construct from the decision date, when reasonably anticipated environmental review and associated litigation are factored in.

The "No Action" alternative assumes alternative development of transmission via an increased and dispersed set of pathways, compared to the "Proposed Alternative." While this offers a contrast for the purpose of evaluating the possible benefits of a more coordinated planning effort, DOE should include more information in the Draft PEIS about existing transmission conditions – that is, the operational and capacity constraints of existing corridors. The need for and ability to construct new, parallel transmission facilities, even to maintain existing capacity, must be emphasized in the Draft PEIS report. 50422-003

Comparison of the No Action and Proposed Action Alternatives should also convey the potential costs, risks and environmental impacts of inadequate transmission system capacity under both scenarios. While benefits of the "Proposed Action" (corridor designation) are assumed to provide a higher degree of assurance that sufficient corridor dimensions and capacity will be provided in Federal land use plans, the nature of the underlying transmission capacity and security problem appears to be understated. 50422-004

2. Interest of Seattle City Light

Over 70% of the electrical energy used by SCL customers must cross the Cascades on lines in existing corridors. Other Puget Sound Area utilities are also dependent on these same lines. Reliable service to these utilities is only assured if secure operating states are possible during a wide range of adverse conditions. As its load grows, Seattle expects that increased demand that cannot be off-set by conservation must be served by renewable resources that will require transmission service for delivery to its service area.[4] Seattle's 2006 Integrated Resource Plan "Preferred Alternative" identifies seasonal exchanges, capacity options, hydroelectric resources, and wind generation that will require transmission service which crosses the Cascades for delivery to Seattle. Future geothermal, biomass and landfill gas project deliveries may also impact constrained transmission flowgates in the Northwest, unless they are located within the Puget Sound Area.

3. Comments on Proposed Corridor Designations

A. Puget Sound Area transmission service is already constrained by existing circuits in corridors identified in the Draft PEIS

The two corridors in Washington State identified in the Draft PEIS, over Stevens and Stampede passes, contain existing facilities that must remain in service to prevent transmission disturbances during adverse operating conditions affecting 50422-005

[4] See title 19.285 RCW (Washington's renewable portfolio standard).

Puget Sound Area utilities. These circuits are elements of a constrained flowgate called "West of Cascades-North"[5] The state of the circuits comprising this flowgate have a direct bearing on transmission system stability and security in the Puget Sound Area.

Nomograms that establish reliable operating limits for transfers into the Puget Sound Area utilities and transfers to British Columbia are greatly affected by the state of circuits in these corridors.[6] While congestion in this region can be somewhat mitigated using redispatch procedures, such procedures call for non-optimal operation of hydroelectric generating capacity owned by SCL and less efficient use of thermal generators owned by Puget Sound Energy. During the Summer and Fall of 2007, repeated instances of significant operating limit reductions occurred while critical maintenance work was being performed on transmission circuits within the cross-Cascades corridors.[7] Generator dispatch for native load service and wholesale market transactions are negatively affected by congestion of this magnitude.

50422-005 (cont.)

B. Sufficient Corridor Capacity and Dimensions Are Needed for Repair, Replacement and Upgrades

As illustrated by the circumstances during the Summer and Fall of 2007, when existing transmission facilities age, lengthy outages are required for repair and/or replacement of these facilities. Such outages often must be repeated over the course of a few years to complete repair work on a single circuit. Had this outage extended into winter months, the consequences of transmission congestion could have resulted in load-shedding within the Puget Sound Area. To make matters worse, other transmission outages planned for Summer and Fall 2007 were postponed until future years because there is insufficient transmission capacity into the Puget Sound Area to remove existing major transmission facilities from service for extended periods for repair or replacement.

Before repair, replacement or significant upgrade work can be initiated on existing transmission circuits, a parallel transmission circuit must be energized if congestion and adverse impacts on reliability are to be avoided. Absent establishment of new transmission corridors, new parallel facilities must be

50422-006

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5 The West of Cascades-North path is also referred to as "Path 4" in the WECC Path Rating Catalog. The historical loadings and operating limits for the path can be found at BPA Operations Information [External] under the Internal Flowgates links.

6 These nomograms are posted periodically at http://www.transmission.bpa.gov/OASIS/BPAT/outagecoord/nomograms_newest.shtm. They highlight how load levels, generation patterns and transfer limits are dependent on transmission outages.

7 For example, from mid-September through mid-October, spacer-damper replacements on the Chief Joseph-Monroe 500 kV line (located in the Stevens Pass corridor) resulted in operating limit reductions of approximately 500 MW on the Northern Intertie (S-N).

located in the corridors designated in the Draft PEIS report. SCL generally agrees that the proposed width of 3,500 feet is reasonable since there are typically 3 or more circuits already occupying existing corridors where upgrades may be needed. Reliability criteria dictate that circuits be physically separated by sufficient distance to prevent common-mode failures—a situation where multiple circuits could be simultaneously impacted by a single event within the corridor. While the Draft PEIS presumes an "operational ROW width of 400 feet," additional width may be necessary depending on span lengths, separation and clearance requirements for new construction, and other factors affecting construction (particularly in rough terrain).

50422-006 (cont.)

