



**From:** [corridoreiswebmaster@anl.gov](mailto:corridoreiswebmaster@anl.gov)  
**To:** [Corridoreisarchives;](#)  
**CC:**  
**Subject:** Energy Corridor Programmatic EIS Comment 80076  
**Date:** Monday, November 28, 2005 5:57:47 PM  
**Attachments:** [WUG\\_Doc1\\_80076.doc](#)

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Thank you for your comment, Bud Andersen.

The comment tracking number that has been assigned to your comment is 80076. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 05:57:42PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80076

First Name: Bud

Middle Initial: R

Last Name: Andersen

Organization: Western Utility Group

Address: P. O. Box 1087

Address 2: Attn: John Bridges

City: Colorado, Springs

State: CO

Zip: 80944

Country: USA

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

Attachment: C:\Documents and Settings\Bud\My Documents\WUG Doc1.doc

Comment Submitted:

Ms. Julia Souder:

Please see attached submission.

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

Webmaster at (630)252-6182.

**From:** [corridoreiswebmaster@anl.gov](mailto:corridoreiswebmaster@anl.gov)  
**To:** [Corridoreisarchives;](#)  
**CC:**  
**Subject:** Energy Corridor Programmatic EIS Comment 80078  
**Date:** Monday, November 28, 2005 6:12:19 PM  
**Attachments:** [WUG\\_Doc1\\_80078.doc](#)

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Thank you for your comment, "Bud" Andersen.

The comment tracking number that has been assigned to your comment is 80078. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 06:12:07PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80078

First Name: "Bud"

Middle Initial: R

Last Name: Andersen

Organization: Western Utility Group

Address: P. O. Box 1087

City: Colorado Springs

State: CO

Country: USA

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

Attachment: C:\Documents and Settings\Bud\My Documents\WUG Doc1.doc

Comment Submitted:

Ms. Julia Souder:

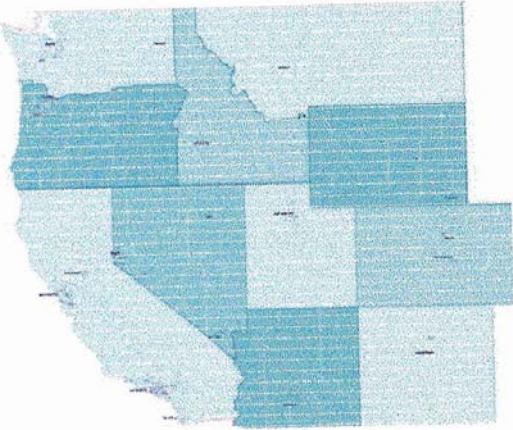
Please accept corrected and signed copy of the submission from Western Utility Group.

Thank You.

R. Bud Andersen

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.

*The*  
**WESTERN  
UTILITY  
GROUP**



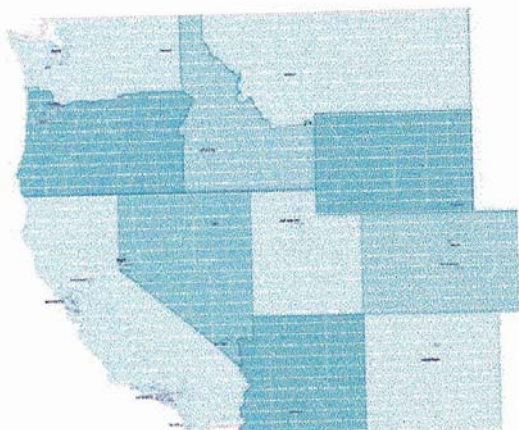
P. O. Box 1087  
Colorado Springs, CO 80944

**Submission of  
The Western Utility Group  
To the  
United States of America  
Department of Energy  
Department of Agriculture  
And  
Department of Interior**

**Regarding**

**Section 368 of the Energy Policy Act of 2005  
Programmatic Environmental Impact Statement  
For  
Energy Corridors in the Eleven Western States**

**Federal Registry Reference  
Vol. 70, No. 187/Wednesday, September 28, 2005**



*The*  
**WESTERN**  
**UTILITY**  
**GROUP**

November 28, 2005

Ms. Julia Souder,  
Office of Electricity Delivery & Energy Reliability  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, D. C. 20585

Dear Ms. Souder:

Please consider this "Submission" as a response to the Notice of Intent as referenced on the previous page. The Western Utility Group (WUG) is pleased to respectfully submit its views and recommendations to the Department of Energy, the Department of Interior and the Department of Agriculture (Agencies) as they pertain to the corridor efforts and the Programmatic Environmental Impact Statement.

