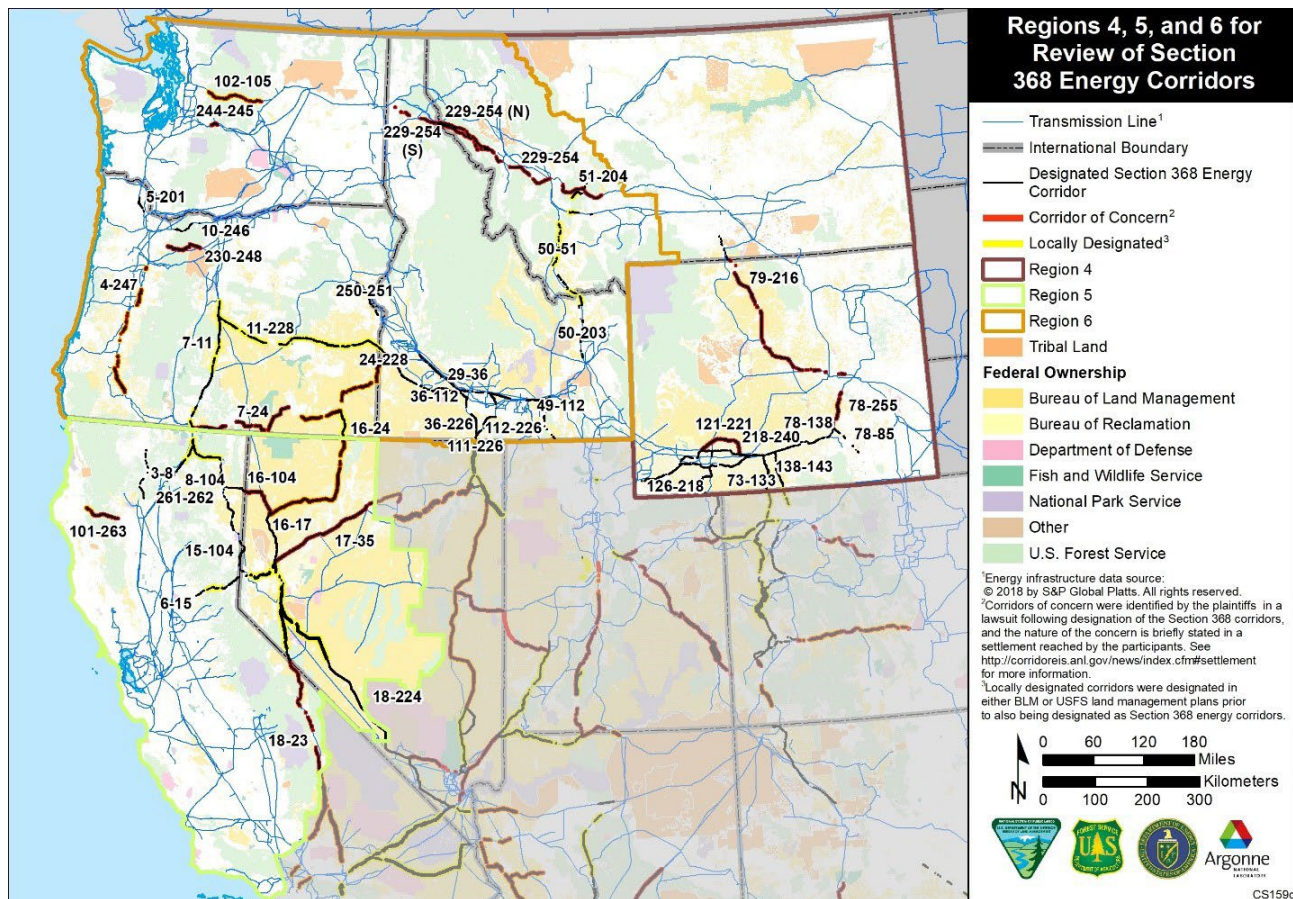




REGIONS 4, 5, & 6: STAKEHOLDER INPUT - ABSTRACTS

Section 368 Energy Corridor Regional Review



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Region 4, 5 & 6 Stakeholder Input on Corridor Abstracts

This document is a record of stakeholder input received on Corridor Abstracts during the Regions 4, 5, & 6 Review and serves as a reference document for the Regions 4, 5, & 6 Report.

Preliminary Region 4, 5, & 6 corridor abstracts were released to the public on January 10, 2018. Stakeholders were given 45 days to provide input; the public input period closed February 25, 2018. All written stakeholder input received within that timeframe is provided in this document. This input was used to update the corridor abstracts and develop Agency recommendations as presented in the Regions 4, 5, & 6 Report.

Stakeholder input focused on the general Regional Review process and on environmental concerns, and cultural resource and tribal concerns regarding individual Section 368 energy corridors within Regions 4, 5, & 6. Although some recommendations for specific corridor revisions, deletions, and additions were received, there were no recommendations for a new Section 368 energy corridor in Regions 4, 5, & 6.

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From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10195] - Webmaster Receipt
Date: Tuesday, February 26, 2019 2:31:17 PM

Thank you for your input, Lee Spears.

The tracking number that has been assigned to your input is **10195**. Please refer to the tracking number in all correspondence relating to your input.

Date: February 26, 2019 14:30:49 CST

First Name: Lee
Last Name: Spears
Email:

Are you submitting input on the behalf of an organization? No

Topics

Physical barrier
Public access and recreation

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

Hello

I am requesting an old route be reopened to travel by all users in which appears to be Region 5. There are two gates that were installed a decade or so ago during deforestation at Spooner Summit NV, South side of HWY 50. UTM coordinates for one of them is (11S 4332444.83 m N 250267.13 m E) or 39.105421, -119.888034 the other gate is in the parking lot a 1/2 mile West. This road is vital to connecting Kings Canyon Rd/Lincoln Memorial Hwy and Genoa peak. this allows people to only be on the busy highway for a short distance. Public safety will be enhanced as well as local users will be very grateful.

Thanks, Lee Spears.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10196] - Webmaster Receipt
Date: Wednesday, March 20, 2019 10:47:22 AM

Thank you for your input, James Strait.

The tracking number that has been assigned to your input is **10196**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 20, 2019 10:46:56 CDT

First Name: James
Last Name: Strait
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Montana DEQ

Topics

Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Lands and realty
Visual resources

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

This section of the proposed corridor should be considered a high conflict area for DEQ siting purposes. It is too fragmented to be effectively considered under Montana MFSA Preferred Location Criteria (MFSA Circular 2 Section 3.1: <http://deq.mt.gov/Portals/112/DEQAdmin/MFS/Documents/Circular2.pdf>). Criteria that would be impacted, or difficult to address include residences, visual impacts, and difficulty in obtaining greatest local acceptance.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Regions 4, 5, & 6:

Helena



115

51-204

Boulder

3

F



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10197] - Webmaster Receipt
Date: Thursday, March 21, 2019 10:38:14 AM
Attachments: [ID_10197_3212019CenterEnergyCorridorComments.pdf](#)

Thank you for your input, Jared Margolis.

The tracking number that has been assigned to your input is **10197**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 21, 2019 10:37:50 CDT

First Name: Jared
Last Name: Margolis
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Center for Biological Diversity

Topics

Physical barrier
Land Management Responsibilities and Environmental Resource Issues
Air quality
Ecological resources
Hydrological resources
Lands with wilderness characteristics
Soils/erosion
Specially designated areas

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

Please see the attached comment letter.

Attachments

3-21-2019 Center Energy Corridor Comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



Via Online Submission

March 21, 2019

West-Wide Energy Corridor Regional Review

U.S. Bureau of Land Management

U.S. Forest Service

U.S. Department of Energy

Re: Center for Biological Diversity Comments on BLM, USFS and DOE published draft energy corridor abstracts for Regions 4, 5, and 6.

To whom it may concern,

On behalf of the Center for Biological Diversity (Center) and our over 1.4 Million members and on-line activists, I am writing to provide comments in response to the U.S. Bureau of Land Management, U.S. Forest Service and U.S. Department of Energy (together, the “Federal Agencies”) draft energy corridor abstracts for the Regions 4, 5, and 6.

The Center is very concerned about the significant adverse impacts that the development of these energy corridors may have on species that are protected under the Endangered Species Act (ESA), as well as migratory birds protected under the Migratory Bird Treaty Act (MBTA). The construction of power lines is likely to lead to take of protected species through powerline collisions, as well as habitat loss from the direct, indirect and cumulative impacts associated with development of the energy corridors. Moreover, these energy corridors would facilitate the increased production and use of fossil fuels by creating a network of future oil and gas pipelines across federal lands. The exploitation of these resources will exacerbate the current climate crisis, putting people and species at risk.

The Center therefore urges the Federal Agencies to ensure that these potential impacts are fully analyzed. Powerlines must adopt appropriate measures to minimize and mitigate harm, including route alternatives and burying of lines. Pipelines should not be developed if they will contribute to climate change or adversely affect habitat for listed species. Moreover, the impacts to listed species from the development of these energy corridors must be fully analyzed and addressed through formal Section 7 ESA consultation.

Under Section 7 of the ESA, federal agencies must “utilize their authorities in furtherance of the purposes of” the ESA and carry out “programs for the conservation of endangered species and threatened species.”¹ Agencies must further “insure that any action authorized, funded, or carried out by such agency ... is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined ... to be critical.”²

¹ 16 U.S.C. § 1531(a)(1)

² 16 U.S.C. § 1536(a)(2).

The definition of agency “action” is broad and includes “all activities or programs of any kind authorized, funded, or carried out, in whole or in part, by Federal agencies,” including programmatic actions that may affect land, water or air, such as the development of energy corridors.³ Likewise, “action area” is defined broadly to include “all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action.”⁴

The duties in ESA Section 7 are only fulfilled by an agency’s satisfaction of the consultation requirements that are set forth in the implementing regulations for Section 7 of the ESA, and only after the agency lawfully complies with these requirements may an action that “may affect” a protected species go forward.⁵ Pursuant to the consultation process, if the action agency concludes in a “biological assessment” that a proposed action is “not likely to adversely affect” a listed species that occurs in the action area—and the Service lawfully concurs in writing with the action agency’s determination—then the process is terminated. Under such a scenario, unless the Service’s concurrence was arbitrary and capricious and/or the action agency failed to adhere to the ESA’s requirements, no formal consultation is required.⁶ If the Service’s concurrence in a “not likely to adversely affect” finding is inconsistent with the best available science or otherwise unlawful, however, any such concurrence must be set aside.⁷

If the action agency concludes that an action is “likely to adversely affect” listed species or critical habitat, it must enter into “formal consultation” with the Service.⁸ The ESA’s threshold for triggering the formal consultation requirement is “very low.”⁹

Formal ESA consultation commences with the action agency’s written request for consultation and concludes with FWS’s issuance of a “biological opinion.”¹⁰ During formal consultation, the Service must evaluate the “effects of the action,” including all direct and indirect effects of the proposed action, plus the effects of actions that are interrelated or interdependent, added to all existing environmental conditions – that is, the “environmental baseline.”¹¹ The environmental baseline includes the past and present impacts of all Federal, state, and private actions and other human activities in the action area....¹² The effects of the action must be considered together

³ 50 C.F.R. § 402.02.

⁴ *Id.*

⁵ *Pac. Rivers Council v. Thomas*, 30 F.3d 1050, 1055-57 (9th Cir. 1994). Further, pursuant to ESA Section 7, Federal agencies must confer with FWS on any agency action which is likely to jeopardize the continued existence of any species proposed to be listed under the ESA. 16 U.S.C. § 1536(a)(4).

⁶ 50 C.F.R. §§ 402.12(k), 402.13(a), 402.14(b).

⁷ *See* 5 U.S.C. § 706(2).

⁸ 50 C.F.R. §§ 402.12(k), 402.14(a).

⁹ *See* 51 Fed. Reg. 19,926, 19,949 (June 3, 1986).

¹⁰ 50 C.F.R. § 402.02.

¹¹ 50 C.F.R. §§ 402.14 and 402.02.

¹² *Id.* § 402.02.

with “cumulative effects,” which are “those effects of future State or private activities, not involving Federal activities, that are reasonably certain to occur within the action area of the Federal action subject to consultation.”¹³ The biological opinion states FWS’s opinion as to whether the effects of the action are “likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat.”¹⁴

Pursuant to the Services’ revised regulations defining “framework programmatic action,” programmatic consultations, such as for the West-wide Energy Regional Review, should not result in the issuance of an incidental take statement (ITS). Rather, any incidental take must be subsequently authorized under a project-specific Section 7 or Section 10 process.¹⁵ For project-specific consultations, if FWS concludes that a project is not likely to jeopardize listed species, it must nevertheless provide an ITS with the biological opinion. The ITS must specify the allowed amount or extent of take that is incidental to the action (but which would otherwise be prohibited under Section 9 of the ESA), “reasonable and prudent measures” (“RPMs”) necessary or appropriate to minimize such take, and the “terms and conditions” that must be complied with by the action agency to implement any RPMs.¹⁶

Allowing activities that harm federally-protected species absent valid take coverage opens up state and private actors to liability.¹⁷ Under Section 9(a)(1)(B) of the ESA, it is illegal to engage in any activity that “takes” an endangered species.¹⁸ Persons subject to the prohibition on take include individuals and corporations, as well as “any officer, employee, agent, department, or instrumentality of the Federal Government... [or] any State.”¹⁹

¹³ *Id.*

¹⁴ *Id.* § 402.14(g)(4). To “jeopardize the continued existence of” means “to engage in an action that reasonably would be expected, directly or indirectly, to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of that species.” *Id.* § 402.02.

¹⁵ *See* 80 Fed. Reg. 26,832 (May 11, 2015) (adding definition of “framework programmatic action” to 50 C.F.R. § 402.02 and adding 50 C.F.R. § 402.14(i)(1)(6) on incidental take statements not being required at the programmatic level).

¹⁶ 16 U.S.C. § 1536(b)(4), 50 C.F.R. § 402.14(i).

¹⁷ The term “take” is defined in the “broadest possible manner to include every conceivable way” in which a person could harm or kill wildlife. The term “take” is defined in the statute to include “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” 16 U.S.C. § 1532(18). The ESA’s implementing regulations define “harm” to mean “significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering.” 50 C.F.R. § 17.3. The term “harass” is defined to mean “an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering.” *Id.* § 17.3.

¹⁸ 16 U.S.C. § 1538(a)(1)(B).

¹⁹ 16 U.S.C. § 1532(13).

Where a violation of the Section 9 take prohibition is alleged, a court must issue an injunction if a plaintiff establishes by a preponderance of the evidence that there is “a reasonably certain threat of imminent harm to a protected species.”²⁰ Because Congress has accorded the protection of endangered species the “highest of priorities,” courts do not have the discretion to withhold injunctive relief where it is necessary to prevent an imminent and likely violation of the ESA.²¹

It remains unclear whether the Federal Agencies have commenced Section 7 consultation on the energy corridors, and there is scarce information in the abstracts regarding the potential harm to listed species from construction and operation of the energy corridors.²² It is also not clear whether the Federal Agencies have developed migratory bird conservation plans for these corridors. Where activities have the potential to take listed species, consultation must occur “at the earliest possible time,” in order to avoid delay, ensure that impacts are avoided and opportunities for mitigation are not overlooked.²³ The Center therefore urges the Federal Agencies to commence the consultation process, so that the impacts to listed species may be fully considered in the development of these energy corridors.

Furthermore, there can be little doubt that the development of energy corridors is likely to result in take of federally-protected species, and it is not clear whether such take would be covered by a valid ITS. While using already-disturbed areas is a reasonable means of mitigating the impacts of the proposed activities, the impacts must still be fully considered. Power lines pose a high risk of collision for the many migratory bird species, and development of power lines and pipelines will lead to the loss and/or degradation of essential habitat in the area, including wetlands and other waterbodies that would be impacted directly from construction, as well as through sediment loading from erosion.²⁴

Power lines also increase the potential for predation of certain protected species, such as plovers and migratory birds, by increasing the opportunity for raptor perching.²⁵ Increased predation of protected birds could result in significant mortality and adverse impacts to these species.

²⁰ *Defenders of Wildlife v. Bernal*, 204 F.3d 920, 925 (9th Cir. 2000); *Animal Welfare Institute v. Beech Ridge Energy*, 675 F. Supp. 2d 540, 563 (D. MD 2009).

²¹ *Tennessee Valley Auth. v. Hill*, 437 U.S. 153, 184 (1978).