The Draft PEIS does not appear to highlight some of these concerns, in particular the need for redundant circuits for repair and/or replacement of existing, aging facilities. While the need for additional capacity may not be indicated for years into the future, current maintenance requirements are already loading the cross-Cascades corridors close to their actual operating limits. The "No Action Alternative" may increase the frequency and prolong the duration of congestion incidents. In the future, congestion may prevent wind energy from being available to displace fossil-fueled generation. Or it may cause excessive stream flows in rivers downstream of hydroelectric projects that must participate in redispatch efforts or risk curtailment and load shedding.

50422-007

C. Conceptual Model Lacks Direct Path to Seattle Metro/Puget Sound Area from Eastern-Washington Wind Resources

The "Areas of Potential Wind Energy Development" map in Figure 2.2-4a[8], does not include significant areas of wind energy development in the lower Columbia River and Southeastern Washington/Northeastern Oregon region. For a detailed description of the location of these wind energy projects, see the BPA Wind Project Interconnection Map (embedded hyperlink). Nearly 3,000 MW of wind power production capacity is estimated to be located in this region by the end of 2009. Because this region is remote from load centers, long-distance interregional transmission facilities will be needed to deliver the output to consumers. While the "Unrestricted Conceptual West-wide Energy Transport Network" map shows indirect looped transmission paths that would promote delivery of power from these wind energy resources to Seattle/Puget Sound Area, a direct path should be included in future versions of the Draft PEIS.

50422-008

D. Proposed Designations Lack Paths for Geothermal Resources in Western Washington

[8] Volume I, page 2-17.

Similarly, SCL is concerned that the "Areas of Potential Geothermal Energy Development" map in Figure 2.2-6b[9], shows geothermal areas of interest in Western Washington along the Cascade mountain range, but the Draft PEIS does not include any energy corridors associated with these resources. 50422-009

E. Transmission Corridors Are Needed for Distant Resources

Much of the work performed by DOE in preparation of the 2006 Congestion Study under Section 1221(a) of EPAct identified transmission congestion associated with delivery of power generating resources spanning the footprint of the entire Western Interconnection. Mitigation of congestion throughout the interconnection may benefit consumers by increasing the physical scope of power production resources available to meet future loads. For example, significant new geothermal resources being developed in Idaho, Oregon and Nevada are electrically inaccessible without new transmission circuits that would need to be constructed in yet-to-be established corridors that join remote regions of those states with load centers. Wind resources in Montana and Wyoming face congestion on lines used by base-loaded fossil fuel powerplants and will not find capacity to reach West Coast power markets without upgrades to existing corridors. 50422-010

F. Clarification of Definitions and Distinctions

1. Environment and Human Environment

The Draft PEIS includes the statement "Corridor designation will no have no direct impacts that may significantly impact the quality of the human environment." Is there a distinction being drawn between environment and human environment? 50422-011

2. Multiple Energy Transport Systems v. Multi-modal Energy Transport

It is not clear whether the term "multi-modal energy transport" is synonymous with another phrase "multiple energy transport systems". These terms do not appear in the Glossary (Draft PEIS, Chapter 10). SCL is not aware of any specific standards that preclude collocation of electric transmission corridors with natural gas pipelines or other energy transport systems, but would not consider it prudent to locate facilities with potentially catastrophic failure modes in corridors shared by multi-circuit electric power transmission facilities. 50422-012

[9] Volume I, page 2-20.

3. Grid Security

The term "security" is used in Text Box 1.1-2, but is not defined in the body of the report or Glossary. This is an important concept that must be considered when evaluating the need for redundant, parallel transmission circuits. | 50422-013

4. Health and Safety

Were there criteria relating to safety or security of potential mixed use of corridors included in development of the proposed alternative, or procedures envisioned under the proposal? | 50422-014

From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:09 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50423

Attachments: 021408_PGE_Westwide_Corridor_PEIS_Comments_WWECD50423.DOC

021408_PGE_West wide_Corridor_P...

Thank you for your comment, Diane Ross-Leech.

The comment tracking number that has been assigned to your comment is WWECD50423. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:08:54PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50423

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Comment Submitted:
Comment letter from PG&E attached below.

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

Pacific Gas and Electric Company

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February 4, 2008

West-wide Energy Corridor PEIS
Argonne National Laboratory
9700 South Cass Avenue
Building 900, Mail Stop 4
Argonne, Illinois 60439

Re: PG&E Comments to the Draft West-wide Energy Corridor Programmatic EIS

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS). Previous comments were provided for the record on November 28, 2005, and July 10, 2006, regarding corridors within the State of California. This letter will supplement those and other comments provided to the federal project team by PG&E.

Coordination with State-wide Efforts

The ability of the corridor designations to meet the goals of Section 368 of the Energy Policy Act of 2005, depends upon the feasibility of the designated corridors to meet the needs of the energy industry to develop energy pipelines and transmission and distribution facilities. Locating corridors on federal lands without consideration of adjacent private and state-owned lands could render use of the corridors infeasible. For example, it would be counterproductive to designate a corridor within a specific region of federal land where the topography of adjoining nonfederal land would prohibit the siting of energy facilities. Thus, to ensure that designated corridors appropriately consider impacts on private and public lands, PG&E recommends that the federal agencies coordinate final and future mapping efforts with the efforts of the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) to establish energy corridors within California. Where possible, locations of these federal corridors across private and public lands should be identified on future maps to provide continuity on the transition between federal land ownership and privately held lands. This would serve to identify possible points of constraint with local land use policies that may conflict with future utility facilities. 50423-001

Likewise, to maximize efficiency, the designation of corridors under Section 368 should be coordinated with state-wide efforts to identify appropriate and necessary transmission projects. In California, the entities responsible for ensuring the implementation of the state's renewable energy policies (CPUC, CEC, California Independent System Operator (CAISO), and publicly owned utilities) have initiated a Renewable Energy Transmission Initiative (RETI) to help identify the transmission projects needed to accommodate renewable energy goals, support future energy policy, and facilitate transmission corridor designation and transmission and generation siting and permitting. The efforts of RETI are guided by a 50423-002

Stakeholder Steering Committee that includes, among others, representatives of permitting agencies such as the CPUC, BLM and USFS. 50423-002 (cont.)