**HISTORY:**

The Western Utility Group has a long standing relationship and partnership with the the Department of Agriculture (USFS) and Department of Interior (BLM) concerning the planning, identification and designations of utility corridors, environmental issues and rights-of-way issues throughout the eleven contiguous western United States. In 1983 WUG published its first Western Regional Corridor Study (WRCS). This study was intended to facilitate the utility industry in their efforts to comply with Section 503 of the Federal Land Policy & Management Act (FLPMA) of 1976 and to assist the USFS & BLM in their efforts of identifying corridors. This particular study, while being useful,

did not address the concerns of many of the field offices and district forest offices. In 1988 the second attempt of identifying corridors was undertaken collectively by USFS, BLM and WUG. Upon completion of this effort it was found that many existing utility electric lines did not coordinate with state boundaries as they entered and exited abutting states.

In 1992 WUG collected over \$2.3 million and conducted a third Western Regional Corridor Study. This particular study consisted of industry representatives from each of the respective states as well as representatives from many of the federal government agencies. The study was endorsed by the Chief of the United States Forest Service and the Director of Interior, Bureau of Land Management on July 23, 1993. A utility representative from each state distributed the study to each field office and district ranger offices in each of the western United States. While a few of the federal offices utilized the study in their land use plans, the majority of the offices accepted the study and put it on the shelf and did not utilize the study in the land use plans. Subsequently, many of the goals and objectives as outlined in Section 503 of FLPMA were never obtained or realized as they pertained to the identification of corridors in the respective land use plans.

In early 2002, WUG responded to a request by the White House Task Force on Energy Streamlining and revisited the Western Regional Corridor Study of 1992. Industry representatives worked with representatives of the USFS and BLM in digitizing the WRCS and further identifying "priority corridors" as they were anticipated in the 1-10 year ensuing period. Priority 1 corridors were identified as 1-3 years, Priority 2 corridors were identified as 3-5 years and Priority 3 corridors were identified as 5-10 years. One of the results of these efforts was the "Potential Energy Corridor Map" you displayed at your recently held scoping meetings. The corridors were defined by industry planning engineers, industry environmental representatives, industry land and realty directors and managers and realty specialists. Many of the corridors were actually located by GPS efforts of the respective industry companies involved.

In 2002, the BLM issued directions for guidance in Rights-of-Way management for land use planning (IM 2002-196). Key components of these directions included:

1. identification of existing and potential energy corridors;
2. potential development sites such as wind energy, substations, communication sites, etc; and
3. identification of avoidance and exclusion areas
  - a. describe how any type of designation for a special management area would impact the transportation of energy products.

- b. Describe reasonable alternatives to a proposed action such as the designation of a SMA that would have an adverse effect on the production or distribution of energy products.

In mid 2002, the USFS Washington Office issued a request to the USFS District Rangers. That particular request referred to the priority corridors identified and the resulting web site where the map illustrating the corridors was utilized. The comments received from the respective District Ranger Offices essentially was unfavorable to the inclusion into land use plans.

Once again, while there was participation at the higher levels of BLM and USFS there was no significant participation on the part of the district offices of the BLM and/or the District Ranger Offices of the USFS.

As you may ascertain from the above there have been many attempts at identifying corridors for the purpose of transmission of energy reaching as far back as the late 1970's and early 1980's. Including but not limited to the enactment of laws which direct the federal agencies to identify corridors (FLPMA); Internal Memorandums which direct respective field offices to comply with the revisions of land use plans and resource management plans. To the dismay of the industry, there has been only limited participation on the part of the field offices and District Ranger Offices. Paradoxically, there has been extreme participation and endorsement on behalf of the agencies at the State & Washington levels.

### **SECTION 368 of ENERGY POLICY ACT of 2005-Corridor Needs**

WUG appreciates the opportunity to comment on the efforts of the Agencies as they are referred to in the Notice of Intent, Federal Register Vol. 70. No. 187, September 28, 2005 with further efforts in the Programmatic Environmental Impact Statement (PEIS) with the intent of complying with Section 368 of the Energy Policy Act of 2005.

Of the four (4) alternatives outlined in the Notice of Intent, WUG would endorse the Optimization Alternative (Alternative 4). WUG firmly believes that the "No Action Alternative" is not an alternative at all. Essentially, the No Action Alternative has been the choice of federal agencies in the past and resulted in no construction of needed energy transmission facilities for over ten – fifteen (10-15) years.



It has been reported to your “Executive Committee” in various scoping sessions that our anticipated electric energy loads will increase by at least 2-3% in the next 9-10 years. This relates to roughly an increase of 40,000 megawatts of electric energy and does not begin to anticipate the natural gas, gasoline or oil/petroleum products that will be demanded in the western United States.