²² In order to fully assess the impacts of these energy corridors on the many protected species that may be affected, surveys are needed to determine where these species may be located. This is essential for determining not only the potential for impacts, but to formulate appropriate conservation measures to minimize and mitigate the impacts to these species.

²³ See *i.e.* 50 C.F.R. §§ 402.14(a), (g)(8).

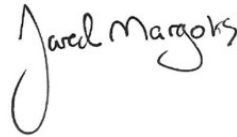
²⁴ See <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions/electric-utility-lines.php>

²⁵ See APLIC Suggested Practices for Avian Protection on Power Lines at 18 (2006) (available at <https://www.nrc.gov/docs/ML1224/ML12243A391.pdf>); APLIC Reducing Avian Collisions with Power Lines (2012) (available at http://www.aplic.org/uploads/files/11218/Reducing_Avian_Collisions_2012watermarkLR.pdf). See also Bernardino, Joana et al. (2018). *Bird collisions with power lines: State of the art and priority areas for research. Biological Conservation*. 222. 10.1016/j.biocon.2018.02.029.

Given the high concentrations of migratory birds in the area, and the potential for construction of energy infrastructure over, under or through various rivers, streams, and wetlands that provide habitat for these migratory birds, direct harm and resulting mortality is likely. The Federal Agencies should therefore immediately commence formal ESA Section 7 consultation, and provide an opportunity for the public to comment on any analysis of potential impacts, and measures to minimize and mitigate these impacts.

Thank you for your attention to these comments.

Sincerely,

A handwritten signature in black ink that reads "Jared Margolis". The signature is written in a cursive style with a large initial "J".

Jared M. Margolis
CENTER FOR BIOLOGICAL DIVERSITY
2852 Willamette St., Box 171
Eugene, OR 97405
Tel: (802) 310-4054
Email: jmargolis@biologicaldiversity.org

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10198] - Webmaster Receipt
Date: Friday, March 22, 2019 4:38:58 PM
Attachments: [ID_10198_PCTAResponse368EnergyCorridorReviewRegions6ColumbiaCascades.pdf](#)

Thank you for your input, Dana Hendricks.

The tracking number that has been assigned to your input is **10198**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 22, 2019 16:38:41 CDT

First Name: Dana
Last Name: Hendricks
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Pacific Crest Trail Association

Topics
Public access and recreation
Specially designated areas
Visual resources

Geographic Area
[Area selected via Corridor Mapping Tool](#)

Input

[Blank]

Attachments

PCTA Response --368 Energy Corridor Review--Regions 6--Columbia Cascades.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Bull Run
Watershed
Management
Unit

The Dalles
Watershed
Management
Unit

10-246

Mount
Hood
Wilderness

Salmon-
Huckleberry
Wilderness

Badger
Creek
Wilderness

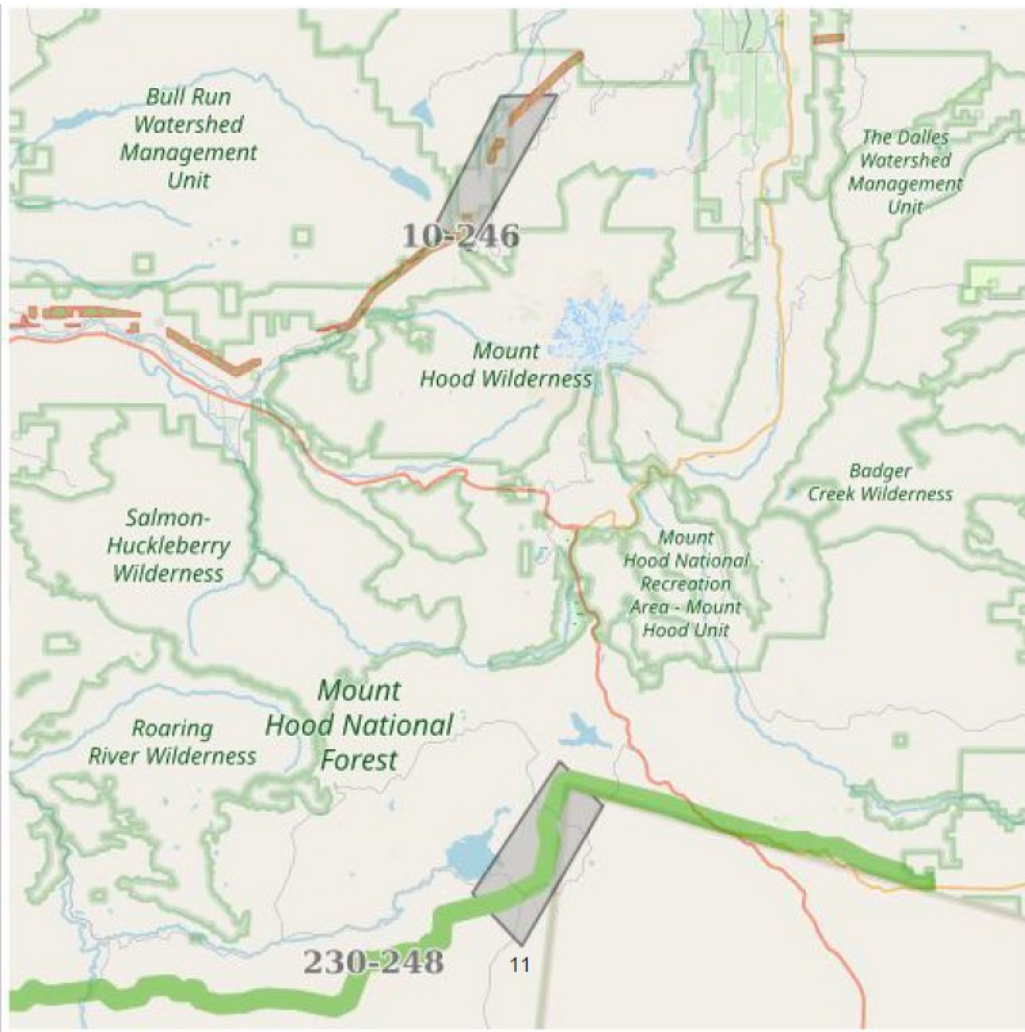
Mount
Hood National
Recreation
Area - Mount
Hood Unit

Roaring
River
Wilderness

Mount
Hood National
Forest

230-248

11



March 25, 2019

RE: Pacific Crest Trail Association Response to the Section 368 West-wide Energy Review Corridor—
Regions 4, 5 and 6

To Project Review Team,

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's and Bureau of Land Management's (BLM) primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails dates back to the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states in Sec. 11 (a), "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." Sec. 11 (b) continues, "Each Secretary or the head of any Federal land managing agency, may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails." Based on this direction, it is PCTA's role to work with the Forest Service and BLM to ensure the best possible management of the PCT and the experience it affords trail users, year-round. Additionally, PCTA has had a strong partnership with these agencies for over a decade with the maintenance and management of the PCT.

Over 2,650 miles in length, the PCT is the longest continuously developed hiking and equestrian experience in the United States. The PCT is renowned as the most remote of our National Scenic Trails and passes through more miles of designated Wilderness than any other National Scenic Trail. As such, it takes a good deal of its character as a world-class hiker and equestrian resource from the opportunities it provides to experience landscapes that appear pristine, wild, and free from development by humankind. The PCT also boasts the greatest elevation changes of any of America's National Scenic Trails, allowing it to pass through six out of seven of North America's ecozones, including high and low desert, old-growth forest, and alpine country. The PCT Comprehensive Plan states that the Trail should be routed to "display a great variety of natural beauty and expanse of panoramic scenery from a position of height." The Trail was intentionally routed through as many protected areas as possible, envisioned largely as a showcase of diverse and untrammeled ecosystems. From desert to glacier-flanked mountain, from meadow to rain forest, the PCT symbolizes everything there is to love—and protect—in the Western United States.

The PCT user's experience can be significantly impaired if, along the Trail in between protected areas, they encounter harshly clashing land uses. This was acknowledged early on by a federal interagency task force who interpreted the NTSA by developing these guidelines, which also appear in the PCT Comprehensive Plan:

"The routes of national scenic trails should be so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. They should avoid, insofar as practicable, established highways, motor roads, mining areas, power transmission lines, existing commercial and industrial developments, range fences and improvements, private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition and its use for outdoor recreation."

Protection of the unique resource the PCT represents is particularly challenging because, along its 2,650 miles, hundreds of developments are proposed each year by an array of different land management agencies, private owners, and industries. However, the original vision was reaffirmed in the 21st century via executive order to the federal agencies: “Corridors associated with national scenic trails . . . [should be] protected to the degree necessary to ensure that the values for which each trail was established remain intact”.¹

Within Region 6, PCTA has analyzed all of the energy corridors that cross, are adjacent to, and have potential to impact the PCT and the experience the trail provides to hikers, horseback riders and non-motorized winter trail users. Protection of the Trail experience must consider not only developments adjacent to or intersecting the trail corridor, but also developments that would disrupt an otherwise relatively pristine vista for trail users. It would be a significant detriment to the trail user’s experience to look out over what used to be a relatively natural-looking landscape and to encounter a jarringly unnatural, long, straight, permanent clearcut. While some of the energy corridors appear to have minimal impact on the PCT, others appear to have the potential to substantially interfere with the nature and purposes for which the PCT was designated a National Scenic Trail. The following corridors are addressed with PCTA’s questions, input and there are associated maps for the areas of interest using the “drawing tool” provided on the West-wide Energy Corridor website.

Corridor 230-248

This corridor, where there are currently no utility lines, would present a major disruption to the PCT and surrounding landscapes on the Mount Hood National Forest (MHNF), a large proportion of which contain old-growth or Late Successional Reserves. It would not only cross the PCT, but it would disrupt the experience of users at the popular Timothy Lake recreation area, with its extensive system of trails. The corridor would also cross more than one federally designated Wild and Scenic River. These crossings would significantly diminish these congressionally designated and distinctive recreational resources and opportunities.

MHNF has identified recreation as its largest niche, bringing in far more revenue than logging and other forms of resource extraction. In order to preserve the appeal that serves the recreating public and brings in the recreation revenue that sustains it, the MHNF must prioritize its landscapes and scenery preservation.

We would like to see alternative corridor routes, which would intersect the PCT in an already-impacted corridor, considered instead. For example, existing transmission lines cross the PCT within just a few miles to the south of the proposed corridor. Co-location would go a long way towards protecting against scenery impacts.

The PCT follows the crest of the mountains and offers vistas of the landscape at many different places where the permanently-cleared artificial corridor would be visible within the Middleground (0.5 to 4.5 miles viewed from the trail.) Considering the importance of vistas from the trail, we urge that the conflicts analysis consider a visual analysis of not only the PCT intersection, but the entire corridor route’s impact on views from all along the PCT for miles around. As the abstract states:

“The LMP states that the Pacific Crest NST is a Sensitivity Level I trail. It shall have prescribed VQOs of Retention, Partial Retention, and Modification in near foreground, far foreground, and middle ground distance zones, respectively.”

A VQO of Modification means vistas lying in the middle ground as viewed from all along the PCT (not just at the intersection) may be dominated by management activities, but these should still be compatible

¹ Exec. Order No. 13195, 3 C.F.R. 743 (2001).

with the natural surroundings. A very long, very straight forest clearing cannot blend with the natural surroundings and protect the nature and purposes of the PCT without thoughtful visual mitigations. We'll mention mitigation suggestions below.

As the corridor abstract states:

“The LMP states that new utility rights of way for transmission lines should be located and designed to blend with the natural landscape character where Retention and Partial Retention VQOs are prescribed. . . The VQO for part of the area where the trail intersects the corridor is Retention. In areas under the Retention VQO, management practices should not be evident to the casual observer.”

If an energy corridor simply must intersect the PCT at this location, it would be extremely challenging to meet VQOs. Our proposed mitigations are below.

Under Stakeholder Input and other Relevant Information, the abstract states:

“The Pacific Crest NST Comprehensive Management Plan was finalized in 1982. The plan does not reference management conflicts with utility corridors.”

The last part of this statement is not accurate. As referenced in the opening paragraphs of this letter, the Plan specifically mentions the need to avoid utility corridors, along with other major developments.

Under Potential Resolutions, the abstract states:

“The corridor appears to best meet the siting principles. The trail runs from north to south perpendicular to the corridor, and cannot be avoided. While the corridor cannot be re-routed to avoid the NST, the corridor crosses the NST perpendicularly (minimizing impacts). Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.”

We propose the following mitigation measures at the intersection: Narrowing of the corridor to the absolute minimum width within the trail's foreground or immediate foreground, an angular jog of the line to obscure from the observer the long length of the corridor, and an underground-only stipulation, with mandated vegetation management provision of visual screening such as tall shrubs within the intersection zone. We propose the following mitigation measures at other places along the PCT (besides the intersection) wherever the long length of the corridor is viewed within the middleground: vary the shape and width of the corridor, and feather edges of the clearing, to blend in better with the forms and lines of the landscape.

Corridor 10-246

This corridor is co-located with an existing transmission line where significant visual impacts already affect the trail experience. The trail emerges from a relatively serene, remote forest to cross through a 500-foot wide clear-cut under buzzing, high-voltage lines, with a clear view of the lines' long length all down the valley below. The proposed corridor appears to more than double the width of the existing disturbance.

The corridor abstract states:

“Pacific Crest NST and the corridor intersect — The LMP states that the Pacific Crest NST is a Sensitivity Level I trail. It shall have prescribed VQOs of Retention, Partial Retention, and Modification in near foreground, far foreground, and middle ground distance zones, respectively. The LMP states that new utility rights of way for transmission lines should be located and designed to blend with the natural landscape character where Retention and Partial Retention VQOs are prescribed. (In areas under the Retention VQO, management practices should not be evident to the casual observer. In areas under the Partial Retention VQO, management practices should remain visually subordinate to the characteristic landscape.)”

Considering the impacts that already exist at this intersection, not to mention for miles further north along the PCT where the cleared utility corridor dominates the viewshed in the middleground without any mitigation to make it blend in with natural surroundings, much would need to be done simply to bring the

situation up to the VQOs in the LMP. If more utility lines were to be added to this corridor, it would become even more challenging to meet the VQOs. Our recommended mitigations are below.

Under Stakeholder Input and other Relevant Information it states:

“The standards and guidelines for location, design, signing, user facilities, and management of the PCT will be in accordance with the criteria established in the Pacific Crest NST Comprehensive Management Plan, 1/18/82.

The plan does not reference management conflicts with utility corridors.”

The last part of this statement is not accurate. As referenced in the opening paragraphs of this letter, the Plan specifically mentions the need to avoid utility corridors, along with other major developments.

Under Potential Resolutions, the abstract states:

“The trail intersects the corridor and cannot be avoided. The location appears to best meet the siting principles because of collocation with several existing transmission lines, the minimal area of intersection with the trail, and the absence of more preferable alternatives. Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.”

We propose the following mitigation measures at the intersection: Narrowing of the corridor to the absolute minimum width within the trail’s foreground or immediate foreground, an angular jog of the line to obscure from the observer the long length of the corridor, and an underground-only stipulation, with mandated vegetation management provision of visual screening such as tall shrubs within the intersection zone. We propose the following mitigation measures at other places along the PCT (besides the intersection) wherever the long length of the corridor is viewed within the middleground: vary the shape and width of the corridor, and feather edges of the clearing, to blend in better with the forms and lines of the landscape.

Sincerely,



Dana Hendricks
Columbia Cascades Regional Representative

CC:

Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator
Justin Kooyman, PCTA, Associate Director of Trail Operations

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10199] - Webmaster Receipt
Date: Monday, March 25, 2019 5:33:17 PM
Attachments: [ID_10199_PCTAResponse368EnergyCorridorReviewRegions15.pdf](#)[SouthernSierra.pdf](#)

Thank you for your input, Benjamin Barry.