Future Corridors or Projects Located Outside of Corridors

While the Section 368 energy corridor analyses began with an assessment of regional energy transfer needs, other needs have emerged within the states for energy corridors to meet renewable energy goals. For example, while RETI is not yet to a point where it can recommend electric transmission corridors, future recommendations will likely involve corridors across public lands. As the locations of potential renewable resources are often immovable, it likely will not be feasible for such recommendations to stay within the corridors identified in the initial Section 368 energy corridor designations. Therefore it is important that the federal agencies identify the process whereby the corridor designations are periodically reviewed and amended. 50423-003

Likewise, the PEIS should also clarify that applications for permits to site projects outside of existing corridors will be fairly considered for federal permits and environmental reviews, whether or not the locations for such facilities are situated within a designated corridor. Though PG&E and other parties have provided comments and feedback on the proposed corridors based upon current projections of future projects, the industry's understanding of the most effective locations for energy pipelines and transmission and distribution facilities to improve reliability, relieve congestion, and access renewable resources evolves in accordance with changing conditions and further studies. The PEIS should affirmatively support this principle by expanding upon the statement that applications for rights of way outside of the designated energy corridors would not be precluded (page ES4). 50423-004

In addition, the procedures developed through the PEIS process should be leveraged to apply to future projects that are not included within designated corridors, where applicable. For example, the PEIS process has resulted in the development of procedures for assignment of a single Point Of Contact for a project and implementation of the Interagency Operating Procedures for processing right-of-way applications. These procedures will significantly streamline the process for obtaining rights of way for federal land, increasing the efficiency for federal agencies and permit applicants alike. All projects located on federal land would benefit from the application of these procedures, regardless of whether such projects are located within a designated corridor. 50423-005

The PEIS Should Designate A Corridor Width that Will Satisfy Reliability and Planning Needs

The current proposed corridor width of 3500 feet does not allow sufficient clearance to site multiple projects within a corridor in light of reliability and planning considerations. For example, the project team has apparently assumed a 500kV electric transmission line requires only a 400 foot right-of-way, which is not consistent with the Reliability Subcommittee Draft Recommendations of the Western Electric Coordinating Council (WECC), the regional entity authorized under Section 215 of the Federal Power Act to enforce reliability standards in the West. PG&E practice requires a minimum 2,000-foot separation from an existing high-voltage line where common mode failures would potentially trigger system reliability or performance issues. Exceptions to the minimum distance policy are only allowed for the last five spans approaching a substation and where a line crossing occurs. Thus, the existing corridor width would likely not accommodate multiple high voltage transmission lines sited within the same corridor. 50423-006

Similarly, whether proposed corridors are intended for oil, gas, or hydrogen pipeline or electricity transmission or distribution facilities, or some combination thereof will have a significant impact upon the environmental effects of the designation of such corridors, operating constraints and incorporation into land use plans. Electric transmission lines in close proximity to buried steel pipelines cause induced

current that requires additional cathodic protection during pipeline installation, or significant cost ($120,000/mile) to retrofit an existing pipeline's cathodic protection system if the electric transmission line is installed after the pipeline.

PG&E's extensive experience in routing and siting energy facilities indicates that the corridor should be increased to a minimum one mile width to allow adequate room to avoid sensitive resources and to maintain sufficient separation of facilities within the corridor so as not to compromise safety, reliability and national security concerns. 50423-006 (cont.)

Correction of Specific Corridor Plotting

As PG&E has previously noted, there are apparently two errors in the plotting and designation of a corridor (Corridor 27-41), which should be corrected to ensure that the corridors are appropriately designated and useful. First, this corridor, which runs between Topock, Arizona and Bakersfield, California, is apparently intended to track an existing right of way, as indicated by the existing ROW designation on the map. On the draft California Corridor Map, however, the corridor is incorrectly marked as following I-40 from Needles to the junction of I-15 at Barstow. The existing facilities – and therefore the intended corridor– actually extend westward from Topock to Barstow along the existing pipeline corridor and Route 66 to the junction of I-15. Second, the corridor is designated as "underground only," in part to address concerns with local military operations and visual impacts to historic Route 66. Designating this corridor as "underground only," however, is inconsistent with existing use of transmission corridors: not only are other existing overhead transmission lines in closer proximity to military bases, but Route 66 in California is not a state or federal scenic byway. Therefore, the portions of this corridor within California should not be limited to underground only. PG&E would be happy to provide a more detailed description upon request so that this existing and proposed utility corridor can be corrected for the record. 50423-007

