

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 7:06 PM
To: Corridor EIS Archives
Subject: Preliminary Draft Corridor Map Comment M0128

Attachments: Montana_Comments_Westwide_Corridors_tr_(3)_M0128.doc



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s_Westwide_Corr...

Thank you for your comment, Tom Kaiserski.

The comment tracking number that has been assigned to your comment is M0128. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 07:06:05PM CDT

Preliminary Draft Corridor Map Comment: M0128

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Attachment: f:\My Documents\Energy\Montana Comments Westwide Corridors tr (3).doc

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.

Scott Powers
BLM
Billings, Montana

Dear Scott:

Thanks again for meeting with state officials on April 27 to present the draft map of the proposed Western Energy Corridor System. We wrote a comment letter via e-mail on May 26 on the draft energy corridors and this letter represents our desire to make some final comments before the July 10 comment deadline. As we have had time to think about this issue, we believe our earlier comments adequately express our concerns, and we will take this comment opportunity to emphasize what are essentially the key points contained in our earlier comments. We also reviewed the revised corridor map as it appears on the federal programmatic energy corridor website and we have prepared additional comments based on the review of that map. Those additional comments are attached to this letter and designated Appendix A .

Many factors will determine the ultimate best locations for additional energy corridors in Montana. Environmental, social and economic impacts will all be weighed by private industry as well as public agencies in the siting process. Governor Schweitzer is promoting energy development as a key component of his economic development strategy. And this new energy will largely be exported to load centers and refineries outside Montana and this makes energy corridor designation and ensuing permitting critical to this economic development path. We believe our biggest challenge, as a state, is to balance the public interests with those of the industry that will develop the energy and build the transmission lines and pipelines. We think we can build a strong economy, help private industry prosper and create good jobs while we protect the attributes of Montana that are so precious to our citizens, i.e. beautiful scenery and a clean and health environment.

Our comments reflect the Governor's desire to balance these interests to the benefit of all. To that end, the recommended routes that were shown on the map that was previously provided to you try to achieve that balance. For example, one of our recommended federal land energy corridors will allow for intersecting the existing east west 500 kv transmission line near Garrison and exiting the state to the south near Dillon. This was done largely to take advantage of the preponderance of federal lands in the area and to avoid the prevalence of private lands and rural residential development that has taken place further to the east in places such as the Madison Valley.

We recognize that this south trending energy corridor beginning at Garrison avoids impacting private land holders who have legitimate concerns over locating a line where it would adversely affect private land uses and the most scenic landscapes. However, the private companies who will develop the projects to build these transmission lines or pipelines may have differing opinions of their optimal locations for corridors. Perhaps

they have strategies and technologies that they feel could address and mitigate landowner concerns that we are not aware of at this time.

We do not want federally designated energy corridors to be so rigidly enforced by BLM as to preclude rational private land corridor development by private development concerns. As long as the visibility and other issues can be dealt with, there is no distinct advantage in federal corridors, other than eminent domain concerns.

We invite you to consider all of our previous comments, perhaps focusing on the lack of designated corridors in eastern Montana. This corresponds closely to identifying routes to place carbon dioxide pipelines across federal lands (likely BLM land in the south east part of the state) that connect oil-producing areas to coal producing areas. Thanks again for the opportunity to comment. We also invite you to consider the comments contained in Appendix A.

Sincerely,

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APPENDIX A - ADDITIONAL ENERGY CORRIDOR COMMENTS

GENERAL CONCERNS

Overall, analyzing the map you published on your website was extremely difficult considering the lack of appropriate scale in order to read it with any reasonable degree of accuracy. As a result, many of our staff at the Governors Office, Department of Environmental Quality and Fish, Wildlife and Parks struggled to develop meaningful comments. However we did attempt to compare your map to larger scale GIS information available to our state agencies. This information shows land ownership, fish and wildlife ranges, topography, hydrography, land management status, and existing transmission lines and pipelines. However, this was a difficult and time-consuming undertaking and it is doubtful that other members of the public were able to complete a similar comparison.

GEOGRAPHICALLY SPECIFIC CONCERNS

Toole County, Montana

In the area northwest of Shelby, the map raises several concerns. Although scattered parcels of federal land do occur in the area, private and state land predominates. According to the federal legislation guiding your efforts, corridors can only be designated where there is a preponderance of federal land and close examination should be given to determine if this area would even qualify for corridor designation. In addition, there are currently no pipelines in this area (National Pipeline Mapping System, USDOT, Office of Pipeline Safety), no major electric transmission lines in this area, and the terrain is hilly to steep potentially rendering construction of new facilities unsuitable due to potential for excessive and unnecessary erosion.

The BLM has designated an area along the Kevin Rim as an area of critical environmental concern noted for its nesting raptors. Construction of a new transmission line in this area could encourage development of wind power nearby that might conflict with raptor use. For many of these reasons, most pipelines and transmission lines have been located further west in the Cut Bank vicinity.

Western Cascade County, Montana

Again in western Cascade County the potential energy corridor is located in an area with limited and scattered parcels of federal land. Private and state lands predominate and federal corridor designation may not be appropriate considering your federal legislation requirements that corridors can only be designated where there is a preponderance of federal land. We would recommend close examination to determine if this qualifies for corridor designation.

There are currently no pipelines in the area (National Pipeline Mapping System, USDOT, Office of Pipeline Safety).

