



Monday, November 28, 2005

Ms. Julia Souder  
U.S. Department of Energy  
Office of Electricity Delivery and Energy Reliability  
Room 8H-033  
1000 Independence Avenue, SW  
Washington, DC 20585

Sent via facsimile – (202) 586-1472

**Re: DOE/EIS-0386 – Designation of Energy Corridors on Federal Lands in  
11 Western States**

Dear Ms. Suidor:

Wind Hunter, LLC appreciates the challenge and effort required to evaluate and designate utility corridors on Federal lands in the eleven Western States. Wind Hunter is actively developing wind energy generation projects in several of these states, and the electric transmission system needed to transmit the power from these projects is critical to their success, and to the development of wind energy in these states. Wind Hunter supports the efforts of the federal agencies to implement national interest corridors by amending agency land use plans.

Because the existing transmission system is congested and will not accommodate growing electrical infrastructure needs of our citizens, business and industry, there is compelling need to expand the transmission grid. Both our present and future economic well being and our national security interests demand that the electrical infrastructure expansion include diverse sources of new electrical generation and a robust electrical transmission system. Wind Hunter supports the federal government's commitment to help resolve this need by establishing corridors and amending land use plans on National Forest System lands, public lands managed by the BLM, and other public lands.

The comments that follow are intended to support the corridor planning efforts specific to electric transmission lines in the region. Our comments are organized as follows:

1. Corridor Needs
2. Scoping
3. Corridor Compatibility
4. Project Environmental Review
5. Relationship of Corridors to Electrical Constraints

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## ***Corridor Needs***

### ***How will the need for corridors be identified?***

It is important for the agencies to start with a firm study foundation based on identifying the needs for corridors. It is unclear how this process will begin or be conducted.

### ***What process will the agencies use to determine which transmission lines and generation projects are included and which are not?***

Transmission line corridors need to be identified for major generation interconnect lines, as well as for major transmission system expansion and improvements. Corridors need to be identified for all types and sizes of transmission lines as long as the need is understood. It is unclear how the agencies will deal with this issue.

In addition to the information and mapping provided by the Western Utility Group (WUG), the agencies should reach out to all sectors of the electric energy industry, including developers such as Wind Hunter, on the way to determining the need for corridors.

### ***What is the planning horizon for the corridors identified in this effort?***

Corridors identified during this process may soon be out of date. The agencies should clearly identify the means to update the corridor plan, including a continuous effort to identify changing system needs, economies and requirements.

### ***How will Corridor Width and Capacity Be Identified?***

BLM and FS have largely recognized existing transmission lines as corridors. Some of the existing corridors will need to be expanded to accommodate the needs. Likewise, new corridors will need to be identified and transmission line separation recognized. The agencies should recognize that corridor needs will change with time, and building flexibility into designing corridor width and capacity would help facilitate specific project review.

### ***How will the Priority Interest Corridors Be Selected?***

Criteria should be carefully selected and shared with the public before the Draft Programmatic EIS is published. The criteria should be carefully administered to the selected Priority Interest Corridors, and there should be a transparent process described in the Draft Programmatic EIS.



### *Will Separating Transmission Lines for Reliability be Observed as Corridors are Identified and Designated?*

The Western Electric Coordinating Council (WECC) observes criteria to maintain the reliability of the transmission system. Separating important transmission lines from other lines is often needed to maintain reliability requirements. The agencies need to understand and observe these requirements in the corridor planning process.

### *Scoping*

#### *Will the Scoping Process Adequately Identify Issues?*

The public scoping process is meant to identify issues, concerns, and opportunities. Public scoping started with the series of public meetings, which was the first opportunity to interact with the public, industry, and state and local government. We think that understanding the electric energy corridor needs and reaching out to the electric industry during the scoping process should part of this important first step. The public scoping meetings were limited in terms of full opportunity for meaningful input from the public and electric energy business sector, and we encourage the agencies to further reach out to the public and industry to gain the background necessary to make this process successful.

Corridor process must be understood and communicated to be effective.

### *Corridor Compatibility*

#### *How will Corridors be Sited, Compared, and Selected?*

It is an enormous task to collect and analyze the land use, biological resource, cultural resource, visual impact, and earth resource information needed to adequately identify electric transmission line corridors. The data and information should be uniformly collected and mapped across each of the states. Criteria to identify constraints and opportunities should be communicated early with the interested public. Additional public meeting should be conducted to share the identified needs and the mapped information prior to publishing the Draft Programmatic EIS.

The agencies should consider the following in development of planning criteria for the Programmatic EIS:

- Corridors should be developed in consideration of constraining land use designations, existing communities and residences, conservation easements, and visual impacts.

- Corridors designation should also realize a programmatic process for Endangered Species Act Consultations and Section 106 Consultation for cultural resources.
- Corridors should be uniform across state or jurisdiction boundaries, and address corridors potentially crossing private lands.
- The process must coordinate corridor designation with the applicable state siting laws (e.g., the Montana Major Facility Siting Act).
- Corridors must be selected that minimize environmental impacts.

*How will Corridors be Designated on Private Lands?*

Corridor designation will be done only on federal public lands, but corridors adjacent to private lands should be recognized and addressed in the Draft Programmatic EIS. This should be combined with recognition and and coordination with the applicable state siting laws (e.g., Montana Major Facility Siting Act).

*How will Reasonable Alternatives be Determined?*

Alternatives development should consider that project costs need to be reasonable for an alternative to be carried forward. Reasonable alternatives should be identified based on the needs identified early in the process (i.e., purpose and need).

***Project Environmental Review***

*How will the Corridors Recognize Changing Conditions and Needs?*

Corridor designation should be flexible to recognize the changing transmission system needs and requirements, and changing land uses.

*Will the Environmental Review Process for Transmission Lines be Less Cumbersome?*

The Draft Programmatic EIS should clearly describe a streamlined permitting process for facilities proposed within designated corridors.



***Relationship of Corridors to Electrical Constraints***

*How will the identification of corridors relate to the separate requirement to identify electrical constraints, also a part of the Energy Law.*

Electrical constraints should help the agencies identify high priority corridors, but should not be the only criteria the agencies use to identify the need for corridors.

Wind Hunter thanks the agencies for considering these comments. Please include us on your mailing list to receive information and a copy of the Draft and Final Programmatic EIS.

Sincerely,

***WIND HUNTER, LLC***



Jon N. Chafin  
President



**CROWLEY, HAUGHEY, HANSON, TOOLE & DIETRICH P.L.L.P.**

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1:34 PM

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**TO:** Ms. Julia Souder/Office of Electricity Delivery and Energy Reliability  
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**FROM:** Brian Holland

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**MESSAGE**

Enclosed are comments from a client, Wind Hunter, LLC, with respect to the West-wide Energy Corridor Programmatic Corridor EIS Scoping.

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