Key Considerations

Finally, we would like to reiterate some of the key considerations for these federal corridors, including:

- Provide corridors suitable in terrain and free from physical constraints that prevent cost effective construction and management of utility facilities. Be mindful that underground pipelines have different corridor constraints than overhead electric power lines; 50423-008
- Provide a mechanism to allow a utility to reserve corridor space; 50423-009
- Allow perpetual entitlements within future corridors once approved; 50423-010
- Streamline or simplify environmental and public review; and 50423-011
- Incorporate existing utility corridors crossing federal lands into this designation process. 50423-012

Sincerely,

Diane Ross-Leech

Diane Ross-Leech
Director, Environmental Policy

Cc:

Mark Murray – Western Utility Group
Jim Bartridge – California Energy Commission
Pamela Lacey - American Gas Association
Richard Loughery – Edison Electric Institute

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From: corridoreiswebmaster@anl.gov
Sent: Thursday, February 14, 2008 12:14 PM
To: mail_corridoreisarchives; corridoreiswebmaster@anl.gov
Subject: Energy Corridor Draft Programmatic EIS Comment WWECD50424

Attachments: SCE_Comments_to_Draft_PEIS_February_14.2008_FINAL_WWECD50424.doc

SCE_Comments_to
_Draft_PEIS_Feb...

Thank you for your comment, Nino Mascolo.

The comment tracking number that has been assigned to your comment is WWECD50424. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: February 14, 2008 12:13:32PM CDT

Energy Corridor Draft Programmatic EIS
Draft Comment: WWECD50424

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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 14, 2008

VIA Electronic Filing

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

Subject: Southern California Edison Company Comments to the Draft Programmatic Environmental Impact Statement, Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386)

To Whom It May Concern:

Southern California Edison Company (SCE) appreciates the opportunity to comment on the Department of Energy's Draft Programmatic Environmental Impact Statement designating energy corridors on federal land in the 11 Western States. SCE has been actively following the Department's efforts to implement Section 368 of the Energy Policy Act of 2005 (P.L. 109-58). Attached are SCE's comments on the Draft Programmatic Environmental Impact Statement issued in November 2007.

Should you have any questions, please do not hesitate to contact me at (626) 302-4459.

Sincerely,

/s/ Nino J. Mascolo

Nino J. Mascolo
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Comments of
Southern California Edison Company

Draft Programmatic Environmental Impact Statement, Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386)

Southern California Edison Company (SCE) appreciates the opportunity to provide comments on the Draft Programmatic Environmental Impact Statement (PEIS), Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386). The PEIS was prepared in compliance with Section 368 of the Energy Policy Act of 2005. SCE has provided oral and written comments previously in this proceeding during the public scoping meetings held in 2005 and at the California Energy Commission (CEC) workshops held in February 2006 on this same topic. SCE understands that the DOE worked with the CEC, and other federal and state agencies, to prepare the PEIS. SCE also provided comments on the preliminary corridor maps released by the U.S. Departments of Energy (DOE), Interior, Agriculture, and Defense (the Agencies).

Designation of All Existing Corridors

1. **Designating All Existing Corridors is Consistent with the Intent of the Energy Policy Act of 2005**

As SCE has noted in previous comments, it is critical that existing corridors on Federal lands be identified and retained throughout this process. The PEIS acknowledges that many existing corridors were not designated and that the exclusion of such existing corridors does not preclude their future use as an energy corridor. While SCE agrees fully that excluding a corridor within the PEIS does not foreclose its future use as an energy corridor, the designation in the PEIS carries potentially significant weight in how utilities and federal land management agencies will allow for the use of energy corridors in the future. For example, one result of the final EIS for this process is that the federal land agencies will modify their existing land management plans to allow for the designated corridors. That action gives greater emphasis, from a planning perspective, to the use of the designated corridors. By implication, the corridors with existing infrastructure that are not designated will be relegated to a second tier status despite

50424-001

DOE's intent that existing corridors should generally be considered as a first option, compared to creating a new corridor for infrastructure. No general basis exists in the PEIS for excluding existing corridors from being designated. (SCE understands that certain corridors may have greater environmental resources and other concerns that preclude them from being recommended as a designated corridor.)

The Departments' position that the designation of corridors does not establish the exclusive location for siting future transmission and other energy facilities is the best policy. However, the use of the phrase "designating corridors for the preferred location" for siting of energy facilities may cause some to believe that the designation creates an expectation that the project must be sited in that location. For instance, where projects are already being considered, and for which tentative or specific routes have been identified but are not included in the PEIS, the Departments should make it clear that the PEIS will not restrict such alternative routes.

50424-001 (cont.)

To avoid establishing a presumption that could become a barrier for siting facilities outside designated corridors, SCE strongly recommends that the Final PEIS use an alternative phrase such as "the corridors are being designated to identify locations that will be available for the siting of new infrastructure". The use of this phrase would be consistent with the Departments' recognition that not all the requests for designated corridors may be reasonably accommodated. As the corridor designation process is intended to plan for the need for new infrastructure, creating a mechanism that resulted in effectively precluding the siting of new facilities across federal lands outside a designated corridor would be contrary to the intent of the Energy Policy Act of 2005.