The tracking number that has been assigned to your input is **10199**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 25, 2019 17:33:11 CDT

First Name: Benjamin

Last Name: Barry

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Pacific Crest Trail Association

Topics

Land Management Responsibilities and Environmental Resource Issues

Specially designated areas

Geographic Area

[Area selected via Corridor Mapping Tool](#)

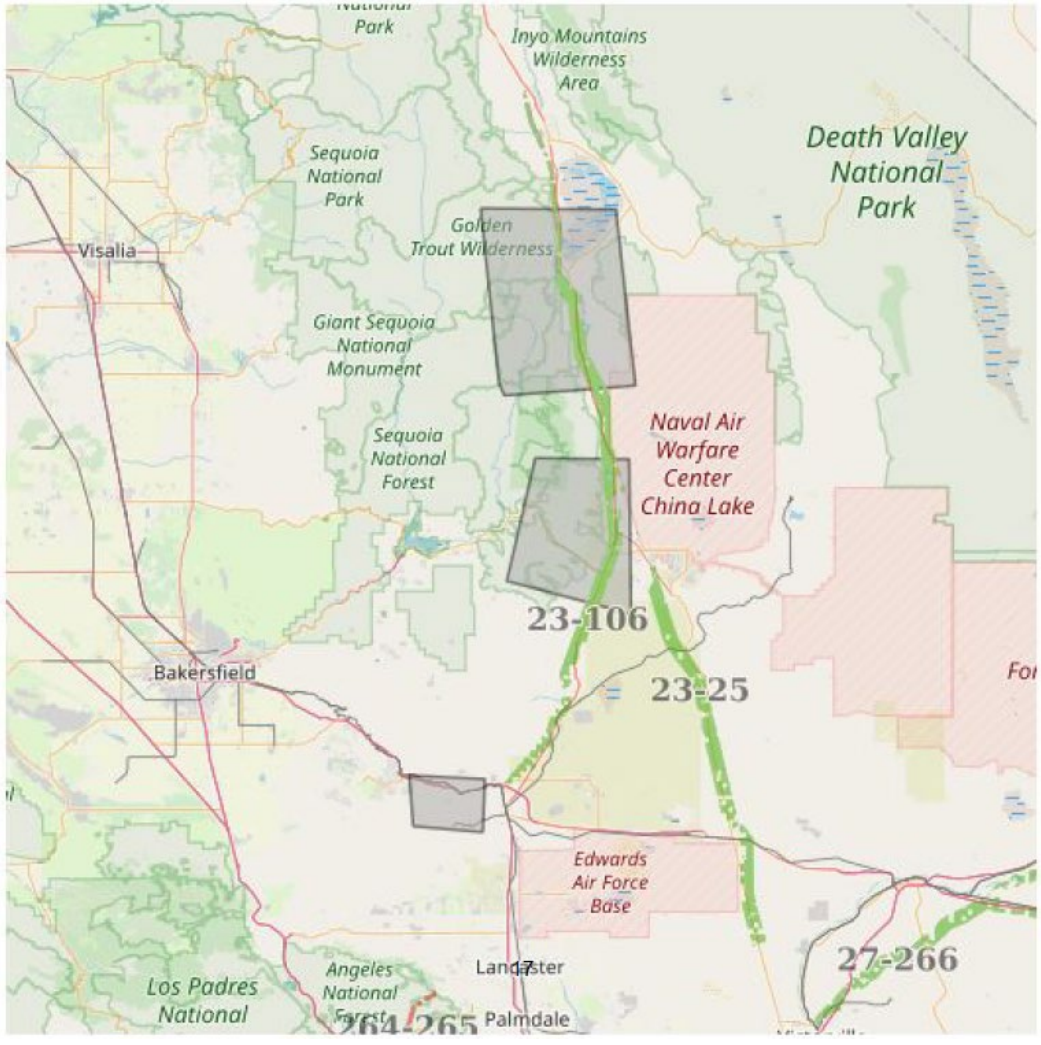
Input

[Blank]

Attachments

PCTA Response--368 Energy Corridor Review--Regions 1, 5.pdf--Southern Sierra.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



Natural Park

Inyo Mountains Wilderness Area

Death Valley National Park

Sequoia National Park

Golden Trout Wilderness



Visalia

Giant Sequoia National Monument

Sequoia National Forest

Naval Air Warfare Center China Lake

23-106

23-25

Bakersfield



For

Edwards Air Force Base

Los Padres National

Angeles National Forest

Lancaster

27-266

Palmdale

264-265

March 25, 2019

RE: Pacific Crest Trail Association Response to the Section 368 West-wide Energy Review Corridor—
Regions 4, 5 and 6

To Project Review Team,

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's and Bureau of Land Management's (BLM) primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails dates back to the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states in Sec. 11 (a), "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." Sec. 11 (b) continues, "Each Secretary or the head of any Federal land managing agency, may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails." Based on this direction, it is PCTA's role to work with the Forest Service and BLM to ensure the best possible management of the PCT and the experience it affords trail users, year-round. Additionally, PCTA has had a strong partnership with these agencies for over a decade with the maintenance and management of the PCT.

The PCT user's experience can be significantly impaired if, along the trail in between protected areas, they encounter harshly clashing land uses. This was acknowledged early on by a federal interagency task force who interpreted the NTSA by developing these guidelines, which also appear in the PCT Comprehensive Plan,

"The routes of national scenic trails should be so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. They should avoid, insofar as practicable, established highways, motor roads, mining areas, power transmission lines, existing commercial and industrial developments, range fences and improvements, private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition and its use for outdoor recreation."

Protection of the unique resource the PCT represents is particularly challenging because along its 2,650 miles, hundreds of developments are proposed each year by an array of different land management agencies, private owners, and industries. However, the original vision was reaffirmed in Executive Order Number 13195, Trails For the 21st Century which states, "Corridors associated with national scenic trails . . . [should be] protected to the degree necessary to ensure that the values for which each trail was established remain intact."

This comment letter focuses on Regional Review Areas 1 and 5, which are within PCTA's Southern Sierra Region of the PCT. PCTA has analyzed all of the energy corridors that cross, are adjacent to, and have potential to impact the PCT and the experience the trail provides to hikers, horseback riders and non-motorized winter trail users. Energy corridors within the Southern Sierra Region, defined as all sections of the PCT between Yosemite National Park and the northern boundary of the Angeles National Forest, appear to have minimal impact on the PCT. The following corridors are addressed with PCTA's questions, input and there are associated maps for the areas of interest using the "drawing tool" provided on the West-wide Energy Corridor website.

Corridor 18-23

- This corridor roughly parallels the Pacific Crest Trail. Our rough estimate shows this corridor coming as close as 4.6 miles to the trail at milepost 214. We are concerned that the corridor may come closer to the trail than can be analyzed by using the Section 368 Energy Corridor Mapping Tool.
- We would appreciate a more thorough analysis of the potential visual quality impacts that developments in this corridor would have on trail users. In particular, we are most concerned with any part of the corridor that falls within the middleground as defined by Visual Quality Objectives in the Forest Service Landscape Aesthetics Handbook. Middleground is the landscape that can be viewed from the PCT up to 4.5 miles from the trail center line.
- This traverses both Region 1 and Region 5, transitioning regions between mileposts 211-212. The width of the corridor is substantially wider in Region 1 – we would appreciate clarification on why the corridor shrinks immediately upon entering Region 5 - our concern being that if the corridor was any wider in Region 5, many areas of the corridor would be well within the middleground area previously mentioned.
- The Inyo National Forest Revised Management Plan lists the following desired condition for the PCT:
 - *Scenic integrity objectives and scenic stability levels are maintained to retain panoramic views and landscape connectivity. Lands viewed beyond the management area meet the scenery integrity objective of at least moderate. (MA-PCT-DC)*
- The Forest Service Scenery Management System states, “MODERATE scenic integrity refers to landscapes where the valued landscape character appears “slightly altered.” Noticeable deviations must remain visually subordinate to the landscape character being viewed.” We agree with this desired condition and urge this project to strongly consider any corridor expansion which would be visible in the middleground, coming within 4.5 miles of the centerline of the trail.

Corridor 23-106

- The corridor roughly parallels the Pacific Crest Trail. Our estimate shows this corridor coming as close as 4.5 miles to the trail at milepost 14. We are concerned that the corridor may come closer to the trail than can be analyzed by using the Section 368 Energy Corridor Mapping Tool.
- We would appreciate a more thorough analysis of the potential visual quality impacts that developments in this corridor would have on trail users. In particular, we are most concerned with any part of the corridor that falls within the middleground as defined by Resource Classes in the Bureau of Land Management Visual Resource Inventory Handbook. Middleground is the landscape that can be viewed from the PCT up to 5 miles from the trail center line.
- The abstract for this corridor references the numerous wind developments located at the southern end of this corridor, largely between mileposts 40-50. We are curious why this corridor does not continue further south and would like reassurance the corridor will not cross the PCT at Tehachpi-Willow Springs Road, where numerous other transmission lines currently cross.

The following language, or language with slight variations, is contained in several corridor abstracts that contain the PCT, “Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.” With this, PCTA suggests the following Interagency Operating Procedures (IOPs) be considered for addressing nationally designated trails:

- Corridors prior to crossing any National Scenic or Historic Trail perpendicularly will incorporate a change in the angle of approach within the immediate foreground to foreground viewshed prior to the trail and corridor intersection

- This will minimize the length of the clearing viewed and experienced by trail users as they cross energy corridors
- Narrowing of the corridor to the absolute minimum width within the trail's foreground
- Utilize vegetation management approaches such as visual screening by leaving tall shrubs where the trail intersects energy corridors
- Where a corridor is viewed within the middleground viewshed from the trail, vary the shape and width of the corridor, and feather edges of the clearing, to blend with the forms and lines of the landscape

We look forward to working with our agency partners on this planning effort to ensure that impacts to the Pacific Crest National Scenic Trail are minimized and to ensure the trail provides the best experience possible for trail users. Please do not hesitate to contact me with any questions.

Sincerely,



Benjamin Barry
Southern Sierra Regional Representative

CC:

Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator
Justin Kooyman, PCTA, Associate Director of Trail Operations

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10200] - Webmaster Receipt
Date: Tuesday, March 26, 2019 2:47:01 PM

Thank you for your input, Scott Downes.

The tracking number that has been assigned to your input is **10200**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 26, 2019 14:42:50 CDT

First Name: Scott
Last Name: Downes
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Washington Department of Fish and Wildlife

Topics

Energy Planning Opportunities
Energy Planning Issues
Physical barrier
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources
Specially designated areas

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

Wildlife Connectivity:

This area, Cascade crest down through Easton provides a high level on needed wildlife connectivity for animals moving north-south. A prime example of that is the long-running and heavily invested effort of the I-90 east project where the partnership, led by WSDOT and USFS is building multi-million dollar wildlife connectivity structures and studying their long-term use and effectiveness.

This has been combined with a large land purchase effort, both federal, state and private conservation groups to ensure long-term connectivity and viability of this corridor. This energy corridor is just south of that effort, and thus any potential energy expansion should be aware of and plan to ensure that proposals are compatible with and do not undermine the extensive efforts a broad collaborative has worked to achieve.

The connectivity efforts for I-90 east are designed to not only connect large species such as ungulates and large carnivores (bear, wolf, cougar, bobcat etc..) but also smaller carnivores (weasels, foxes) and down to herptiles and small mammals.

Aquatic/Riparian Habitats:

This energy corridor is close to the Yakima River and crosses tributaries to the Yakima River near their junction with the Yakima in many cases. How vegetation and road crossings are managed has a huge impact on whether streams have basic functions such as fish passage, functional riparian habitat or not. Many places on the current energy corridors in the area, vegetation is cut/mowed to almost ground level and thus no ability for the stream to form a defined channel. This combined with road issues (undersized culverts, improperly placed fords etc..) have created numerous fish passage barriers along the energy corridors in this area (the 244-245 corridor and adjacent powerline corridors to the north). In addition to leaving more riparian habitat for stream function, leaving intact riparian habitat would also allow for increased wildlife connectivity as large corridors with mowed vegetation act as partial barriers to wildlife who are reluctant to venture into large wide open spaces for fear of predation or other aspects of the habitat needs.

The Yakima River in this area is critical habitat for Steelhead and Bull Trout and known spawning habitat for Chinook. These tributaries provide important rearing habitat for these species and are vital for their survival.

Road management:

I haven't explored all places in this corridor, but a frequent problem in the energy corridors in this area are that they have roads that cross both tributaries and in a few places the Yakima River. These accesses are not gated or blocked off to the public, and thus we have witnessed the public driving through the streams impacting and destroying aquatic habitat. Improved road management and access could help to fix this problem.

Wildlife Connectivity:

This area, Cascade crest down through Easton provides a high level on needed wildlife connectivity for animals moving north-south. A prime example of that is the long-running and heavily invested effort of the I-90 east project where we are building multi-million dollar wildlife connectivity structures and studying their long-term use and effectiveness. This has been combined with a large land purchase effort, both federal, state and private conservation groups to ensure long-term connectivity and viability of this corridor. This energy corridor is just south of that effort, and thus any potential energy expansion should be aware of and plan to ensure that proposals are compatible with and do not undermine the extensive efforts a broad collaborative has worked to achieve.

The connectivity efforts are designed to not only connect large species such as ungulates and large carnivores (bear, wolf, cougar, bobcat etc..) but also smaller carnivores (weasels, foxes) and down to herptiles and small mammals.

Aquatic/Riparian Habitats:

This energy corridor is close to the Yakima River and crosses tributaries to the Yakima River near their junction with the Yakima in many cases. How vegetation and road crossings are managed has a huge impact on whether streams have basic functions such as fish passage, functional riparian habitat or not. Many places on current energy corridors in the area, vegetation is cut/mowed to almost ground level and thus no ability for the stream to form a defined channel. This combined with road issues (undersized culverts, improperly placed fords etc..) have created numerous fish passage barriers along the energy corridors in this area (the 244-245 corridor and adjacent powerline corridors to the north). In addition to leaving more riparian habitat for stream function, leaving intact riparian habitat would also allow for increased wildlife connectivity as large corridors with mowed vegetation act as partial barriers to wildlife who are reluctant to venture into large wide open spaces for fear of predation or

other aspects of the habitat needs.

The Yakima River in this area is critical habitat for Steelhead and Bull Trout and known spawning habitat for Chinook. These tributaries provide important rearing habitat for these species and are vital for their survival.

Road management:

I haven't explored all places in this corridor, but a frequent problem in these energy corridors are that they have roads that cross both tributaries and in a few places the Yakima River. These accesses are not gated or blocked off to the public, and thus we have witnessed the public driving through the streams impacting and destroying aquatic habitat. Improved road management and access could help to fix this problem.

Wildlife species of potential concern in this corridor:

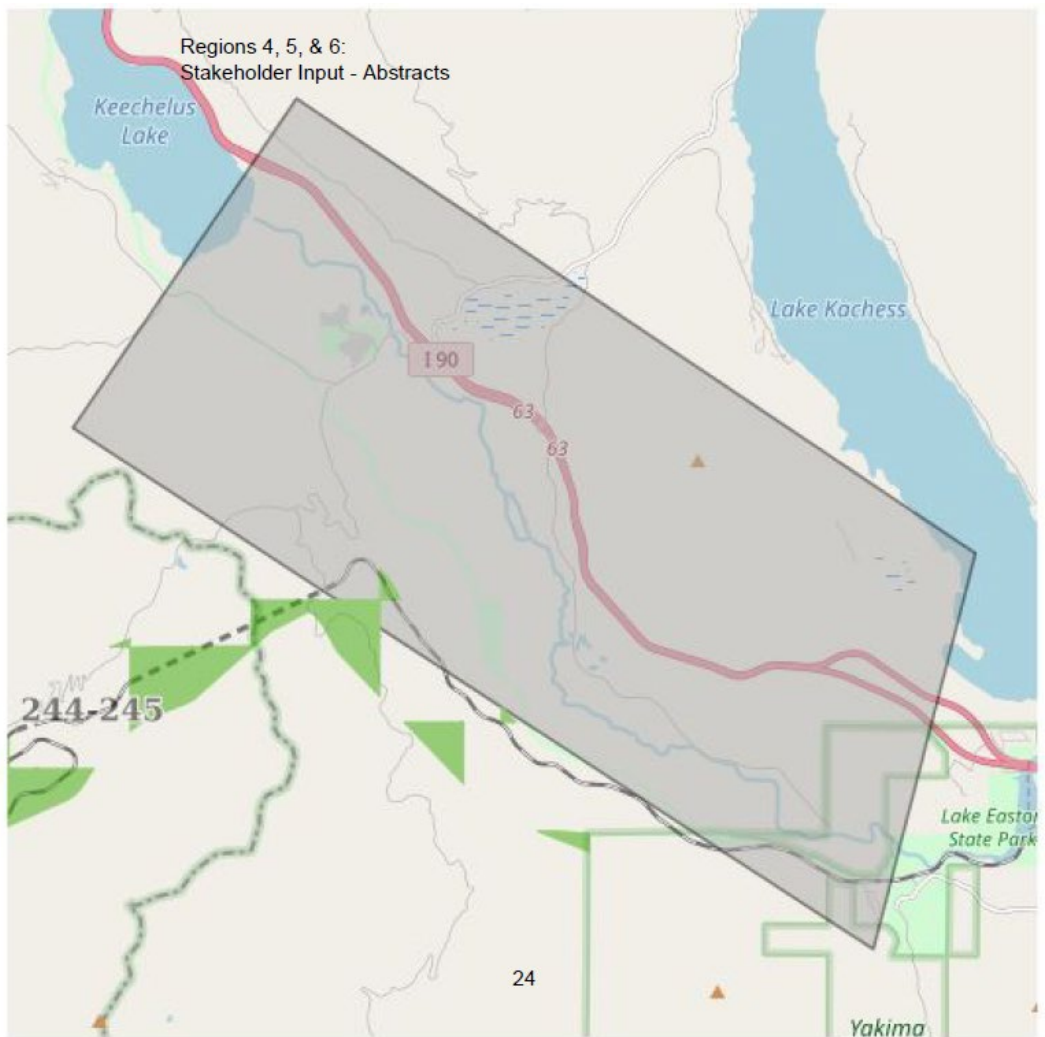
Listed species (State or Federal) who have or could have potential occurrence or habitat adjacent to the corridor include Marbled Murrelet, Fisher, Gray Wolf and Northern Spotted Owl.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Regions 4, 5, & 6:
Stakeholder Input - Abstracts



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10201] - Webmaster Receipt
Date: Thursday, March 28, 2019 5:26:13 PM
Attachments: [ID_10201_NorCalSoOr_PCTAResponse368EnergyCorridorReview.docx](#)

Thank you for your input, Ian Nelson.

