



From: corridoreiswebmaster@anl.gov
To: [Corridoreisarchives;](#)
CC:
Subject: Energy Corridor Programmatic EIS Comment 80044
Date: Monday, November 28, 2005 2:25:34 PM
Attachments: [Westwide Energy Corridor EIS scoping 80044.doc](#)

Thank you for your comment, Doug Heiken.

The comment tracking number that has been assigned to your comment is 80044. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 02:25:23PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80044

First Name: Doug

Last Name: Heiken

Organization: Oregon Natural Resources Council

Address: PO Box 11648

City: Eugene

State: OR

Zip: 97440

Country: USA

Privacy Preference: Don't withhold name or address from public record

Attachment: C:\Documents and Settings\Doug\My Documents\!nSnych\Comments\Misc.comments\Westwide Energy Corridor EIS scoping.doc

Comment Submitted:

Please see attached comments.

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

From: corridoreiswebmaster@anl.gov
To: [Corridoreisarchives;](#)
CC:
Subject: Energy Corridor Programmatic EIS Comment 80046
Date: Monday, November 28, 2005 2:38:50 PM
Attachments: [Oregon Forested Roadless Areas Map \(avoid these areas\)
_80046.doc](#)

Thank you for your comment, Doug Heiken.

The comment tracking number that has been assigned to your comment is 80046. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 02:38:41PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80046

First Name: Doug

Last Name: Heiken

Organization: Oregon Natural Resources Council

Address: PO Box 11648

City: Eugene

State: OR

Zip: 97440

Country: USA

Privacy Preference: Don't withhold name or address from public record

Attachment: C:\Documents and Settings\Doug\Desktop\Oregon Forested Roadless Areas Map (avoid these areas).doc

Comment Submitted:

Please avoid locating energy corridors in any of the following forested roadless/unroaded areas in Oregon. See attached map.

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Energy Corridor Programmatic EIS

Webmaster at (630)252-6182.

Oregon Natural Resources Council

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28 Nov 2005

Office of Electricity Delivery and Energy Reliability
Room 8H-033

U.S. Department of Energy
1000 Independence Avenue, S.W.

Washington, DC 20585

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<http://corridoreis.anl.gov/involve/comments/index.cfm>

Subject: Scoping Comments on the Westwide Energy Corridor EIS

Dear Corridor EIS team:

Please accept the following comments from Oregon Natural Resources Council concerning the scope, key issues, and alternatives for the Westwide Energy Corridor EIS.

1. **Consider the cumulative impacts with power production alternatives.** Energy distribution cannot be separated from the impacts of energy production. This EIS must consider alternative pathways for US energy production and the comparative impacts of those alternatives (including their energy corridor consequences). In essence, this EIS must be preceded by the development of a rational national energy policy.
2. **Decentralize energy production.** Centralized energy production and the energy corridors that serve them are red hot targets for terrorism, vandalism, etc. These centralized facilities and corridors must be recognized as an anachronism of a pre-911 mind-set. The EIS must consider alternatives that would encourage decentralized energy generation and energy consumption at or near the place of production so as to reduce the need for so many new energy corridors, while simultaneously reducing vulnerability to terrorism, market instability, etc.
 - a. The EIS needs to account for technology change and how that interacts with price and market changes. New technologies will allow more co-location of energy production and consumption thereby removing the need for lots of new energy corridors.
 - b. The EIS needs to account for changing energy prices and market changes and how those interact with technology changes. Higher prices and energy supply uncertainty in foreign countries will stimulate technological development toward more co-location of energy production and consumption thereby removing the need for lots of new energy corridors.