2. The Final PEIS Should Designate All Existing Corridors Proposed by SCE.

SCE previously provided the Agencies a detailed list of SCE's existing corridors and requested that those corridors be designated as corridors in this DOE-sponsored process. SCE also identified new corridors and requested that those new corridors also be designated during this process. SCE's proposed new and existing corridors were

50424-002

correctly incorporated into the February 2, 2006 map titled "Southern California – Stakeholder Identified Energy Corridor Needs", posted to the CEC website. However, after reviewing the maps released under the PEIS, it appears that few, if any, of SCE's existing and proposed new corridors were adequately considered for corridor designation by the Agencies. SCE's existing corridors include:

i. Big Creek T/L System: located in the Sierra National Forest, Los Padres National Forest, and Angeles National Forest;
ii. Midway-Vincent T/L: Located in the Angeles National Forest and the Los Padres National Forest, as well as on Bureau of Land Management lands;
iii. Vincent-Rio Hondo T/L: Located in the Angeles National Forest and on Corps of Engineers lands;
iv. Antelope-Pardee T/L: Located in the Angeles National Forest;
v. Vincent-Gould T/L: Located in the Angeles National Forest and on Corps of Engineers lands;
vi. Serrano-Valley T/L: Located in the Cleveland National Forest;
vii. Lugo-Eldorado T/L: Located on land managed by the Bureau of Land Management and the National Park Service;
viii. Mohave-Lugo T/L: Located on land managed by the Bureau of Land Management and the National Park Service;
ix. Lugo-Mira Loma T/L: Located in the San Bernardino National Forest;
x. Lugo-Serrano T/L: Located in the San Bernardino National Forest;
xi. Devers-Valley T/L: Located in the San Bernardino National Forest and on land managed by the Bureau of Land Management;
xii. Devers-Palo Verde T/L: Located on land managed by the Bureau of Land Management and U.S. Fish and Wildlife (KOFA National Wildlife Refuge in Arizona); and,
xiii. Other transmission lines, including Control-Inyokern, Coolwater-Kramer, Kramer-Victor, Vincent-Lugo, Devers-Mirage, Devers-Julian Hinds, etc.

50424-002 (cont.)

SCE also requests that the Agencies also consider designating several additional existing SCE corridors under this section 368 corridor designation process. These corridors include:

i. Eldorado-Mohave T/L: Located on land managed by the Bureau of Land Management;
ii. Bailey-Pardee T/L: Located in the Angeles National Forest and the Los Padres National Forest, as well as on Bureau of Land Management lands
iii. Gould-Mesa T/L: Located in the Angeles National Forest
iv. Pardee-Vincent T/L: Located in the Angeles National Forest
v. Pastoria-Pardee T/L: Located in the Angeles National Forest

50424-002 (cont.)

SCE respectfully requests that the Agencies reexamine SCE's previous request designating existing corridors in the Final PEIS. Additionally, if the Agencies decline to designate any or all of these existing corridors, SCE requests that the Agencies provide a reasoned explanation why the SCE existing corridors were not included.

Designation of Existing Federally Designated Corridors

SCE is concerned that the Draft PEIS does not adequately designate corridors that cross national forest lands. The four southern California National Forests recently developed Land Management Plans. The Bureau of Land Management also has its own Land Management Plans. Each of these plans has one or more designated utility corridors, many of which are the same as the corridors proposed by SCE. The PEIS, without explanation, does not include all of the corridors that are already included in the Forest Service Land Management Plans. SCE requests that the Agencies evaluate the existing land management plans and include all the corridors identified in those plans in the Final PEIS.

50424-003

Designation of New Corridors

SCE also reiterates its request that its proposed new corridors crossing federal lands be designated as corridors under this process. SCE considers these new corridors as critical in meeting growing electricity demand, accessing new diversified generating resources, increasing reliability on the SCE transmission grid, and mitigating potential congestion due to significant load growth in Southern California, which is mostly surrounded by federally owned lands.[1] SCE's list of proposed new corridors is below. Unfortunately, it appears that only two of the corridors on the SCE list (the Mohave National Preserve Corridor and the Joshua Tree National Park Corridor) were included in the PEIS corridor maps. SCE respectfully requests further clarification from the Agencies as to why the majority of the proposed new corridors were not designated. SCE believes it is imperative that each of the proposed corridors be designated in the PEIS. SCE would welcome the opportunity to meet with Agency representatives to review the maps that SCE has developed and to discuss SCE's proposed new corridors.

50424-004 (cont.)

San Bernardino National Forest

- In addition to the existing corridors within the San Bernardino National Forest, a new corridor crossing the San Bernardino National Forest, south of Interstate Highway 10 and adjacent to the San Jacinto Wilderness State Park in Riverside County, California should be designated and preserved to accommodate future transmission facilities. The corridor should begin in the north Palm Springs area, traverse the San Bernardino National Forest in an east-to-west direction, and end near the San Jacinto area. The transmission facilities situated in this corridor would bring needed power to the load centers in western Riverside County from the southwest, as well as improve reliability in the area. SCE plans to construct a second 500 kV line between our Devers and Valley substations as a part of the new Devers-Palo Verde #2 500 kV line project (DPV2) within an existing designated corridor. However, another separate corridor for a third transmission line should be designated. A separate corridor will significantly reduce risks associated with otherwise constructing new line(s) within the existing transmission right of way.

