



November 28, 2005

Delivered via email an facsimile

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

RE: West-wide Energy Corridor Programmatic Environmental Impact Statement

Please accept the following comments from the Sierra Club on the West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS). The Sierra Club's nearly 800,000 members nationwide have a strong interest in the management of America's public lands as well as the development of a sustainable energy future. Provided below are specific comments on the preliminary environmental issues identified in Federal Register notice of September 28, 2005 as well as additional environmental issues we believe you should consider and analyze in detail during this process.

Socioeconomic and recreational impacts of development of the land tracts and their subsequent uses

This area of analysis should include a detailed discussion of the current economic activity associated with recreational activities enjoyed by the American public that could be impacted by additional energy corridors and energy development across the West. This analysis should also consider the economic and social impacts if these recreational activities are reduced or eliminated by development of particular land tracts and their subsequent uses. Further, the potential environmental damage associated with oil and gas spills or leaks, and how this could affect recreational activities, must be considered. Fishing, hunting, hiking, backpacking, and river recreation should all be specifically included in this portion of the analysis. This consideration should also be made for wind and solar energy projects, which are not always compatible with pre-existing recreational uses of the land.



Motorized recreation on easements and in corridors should also be analyzed and addressed in the PEIS.

Impacts on protected, threatened, endangered, or sensitive species of animals or plants, or their critical habitats

Though this PEIS does not, in itself, authorize new energy corridor construction activities, it should analyze the impacts to all protected, threatened, endangered and sensitive species and their critical habitats within and along each proposed new corridor as well as within and along existing energy corridors considered in this EIS. This should include state special-status species as well as federal ones. To what extent will new energy corridor creation contribute to or impede the recovery of particular threatened and endangered species? Similarly, are there ways that current energy corridors could be more optimally managed, including discontinuing particular corridors from use that may be contributing to the harm of threatened or endangered species, or which impede species recovery efforts?

These questions must also be asked in the context of the overall cumulative impacts associated with these energy corridors, such as associated energy development and extraction. Harm to threatened, endangered, or sensitive species can be reasonably anticipated due to energy development that may be facilitated or encouraged by new or more intensively utilized energy corridors. This larger question of potential cumulative impacts is the type of issue that is particularly important to consider and analyze fully in a larger-scale programmatic document such as this. New energy corridors and associated energy developments with the potential to harm species listed under the Endangered Species Act or species that are in the process of being listed while the corridors are being identified should be identified and excluded from consideration in this Programmatic EIS.

Lastly, the impacts of particular energy corridors and associated energy development on various species of wildlife that migrate seasonally but that may not necessarily be listed as threatened or endangered should also be analyzed. This should include species that migrate seasonally for forage, shelter and calving such as deer, elk, antelope, bison, wild horses and burros, bighorn sheep, and mountain goats. It should also fully consider the consequences for



migratory bird populations protected under the Migratory Bird Treaty Act, as well as migratory bats. Further, the discussion and analysis of connectivity issues should not be limited solely to species that migrate seasonally. While seasonal migration is a critical category for consideration, many species of wildlife need habitat connectivity for their basic requirements of foraging, breeding, and dispersal, which could all be negatively impacted by energy corridors, including state and federally listed sensitive, threatened and endangered species, Forest Service sensitive and management indicator species, species of concern identified in new Forest Plans, and Natural Heritage Program/Conservation Data Center species of special concern not necessarily identified in new Forest Plans.

Impacts on floodplains and wetlands

The PEIS should eliminate from consideration proposals to build new energy corridors or add to existing energy corridor infrastructure within wetlands and floodplains. If development in wetlands and floodplains is proposed, this EIS should analyze not only the direct environmental consequences of the creation or expansion of energy corridors through these areas, but also the impact on these areas if oil, gas or other spills and leaks were to occur. A detailed analysis of pipeline accident rates or breakdown potential under a variety of scenarios should be provided. What is the 'normal' or 'anticipated' amount of pipeline breakdown, rupture and leakage? What about under the stress of natural periodic events such as earthquake, flood, ice, fire or tsunami? Planning in advance for natural disasters will be particularly important when considering the potential impacts of energy corridor development in sensitive areas such as floodplains and wetlands.

