

## Corridor EIS Archives

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**From:** corridoreiswebmaster@anl.gov  
**Sent:** Monday, July 10, 2006 2:35 PM  
**To:** corridoreisarchives,  
**Subject:** Preliminary Draft Corridor Map Comment M0094

**Attachments:** Draft\_368\_corridor\_comments\_M0094.doc



Draft\_368\_corridor\_  
comments\_M0...

Thank you for your comment, Adam Bless.

The comment tracking number that has been assigned to your comment is M0094. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 02:35:15PM CDT

Preliminary Draft Corridor Map Comment: M0094

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Privacy Preference: Don't withhold name or address from public record  
Attachment: C:\Documents and Settings\Administrator\Desktop\Draft 368 corridor comments.doc

Comment Submitted:  
letter attached

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

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Attn: Julia Souder, Western Regional Coordinator

July 11, 2006

EPACT05 Section 368 -- Draft Energy Corridor Comments.

The Oregon Department of Energy (ODOE) offers the following comments on the preliminary energy corridors 2005 Energy Policy Act.

#### General Comments

USDOE has issued a map of preliminary corridors, with no accompanying text. Looking just at the map, it is difficult to tell what the rationale was for proposing these particular corridors. This limits our ability to provide substantive comments. USDOE has announced that it will issue a draft Programmatic Environmental Impact Statement (PEIS), but probably not until late fall of 2006. We believe USDOE should provide some text explanation of the rationale behind the proposed federal corridors before issuing the draft PEIS. The higher quality of the comments we could provide with such an explanation would greatly help USDOE in its effort to write a good PEIS on the first try.

We also request more time to comment on the preliminary corridors. As the lead agency for siting energy facilities in Oregon, we have closely monitored USDOE's implementation of sections 1221 and 368 of EPACT, and are commenting on the issues within our agency's scope. However, the short comment deadline has not allowed for coordinated comments with other state agencies. For this reason, we request more time to coordinate a response that represents the views of the state.

ODOE is an active participant in the SSGWI (now WECC) study process, the Northwest Transmission Assessment Committee (NTAC) study efforts, and the Western Congestion Assessment Task Force (WCATF) that was formed in an effort to provide a unified congestion study for the Western Interconnect. Because of the short comment period provided, we can comment for Oregon but did not have time to coordinate comments with neighboring states or the WCATF team. We think that allowing extra time to compare draft comments with other WCATF participants will result in much more insight and much more useful comments.

Corridor specific comments

We have reviewed the state specific map and note that the proposed 368 corridors in Oregon can be described roughly as follows:

1. A short corridor segment in southern Columbia County.
2. A corridor crossing Forest Service Land (USFS) in the NE corner of Clackamas County
3. A corridor running East-West across central Clackamas County, with the Eastern end terminating on tribal land of the Warm Springs tribe.
4. Several very short corridor segments roughly paralleling Interstate Highway (I-5) in Linn, Lane, and Douglas counties.
5. Corridor segments running from the NW to the SE corner of Jackson county
6. A long corridor East of the Cascades from north to south in Jefferson, Crook, Deschutes, Land and Klamath Counties
7. A long corridor running East-West roughly paralleling US Highway 20
8. A corridor paralleling Interstate Highway 84 (I-84) in Eastern Oregon
9. A corridor running East-West across southern Oregon in Malheur, Harney and Lake counties
10. A corridor in the NE corner of Oregon, in Umatilla and Union counties.

Corridor Comments – Siting considerations

In our comments of November 23, 2005 during the scoping period, we commented that USDOE should consider not only the environmental impact of the proposed corridor on federal land, but also the impact on adjacent private lands. This comment is doubly important now, because most of the proposed federal energy corridors in Oregon would have to continue on in to private land in order to connect with the rest of the grid.

We also suggested that USDOE consider the impact not only of the proposed federal energy corridor but of any generation facilities that will likely be located on adjacent private lands. Our experience is that generation developers gravitate towards already existing transmission.

As staff to the siting agency in Oregon, ODOE is particularly concerned about the short corridor segments in Linn, Lane and Douglas counties, west of the Cascades. These short segments would be connected by corridors on private land. A large transmission line on private land along this corridor would be very difficult to site, and any new right of way in this area would be very difficult to acquire without relying heavily on condemnation. Although section 368 of the EPACT mandates federal corridors on federal lands, this particular set of proposed corridor segments really creates a defacto corridor on predominantly private lands. USDOE should strongly consider the impact on private lands along this suggested corridor.

We are also curious about the usefulness of the corridor in Western Clackamas county that abuts the Warm Springs reservation. We generally agree that additional transmission capacity across the Oregon Cascades may be needed to bring wind energy from Eastern Oregon to load centers West of the mountains. However, the federal siting authority created by the EPACT will not extend to tribal lands. USDOE should explain the rationale for this corridor segment.

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### Corridor Comments – congestion considerations

Regarding electrical congestion consideration, we refer to the WCATF studies transmitted under the May 9, 2006 letter from Rob Kondziolka, WCATF Chair, to Poonum Agrawal, USDOE. Although those studies were written to address the National Interest corridors created by section 1221 of the EPACT, they provide a good indication of where additional energy transmission capacity is needed to relieve congestion.

One proposed corridor, running north to south west of US highway 97, shows obvious agreement with the WCATF study. It would serve to strengthen the Pacific DC Intertie (PDCI) and the California-Oregon Intertie (COI). Both of these transmission paths consistently rank high on the WCATF list of congested paths. We were not surprised to see this corridor proposed for federal designation. We do ask whether this corridor is new or existing right of way.

The congestion rationale behind other corridors is less obvious. For example, the short corridor segment in the northwest corner of Umatilla County does not appear to be in an area where congestion has been identified. The same might be said for the proposed corridor across the south eastern quarter of the state. Without knowing why this corridor is proposed, our ability to make substantive comments is limited.

### Conclusion

We request more time to comment and more detailed information on the proposed corridors. We are concerned that USDOE has not announced any comment opportunity between the July 11<sup>th</sup> deadline and the issuance of the draft PEIS. We strongly request additional comment opportunities and some text explanation of the reasoning behind the preliminary corridors. In particular, ODOE would like to learn:

- a. What congestion the proposed corridor is expected to relieve
- b. What environmental considerations went into the selection of these preliminary corridors
- c. What siting consideration went into the selection of these preliminary corridors
- d. How DOE considered the need for corridors on federal lands to mesh with transmission corridors on adjacent private lands, and
- e. How the WCATF and subregional congestion studies were used in selecting the preliminary corridors.

The Department appreciates this opportunity to comment and looks forward to working with USDOE in the months to come.

Sincerely,

Adam Bless  
Senior Energy Facilities Analyst  
Oregon Department of Energy