If the existing 100 kV transmission line in the area were to be proposed today, it is not certain that this would be the route chosen because of land use changes on the approaches to federal land from either direction. On the approaches there could be land use conflicts with a new transmission lines. We would suggest that this corridor only be considered for an upgrade of the existing line rather than for new parallel lines. We think that State review under the Montana Major Facility Siting Act and the Western Governors Association MOU on siting should be allowed to proceed in lieu of a federal corridor designation for new lines in this area.

Lewis & Clark County and Jefferson County

In eastern Lewis & Clark County, the potential energy corridor appears to unnecessarily cross BLM's Sleeping Giant Area of Critical Environmental Concern. We recommend locating the corridor further west closer to I-15.

Greater Helena Area

The potential energy corridor located on BLM land roughly four miles north of Lake Helena sets the stage to cross an extensive developing area on the east side of the Helena valley, the quickly growing Helena valley, and the growing Montana City and Clancy areas in northern Jefferson County. We think that the State siting process under the Montana Major Facility Siting Act should be allowed to determine if the site specific indirect effects of transmission and pipeline development on private lands in these areas are feasible. We strongly recommend that no corridor designation in this area.

Rock Creek area, Missoula and Granite Counties

In the Rock Creek area southeast of Missoula careful consideration should be given to the effects of a transmission line on approaches to the Rock Creek airstrip. This area receives air ambulance flights, contains recently developed subdivisions, has numerous visual resources and is a significant area of recreational use often related to the drainage supporting the Blue Ribbon Trout fishery of Rock Creek. A corridor as indicated in this area and further west may not represent the lowest impact location for a pipeline. If designated, a corridor should only be for upgrades to the existing transmission lines.

Missoula County

South of Missoula, you should consider the effects of designating a corridor both east and west of the Miller Creek and Bitterroot River valleys. Private land use predominates the area and numerous visual resources exist in and adjacent to these valleys. Subdivision growth is occurring adjacent to the existing 500 kV transmission line and siting a new line adjacent to the existing line may no longer be appropriate. We recommend that this area only be considered for an upgrade to the existing transmission line in designating a corridor.

Beaverhead County

We recommend that you carefully consider the effects to land uses and visual resources on private land that certainly would be crossed by a transmission line if the easternmost of the two potential corridors west of Dillon were designated and used. West of Dillon we recommend a single corridor that utilizes mostly BLM land and avoids private land to the extent practicable. The corridor should avoid the Apex mine north of Dillon.

Carbon County

In Carbon County the potential energy corridor indicated on the map would result in pipelines and transmission lines crossing private lands in the valley of the Clarks Fork Yellowstone River. This fertile valley supports economically important wildlife resources as well as sugar beet farming - one of the highest value crops in Montana. In the state's previous comments we suggested that the corridor be located just to the east of Warren and follow the well established pipeline corridor located there. Such a corridor designation would avoid more irrigated land on adjacent private lands.

CONCERNS SPECIFIC TO FISH AND WILDLIFE AND RELATED RESOURCES

Overall Fish and Wildlife Inventory and Monitoring

Many of the potential corridors that parallel existing lines were subject to Montana Fish, Wildlife & Parks studies during the original siting processes. For example, a significant study was completed exploring the effects on elk of the 500-kv transmission line that was constructed in 1984-85 by the Bonneville Power Administration from Garrison to Taft, generally paralleling Interstate 90 for a distance of approximately 156 miles. As a result, mitigations related to potential impacts of the transmission lines were enacted at that time. However, potential impacts to fish, wildlife and recreation using these same corridors for the transportation of oil, gas, and hydrogen were not foreseen or included in any of these impact assessments. Because the location of these corridors on Federal lands will be a strong determining factor for where applications are made to site corridors on private lands, state agencies are intensely interested in reviewing all of the environmental documentation you are preparing for this proposed action. We think it is in the public's interest that state agencies be provided with more appropriately scaled map and GIS coverages of the potential corridors in the near future so that we can jointly develop and implement the most appropriate and effective pre and post designation monitoring protocols and mitigations for potential fish and wildlife impacts.

Sage Grouse

Although the poor scale of the maps provided of the potential corridors precluded identification of specific siting issues, many of the proposed corridors through Beaverhead, Carbon, and Powder River Counties could have detrimental impacts on struggling sage-grouse populations. It is documented that sage grouse avoid and are

impacted by any structures that provide roosting areas for raptors and wide buffers should be used to avoid siting corridors within proximity to sage grouse leks. Similarly, any kind of disturbance that fragments sagebrush-grassland habitat typically results in reduced sage-grouse productivity and, depending on the type of disturbance, can also result in direct avoidance. It is important to avoid further fragmentation of these habitats.

Raptors

The Kevin Rim area (Liberty County) as mentioned earlier in this letter, is an important breeding habitat for raptors. Ongoing disturbances such as line construction and maintenance would likely have an impact on raptor use and productivity. Increased opportunity for wind generation development could also promote indirect impacts from corridor designation.

Wetlands and Streams

Wetland habitats in Liberty County and other areas appear to be potentially impacted by the proposed corridor in that area. A more appropriately scaled map should be used to consider these areas and be avoided in order to reduce bird collisions (and resultant botulism outbreaks), impacts from raptor roosting, interference with hunting and recreational opportunities and other impacts.

River and stream crossings will undoubtedly occur in many of the proposed corridors. Careful consideration should be given to the approaches for these crossing because they will proceed through diverse riparian habitat and will have impacts on birds and other fish and wildlife. Historically, these impacts have been difficult to mitigate for on-site.

Freezeout Lake WMA (Teton county) and Benton Lake Refuge (Cascade County) are very important waterfowl and shorebird production and migration staging areas. These areas need to be provided extremely wide buffers and avoided so as to reduce collisions and impacts from raptor roosting.