As a result of the increase of energy demands our members are anticipating and indeed planning for construction of new transmission facilities, regeneration sites, substations, compressor stations and upgrading the existing facilities. Some of those plans are including existing corridors and rights-of-way through federal agency managed public lands. Additionally, not only are we envisioning the traditional transmission and siting requirements on federal lands, we also are seeing an increase in the renewable energy demands for transmission of energy to existing facilities. We feel that in order to meet those demands now and in the future the agencies will need to realize and draw upon not only the new corridors presented at the scoping meetings but the existing rights-of-ways and corridors outlined and defined in the Western Regional Corridor Study of 1992. We feel that in utilizing the newly defined corridors and the optimization of the existing corridors the federal agencies will be realizing the need for corridors for the ensuing fifteen – twenty (15-20) years. Designating the corridors in this manner will recognize the source to market (for all aspects, hydro, renewable wind, solar, traditional, etc); future needs of expedited permitting procedures which will enable to draw upon the already identified environmental sensitive areas as well as assuring compliance with NEPA.

WUG encourages the Agencies to embrace the work completed by the industry in their combined efforts with the federal agencies in the development of the WRCS, the efforts of WUG’s member companies in their efforts of defining transmission routes through inter and intra state efforts. We encourage you to adopt these existing rights-of-ways and corridors defined in the WRCS study of 1992 as designated corridors. We feel you will find a multitude of environmental information from the industry which will assist in the PEIS. By such designation we feel you are addressing both the immediate needs as well as the future needs of corridor designations for energy transmission as well as shortened permitting time periods. It is essential that a streamlined permitting process be one of the end results of the PEIS and subsequent corridor designations.

**COMPATIBLE USES AND INCLUSIONS:**

In the development of transmission facilities (natural gas, oil pipelines, gasoline pipelines, electric transmission lines & communication lines) our membership feels that the uses within these corridors could include those facilities as above mentioned as well as such compatible uses as farming, irrigation, ranching, boating and related boating

activities (i.e., fishing, water skiing, etc.), roads, highways, railroads, wildlife (including wildlife area connection routes) and other distribution lines with an emphasis on the safety width of each facility. Other activities such as hiking, bicycling, and some other recreational activities could be found in the corridor compatible uses as well.

Some of the incompatible uses would include residential development over or under transmission facilities, commercial development in the same manner, industrial development over or under transmission facilities, limiting the rights-of-way to a width that prevents safety and encourages catastrophe (i.e., preventing tree removal out of the right-of-way which would result in fires, etc., if the tree were to fall into a power line).

WUG endorses the inclusion of a good vegetation management plan in the PEIS for the reclaiming of disturbed lands thus returning the lands to a continued multi use status.

#### **WIDTHS:**

WUG members encourage the Agencies to designate the corridors in such a manner that the corridor will be encompassing multiple use functions. We recommend that such widths that are identified in the WECC (Western Electric Coordinating Council), NGSA (Natural Gas Safety Act), and NESC (National Electric Safety Code) are adopted. The agencies should be willing to realize that a width with such considerations could be in the vicinity of ½ - 1-mile wide all of the way to a five (5) mile width.

#### **RECOMMENDATIONS & REQUESTS:**

1. Include the priority corridors identified by WUG and the industry planners.
2. Include the existing corridors as outlined in the WRCS and endorsed by the federal agencies in 1992 & 1993 respectively.
3. Consult with regional transmission organizations, WUG, WECC, INGA & industry representatives regarding widths, compatible uses and other corridor requirements.
4. Consider time periods greater than 2-5 years. Industry companies often utilize 10-20 year transmission planning timelines.
5. Allow for sharing of information collected through the PEIS efforts with reduction of permitting time and not the sacrificing of NEPA in mind.
6. Include in either the PEIS or the amendment of land use plans an approach that will allow the transferring of rights obtained by a permit holder in such an event as the federal lands being sold or traded. Essentially, making any sale or trade of federal lands subject to existing rights granted to a permit holder.

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WUG Submission  
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7. Provide for a clear and expedient process to site and permit facilities within the corridor.
8. Ensure that, after the PEIS is complete, that the gathered information is available to an applicant within the designated corridor.

Once again, WUG appreciates the opportunity to submit written response. We would like to take this opportunity to thank the Agencies for their efforts in obtaining a compliance of Section 368 of the Energy Act of 2005 and will volunteer to assist in any manner that we are able in the development of a process that will be of mutual benefit to all entities as well as our public involved.

Sincerely,

*R. L. "Bud" Andersen*

R. L. "Bud" Andersen, Chairman  
Corridor Sub Committee  
Western Utility Group