The tracking number that has been assigned to your input is **10201**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 28, 2019 17:25:55 CDT

First Name: Ian
Last Name: Nelson
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Pacific Crest Trail Association

Topics

Public access and recreation
Specially designated areas
Visual resources

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

Hello-

Please find comments from the Pacific Crest Trail Association's Northern California/Southern Oregon Regional Office attached.

Thank you,
-Ian Nelson
inelson@pcta.org

Attachments

NorCal-SoOr_PCTA Response--368 Energy Corridor Review.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

▲
Castle
Dome
1523 m

Castle Crags
State Park

261-262

722
Cascade Wonderland Highway

15

26

728

727

726

726

722

723

March 25, 2019

RE: Pacific Crest Trail Association Response to the Section 368 West-wide Energy Review Corridor—
Regions 4, 5 and 6

To Project Review Team,

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's and Bureau of Land Management's (BLM) primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails dates back to the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states in Sec. 11 (a), "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." Sec. 11 (b) continues, "Each Secretary or the head of any Federal land managing agency, may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails." Based on this direction, it is PCTA's role to work with the Forest Service and BLM to ensure the best possible management of the PCT and the experience it affords trail users, year-round. Additionally, PCTA has had a strong partnership with these agencies for over a decade with the maintenance and management of the PCT.

The PCT user's experience can be significantly impaired if, along the Trail in between protected areas, they encounter harshly clashing land uses. This was acknowledged early on by a federal interagency task force who interpreted the NTSA by developing these guidelines, which also appear in the PCT Comprehensive Plan,

"The routes of national scenic trails should be so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. They should avoid, insofar as practicable, established highways, motor roads, mining areas, power transmission lines, existing commercial and industrial developments, range fences and improvements, private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition and its use for outdoor recreation."

Protection of the unique resource the PCT represents is particularly challenging because, along its 2,650 miles, hundreds of developments are proposed each year by an array of different land management agencies, private owners, and industries. However, the original vision was reaffirmed in Executive Order Number 13195, Trails For the 21st Century which states, "Corridors associated with national scenic trails . . . [should be] protected to the degree necessary to ensure that the values for which each trail was established remain intact."

Within Region 5 in Northern California, PCTA has analyzed all of the energy corridors that cross, are adjacent to, and have potential to impact the PCT and the experience the trail provides to hikers, horseback riders and non-motorized winter trail users. Protection of the trail experience must consider not only developments adjacent to or intersecting the trail corridor, but also developments that would degrade the vista for trail users. While some of the energy corridors appear to have minimal impact on the PCT, others appear to have the potential to substantially interfere with the nature and purposes for which the PCT was designated a National Scenic Trail. The following corridor is addressed with PCTA's

questions, input and there are associated maps for the areas of interest using the “drawing tool” provided on the West-wide Energy Corridor website.

Corridor 261-262

1. The corridor will cross the PCT in the vicinity of Castle Crags State Park where the PCT crosses Interstate 5 near the town of Dunsmuir, California.
2. The analysis does not thoroughly address the potential impacts to the viewshed of the Pacific Crest National Scenic Trail as it approaches the I-5 corridor from the west and the east.
3. We ask that the corridor width at the PCT crossing be kept to a maximum of 2,000 feet and that any additional development be kept as close to the I-5 freeway as possible.
4. The PCT is on California State Park lands on both sides of the freeway at the PCT crossing of I-5 and PCTA has a strong working relationship with the State Park. Therefore, PCTA would work closely with the State Park should any development within the corridor be proposed.

The following language, or language with slight variations, is contained in several corridor abstracts that contain the PCT, “Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.” With this, PCTA suggests the following Interagency Operating Procedures (IOPs) be considered for addressing nationally designated trails:

- Corridors prior to crossing any National Scenic or Historic Trail perpendicularly will incorporate a change in the angle of approach within the immediate foreground to foreground viewshed prior to the trail and corridor intersection
 - This will minimize the length of the clearing viewed and experienced by trail users as they cross energy corridors
- Narrowing of the corridor to the absolute minimum width within the trail’s foreground
- Utilize vegetation management approaches such as visual screening by leaving tall shrubs where the trail intersects energy corridors
- Where a corridor is viewed within the middleground viewshed from the trail, vary the shape and width of the corridor, and feather edges of the clearing, to blend with the forms and lines of the landscape

We look forward to working with our agency partners on this planning effort to ensure that impacts to the Pacific Crest National Scenic Trail are minimized to ensure the trail provides the best experience possible for trail users. Please do not hesitate to contact me with any questions.

Sincerely,

Ian Nelson
Northern California/Southern Oregon Regional Representative
Pacific Crest Trail Association

CC:

Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator
Justin Kooyman, PCTA, Associate Director of Trail Operations

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10202] - Webmaster Receipt
Date: Friday, March 29, 2019 8:43:32 AM

Thank you for your input, James Strait.

The tracking number that has been assigned to your input is **10202**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 29, 2019 08:42:54 CDT

First Name: James
Last Name: Strait
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Montana DEQ

Topics

Lands and realty
Visual resources
Interagency Operating Procedures

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

I'm confused on the webmapper here. The MP markers (10-27.6) seem to be following the interstate, but the Conflict Map PDF shows the 368 corridor following the existing transmission to the north. Should the MP's not follow the proposed designated corridor? The route shown by MP 10-27.6, that goes through Whitehall, would be impossible to site.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

MT 399

Whitetail Road

249

249

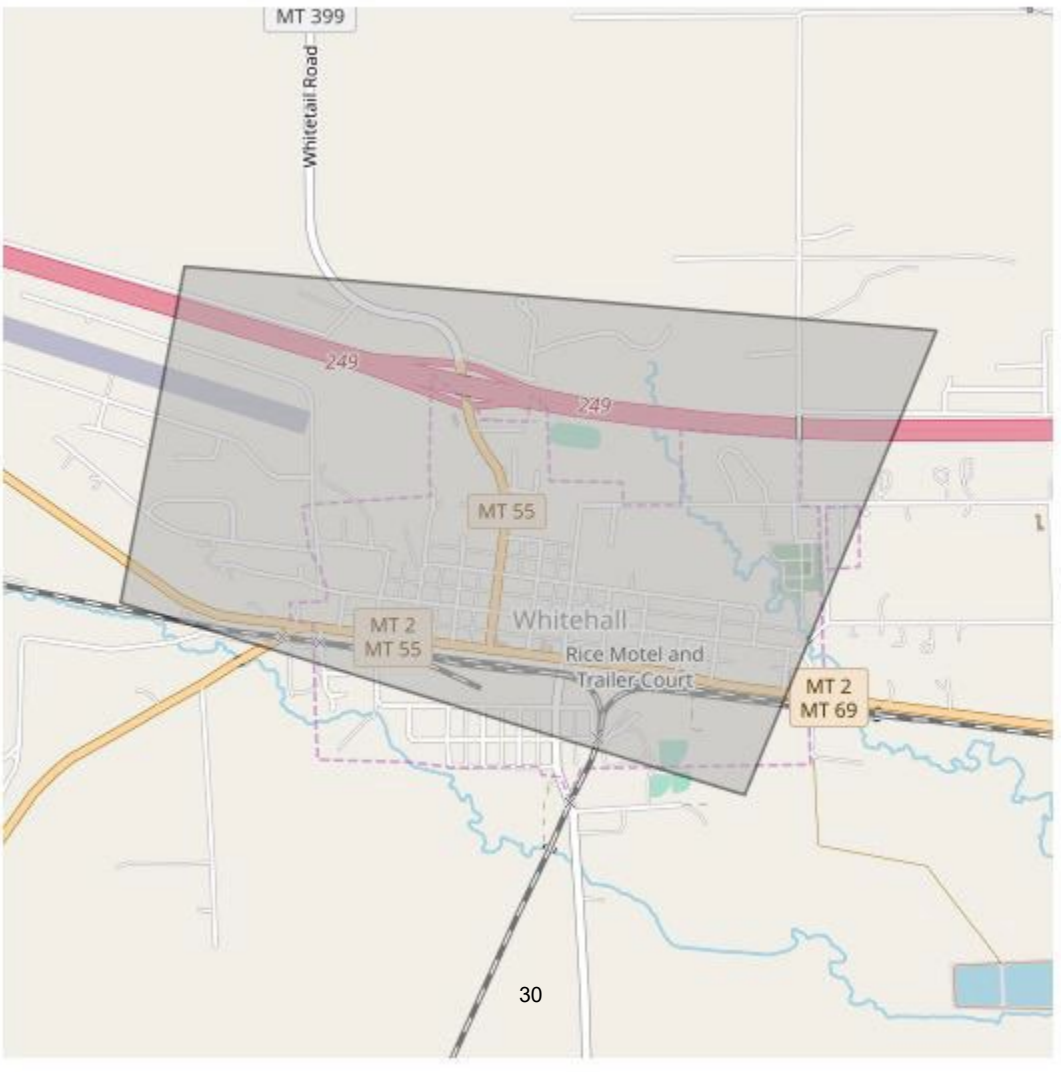
MT 55

Whitehall

Rice Motel and
Trailer Court

MT 2
MT 55

MT 2
MT 69



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10203] - Webmaster Receipt
Date: Friday, March 29, 2019 8:46:08 AM

Thank you for your input, James Strait.

The tracking number that has been assigned to your input is **10203**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 29, 2019 08:45:39 CDT

First Name: James
Last Name: Strait
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Montana DEQ

Topics

Energy Planning Opportunities
Energy Planning Issues
Existing infrastructure/available space
Lands and realty
Visual resources

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

This section of the proposed corridor should be considered a high conflict area for DEQ siting purposes. It is too fragmented to be effectively considered under Montana MFSA Preferred Location Criteria (MFSA Circular 2 Section 3.1: <http://deq.mt.gov/Portals/112/DEQAdmin/MFS/Documents/Circular2.pdf>). Criteria that would be impacted, or difficult to address include residences, visual impacts, agricultural center-pivots, and difficulty in obtaining greatest local acceptance.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Regions 4, 5, & 6:
Stakeholder Input - Abstracts



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10204] - Webmaster Receipt
Date: Friday, March 29, 2019 8:50:32 AM

Thank you for your input, James Strait.

The tracking number that has been assigned to your input is **10204**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 29, 2019 08:50:06 CDT

First Name: James
Last Name: Strait
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Montana DEQ

Topics

Energy Planning Issues
Jurisdiction
Existing infrastructure/available space
Lands and realty
Visual resources

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

This section of the proposed corridor should be considered a high conflict area for DEQ siting purposes. It is too fragmented to be effectively considered under Montana MFSA Preferred Location Criteria (MFSA Circular 2 Section 3.1: <http://deq.mt.gov/Portals/112/DEQAdmin/MFS/Documents/Circular2.pdf>). Criteria that would be impacted, or difficult to address include residences, visual impacts, and difficulty in obtaining greatest local acceptance.

This part of the corridor was attempted for use during the MSTI siting process. General feedback from the communities was that they wanted it farther away from residences and the interstate where it would not be visible. Forcing these locations in the valley will result in greater public opposition due to visuals and repeated infrastructure impacts to a small number of landowners due to the fragmentation of the corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Study Area

115
50-51

34



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10205] - Webmaster Receipt
Date: Friday, March 29, 2019 8:54:53 AM

Thank you for your input, James Strait.

The tracking number that has been assigned to your input is **10205**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 29, 2019 08:54:38 CDT

First Name: James
Last Name: Strait
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Montana DEQ

Topics

Energy Planning Issues
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Lands and realty
Soils/erosion
Visual resources

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

This section of the proposed corridor should be considered a high conflict area for DEQ siting purposes. It is too fragmented to be effectively considered under Montana MFSA Preferred Location Criteria (MFSA Circular 2 Section 3.1: <http://deq.mt.gov/Portals/112/DEQAdmin/MFS/Documents/Circular2.pdf>). Criteria that would be impacted, or difficult to address include residences, visual impacts, land use, cultural, and difficulty in obtaining greatest local acceptance.

This part of the corridor was attempted for use during the MSTI siting process. General feedback from the communities was that they wanted it farther away from residences and the interstate where it would not be visible. Forcing these locations in the valley will result in greater public opposition due to visuals and repeated infrastructure impacts to a small number of landowners due to the fragmentation of the corridor. Additionally, slope stability issues (known mass land movement) were identified as a grave concern in the area of MP 8-12

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10206] - Webmaster Receipt
Date: Friday, March 29, 2019 8:58:47 AM

Thank you for your input, James Strait.

The tracking number that has been assigned to your input is **10206**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 29, 2019 08:58:18 CDT

First Name: James
Last Name: Strait
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Montana DEQ

Topics

Energy Planning Issues
Jurisdiction
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Lands and realty
Visual resources

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

This section of the proposed corridor should be considered a high conflict area for DEQ siting purposes. It is too fragmented to be effectively considered under Montana MFSA Preferred Location Criteria (MFSA Circular 2 Section 3.1: <http://deq.mt.gov/Portals/112/DEQAdmin/MFS/Documents/Circular2.pdf>). Criteria that would be impacted, or difficult to address include residences, visual impacts, and difficulty in obtaining greatest local acceptance. mp ~18-25, and mp 30 to 78.8 (Alberton) are generally unusable for MFSA siting purposes unless there is no other option.