Impacts on archaeological, cultural, or historic resources

Every effort should be made to ensure that energy corridors, both new and existing, do not impact various archaeological, cultural, or historic resources. Further, the broader cumulative impacts on these values from increased energy development and extraction activities that may be facilitated or encouraged by new or more intensively utilized energy corridors must be analyzed.



Full tribal consultation must not only be undertaken, but it should be done face-to-face. Consultation letters sent to the tribes should be followed up by phone calls until a response is received. Many smaller tribes do not have staff to respond to every written request they receive, especially as in recent years some tribes have been flooded with letters regarding repatriation of burials and cultural objects. Tribal consultation should also take into consideration the historic seasonal movement of many Native American groups between areas and recognize that there may be more Native American stakeholders for a certain area than just the tribe with the nearest reservation. In addition, all tribes known to have an interest in an area should be consulted, regardless of whether there are energy development projects proposed for their reservations or not.

Impacts on human health and safety

Human health and safety are critically important issues to consider in this process. Pipelines and energy storage facilities, whether located in communities or miles from the nearest human outpost, present targets for terrorists and are potentially vulnerable to natural disasters. If terrorists were to target energy corridors within or near existing human settlements, or natural disasters were to strike, it could present significant threats to human health and safety. Vulnerabilities to natural disaster or terrorist attack and the potential human health and safety impact must be assessed when considering development of new energy corridors or when analyzing the use of existing corridors.

Impacts on existing and future land uses

The history of public land development in the West shows that once an energy corridor, such as for a high-voltage transmission line, is established, other consumptive uses for that land are often clustered in that area. The PEIS should spell out that energy corridor developments should be compliant with local land use and zoning rules designed to protect, among other values, open space, farmland, schools, and residential areas. Further, it is vitally important that



the PEIS be written so that siting an energy corridor in an area does not sacrifice that area to future development without proper regard for its visual, wildlife, and cultural resources.

In terms of the impacts to existing and future uses of undeveloped public lands, we must note the immense value of the West's wildlands to Americans for primitive recreation, hiking, birding, spiritual purposes, hunting, fishing and the habitat they provide to fish and wildlife, and of their growing use for these purposes. The Sonoran Institute has worked extensively with the BLM to provide county-by-county and state-by-state research across the West, which shows the economic value of wilderness, roadless areas, parks and national monuments on rural communities. Please incorporate economic data from the Sonoran Institute, the BLM, and other sources on a county by county and state by state level to help analyze how developing undeveloped land in energy corridors or with energy production facilities may negatively impact the current and future use of land maintained in its undeveloped state for economic, recreational, hunting, fishing, and other values at both the local and regional levels.

The PEIS should also address all areas impacted by the development or expansion of energy corridors, such as roads and construction sites created, and the rehabilitation strategies for these.

Visual impacts

See section on Roadless areas, Wilderness, Wildlife Refuges, National Monuments and Parks, below.

Disproportionately high and adverse impacts on minority and low income populations

This is an important issue to analyze and guard against. Lands near energy corridors, transmission lines, energy storage facilities, and energy developments such as coal mines, oil and natural gas wells are often depressed in value, which can encourage development of lower income neighborhoods and homes in close proximity to these areas. Historically energy corridors, storage facilities and developments have been cited near minority and low-income populations including Indian reservations, or in certain portions of urban communities with



higher proportions of minority and low-income individuals. An environmental justice analysis should be specifically undertaken to avoid the impacts of new or expanded energy corridors and associated production and storage facilities falling on Native American tribes and minority and low-income populations. This should also include an analysis of how past disproportionate impacts have been distributed to Native American tribes and low income and minority populations in each of the 11 western states being analyzed.

In addition to the above environmental issues listed in the Federal Register notice announcing the West-wide Energy Corridor Programmatic EIS, the following are other key issues that should be analyzed

Roadless areas, Wilderness, Wildlife Refuges, National Monuments and Parks

The American West contains vast areas of land found in inventoried and uninventoried roadless Areas, Wilderness Study Areas, Wildlife Refuges, Congressionally designated Wilderness, National Monuments, National Parks and other protective designations. It should be made explicitly clear in the PEIS in which of these areas existing statutes preclude and prohibit energy development as well as energy corridor creation. Further, due to numerous values associated with undeveloped roadless lands, National Monuments, Wilderness Areas, Wildlife Refuges, Wilderness Study Areas, Wild and Scenic Rivers, National Conservation Areas, Areas of Critical Environmental Concern, National Cooperative Land and Wildlife Management Areas, and more, energy corridor creation and energy development should be explicitly prohibited in these areas through this Programmatic EIS. A complete list of areas where energy corridors should be prohibited is contained below:

1. Wilderness Areas;
2. Wilderness Study Areas (WSAs);
3. National Parks;
4. National Wildlife Refuges;
5. National Monuments;



6. National Conservation Areas;
7. Other lands within BLM's National Landscape Conservation System (NLCS), such as Outstanding Natural Areas;
8. National Historic and National Scenic Trails;
9. National Wild, Scenic, and Recreational Rivers, study rivers and segments, and eligible rivers and segments;
10. Areas of Critical Environmental Concern (ACECs);
11. Forest Service Roadless Areas, both inventoried and uninventoried;
12. Threatened, endangered and sensitive species habitat, as well as critical cores and linkages for wildlife habitat;
13. Old Growth reserves, and other areas designated for the protection and conservation of Old Growth forests under existing Forest Service Forest Plans, BLM Land and Resource Management Plans, or other regional ecosystem management plans;
14. Citizen Proposed Wilderness Areas; and other lands with wilderness characteristics.

Roadless wildlands, Wildlife Refuges, Wilderness Areas, Parks and each the other land management allocations listed above arguably provide some of the West's most important habitats for fish and wildlife, and some of the best opportunities for recreation such as fishing, hunting, camping, hiking, and more. Further, much of the West's drinking water supplies emerge from roadless areas and other wildlands on public lands. Energy corridors and associated development and extraction will have a particularly damaging effect on the numerous wildlife, water, and recreation values closely associated with these unique and irreplaceable public resources.

Based on the values listed above as well as the economic values for rural communities associated with intact natural areas, combined with the potential for damage from the construction, use and maintenance of energy corridors, we recommend that the PEIS specifically prohibit the siting and expansion of energy corridors in the above listed areas.

In addition to the numerous values associated with these lands that would be at risk and irreversibly damaged if energy corridors are proposed to pass directly through any of the types of



areas listed above, it is equally important to fully analyze and consider that energy corridors also impact visual quality and recreational potential of these areas when sited immediately adjacent or within visual range of them. The negative visual impacts from energy corridors in or within sight of these areas are particularly acute due to strong contrast against the surrounding untrammeled landscape. We thus recommend that energy corridors not be sited immediately adjacent to the above listed areas, or within viewing distance (the 'viewshed') of them. If energy corridors proposed at this time or in the DEIS, or developments anticipated to be established in association with these energy corridors, have the potential to impact the visual quality from existing or proposed wilderness areas, or any of the other land management areas listed above, this must be disclosed in the PEIS.

Further, any analysis of these issues in the PEIS should include a state-by-state examination of areas, which fall into the above 14 land management categories. This examination should include widely available GIS data and maps to help inform the public of the potential impact to areas proposed for new or expanded energy corridors and associated energy production and storage facilities on these areas. As an example, attached are a series of maps from western Montana based on GIS information regarding both inventoried and uninventoried roadless areas. We would be happy to provide you with full GIS layers for these areas and urge you to contact us and other organizations if you have difficulty in finding relevant GIS data for all 11 states considered in the PEIS.

Impacts on forests

Many western forests and range lands currently face a high potential for large scale fires due to poor past management, including old growth logging and fire suppression. In many places, fire has been kept out of its natural place in the ecosystem. We expect the PEIS to provide an extensive discussion of any proposed corridor and fire risk, fire fighting and containment, and proactive strategies to reduce the risk of fire near homes and communities that the corridors would put at increased risk.



Impacts on deserts

Deserts are fragile natural environments that are often more difficult to restore than other areas that receive more rainfall. Energy corridors in desert areas should be as narrow as possible. New or improved access roads in desert areas can easily open up previously pristine, unmolested areas to damage from off-road vehicles, providing access routes to areas where they may be otherwise prohibited under existing management plans. Therefore, the new PEIS should specify that all plans for new or improved access roads constructed in desert energy corridors should include how the surrounding roadless area will be protected from illegal off-roading along with a discussion of the mechanisms for funding that protection and enforcement.

