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FACSIMILE TRANSMITTAL COVER SHEET

DATE: July 6, 2006
TO: Office Electricity Delivery & Energy Reliability—Energy Corridor EIS
FAX NO.: 202-586-1472
FROM: Bruce Pendery
RE: Draft Energy Corridor Map-- Wyoming

ACCOMPANYING DOCUMENTS: Comments

MESSAGE: _____

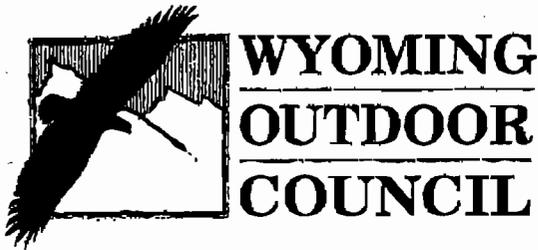
Original documents will will not _____ be mailed; will be hand delivered _____.

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Thank you.



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July 6, 2006

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Re: Comments on the Preliminary Draft Energy Corridor Map for Wyoming

To whom it may concern:

In light of the widespread call for upgraded and new electricity transmission and distribution facilities, the Wyoming Outdoor Council appreciates the federal government's efforts to evaluate the reliability, congestion and enhancement of the national electricity grid (*Energy Policy Act of 2005*, Section 368). We believe that Wyoming's electricity economy should increasingly feature wind and solar power, and for that to occur improved access to transmission facilities is crucial. We believe access to transmission facilities for renewable forms of energy (electricity) should be given priority as part of a sustainable energy strategy for our state.

The Wyoming Outdoor Council would like to offer the following comments on the potential energy corridors map for Wyoming that has been released by the Departments of Energy, Interior, Agriculture, and Defense. See http://corridoreis.anl.gov/documents/docs/WWEC_PrelimDraftMap_Wyoming.pdf.

Generally speaking we believe the following considerations should guide designation of corridors. Corridors should be designated along existing energy corridors and/or transportation routes (roads) to the maximum extent possible while also creating the maximum possible opportunities for the development of renewable energy, particularly wind energy. It is widely

recognized that the greatest impediment to the full development of wind energy resources is the lack of access to transmission lines. This needs to be rectified to the maximum extent possible, while also protecting fragile environmental values and qualities. As recognized in the Western Governors' Association (WGA) report "Clean Energy, a Strong Economy and a Healthy Environment" (June 2006), "Energy efficiency and conservation are our cheapest, cleanest, least risky and least controversial energy strategies." Furthermore, the WGA's Transmission Task Force concluded that, "Implementation of the recommendations of the Efficiency Task Force can potentially defer or even lessen the need for some new transmission investment" (May 2006). The selection of energy corridors should recognize and support this energy efficiency imperative.

The map referenced above shows that a significant portion of the potential energy corridors in Wyoming would follow the Interstate 80 corridor. We support this. The I-80 corridor is clearly the dominant and most appropriate corridor in Wyoming, for energy as well as transportation. There are several existing wind farms in the vicinity of this corridor, and special effort should be made to ensure that they, and potential future wind farms along this corridor, have access to transmission lines.

That said, we do have several concerns regarding the potential corridors due to the potential they have for significant environmental impacts. These concerns are as follows:

- The I-80 energy corridor diverges significantly from I-80 itself beginning in the general vicinity of Superior in the Red Desert, continuing straight west a number of miles north of the Interstate. This takes the corridor through large areas of undeveloped countryside, much of it public land, which could be greatly impacted by introducing a large energy corridor into this area. We believe the corridor should follow I-80 itself to the maximum extent possible.
- Along this same stretch of potential energy corridor, it appears to us that the potential corridor would bisect Seedskadee National Wildlife Refuge. We believe it is inappropriate to designate an energy corridor in a National Wildlife Refuge. At a minimum, any such corridor will need to meet the governing standard for National Wildlife Refuges: there must be assurance that any energy corridor uses are "compatible" with the principle use, namely that other uses cannot interfere with or detract from the principle use, which is the protection of wildlife. But to reiterate, there does not appear to be any need for the energy corridor to cross the refuge.
- This same stretch of corridor, which roughly follows U.S. Highway 30 in western Wyoming, also appears to intersect the U.S. Fish and Wildlife Service's riparian restoration projection in the Bear River watershed and may possibly intersect the Bureau of Land Management's Raymond Mountain Wilderness Study Area (WSA). Clearly lands being evaluated for their important wetlands values should not be harmed by potential energy corridors. And the Raymond Mountain WSA is one of the largest – if not the largest – WSAs in Wyoming, and thus it has special values owing to its size alone, values which should not be diminished by dissecting the area with energy infrastructure. More generally, this stretch of potential corridor in the vicinity of U.S. 30 diverges significantly from the highway in the vicinity of Kemmerer, and we do not believe this

should occur; it should follow U.S. 30 more closely so as to avoid disturbing a vast area of undeveloped land, much of it public land.

- An energy corridor is also portrayed in the Shirley Basin. We believe an energy corridor in this vast, undeveloped basin, which is a center for black-footed ferret recovery efforts, cannot be justified absent compelling needs, such as providing transmission access to planned wind farms. Overhead transmission lines in particular can serve as perches for raptors, which can prey on prairie dogs, vital food for ferrets.
- Several small sections of energy corridor are shown in and near the Thunder Basin National Grassland in Converse and Campbell counties. It is not clear to us what the destinations of these short segments are, perhaps to support development of coal or coal bed methane, but special efforts should be made to protect the values in the National Grassland.
- A rather lengthy segment of corridor is shown running northwest of U.S. Highway 20 departing from the highway in the general vicinity of Waltman in Natrona County. This corridor appears to follow an existing railroad until it reaches Lysite. If that is indeed the case, we support siting an energy corridor along the railroad.
- The potential energy corridor map shows no corridor being planned in the South Pass area, and we strongly support maintenance of this exclusion. The historical values of the South Pass area are of such overwhelming national significance that no energy corridor should be designated in this area.
- The "Note" on the June 2006 "Potential Energy Corridors" map says, "The majority of the preliminary energy corridors utilize existing corridors and/or rights-of-way, but there are a small number of potential new corridor locations...Corridors are shown on this map with widths of 3,500 feet the default width currently under consideration." We believe the width of the potential energy corridors should be minimized in all cases. Siting a 3,500 foot wide – two-thirds of a mile – corridor will significantly fragment wildlife habitat and other natural resource values on public and private lands, and should not be pursued as the "default." The default should be the narrowest width possible.

Last, attached to these comments as provided to the Wyoming Governor's office are the scoping comments we submitted for this National Environmental Policy Act compliance effort, and we ask that they be considered by the Governor's office. Thank you for considering these comments.

Sincerely,



Bruce Pendery
Program Director



Michele Barlow
Government Affairs Director