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RE: Preliminary Draft Map of Potential Energy Corridors on Federal Lands

The Nevada Department of Wildlife (NDOW) does not favor the No Action Alternative which is reflective of a continuation of the increasing rate of regional planning activities for a variety of proposed actions and needs contributing to significant burden on existing natural resource agencies. In practice, the result is not enough agency time or personnel to implement needed fish and wildlife monitoring and. Hence, we look forward to this PEIS effort adopting the following considerations:

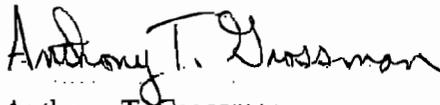
- Strong, collaborative coordination with State fish and wildlife agencies;
- With assistance from State and Federal wildlife agencies, identify habitats and movement corridors critical to wildlife and ensure meaningful short- and long-term impact minimization and mitigation measures are developed and implemented.
- Mechanisms (formulae) for accrual of funding dedicated to supporting this PEIS effort (reimburse Local, State, and Federal participation) and to fund impact minimization and mitigation measures. Source of funds are expected to be born from the benefiting energy and utility purveyors and conveyers.
- Ensure that any potentially designated energy corridors receive thorough and complete analyses addressing geo-technical and hydrological design considerations for any proposed utility as an integral part to the PEIS. (Too often after a Record of Decision has been finalized have subsequent geo-technical design analyses disrupted meaningful impact minimization and mitigation measures agreed to during the EIS process);
- Comprehensive and Complete Cumulative Effects analyses. When viewed collectively, cumulative effects of landscape level activities such as implicated in this PEIS and others of past, present, and the foreseeable future have potential to significantly impact fish and wildlife resources from additive and/or synergistic acting consequences.
- Address meaningful re-vegetation effort and goals for disturbed habitats;
- Address curbing spread of noxious and invasive species, (including rich, environmentally insensitive entrepreneurs, land barons, lobbyists, politicians, and ex-government officials);
- Avoid deleterious impacts to habitats by corridor designations in size, shape, quality and quantity, and connectivity.

- Avoid degradation and fragmentation of habitats;
- Do not encourage other land uses also potentially detrimental to fish, wildlife and habitats to share designated energy corridors except when there is clear benefit to fish and wildlife conservation;
- Clearly identify limitations on the number and types of Rights of Way's (inclusive of other utilities, e.g. water) authorized within designated energy corridors in view of fish and wildlife resources in addition to energy benefiting goals.
- Review on a 5 to 10 year basis the effectiveness of implementing programs and activities pursuant to this PEIS. Effectiveness monitoring will be reliant on progress thresholds that if not met trigger additional impact minimization and/or mitigation measures replete with funds dedicated by DOE and the various energy purveyors and conveyors.
- Fish and wildlife resources are intimately a part of the existing environmental situation relative to:
 - socioeconomic and recreation,
 - protected, threatened, endangered, or sensitive species and/or their critical habitats;
 - floodplains and wetlands;
 - human health and safety;
 - other land uses; and perhaps even
 - environmental justice

We encourage the PEIS to include a complete analysis on the relevance of fish and wildlife values to the affected areas.

NDOW looks forward to working towards a productive PEIS experience and product.

Sincerely,



Anthony T. Grossman
Habitat Staff Specialist