Desert riparian areas such as marshes and springs are particularly important and vital for the preservation of wildlife. Energy corridors should not be routed through these areas. Pipelines create destructive ground disturbance and new or improved access roads can draw in more human visitors to the watering areas needed by wildlife, displacing those species sensitive to human presence.

The California Desert Conservation Area (CDCA) needs special consideration under this proposed PEIS. It is the only National Conservation Area that was not excluded from wind energy development under the BLM's new wind energy PEIS. While there is some existing energy development within the CDCA, it is still a designated National Conservation Area. The new energy corridor PEIS should treat it as such, not as an energy production area when other, less sensitive areas exist for these wind energy developments.

Spread of noxious weeds and invasive species

The PEIS should address the containment, management and spread of noxious weeds and invasive species that will be caused by disturbance associated with energy corridor development and expansion. This should specifically include a discussion on the potential for noxious weeds and invasive species to be spread by motorized vehicles along new and existing energy corridors and associated environmental impacts of these invasives. All weed and invasive species management should be done without the use of substances toxic to wildlife or humans, and



should be spread in such a manner so as to not impact native species. Additionally, any seeding done in relation to a corridor or corridor building, including access and service roads, should be done with native plant species and spread in such a way that the resultant plant community approximates the natural mosaic pattern found in nature. The control and elimination of noxious weeds must be included as an ongoing management activity by the administering agency.

Homeland Security

Everything established by this PEIS would be critical infrastructure, as defined by the Department of Homeland Security. The PEIS should establish how these corridors will be protected and how information can be obtained relating to their protection.

Cumulative Impacts Including Associated Increases in Energy Developments and Greenhouse Gas Emissions

A theme raised in several of the above comments is the need to analyze the cumulative impacts associated with creating new energy corridors or intensifying use of existing corridors. Simply put, the footprint of the energy corridors is much larger the actually acreage they take up. This PEIS would be delinquent if it did not analyze the extent to which these corridors and the types of energy expected to flow across them (whether oil, gas, hydrogen or electricity) lead to or encourage additional energy production, development and extraction on public lands. There is also a need to detail how the PEIS integrates with other specific management plans it will overlap with and to disclose where this process would propose alternate uses for lands already under another management plan, special designation, or consideration for a special designation. Any actions identified in the PEIS that would affect the validity and underlying basis and analysis for these more local or regional management plans must be disclosed, discussed and analyzed.

On a broader, but no less significant level, increased energy production and extraction, particularly of oil, gas and coal in turn has its own set of environmental impacts that are of national and global concern. One of the direct impacts of increasing fossil fuel extraction and utilization is the increased emission of greenhouse gases closely associated with global warming



and climate change. Fossil fuel use also contributes to other environmental problems such as smog, surface level ozone and reductions in ambient air quality, which are associated with higher rates of asthma and other health problems in many urban areas. The PEIS needs to analyze the potential for increased air pollution and greenhouse gas emissions from expanded coal, oil and gas development that may be facilitated or encouraged by new and intensified usage of energy corridors under consideration in this document. If energy production in certain areas will increase or expand due to the development of new or growth of existing energy corridors, this must be disclosed and analyzed. Given that information on new energy corridors is being solicited from numerous members of the energy transport industry, information on potential new energy developments anticipated or proposed by these groups should be readily available to the public.

Addressing increased conservation, efficiency and wildland protection as another Alternative to new corridors and in the context of current and future energy needs

The PEIS should examine America's energy demands and needs and include an Alternative other than the No Action Alternative that calls for ramping up energy conservation and efficiency programs to either eliminate the need for the proposed corridor or to reduce the size of certain corridors. Through this process, the PEIS can help in the development of a new energy future by securing that energy needs are met through increased efficiency, conservation and long-term planning that does not further degrade the environment. Such an alternative would consider maximization of conservation plus smaller, local alternative energy resources such as solar and wind, sited in an appropriate way, that could ultimately reduce the need to move large amounts of power around states and the western-region. For instance, where large amounts of energy are used to pump water for irrigation or to cities in certain regions or states, an analysis of stronger conservation standards could provide for educated and informed decision making which would enable the use less energy for such an endeavor, as opposed to costly and damaging new energy corridors. This could be both economically efficient and environmentally beneficial.

Further, such an alternative should also consider no new or expanded energy corridors or energy developments in undeveloped areas on public land identified previously in the list of



fourteen land management categories listed in the section titled: Roadless areas, Wilderness, Wildlife Refuges, National Monuments and Parks.