- c. The EIS needs to account for the risks of alternative energy futures and their degree of vulnerability to terrorism, vandalism, market instability, etc.
3. **Use principles of “systems science” to make strategic changes that improve reliability.** We don’t need to build a zillion miles of new energy corridors to achieve reliability objectives. A few simple improvements in connectivity might do it. Use strategic links between sub-systems to achieve "improved reliability," "relieve congestion," and "enhance the capability of the national grid to deliver electricity." Consider network structure and inter-node connectivity. See Amory and Hunter Lovins’ book “Brittle Power.” <http://www.rmi.org/sitepages/pid1011.php>
4. **The EIS should focus on connecting large populations, not facilitating suburban expansion or bedroom communities in rural areas.** Compact urban growth forms should be encouraged. The consequences of sprawl should be factored into the NEPA analysis.
5. **Prevent Weeds.** Widespread soil disturbance, especially in long linear corridors are perfect vectors for weeds and disease. Corridor maintenance also aggravates the spread of weeds.
6. **Conserve Soil.** Displacement and compaction of soils during construction and maintenance are a major concern.
7. **Minimize Roads.** Roads are one of the most damaging impacts to ecosystems because they compact soil, divert water, cause erosion and sedimentation, fragment habitat, and serve as a vector for weeds. Don’t forget to consider both the impacts of corridor construction and corridor maintenance.
8. **Protect Water Quality.** Water quality impacts will be caused by pipelines, steep slopes, roads, and stream crossings. We’ve witnessed absolutely horrendous practices where directional drilling under streams ends up blowing drilling mud into sensitive stream habitats. The EIS must consider the problem of Off-Highway Vehicles that trespass on energy corridors and especially enjoy ripping up steep slopes that then erode into streams. Do not analyze best-case scenarios. Be realistic.
9. **Impose Seasonal Restrictions.** Construction and maintenance should be limited to dry seasons, especially in sloped areas.
10. **Protect roadless and unroaded areas in both forested and rangeland-grassland-desert settings.** Large habitat blocks were once abundant and are now rare. Energy corridors should not bisect existing large blocks of habitat. The EIS team should use GIS technology to identify and map all unroaded polygons larger than 1,000 acres and describe the impact of building and maintaining corridors through them. The EIS team should refer to the USDA Forest Service November 2000 Roadless Area Conservation FEIS. The EIS should consider the impacts of energy corridors on all the recognized values of roadless and unroaded areas, including:
 - (1) High quality or undisturbed soil, water, and air;
 - (2) Sources of public drinking water;
 - (3) Diversity of plant and animal communities;
 - (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;

- (5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
 - (6) Reference landscapes;
 - (7) Natural appearing landscapes with high scenic quality;
 - (8) Traditional cultural properties and sacred sites; and
 - (9) Other locally identified unique characteristics.
11. **Minimize fire hazards.** Vegetation management in energy corridors typically results in the growth of dense, stunted plants with interlocking branches (fuel) close to the ground that are relatively more prone to intense fire compared to native vegetation. The long linear shade of energy corridors can also tend to spread wild fire because there is not much to break up the continuity of the unfavorable fuel structures. Energy corridors also increase the risk of fire ignitions due to increase road access and the fact that power lines also interact with smoke to cause arcs that can ignite vegetation.
 12. **Prevent Wildlife Mortality.** The EIS should adopt alternatives that avoid and minimize direct mortality from collisions with power lines, pipelines, service vehicles, etc.
 13. **Minimize habitat loss and fragmentation.** Energy corridors cause habitat fragmentation through soil compaction, vegetation alterations, noise disturbance, physical impediments to migration, etc. Many types of energy corridors are essentially permanent clearcuts with all the negative impacts associated with clearcutting.
 14. **Prepare analysis useful for future site-specific EISs.** Site-specific impacts are huge. This Programmatic EIS will not obviate the need for site-specific EISs.
 15. **Is this really a site-specific EIS, if so, the analysis must be thorough?** The legislation requires the agencies to identify the centerline and width of the corridors. This is no longer a programmatic EIS. The agencies must take it upon themselves to conduct a full site-specific analysis of every corridor so identified, or leave open the possibility that future site-specific analysis can result in site-specific decisions to alter corridor routes, widths, and compatible uses.