Attachments

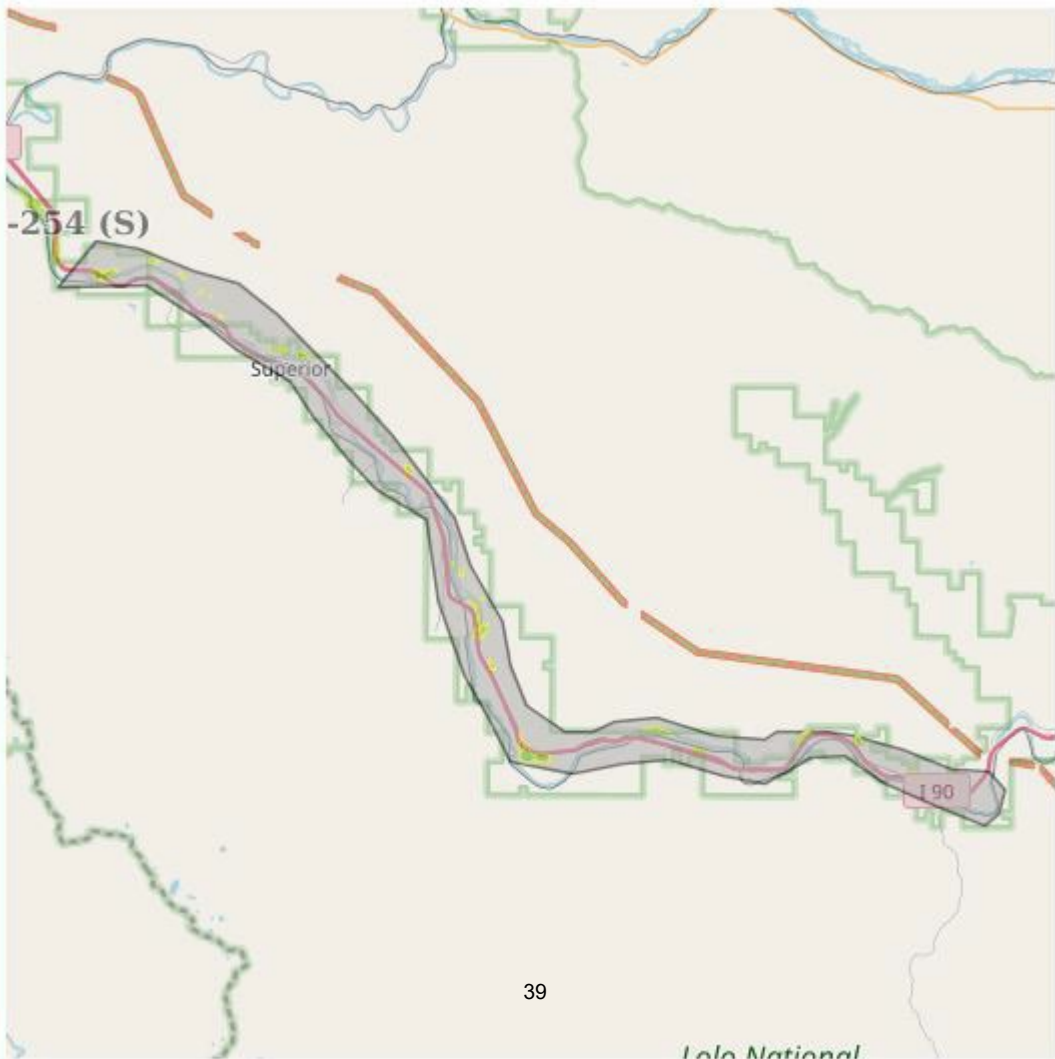
[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

-254 (S)

Superior

190



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10207] - Webmaster Receipt
Date: Sunday, March 31, 2019 1:51:31 PM
Attachments: [ID_10207_Section368PGComments03312019Final.pdf](#)

Thank you for your input, Laura Weyant.

The tracking number that has been assigned to your input is **10207**. Please refer to the tracking number in all correspondence relating to your input.

Date: March 31, 2019 13:51:12 CDT

First Name: Laura
Last Name: Weyant
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Pacific Gas and Electric Company

Topics

Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Lands and realty

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments in the review of the Section 368 Energy Corridor in Region 5. PG&E is an investor-owned electric and gas utility responsible for the construction, operation, and maintenance of electric and gas transmission, distribution, and generation facilities in northern and central California. PG&E's service territory encompasses 70,000 square miles with a population of over 16 million residents. PG&E is working diligently to support Federal and State renewable energy goals and to facilitate delivery of safe, reliable, and cost-effective electricity and gas, including renewable energy from third-party generators, to PG&E's customers. Continued designation of energy corridors combined with robust coordination between the various Federal and State agencies would assist in improving the efficiency of the permitting process for siting new projects. However, PG&E cannot predict with certainty where new development will occur or where additional electric and gas lines will be needed in the future.

The focus of PG&E's review was on identifying existing PG&E facilities within the Region 5 Section 368 Energy Corridor. For a comprehensive list of existing facilities identified by corridor section please see the attached list. It is imperative that PG&E have all rights and authority to carry out vital operation, maintenance, and replacement needs to ensure critical infrastructure is safe and reliable to minimize any risks to the public and customers. PG&E's regulators as well as safe management practices dictate set back requirements from critical utility infrastructure. These regulations and requirements must be adhered to and PG&E

appreciates inclusion in all proposals of new infrastructure on or near PG&E's existing infrastructure.

Thank you again for the opportunity to comment. Please reach out to Laura Weyant directly for additional information.

Attachments

Section368-PGE Comments 03312019 Final.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Request for Comments on Review of Section 368 Region 5 Energy Corridors Pacific Gas & Electric

Corridor		
3 – 8	Pondosa - Copic	<p>PG&E Transmission and/or Subtransmission facilities in this corridor include:</p> <ul style="list-style-type: none"> - One 500kV Line - Two Gas Transmission Lines - One Compressor Station <p>PG&E queued gen near or which could use the corridor: Unknown at this time.</p> <p>Previously triggered and/or proposed projects near this corridor that did not move forward include:</p> <ul style="list-style-type: none"> - No New Gas Transmission or Distribution line projects - No New Electric Transmission or Distribution line projects
6 – 15	Colfax - Reno Corridor	<p>PG&E Transmission and/or Subtransmission facilities in this corridor include:</p> <ul style="list-style-type: none"> - Six 115kV Lines - Three 60kV Lines - Five 12kV Distribution Lines - One Powerhouse <p>PG&E queued gen near or which could use the corridor: Unknown at this time.</p> <p>Previously triggered and/or proposed projects near this corridor that did not move forward include:</p> <ul style="list-style-type: none"> - No New Gas Transmission or Distribution line projects - No New Electric Transmission or Distribution line projects
23 - 25	Little Lake - Adelanto	<p>PG&E Transmission and/or Subtransmission facilities in this corridor include:</p> <ul style="list-style-type: none"> - Three Gas Transmission Lines <p>PG&E queued gen near or which could use the corridor: Unknown at this time.</p> <p>Previously triggered and/or proposed projects near this corridor that did not move forward include:</p> <ul style="list-style-type: none"> - No New Gas Transmission or Distribution line projects - No New Electric Transmission or Distribution line projects
27 – 41	Daggett – Bullhead City	<p>PG&E Transmission and/or Subtransmission facilities in this corridor include:</p> <ul style="list-style-type: none"> - Two Gas Transmission Lines - One Gas Distribution Line <p>PG&E queued gen near or which could use the corridor: Unknown at this time.</p> <p>Previously triggered and/or proposed projects near this corridor that did not move forward include:</p> <ul style="list-style-type: none"> - No New Gas Transmission or Distribution line projects - No New Electric Transmisssion or Distribution line projects
27 – 266	Daggett - Victorville	<p>PG&E Transmission and/or Subtransmission facilities in this corridor include:</p> <ul style="list-style-type: none"> - Four Gas Transmission Lines - Three Other Gas Transmission Equipment/Facilities <p>PG&E queued gen near or which could use the corridor: Unknown at this time.</p> <p>Previously triggered and/or proposed projects near this corridor that did not move forward include:</p> <ul style="list-style-type: none"> - No New Gas Transmission or Distribution line projects - No New Electric Transmission or Distribution line projects
101 – 263	Eureka - Redding Corridor	<p>PG&E Transmission and/or Subtransmission facilities in this corridor include:</p> <ul style="list-style-type: none"> - One 115kV line - Two 12kV Distribution Lines - One Gas Transmission Line <p>PG&E queued gen near or which could use the corridor: Unknown at this time.</p> <p>Previously triggered and/or proposed projects near this corridor that did not move forward include:</p> <ul style="list-style-type: none"> - No New Gas Transmission or Distribution line projects - No New Electric Distribution line projects

261 – 262	Mount Shasta Corridor	<p>PG&E Transmission and/or Subtransmission facilities in this corridor include:</p> <ul style="list-style-type: none">- One 115kV Line- One 60kV Line- Two 12kV Distribution lines <p>PG&E queued gen near or which could use the corridor: Unknown at this time.</p> <p>Previously triggered and/or proposed projects near this corridor that did not move forward include:</p> <ul style="list-style-type: none">- No New Gas Transmission or Distribution line projects- No New Electric Transmission or Distribution line projects
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From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10208] - Webmaster Receipt
Date: Tuesday, April 2, 2019 3:34:45 PM
Attachments: [ID_10208_InyoCountycomments18.23Corridor4.2.19FINAL.pdf](#)

Thank you for your input, cathreen richards.

The tracking number that has been assigned to your input is **10208**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 02, 2019 15:34:31 CDT

First Name: cathreen
Last Name: richards
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Inyo County Board of Supervisors

Topics

Existing infrastructure/available space
Specially designated areas
Visual resources
Interagency Operating Procedures

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

18-23 [blank, blank]

Input

[Blank]

Attachments

Inyo County comments 18.23 Corridor 4.2.19 FINAL.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



BOARD OF SUPERVISORS COUNTY OF INYO

P. O. DRAWER N • INDEPENDENCE, CALIFORNIA 93526
TELEPHONE (760) 878-0373
email: dellis@inyocounty.us



April 2, 2019

Department of the Interior
Department of Agriculture
Department of Energy
blm_wo_368corridors@blm.gov

Re: West-wide Energy Corridor Regional Reviews – Abstract No. 18-23

West-Wide Energy Corridors Regional Review:

On behalf of the Inyo County Board of Supervisors, I wish to thank the Agencies for the opportunity to comment on the regional reviews of the Section 368 Energy Corridors Study. We believe that coordination is of the utmost importance in the Regional Reviews, and reaffirm our earlier requests for coordination between the Bureau of Land Management and the County. We would also like to point out that we are extremely disappointed with the Agencies lack of coordination with the County to this point in the process, as well as, the absence of communications. Inyo County found out about the release of the Corridor 18-23 abstract comment period only two weeks prior to the deadline - and not from the Agencies. In light of this, we would first like to request that the Agencies extend the comment period.

In response to the current review of Regions 4, 5, and 6 (specifically 5) by the Agencies, we restate that Inyo County's renewable energy planning should be considered in the Region 5 Reviews. In particular, the Renewable Energy General Plan Amendment¹ (REGPA) that we have adopted should be referenced in the abstract for Corridor 18-23 particularly with respect to the County policy regarding limitations on additional transmission capacity (please see pages 3, 7 of the REGPA). It should also be referenced for locations at or near Solar Energy Development Areas (SEDA) as identified in the REGPA.

The reviewing agencies should also be made aware of the newly designated Alabama Hills National Scenic Area (NSA). This designation was signed into law as part of S. 47 the Conservation, Management and Recreation Act, on March 12, 2019. The Alabama Hills NSA legislation has been consistently proposed in the many iterations of the California Desert Conservation Act and the California Minerals, Off-Road Recreation, and Conservation Act and has been strongly advocated for years. It is somewhat surprising it was not included in the Corridor 18-23 review, especially since it is located on land managed by the BLM. Based on this new NSA designation, milepost evaluations for 184-192 should be updated to include the NSA. The Alabama Hills NSA purpose statement is:

The purpose of the Scenic Area is to conserve, protect, and enhance for the benefit, use, and enjoyment of present and future generations the nationally significant scenic, cultural, geological, educational, biological, historical,

¹ Refer to <http://inyoplanning.org/projects/REGPA.htm>.

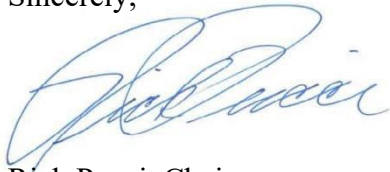
recreational, cinematographic, and scientific resources of the Scenic Area managed consistent with section 302(a) of the Federal Land Policy and Management Act of 1976.

Transmission lines running through the Alabama Hills NSA would not be compatible with the stated purpose of the NSA. Also, there are existing transmission lines located to the east of this area that are a continuation of lines that are listed under *Potential Resolution Bases on Siting Principle Analysis* as collocation with existing infrastructure opportunities, for areas to the south. We understand that at milepost 195 this existing transmission infrastructure veers east and off of federally managed lands, but we strongly urge you to look at the existing infrastructure as your first, if not only, option. It should also be noted that moving the proposed sections (milepost 178-195) anywhere to the west of the 18-23 Corridor, in an attempt to stay on Federal lands, would be completely inappropriate as this would be a serious detriment to the visual resources of the County, including the Alabama Hills NSA.

After reviewing the 18.23 Corridor, we strongly recommend that you adjust corridor 18-23 beginning at milepost 195 on the south to milepost 178 at the north, to the east, to co-locate with the existing transmission infrastructure whether it is on Federally managed lands or not, or leave this section empty similar to much of the rest of the 18-23 Corridor. No new transmission lines or corridors should be necessary or even considered when there is already existing infrastructure and/or right-of-ways in place. In addition, we also submit that any potential co-location should only be evaluated within the capacity parameters set forth in the County's Renewable Energy General Plan Amendment. This is an extremely sensitive issue to the people of Inyo County and the millions of annual visitors to the County who place a very high value on visual resources and where any impacts to these resources could have significant, negative, results on the County's tourist based economy.

Thank you. If you have any questions, please contact the County's Administrative Officer, Clint Quilter, at (760) 878-0468 or cquilter@inyocounty.us.

Sincerely,



Rick Pucci, Chairperson
Inyo County Board of Supervisors

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10209] - Webmaster Receipt
Date: Tuesday, April 2, 2019 4:54:34 PM
Attachments: [ID_10209_PCTAResponse368EnergyCorridorReviewRegions6PCTANorthCascadesRegion.pdf](#)

Thank you for your input, Michael Hanley.

The tracking number that has been assigned to your input is **10209**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 02, 2019 16:54:17 CDT

First Name: Michael

Last Name: Hanley

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Pacific Crest Trail Association

Topics

Specially designated areas

Geographic Area

[Area selected via Corridor Mapping Tool](#)

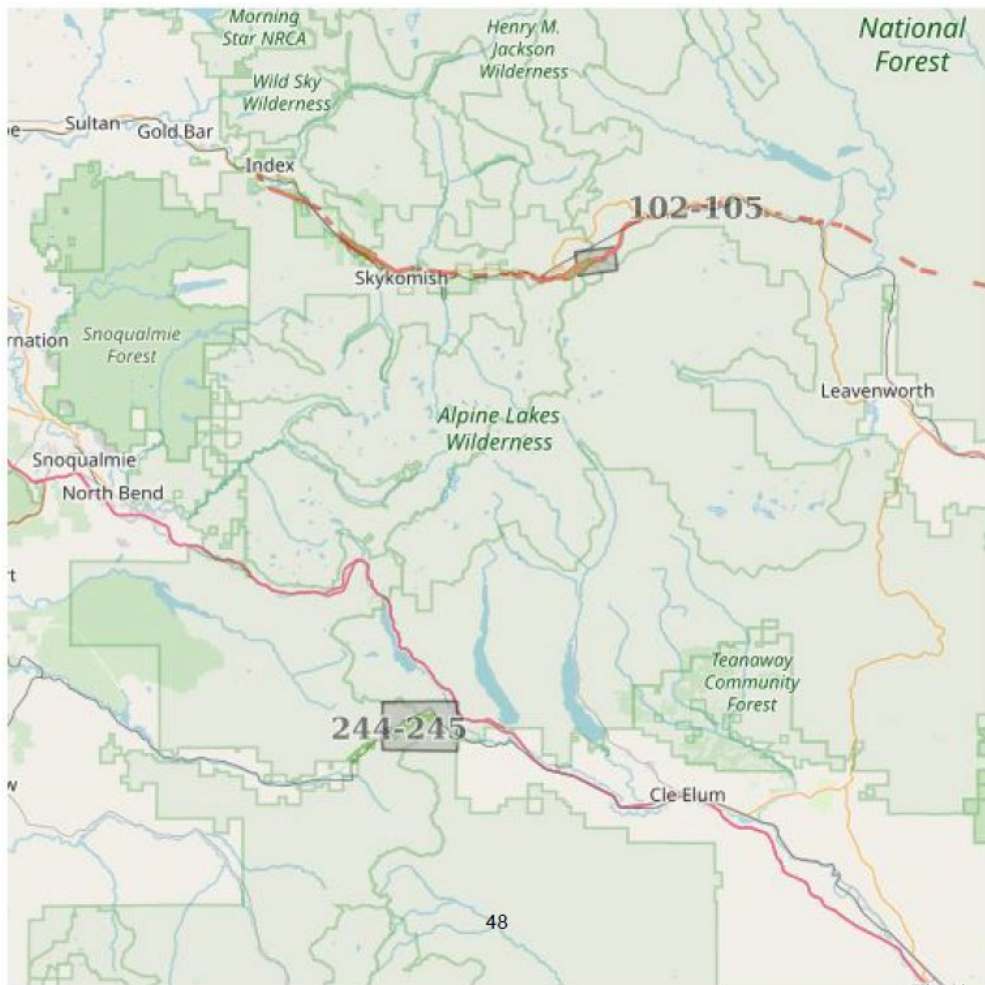
Input

See attached document:

Attachments

PCTA Response --368 Energy Corridor Review--Regions 6- PCTA North Cascades Region.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



North Cascades Regional Office

March 25, 2019

RE: Pacific Crest Trail Association Response to the Section 368 West-wide Energy Review Corridor—Regions 4, 5, and 6

To Project Review Team,

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's and Bureau of Land Management's (BLM) primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails dates back to the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states in Sec. 11 (a), "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." Sec. 11 (b) continues, "Each Secretary or the head of any Federal land managing agency, may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails." Based on this direction, it is PCTA's role to work with the Forest Service and BLM to ensure the best possible management of the PCT and the experience it affords trail users, year-round. PCTA has a strong record of partnership with these agencies. For over a decade, PCTA has supported the maintenance and management of the PCT in Washington State.