General NEPA issues

In order for the public to have full input to the energy corridor and energy development siting process in the future, it is important that this PEIS not authorize the use of categorical exclusions for any energy testing or exploration, expansion of existing energy facilities, or establishment or expansion of any energy corridors. All of these activities should require environmental analysis, public notification, and a public comment period. Further, the NEPA analysis for each site should include a hard look at the width of each proposed corridor, with as narrow as possible corridors proposed to decrease the land and wildlife disturbance area. The PEIS and further NEPA analysis on each site must also look at the viability of the corresponding energy development and only projects that are economically sound and environmentally viable (i.e. meeting all environmental laws, including emission standards). All potential air quality impacts not only of corridor identification and construction, but also of utilization with new power plants, should be addressed, including impacts on communities as well as public land airsheds protected under the Clean Air Act.

Since incorporation of corridors into management plans may well have impacts not anticipated or discussed in the PEIS, these changed plans must then be subject to NEPA review. This should be clearly stated in the PEIS.

There are several federal agencies involved in this project, all of which have different rules and procedures for projects. The PEIS should clearly state which agency's rules will be used for implementation and appeal.

Localized concerns

The Sierra Club comments on the Draft PEIS and PEIS will address multiple site-specific concerns. The following item is an example of localized concerns we will raise in our detailed comments.



The Santa Ana Mountain Task Force (SAMTF) is a sub-group formed between two Groups of the Angeles Chapter and the San Geronio Chapter of the Sierra Club. The purpose of SAMTF is to act as a unified conservation group to “Keep The Santa Ana Mountains Wild”.

Since its inception SAMTF has been concerned with and a participant in a proposed pumped storage hydroelectric proposal and a transmission line, which is intended to run through the Trabuco District of the Cleveland National Forest. Generally known as LEAPS, this proposal is in the application phase as FERC project P-11858. The Enron Corp first proposed the route for the transmission line. We have been informed that the current project developer, Nevada Hydro Corp., has requested that their proposed route be considered for a federal easement designation. The local agency for the proposed project is the Elsinore Valley Municipal Water District.

San Diego Gas & Electric (SDG&E) also considered the LEAPS route for their transmission extension planning and it was on their project short list. However, it was removed from the list. In considering the LEAPS route for easement designation we would like the DPEIS to discuss the following items.

From a decision by the California Public Utilities Commission, D 04-06-011, of June 15, 2004: “Moreover, the proposal provided an interim supply for capacity that did not meet SDG&E grid reliability requirements, and the developers have no proven experience with the type of generation facility proposed or experience with undertaking engineering and construction projects of this complexity.”

With regard to the suitability of the route itself, we quote from a transcript of a committee hearing before the California Energy Committee on July 28, 2005. The subject of the hearing was Preparation of the 2005 Integrated Docket No. Energy Policy Report 04-IEP-01F Re: Strategic Transmission.

“My name is Jim Avery; I am the Senior Vice President for Electric Operations for San Diego Gas and Electric Company. There is one project that has been talked about since oh, at least five or six years, and probably longer, and that's the LEAPS project. LEAPS first came to San Diego as a proposal to construction transmission to connect us to Edison in conjunction with the potential for a pump storage facility. The problem when Enron first came to us with that project, it wasn't economical. And we didn't think it was technically feasible.”



A short time later Mr. Avery continues with: “But I don’t want you to think that that is going to be an easy project. If you look at the potential route, it literally sits right on the spine of a significant mountain range, and goes 20 to 30 miles like that.

I mentioned this morning the issue of Talega where we lost one of our 138 kV lines while we were trying to maintain the second one that had some washout conditions. Imagine if you had 30 miles of a significant link that was sitting right alongside of a mountain ridge with the types of rains we had this past year. It would be a significant thing to try to maintain.”