[1] The Southern California area (Los Angeles and Orange Counties) is bordered on the north by the Los Padres and Angeles National Forests, on the northeast and east by the San Bernardino National Forest, and on the east and southeast by the Cleveland National Forest. Camp Pendleton, also federal land, is to the south. To the northeast, east, and southeast sides of these national forests are vast areas of other federal land administered by the Bureau of Land Management. It is virtually impossible to bring transmission lines to the Southern California area without crossing federal lands.

Cleveland National Forest

- A new corridor crossing the northern end of the Cleveland National Forest should be developed to accommodate future transmission facilities. The corridor should begin in the northeastern foothills of the Santa Ana mountain range south of the city of Corona, Riverside County, cross the northern edge of the Cleveland National Forest south of state highway 91, and end at the northwestern foothills of the Santa Ana mountain range in the proximity of the State Highways 91 and 241 interchange in Orange County, California. The new transmission facilities situated on this corridor would bring needed power from the southwest to the load centers in Orange County. SCE has plans to construct a new 500 kV line between our Valley and Serrano substations following the completion of the DPV2 project. A separate corridor for the new transmission line will significantly reduce risks associated with constructing the new line within the existing transmission corridor in the Cleveland National Forest.

Angeles National Forest

- In addition to the use of existing corridors through the Angeles National Forest, a new corridor should be developed to accommodate future transmission facilities that would provide additional transmission capacity to bring needed power from Northern California, as well as renewable resources located in the Mojave Desert, to the major load centers in the Los Angeles basin. The corridor should begin in the northern foothills of the San Gabriel mountain range near SCE's Vincent Substation in the city of Palmdale, California, cross over the Angeles National Forest in a north to south direction, and stop at the southern edge of the Angeles National Forest near SCE's Rio Hondo Substation in the city of Irwindale, California.

- New corridors crossing the Angeles National Forest and potential National Conservation Area also should be developed to accommodate future intrastate transmission facilities. A new corridor should start near PG&E's Midway Substation near Buttonwillow, California, cross over potential National Conversation Area in a northwestern to southeastern direction, and end at the Tehachapi area north of Lancaster, California. A separate north-to-south corridor should continue from the Tehachapi area, traverse the Angeles National Forest in a north to south direction near Palmdale, California, and end at the southern edge of the Castaic mountain range near the Santa Clarita Valley. The new transmission facilities situated on these corridors would be needed to (1) bring economic power from the Northern California and the Pacific Northwest areas to Southern California, and (2) to integrate renewable resources developed in the Mojave Desert. These corridors should be separate from the existing corridors in the Angeles National Forest to significantly enhance system reliability.

50424-004 (cont.)

Los Padres National Forest

- A new corridor should be designated and preserved in order to accommodate future transmission facilities from Ventura to Goleta, California. This corridor should cross southern portions of the Los Padres National Forest parallel to Interstate Highway 101 in an east-to-west direction. The new transmission facilities situated on this corridor would provide additional transmission capacity to serve loads as well as improve reliability to customers in the Santa Barbara and Ventura areas.

It appears the corridors described below were included in the proposed corridor maps. SCE is also including a description of these proposed corridors to ensure that the Agencies continue to include the designation of these corridors in the final Programmatic EIS and any future maps.

Mojave National Preserve

- A new east-to-west corridor should be designated in order to accommodate future inter-regional transmission facilities that would bring economic power to the major load centers in Southern California from the Nevada/Arizona/New Mexico area. This corridor would start from the southern tip of Nevada near the Nevada/California/Arizona border, cross the Mohave National Preserve parallel to Interstate Highway 40 and Bureau of Land Management (BLM) land, and end near Barstow, California.

50424-004 (cont.)

(SCE addresses its concerns surrounding the "underground only" designation of this corridor later in these comments.)

Joshua Tree National Park

- A new corridor should be designated and preserved to accommodate future interstate transmission facilities from southern Arizona near the Palo Verde area to SCE's Devers Substation near Palm Springs, California. This corridor should cross southern portions of the Joshua Tree National Park in an east-to-west direction.

Western Arizona Utility Corridor Designation

The designation of Corridor 30-52 in western Arizona does not recognize the change in jurisdiction resulting from the Colorado River Indian Reservation (CRIR) Boundary Correction Act of 2005 (Public Law 109-47). As shown on the Proposed Section 368 Energy Corridors (Map D9), it appears that Corridor 30-52, which follows Interstate Highway 10 for approximately 10 miles east of the Colorado River, would be located on BLM land. However, because of the boundary change enacted by Public Law 109-47,

50424-005

that corridor would actually be located on CRIR land, not on BLM land. The Colorado River Indian Tribe opposes the use of CRIR land for new transmission lines. Therefore, Corridor 30-52 should be relocated to avoid CRIR land.

50424-005 (cont.)

There is one viable utility corridor crossing federal lands in La Paz County between Arizona and California: it is bordered on the north by the CRIR and on the south by the Department of Defense/Yuma Proving Grounds land, and is designated the "Devers-Palo Verde Corridor, UC-8" by the BLM Yuma District. The UC-8 corridor includes the Devers-Palo Verde No. 1 and Devers-Palo Verde No. 2 lines that are located in BLM rights-of-way (ROWs) through the Dome Rock Mountains. The corridor is designated in the Yuma Field Office Draft Resource Management Plan (December 15, 2006) in the preferred alternative plan (Map 2-12e). There is a separate utility corridor that is proposed for designation along Interstate Highway 10 on BLM land, but it presently contains underground utilities and no overhead transmission lines. DOE should also be aware that Arizona Department of Transportation rules preclude the construction of overhead transmission lines along Interstate Highway 10.