PCTA is interested in the West-wide Energy Review because the PCT experience can be significantly impaired if, along the Trail in between protected areas, users encounter harshly clashing land uses. This was acknowledged early on by a federal interagency task force who interpreted the NTSA by developing these guidelines which appear in the PCT Comprehensive Plan,

"The routes of national scenic trails should be so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. They should avoid, insofar as practicable, established highways, motor roads, mining areas, power transmission lines, existing commercial and industrial developments, range fences and improvements, private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition and its use for outdoor recreation."

Protection of the unique resource the PCT represents can be challenging because hundreds of developments are proposed each year by an array of different land management agencies, private owners, and industries. However, the PCT must continue to be managed in a manner consistent with Congress's intent. The importance of the lands around national scenic trails was reaffirmed in Executive Order Number 13195, Trails For the 21st Century which states, "Corridors associated with national scenic trails . . . [should be] protected to the degree necessary to ensure that the values for which each trail was established remain intact."



PCTA has six regional offices that assure proper management of the PCT within their respective territory. This letter is submitted by the North Cascades Regional Office and speaks to the PCTA's concerns regarding proposed energy corridors in Washington State. PCTA has analyzed all the energy corridors that cross, are adjacent to, and have potential to impact the PCT and the experience the trail provides to hikers, horseback riders and non-motorized winter trail users within Region 6. I have found that the two energy corridors addressed in this letter are generally well located. In Washington State adjustments to the width of the corridor and more precise collocation with existing transmission lines will likely allow the proposed infrastructure to be built while maintaining the scenic value of the Pacific Crest Trail. However, this letter does not address corridors in Oregon. Those additional proposed routes in Region 6 are addressed by a separate PCTA letter submitted by my colleague Dana Hendricks on behalf of the PCTA's Columbia Cascades Regional Office. For clarity, the two corridors in Washington are addressed individually and associated maps for the areas of interest have been submitted using the "drawing tool" provided on the West-wide Energy Corridor website.

Corridor 102-105

The Seattle-Wenatchee Corridor is generally well located between mileposts 24 and 28. The proposed electric upgrades in this area are near existing transmission lines and cross the Pacific Crest Trail perpendicularly. Crossing the PCT at a right angle minimizes the exposure time of trail users to the visual impacts of energy corridors. This is a crucial design element.

The PCTA appreciates that the Section 368 Corridor Study notes the potential effects of this energy corridor on the visual resources of the PCT. The Corridor 102-105 review states that "adherence to existing IOPs for visual resources would be required" and additionally suggests that, "Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor." The PCTA agrees that a new IOP is needed but additionally calls for changes in the corridor width to assure proper management of the viewshed of the PCT.

In general, the scenic quality of the PCT is best managed by assuring any future development crossing the PCT is precisely collocated with existing infrastructure. Unfortunately, the 102-105 corridor width is highly variable in the vicinity of the PCT. At milepost 27, the corridor is 500 feet wide and closely aligns with existing transmission lines. As the corridor runs west towards its intersection with the PCT, the corridor expands to over 1,000 feet in width. This expansion continues west of the PCT. Near milepost 26, the designated corridor is to over 2,000 feet wide. The PCT intersection has a visual quality objective (VQO) of "retention" which is defined in the 1990 Wenatchee National Forest Plan as "Areas in which changes in the landscape are not visually evident to the average person unless pointed out. They appear to be natural." The Corridor 102-105 abstract acknowledges that the proposed corridor crosses areas with a VQO of retention but states, "The corridor location appears to best meet the siting principles because of collocation with existing transmission lines and the absence of more preferable alternatives." I appreciate the planners' awareness of this visual quality conflict. However, I believe that the visual impact and alteration of the landscape associated with a 1,000 to 2,000 feet wide corridor will not meet the VQO of retention laid out in the Forest Plan. Steps can be taken to reduce this high potential conflict. Moreover, the National Trails System Act prohibits management

actions the “substantially interfere with the nature and purposes of the trail.” PCTA believes that the proposed corridor width will substantially interfere with the nature and purposes of the PCT. To meet the legal requirements of the National Trails System Act, PCTA asks that the corridor width be reduced between mileposts 25 and 27. The proposed corridor ought to be as precisely aligned as possible with existing infrastructure. Therefore, in addition to requesting that the corridor width be reduced to a 500-foot width, I also ask that the proposed corridor be located as parallel as possible to the existing transmission line with the ID 3337270996.

Corridor 244 -245

The Lester to Easton Corridor is fairly well located. The proposed route is in an area near existing transmission lines and crosses the Pacific Crest Trail perpendicularly. I appreciate the intention behind siting corridor 244-245 near existing transmission lines. The scenic quality of the Pacific Crest Trail between milepost 4 and 7 of Corridor 244-245 is already impacted by existing energy infrastructure. However, I ask that the 3,500-foot wide corridor be reduced in size and moved north so that it would be parallel to transmission line 3337270832. This change would have multiple benefits. It would move the designated corridor away from areas with VQO of “partial retention” in the 1990 Wenatchee National Forest Plan. A “partial retention” VQO is equivalent to a SIO of “moderate” and is defined, “MODERATE scenic integrity refers to landscapes where the valued landscape character appears slightly altered.” Although this VQO allows for management activities that alters the viewshed, these modifications must be visually subordinate. PCTA is concerned that a 3,500’ wide corridor cannot meet the VQO of partial retention specifically near milepost 3 and between mileposts 7 through 8. If the corridor is moved north, it could be placed more precisely within areas with a VQO of modification. By adjusting the corridor to follow the 3 existing 500kv lines in the area, future developments would cross the PCT at a location that is less visually prominent and already heavily modified. This change would reduce the exposure of users to visual resource impacts and support the scenic quality of the PCT.

The National Trails System Act prohibits management actions the “substantially interfere with the nature and purposes of the trail.” Corridor 244-245 is currently aligned in a manner that could “substantially interfere” with the PCT. Given the 3,500-foot wide corridor, there is insufficient clarity that the proposed infrastructure will be placed in a manner that maintains the PCT’s scenic character. This high potential conflict can be managed by reducing the corridor width to 500-feet and precisely collocating the proposed route with existing infrastructure.

In addition to these site-specific recommendations, I would also like to point out an inaccurate statement that appears in both the 102–105 and 244-245 corridor abstracts. In the Stakeholder Input and other Relevant Information section, the abstracts state, “The Pacific Crest NST Comprehensive Management Plan was finalized in 1982. The plan does not reference management conflicts with utility corridors.” This statement is misleading. As is excerpted on the first page of this letter, the Comprehensive Management Plan notes that the PCT “should avoid, insofar as practicable, established highways, motor roads, mining areas, power transmission lines... and any other activities that would be incompatible with the protection of the trail in its natural condition and its use for outdoor recreation.” It is inaccurate to suggest that the Pacific Crest NST Comprehensive Management Plan does not consider management conflicts with utility corridors.

Finally, both corridor abstracts note that, “Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor.” PCTA suggests the following Interagency Operating Procedures (IOPs) be considered for addressing nationally designated trails:

- Corridors prior to crossing any National Scenic or Historic Trail perpendicularly will incorporate a change in the angle of approach within the immediate foreground to foreground viewshed prior to the trail and corridor intersection
 - This will minimize the length of the clearing viewed and experienced by trail users as they cross energy corridors
- Narrowing of the corridor to the absolute minimum width within the trail’s foreground
- Utilize vegetation management approaches such as visual screening by leaving tall shrubs where the trail intersects energy corridors
- Where a corridor is viewed within the middle ground viewshed from the trail, vary the shape and width of the corridor, and feather edges of the clearing, to blend with the forms and lines of the landscape

We look forward to working with our agency partners on this planning effort to ensure that impacts to the Pacific Crest National Scenic Trail are minimized to ensure the trail provides the best experience possible for trail users. Please do not hesitate to contact me with any questions.

Sincerely,



Michael Hanley
North Cascades Regional Representative
Pacific Crest Trail Association

CC:

Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator
Justin Kooyman, PCTA, Associate Director of Trail Operations

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10210] - Webmaster Receipt
Date: Tuesday, April 2, 2019 4:59:38 PM
Attachments: [ID_10210_EnergyCorridorReviewcmtR456422019DOE.docx](#)

Thank you for your input, Doug Heiken.

The tracking number that has been assigned to your input is **10210**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 02, 2019 16:59:15 CDT

First Name: Doug
Last Name: Heiken
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Oregon Wild

Topics

Energy Planning Opportunities
Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources
Lands with wilderness characteristics
Soils/erosion
Specially designated areas

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

[Blank]

Attachments

Energy Corridor Review cmt R4,5,6 4-2-2019, DOE.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov



2 April 2019

TO: BLM, USFS and DOE

Subject: Westwide Energy Corridor Review, Regions 4, 5, 6 — comments

Please accept the following comments from Oregon Wild concerning the West-wide Energy Corridor Review Process, <http://corridoreis.anl.gov/regional-reviews/regions-4-5-6/>. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded.

1. **We do not need any more fossil fuel energy infrastructure.** Efforts to address climate change have been delayed far too long. Our options are becoming limited. We must NOT waste any resources on new fossil fuel infrastructure. This process needs to be reconsidered with these priorities in mind.
2. **This process is too speculative.** There are numerous energy corridor projects pending that do not conform to this plan. This planning process should wait for concrete proposals that take steps toward an integrated energy infrastructure to support a decarbonized energy system.
3. **We support co-location of new energy facilities within and adjacent to existing right-of-way.** This will help minimize the footprint of energy development.
4. **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.
5. **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. This review process 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. This review process 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.

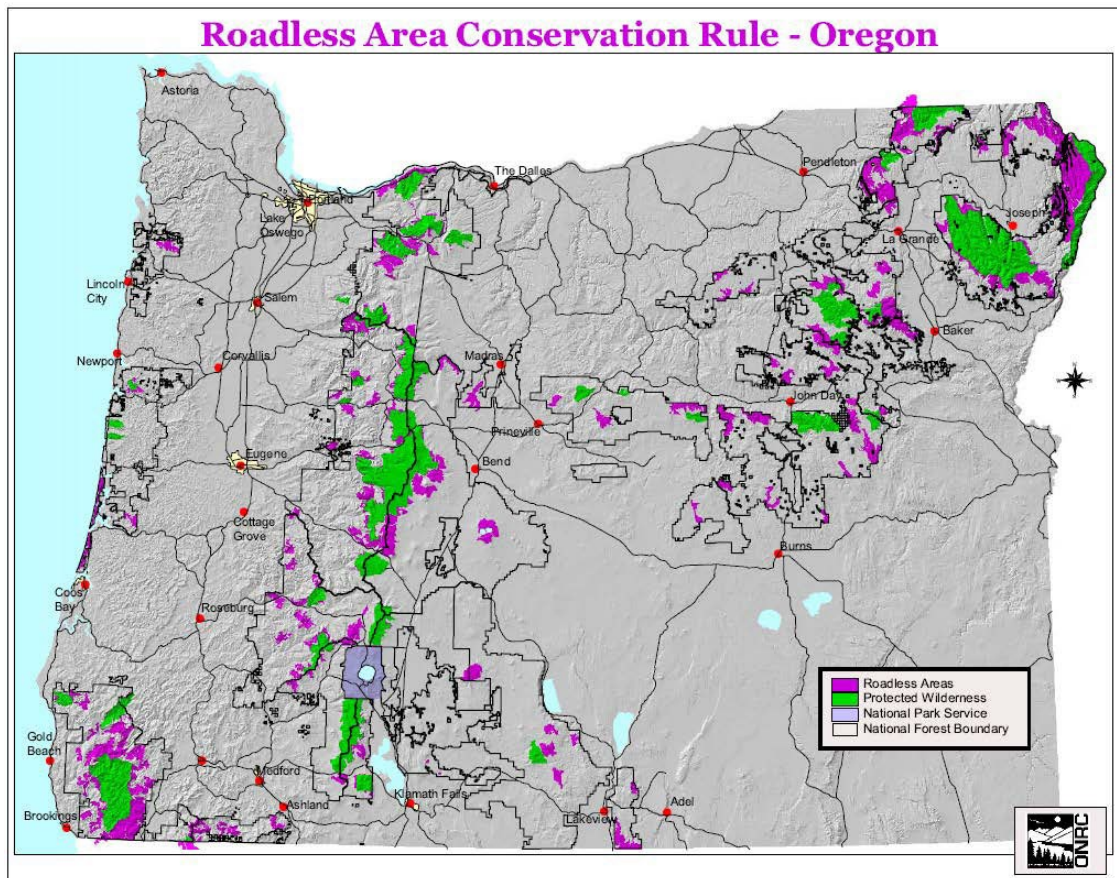
- b. This review process needs to account for changing energy prices and market changes and how those interact with technology changes. Higher prices and energy supply uncertainty in foreign countries will stimulate technological development toward more co-location of energy production and consumption thereby removing the need for lots of new energy corridors.
 - c. This review process needs to account for the risks of alternative energy futures and their degree of vulnerability to terrorism, vandalism, market instability, etc.
6. **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>
7. **This review process 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 analysis.
8. **We are very concerned about impacts to endangered species, such as sage grouse, marbled murrelets, spotted owls, and pacific salmon.** Sage grouse are particularly threatened by energy developments and powerline infrastructure. Marbled murrelets and spotted owls are both harmed by habitat fragmentation such as that caused by powerline corridors, and access roads. Fragmentation makes these endangered birds more vulnerable to predators.
9. **Prevent Wildlife Mortality.** This review process should adopt alternatives that avoid and minimize direct mortality from collisions with power lines, pipelines, service vehicles, etc.
10. **Minimize habitat loss and fragmentation.** Energy corridors cause habitat fragmentation though 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.
11. **Prevent Weeds.** Widespread disturbance of soil and native vegetation, especially in long linear corridors are perfect vectors for weeds and disease. Corridor maintenance also aggravates the spread of weeds. Climate change will make this problem worse.
12. **Conserve Soil.** Displacement and compaction of soils during construction and maintenance are a major concern.
13. **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.
14. **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.

This review process 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.

15. **The DEIS must disclose the effects of connected actions involved non-federal lands.** The DEIS maps just show the federal land portion of the corridors, but conveying liquid, gas or electrons requires *continuous* corridors that cross non-federal lands. The continuous corridor routes are “connected actions” per NEPA and the full and cumulative impacts of these continuous corridors must be disclosed. To discuss discontinuous corridors seems like a strange joke and a waste of everyone’s time.
16. **Disclose the risk of multi-modal energy corridors.** This review process needs to more fully describe the adverse impacts of multi-modal energy corridors. Volatile liquids and gasses and sparking electricity do not mix. These combined facilities are also target rich environments for terrorism and vandalism. These issues need to be more fully disclosed and considered in the EIS.
17. **Permanently removing vegetation from overly wide energy corridors would likely violate the Clean Water Act and the Endangered Species Act.** Corridors would likely be permanently maintained with little or no vegetation. When such corridors cross streams and rivers the water will be exposed to unnatural levels of sunlight and warm correspondingly. Thousands of miles of streams are already water quality limited because of water that is too warm for cold-water fish species like salmon and trout. Devegetated slopes lack soil cohesion normally provided by the roots of trees and shrubs so they are at a higher risk of landslides that can not only cause serious public safety hazards but also dump large quantities of detrimental sediment into streams and rivers. Many cold water fish species are listed as Threatened due in part to warm water and chronic sediment impacts. Implementing these corridors will violate the CWA anti-degradation requirement and the ESA requirement to conserve listed species.
18. **Impose Seasonal Restrictions.** Construction and maintenance should be limited to dry seasons, especially in sloped areas. Avoid vegetation removal during bird nesting season.
19. **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. This review process 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. This review process should refer to the USDA Forest Service November 2000 Roadless Area Conservation FEIS. This review process 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.