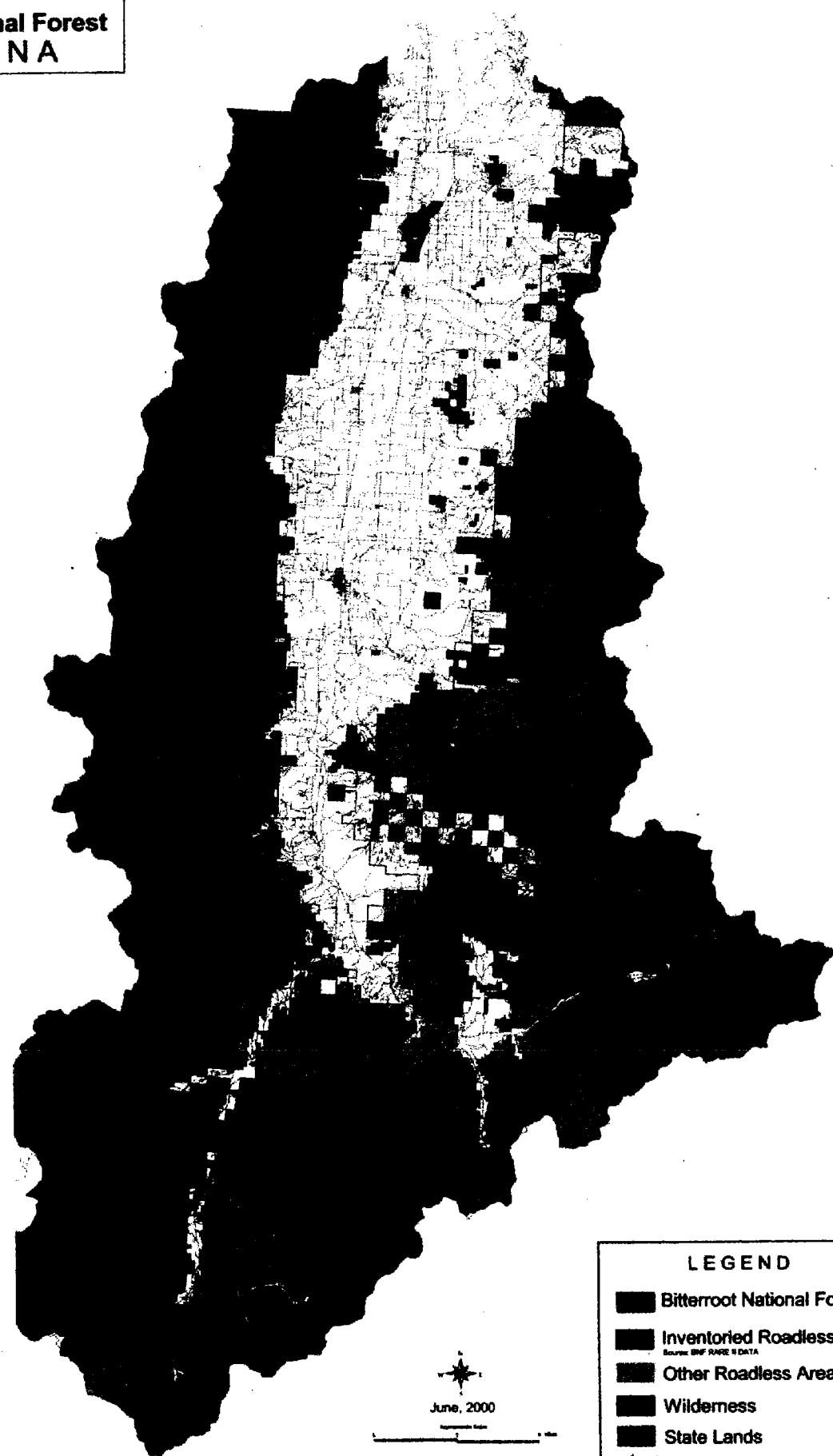
Shortly after that SDG&E eliminated the LEAPS route from further consideration as being unsuitable. We believe the drafters of the PEIS should find this corridor unsuitable for the same reasons and not consider it for review.

We look forward to further opportunities to provide more detailed comments on this proposal. Please contact me at 503/238-0442, extension 304 if you wish to discuss these comments.

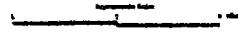
Sincerely,

Ivan Maluski
Conservation Coordinator







Bitterroot National Forest
MONTANA



June, 2000
Representative Scale



LEGEND

-  Bitterroot National Forest
-  Inventoried Roadless Areas
Source: BNF RANGE 11 DATA
-  Other Roadless Areas
-  Wilderness
-  State Lands
-  Roads
Source: BITTERROOT NATIONAL FOREST





Kootenai National Forest