50424-006

In summary, SCE respectfully requests that the Agencies carry forward all of the existing corridors in the respective Resource Management Plans and designate newly proposed corridors as described above in the Final PEIS and future Resource Management Plans. However, if there are specific instances where the Agencies do not believe it is possible to designate corridors due to environmental or other concerns, SCE requests that the Agencies instead consider widening, to a minimum width of twice the current corridor width, any existing SCE corridors on federal lands in those areas where the newly proposed corridors would have been located. For example, Corridor 108-267 currently contains a number of transmission facilities. However, at the southern and northern ends of the corridor, it is far too narrow to accommodate even the existing facilities. As designated, SCE believes it would be extremely difficult to site any new facilities in that corridor. SCE recommends that the Agencies widen the corridor at its northern and southern ends to accommodate the existing facilities and if possible, to accommodate future facilities.

50424-007

Comments on Draft PEIS

As the DOE requested in the Executive Summary of the PEIS, SCE has included its comments and suggested changes to the Draft PEIS. The comments refer to a section or page number, where applicable.

Section 1.4 – How will the Agencies Expedite the Application Process?

In Section 1.4, at page 1-11, the Draft PEIS states:

> "Section 368 directs the Agencies to establish procedures under their respective authorities to expedite the application process for energy related projects within Section 368 designated corridors. The Agencies would include uniform interagency operating procedures (listed and described in more detail at Section 2.4) for reviewing applications for energy ROWs within designated Section 368 corridors."

While the process described in Section 1.4 is to expedite the authorization process when compared to existing processes and procedures, SCE does not believe it goes far enough. Section 1221 of the Energy Policy Act of 2005 (EPAct 2005) regarding Coordination of Federal Authorizations for Transmission Facilities requires that the DOE Secretary of the "…shall establish prompt and binding intermediate milestones and ultimate deadlines for the review of, and Federal Authorization decisions related to the proposed facility."[2] Furthermore, in that same section, EPAct 2005 also requires "all permit decisions and environmental reviews under all Federal laws shall be completed – within 1 year…"[3] The requirements applicable for Section 1221 are relevant to Section 368 because the requirements have the same policy goal: expediting project decision-making over federal lands. While the milestones and deadlines related to the review of each transmission project may differ, SCE believes it is important that the Agencies establish general guidelines up front in the PEIS to ensure that each project is treated in a timely and equitable manner, and that the review conforms with the requirements under EPAct 2005. SCE believes the agencies can develop the guidelines using the processes already

50424-008

[2] Section 1221, Siting of Interstate Electric Transmission Facilities, revising Section 216, Siting of Interstate Electric Transmission Facilities, of the Federal Power Act, (h)(4)(A).
[3] *Id.*

outlined in the Draft PEIS, including the "Application Process" and "Data Analysis" portions of the Agencies' project review.

50424-008 (cont.)

Section 2.4 – How Would the Agencies Evaluate and Oversee the Use and Occupancy of Energy Corridors?

SCE is generally supportive of the Agencies' proposals throughout section 2.4 of the PEIS. However, SCE is concerned with the language that implies that certain items are "absolutes." SCE strongly recommends that the Agencies recognize the need for flexibility in many of the proposed requirements and urges the Final PEIS to include a statement noting that the "requirements" of Section 2.4 may be reviewed as guidelines, may not be applicable to all permitting situations, and may be used or not on a case-by-case basis as determined by the licensing Agency. SCE has provided several examples below where the proposed language in section 2.4 could be troublesome to transmission project developers and inapplicable in some situations.

Section 2.4.1 – What Would Be the IOPs for Project Planning?

Item 21, Page 2-29 - The applicant should prepare a comprehensive transportation plan for the transport of transmission tower or pipeline components, main assembly cranes, and other large equipment. The plan should address specific sizes, weights, origin, destination, and unique equipment handling requirements. The plan should evaluate alternative transportation routes and should comply with state regulations and all necessary permitting requirements. The plan should address site access roads and eliminate hazards from truck traffic or adverse impacts to normal traffic flow. The plan should include measures such as informational signage and traffic controls that may be necessary during construction or maintenance of facilities.

50424-009

SCE recommends that the underlined language in Item 17 (above) be revised to read "…and minimize hazards from truck traffic…" SCE consistently tries to minimize hazards while employees perform their duties; however, it would be difficult, if not impossible, to eliminate all hazards associated with project work, especially in areas with high traffic flow not directly associated with the transmission project. SCE believes that replacing the word "eliminate" with "minimize" is a more reasonable approach to addressing concerns associated with hazards from truck traffic.

> Item 24, Page 2-29 – A health and safety program should be developed by the applicant to protect both workers and the general public during construction, operation, and decommissioning of an energy transport project. The program should identify all applicable federal and state occupational safety standards, establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses, Occupational Safety and Health Administration [OSHA] standard practices for safe use of explosives and blasting agents, measures for reducing occupational electromagnetic field [EMF] exposures), and define safety performance standards (e.g., electrical system standards). The program should include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies should be established.