Here is a map of just the inventoried (>5,000 acre) forested roadless areas in Oregon. We urge the energy corridors avoid these and all other forested and non-forested roadless areas larger than 1,000 acres in the state.



- 20. **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.
- 21. **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.
- 22. **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.

23. Comments regarding Corridor 230-248:

- a. ***The abstract inaccurately portrays both the purpose and rationale for Corridor 230-248 and fails to recognize the potential for pipeline development in the near future (Trail West):*** *It was originally included in the WWEC as a corridor to facilitate the export of liquified natural gas (Palomar Pipeline). PacifiCorp, the aspirant developer of the Palomar Pipeline in conjunction with NW Natural, eventually withdrew its FERC application when the proposed export terminal was halted but repeatedly stated it is still considering developing the corridor. Renamed "Trail West," plans to develop this corridor continue to appear in NW Natural's integrated resource planning documents. Last year, the developer of a proposed methanol export terminal suggested the Trail West route may be developed if the export terminal is approved. This context is misrepresented or absent from the abstract. Please correct the abstract to reflect the fact that this corridor, since its inception, has been intended to move fracked gas across the Cascades for the purpose of export. As such, neither the past proposal for use, nor the potential future proposal, facilitate transportation of renewable energy.*
- b. ***Corridor 230-248 is not located in a favorable landscape.*** *It is identified as a corridor of concern because of major conflicts with environmentally sensitive areas, some of which are accurately captured in the abstract, including: Critical habitat for the ESA-listed Northern Spotted Owl overlaps a significant portion of the route*
 - o *The corridor borders the recently created Clackamas Wilderness*
 - o *Critical habitat for ESA-listed Steelhead, Coho & Chinook Salmon intersect the corridor*
 - o *The corridor intersects the Pacific Crest National Scenic Trail and the Riverside National Recreation Trail*
 - o *The corridor crosses the Wild & Scenic Clackamas River and the Oregon Wilde & Scenic Fish Creek.*
- c. ***In addition to the concerns included in the abstract, the following are major points of concern not included in the list of potential compatibility issues or concerns to examine:***
 - o *For the first time in almost 70 years, there is an ESA-listed wolf pack in Mt. Hood National Forest, the "White River Pack." Their home range directly overlaps the corridor's path but this information is not included in the abstract.*
 - o *Not only is the Clackamas River Wild & Scenic, but also it provides the municipal drinking water supply for nine municipalities and hundreds of thousands of people. The abstract does not consider the risks associated with the transport of oil along this corridor, nor does it preclude oil pipeline development.*
 - o *The clearcut required to maintain the corridor conflicts with Late Successional Reserves and Tier 1 Key Watersheds designated by the NW Forest Plan. The abstract does not consider the conflicts with the NW Forest Plan or provide possible resolutions.*

- *The abstract does not consider the presence of fire on the landscape and the potential impact of the interaction of fire with future energy transmission along this corridor.*
- d. ***The only viable resolution to these conflicts is the deletion of corridor. Please do so in the final report.***

Each substantive issue discussed in these comments should be (i) incorporated into the purpose and need for the project, (ii) incorporated into reasonable alternatives, (iii) carefully analyzed as part of the effects analysis, and (iv) considered for mitigation.

Sincerely,

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

Doug Heiken

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10211] - Webmaster Receipt
Date: Wednesday, April 3, 2019 10:40:48 AM
Attachments: [ID_10211_WestwideCorridor250251.pdf](#)

Thank you for your input, Bill Harvey.

The tracking number that has been assigned to your input is **10211**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 10:40:18 CDT

First Name: Bill
Last Name: Harvey
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Baker County, Oregon

Topics

Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Lands and realty
Specially designated areas
Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

250-251 [blank, blank]

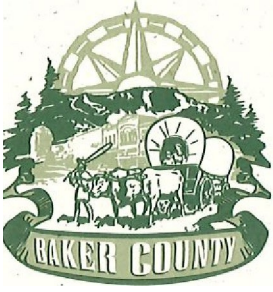
Input

[Blank]

Attachments

West-wide Corridor 250-251.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



- April 3, 2019

West-wide Energy Corridor Regional Review

Baker County appreciates the opportunity to comment on the Energy Corridor, 250-251, that runs through the County.

Bill Harvey
Commission Chair
bharvey@bakercounty.org

Recently, the County has interacted with the BLM in the siting of the Boardman to Hemingway (B2H) transmission line and has found that public input and opposition does not seem to influence the decision made by the BLM to continue the project. The County and many citizens gave public testimony on the reasons that the B2H line should have been located elsewhere. These reasons, include, but are not limited to:

- o Significant financial impact to private property owners adjoining the line by reducing the number of acres they can put into production;
- o The line traverses Critical Habitat for Sage-grouse, a population that is already in decline;
- o Visual impact from the Oregon Trail Interpretive Center; and
- o The passage through multiple cultural and historic sites.

The County would like to suggest solutions for future projects:

- 1) Coordination between the local government, in this case Baker County, the project proponent; and all other federal and state agencies that will be impacted by the project should begin prior to developing and locating the project.
- 2) Government-to-government dialogue must be as equals, open, and meaningful.
- 3) The BLM and Forest Service should explore opportunities to optimize the use of federal lands so private lands are not negatively impacted.
- 4) Easements through private lands must be at least equal in compensation to private property owners as the loss in revenues over the life of the project.
- 5) Project proponents should explore technologies that are current and scientifically valid which could lead to projects that have reduced ecologic, visual, or financial impact.
- 6) Reduce routing challenges by using existing corridors especially in areas where there is no connection to other public lands, that do not align with Section 368 corridors, or have proximity to existing facilities that utilize the corridor transmission.

Baker County welcomes federal and state agencies to engage in the government-to-government coordination process on all projects that occur in Baker County.

Thank you,

Bill Harvey, Chair
Baker County Commission

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10212] - Webmaster Receipt
Date: Wednesday, April 3, 2019 12:02:40 PM

Thank you for your input, Craig Jones Jones.

The tracking number that has been assigned to your input is **10212**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 12:01:59 CDT

First Name: Craig Jones
Last Name: Jones
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Montana Department of Environmental Quality

Topics

Jurisdiction
Visual resources
Interagency Operating Procedures

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

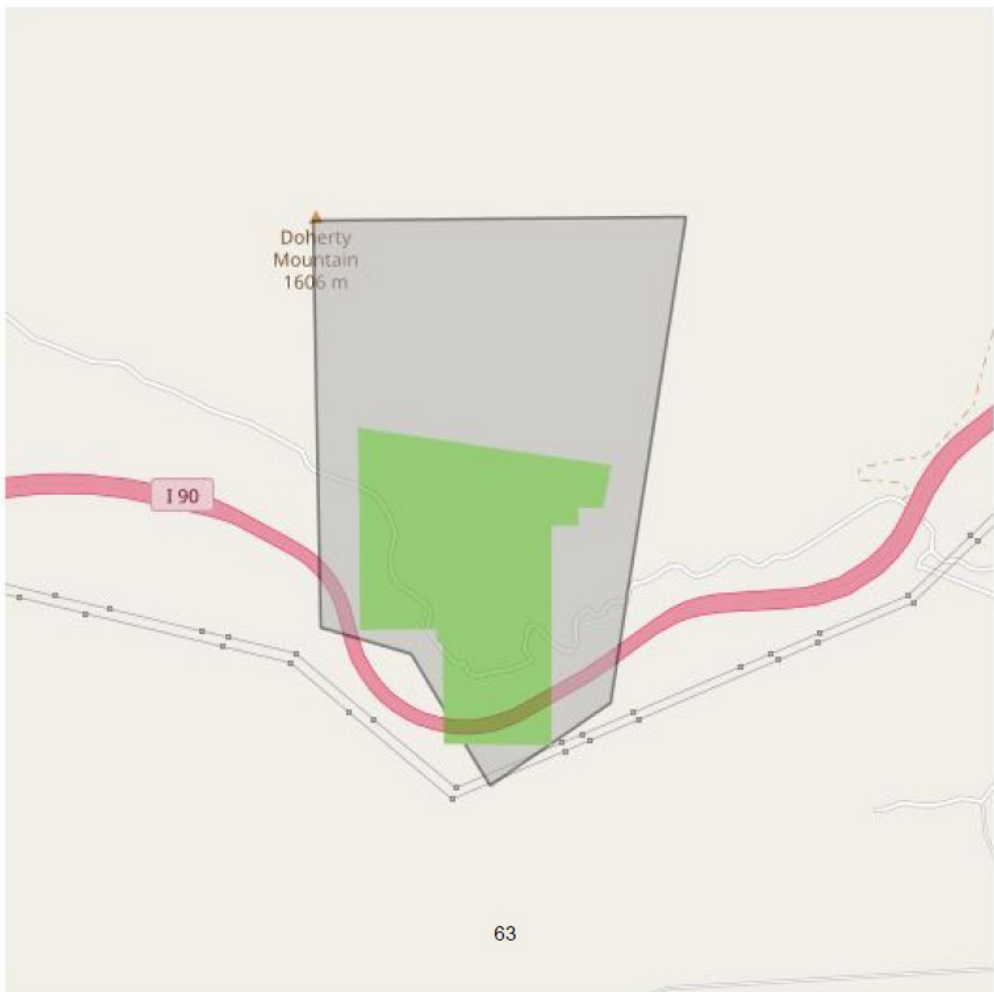
Comment 3:

The BLM visual resource management area to the north of the corridor (MP 27 to 27.6) could be considered in conflict with this segment of the corridor. In the past, BLM's visual resource management was one of the highest objectives and should be considered to be reclassified in order to resolve this conflict.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10213] - Webmaster Receipt
Date: Wednesday, April 3, 2019 3:40:47 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10213**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 15:40:25 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Issues

Existing infrastructure/available space

Land Management Responsibilities and Environmental Resource Issues

Specially designated areas

Geographic Area

[Area selected via Corridor Mapping Tool](#)

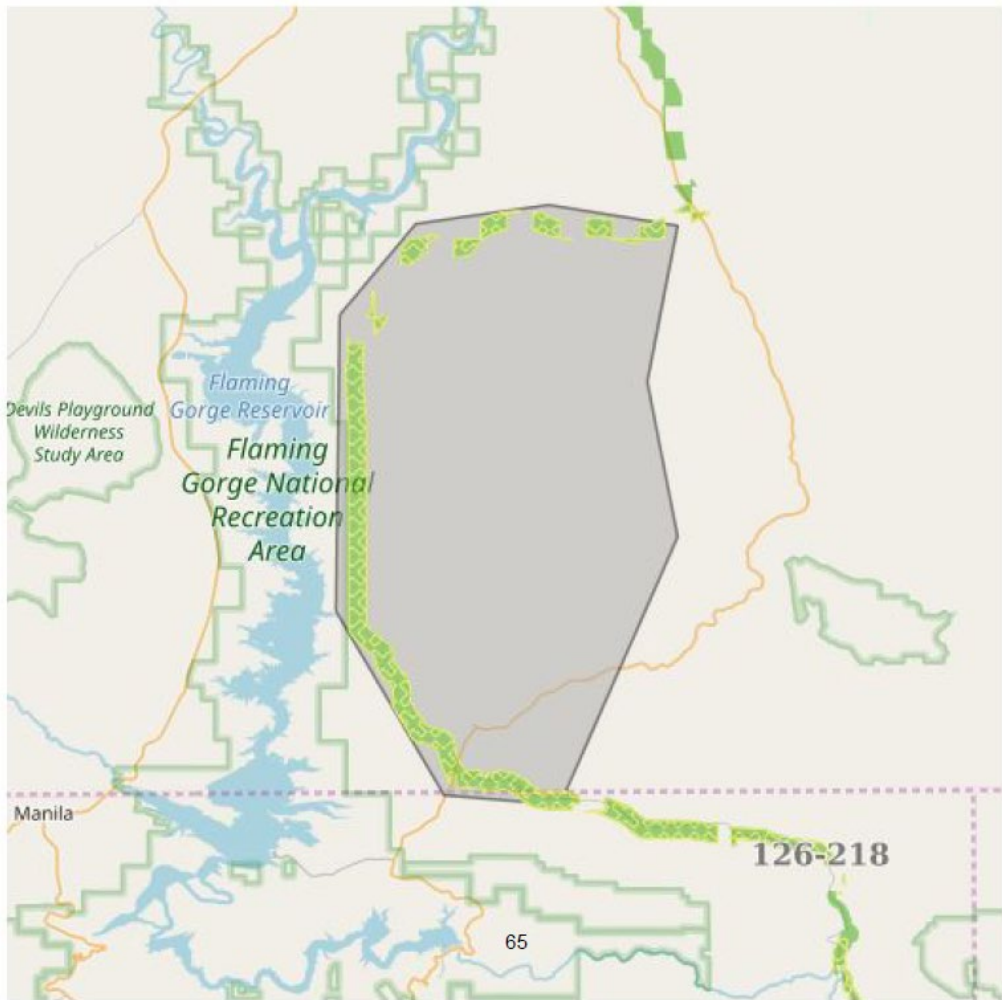
Input

If you choose to relocate the corridor please consider shifting the corridor .5 miles NNW of current location to cross NHT and NST at an angle to minimize impact. Moving the corridor NNW also avoids the Greater Sage-grouse priority habitat.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10214] - Webmaster Receipt
Date: Wednesday, April 3, 2019 3:45:27 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10214**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 15:45:12 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

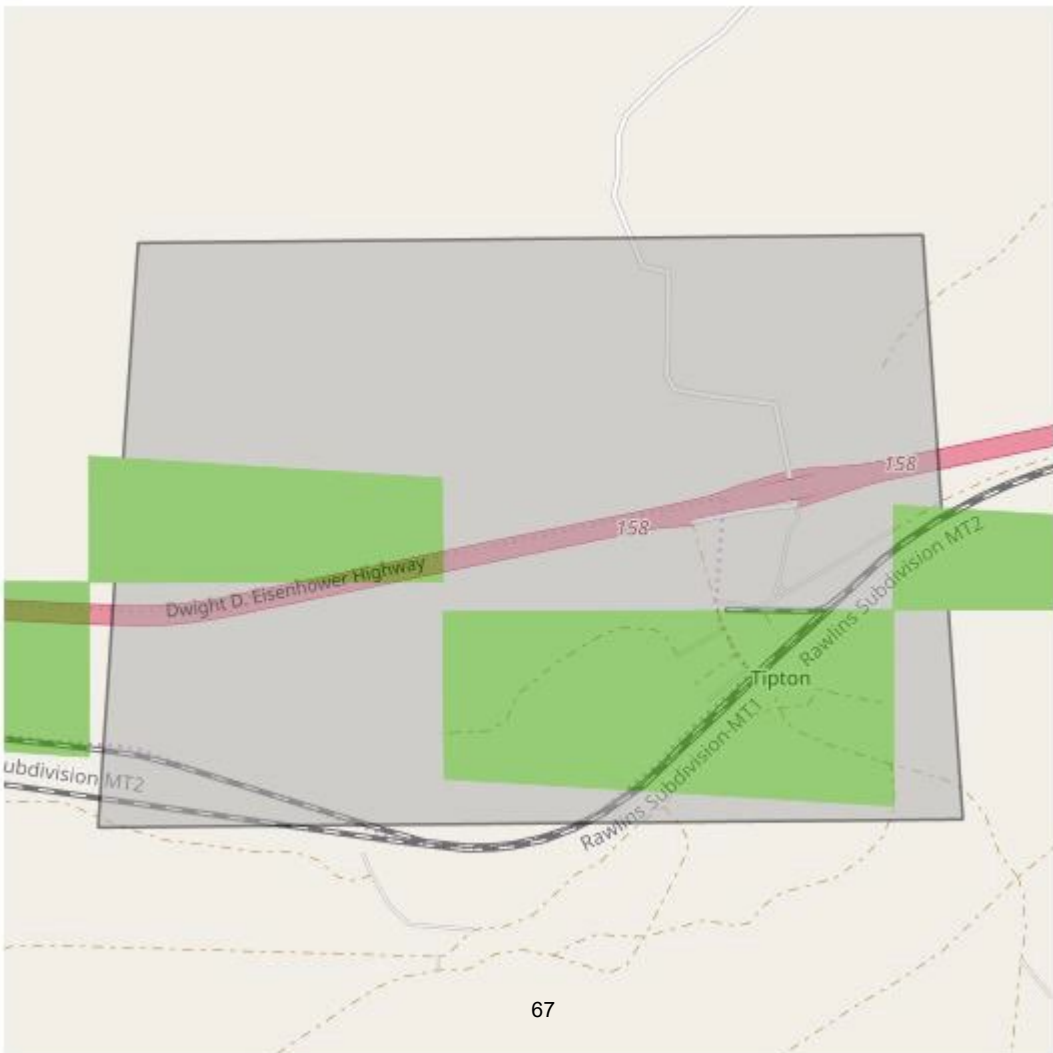
Input

If you choose to relocate the corridor please consider shifting the corridor 1500' north to co-locate with WPCI ROW 2 corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10215] - Webmaster Receipt
Date: Wednesday, April 3, 2019 3:51:04 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10215**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 15:50:38 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