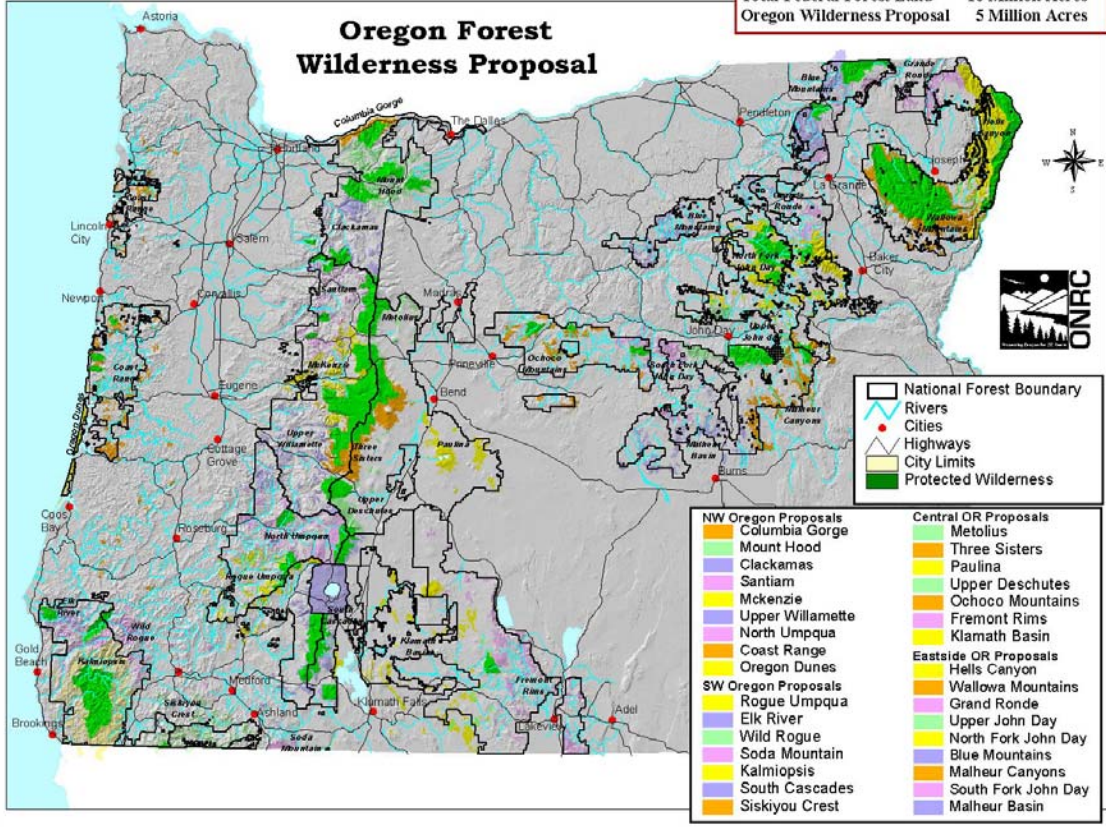
Sincerely,

A handwritten signature in black ink that reads "Doug Heiken". The signature is written in a cursive, slightly slanted style.

Doug Heiken

Total State Acreage 62 Million Acres
 Total Federal Forest Land 18 Million Acres
 Oregon Wilderness Proposal 5 Million Acres

Oregon Forest Wilderness Proposal



- National Forest Boundary
- Rivers
- Cities
- Highways
- City Limits
- Protected Wilderness

- | | |
|----------------------------|------------------------------|
| NW Oregon Proposals | Central OR Proposals |
| Columbia Gorge | Metolius |
| Mount Hood | Three Sisters |
| Clackamas | Paulina |
| Santiam | Upper Deschutes |
| Mckenzie | Ochoco Mountains |
| Upper Willamette | Fremont Rims |
| North Umpqua | Klamath Basin |
| Coast Range | Eastside OR Proposals |
| Oregon Dunes | Hells Canyon |
| SW Oregon Proposals | Wallowa Mountains |
| Rogue Umpqua | Grand Ronde |
| Elk River | Upper John Day |
| Wild Rogue | North Fork John Day |
| Soda Mountain | Blue Mountains |
| Kalmiopsis | Malheur Canyons |
| South Cascades | South Fork John Day |
| Siskiyou Crest | Malheur Basin |