Typically, environmental documents do not include OSHA- and EMF-related regulations. Utilities must comply with OSHA and EMF regulations (if any exist in a particular state) when developing any transmission project. However, the Agencies should not be held responsible for upholding these regulations unless the Agency has a specific regulatory mandate to enforce those laws. Otherwise, these issues are the responsibility of the agencies with jurisdiction over those matters. Furthermore, the Agencies should not impose any additional regulations or requirements on a project developer when those requirements are already imposed by another regulatory entity. As such, SCE recommends elimination of the language in Item 24 or, at a minimum, that the language be revised to reflect that other federal and state agencies are responsible for OSHA- and EMF-related regulations and that compliance or reinforcement of these standards will not be conducted by the Agencies.

50424-009 (cont.)

> **Section 2.4.2 – What Would Be the IOPs for Project Construction?**
>
> Item 17, Page 2-32 - The applicant should limit noisy construction activities (including blasting) to the least noise-sensitive times of day (i.e., daytime only between 7 a.m. and 10 p.m.) and weekdays.

SCE recommends that Item 17 of Section 2.4.2 be revised to allow for work on the weekends and national holidays, once the constructing entity has secured the appropriate permits or variances from the appropriate jurisdiction(s) with control over the work.

Section 3.2.1.5 – Aviation Considerations

Many of the corridors designated under the Draft PEIS are affected by siting constraints due to military airspace restrictions. SCE believes that Corridor 27-41 has been designated as an "underground only" corridor at least partially due to military training requirements (according to Appendix J). Corridor 27-41 is more than 100 miles long, runs along Interstate Highway 40, and could serve as a valuable electric transmission corridor. Importantly, the corridor currently has an aboveground transmission line owned by the Los Angeles Department of Water and Power running a number of miles along the corridor in the area of Ludlow. As this existing transmission line is already in the area, the Department of Defense (DOD) cannot reasonably justify a restriction on overhead lines along Corridor 27-41.

While SCE understands the importance of siting constraints due to military airspace restrictions and realizes that military operations must be protected, SCE believes the Agencies need to use their discretion before imposing inappropriate and unsubstantiated restrictions on federal land corridors. The DOD should examine the specific circumstances where this military precedent needs to be instituted and should review the Draft PEIS to determine where restrictions imposed in the Draft PEIS can be altered. SCE understands that transmission towers under 200 feet in height would not impact training operations. Military flight restriction zones should not be used as the basis for a carte blanche denial of any transmission projects near a military base. Furthermore, the "underground only" designation defeats the general precept for corridor designations for multiple-use purposes and forces other utilities with overhead facilities to seek designation of additional corridors in other areas for such purposes, thereby potentially increasing the overall environmental impacts. 50424-010

A potential solution may be to include requirements such as "where and when necessary military airspace restrictions are identified, potential corridor users considering overhead installations will be required to obtain clearance from the relevant military facility or DOD as to the maximum allowable heights that could be accommodated in specific

sections of the corridor." SCE is hopeful that alternative solutions may be developed to allow transmission facilities and military bases to coexist in the same geographic area while also ensuring the needs of the general public are met from a utility and safety perspective. SCE would welcome an opportunity to meet with representatives from the DOD to discuss potential solutions to both the military and utility needs.

50424-010 (cont.)

PDEIS Appendix E

Section 2.2.1 - What Electricity Transmission Line Assumptions Does the Hypothetical Scenario Make?

Page E-21: Tower Construction

In the third bullet, first sub-bullet on page E-21, the Draft PEIS concludes that "each tower would require a tower assembly area of at least 100 feet × 200 feet" for ROW construction considerations. While SCE believes an area of 100 feet x 200 feet would accommodate the assembly area, it would not include enough area for the tower footprint or crane pad. For prior project work, SCE has requested and received approval for assembly areas of 200 feet x 200 feet at each tower location and suggests that the DOE revise the document to reflect a larger tower assembly area required for tower construction.

50424-011

In the third bullet, second sub-bullet on page E-21, SCE respectfully requests clarification regarding the statement that "Lattice towers would require at least 80,000 square feet per tower for construction." SCE is unsure whether the 20,000 square feet for tower assembly areas in the first sub-bullet is in addition to the 80,000 square feet for tower construction. If this is the case, then 80,000 square feet is more than sufficient to accommodate the assembly and erection of a tower (including the tower footprint and crane pad), and DOE may disregard SCE's comments regarding the first sub-bullet above. However, SCE recommends that the DOE clarify the aforementioned statement to clarify the total size of the assembly and construction areas.

Page E-22: Tower Construction (cont'd.)

In the first sub-bullet on page E-22, the DOE proposes that "At any given time during construction, two cable-pulling sites of 37,500 square feet each (150 feet × 250 feet) would be in use or in preparation." When constructing prior transmission projects, SCE has required a parcel of at least 200 feet x 500 feet for each tensioning site and a parcel of at least 200 feet x 200 feet for the pulling site. SCE respectfully requests that the DOE revised the language in the first sub-bullet at page E-22 to reflect the larger pulling and tensioning sites proposed by SCE to accommodate project construction.

50424-011 (cont.)

SCE appreciates this opportunity to provide additional comments in the corridor designation process and respectfully requests that the Agencies further consider the designation of the corridors proposed by SCE in its comments as well as the other recommendations made in this letter.

Sincerely,

Nino J. Mascolo