If you choose to relocate the corridor please consider shifting the corridor to follow WPCI ROW 6 then south 1 mi. to WPCI ROW 2 corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10216] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:02:47 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10216**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:02:18 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

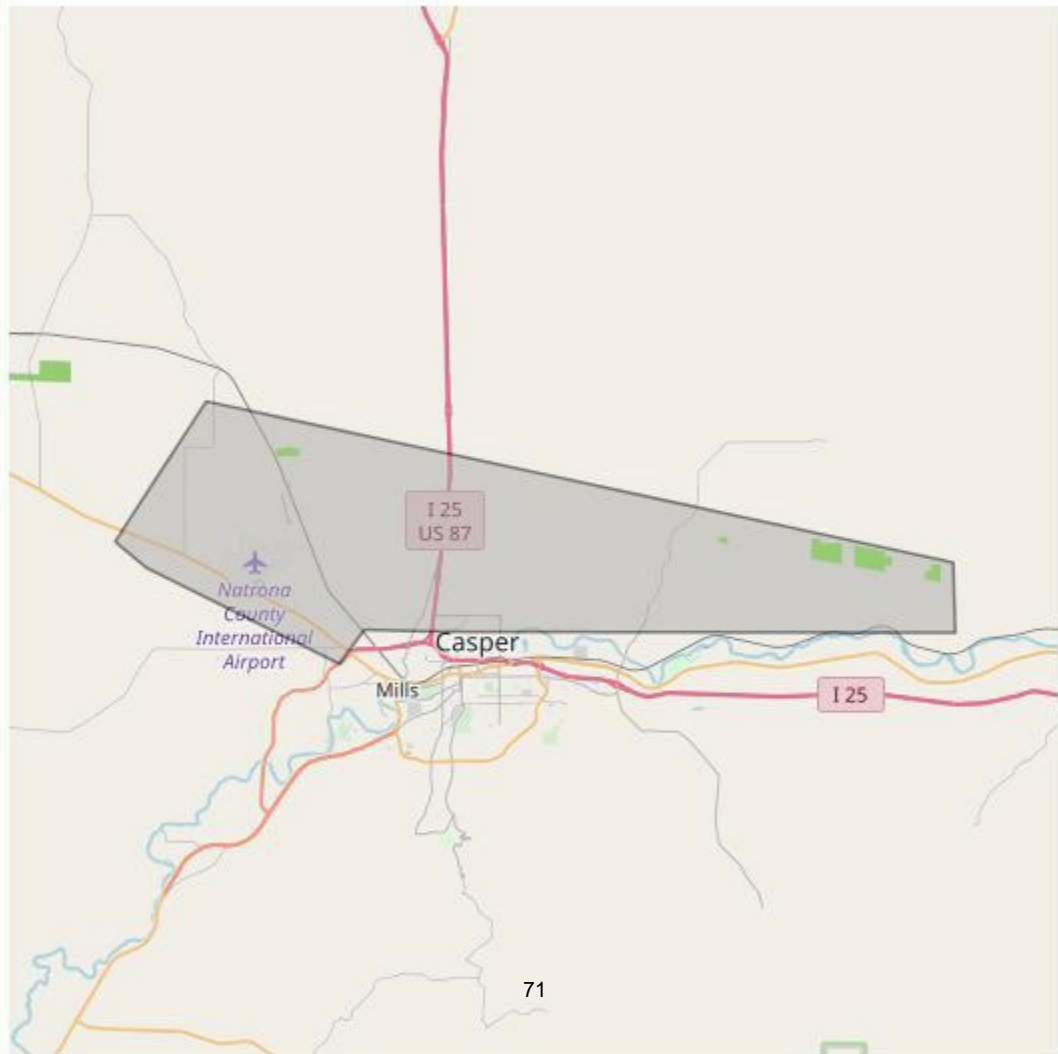
Input

If you choose to relocate the corridor please consider shifting the corridor south by about 1 mi to co-locate within existing pipeline corridor then follow WPCI ROW 11 corridor to the south to avoid the Scenic Byway.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10217] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:04:23 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10217**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:03:52 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

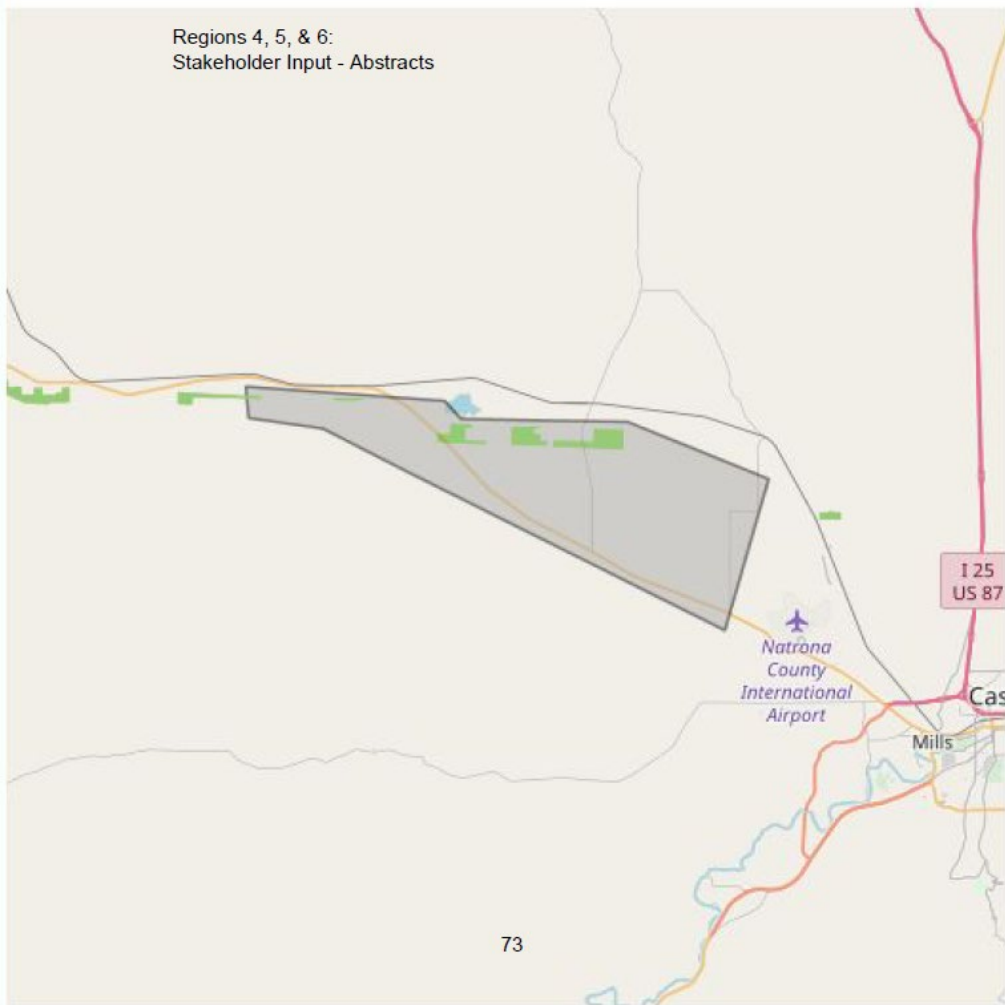
If you choose to relocate the corridor please consider shifting the corridor south about 7 mi. to align with WPCI ROW 11 corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Regions 4, 5, & 6:
Stakeholder Input - Abstracts



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10218] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:06:02 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10218**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:05:39 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

If you choose to relocate the corridor please consider shifting the corridor to follow WPCI ROW 11 corridor to the west of WWEC to avoid the Scenic Byway.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



US 20
US 26

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10219] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:08:10 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10219**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:07:47 CDT

First Name: Kellie
Last Name: Vlastos
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities
Energy Planning Issues
Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

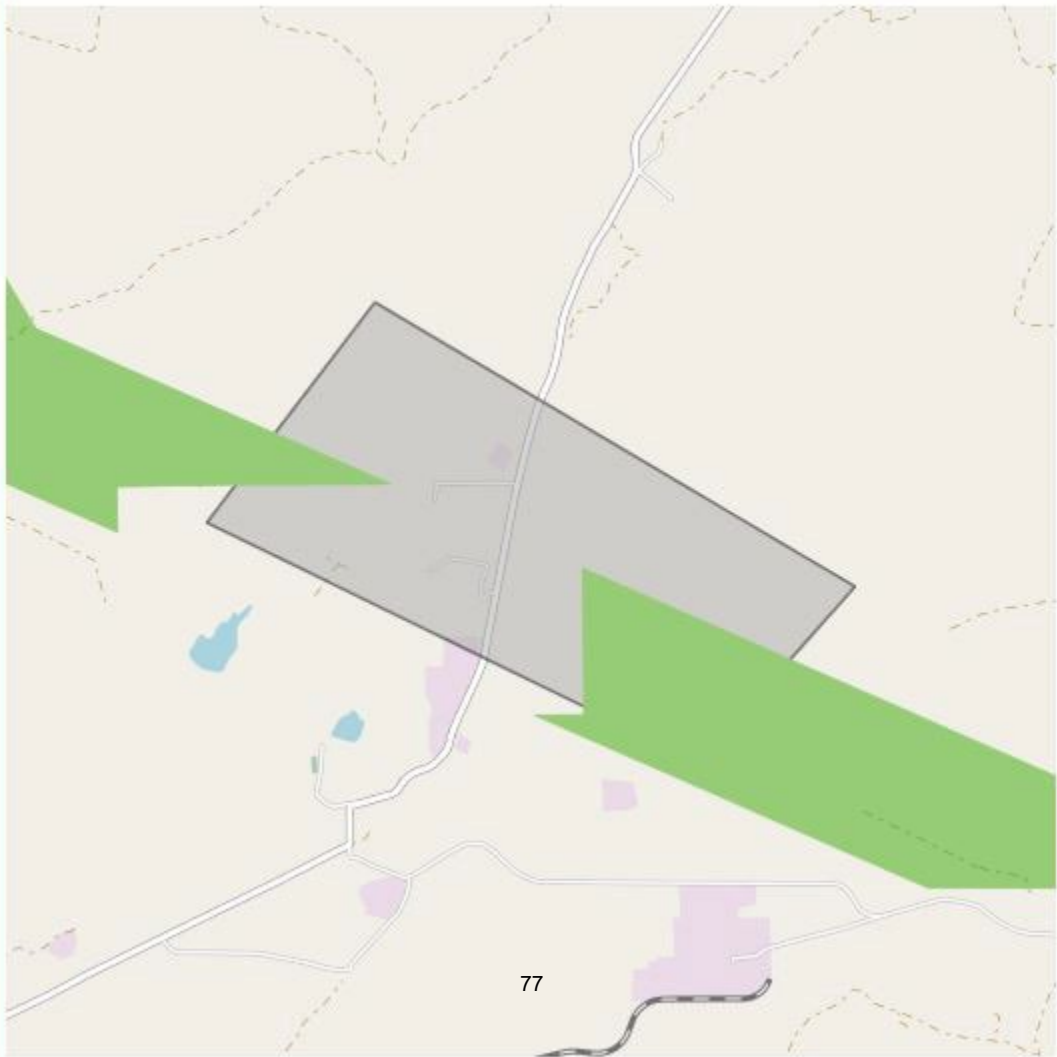
Input

If you choose to relocate the corridor please consider shifting the corridor to follow WPCI ROW 11 corridor northeast to avoid reservoir at Badwater Rd.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10220] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:08:58 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10220**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:08:45 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

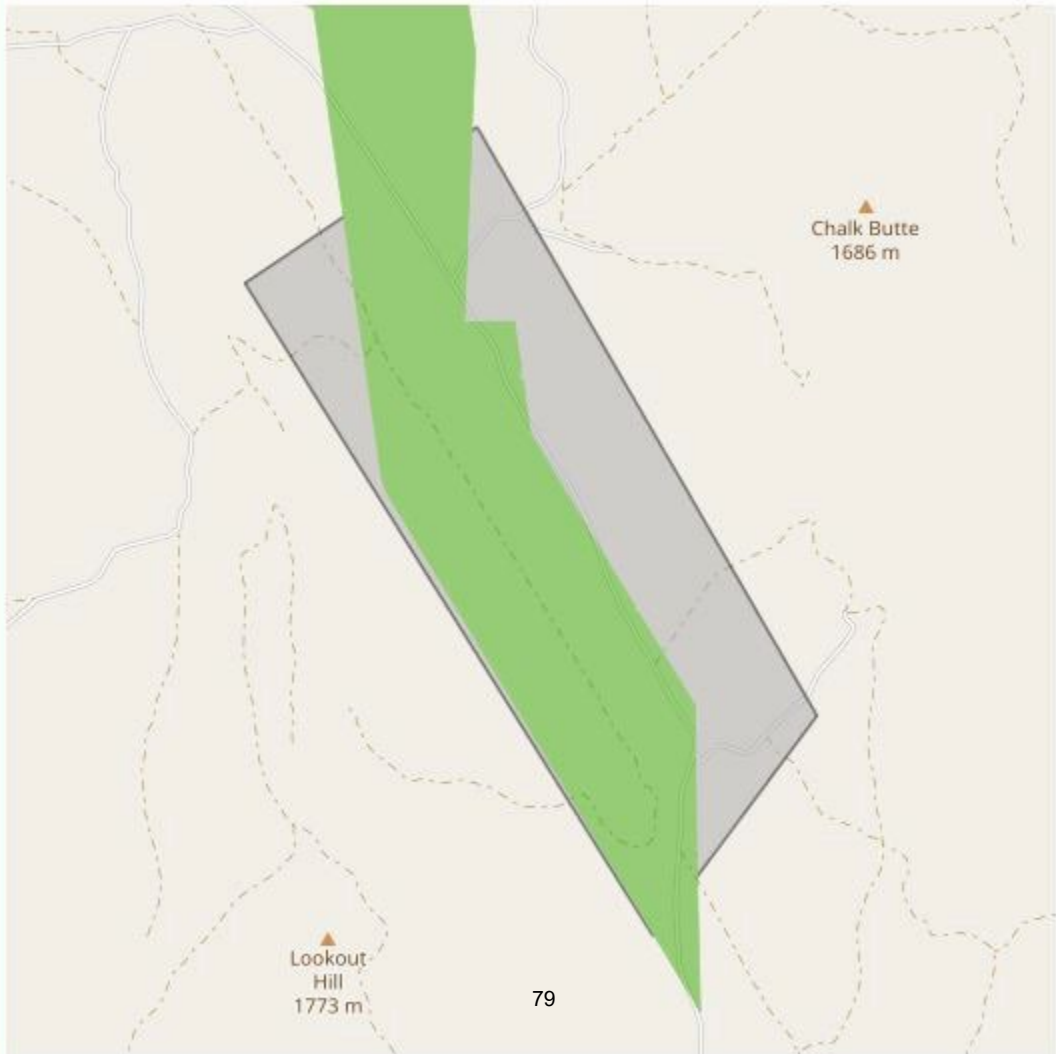
Input

If you choose to relocate the corridor please consider shifting the corridor about 2,000' east to follow WPCI ROW 4 corridor and co-locate with existing pipeline.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



▲
Chalk Butte
1686 m

▲
Lookout
Hill
1773 m

79

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10221] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:11:23 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10221**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:10:58 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

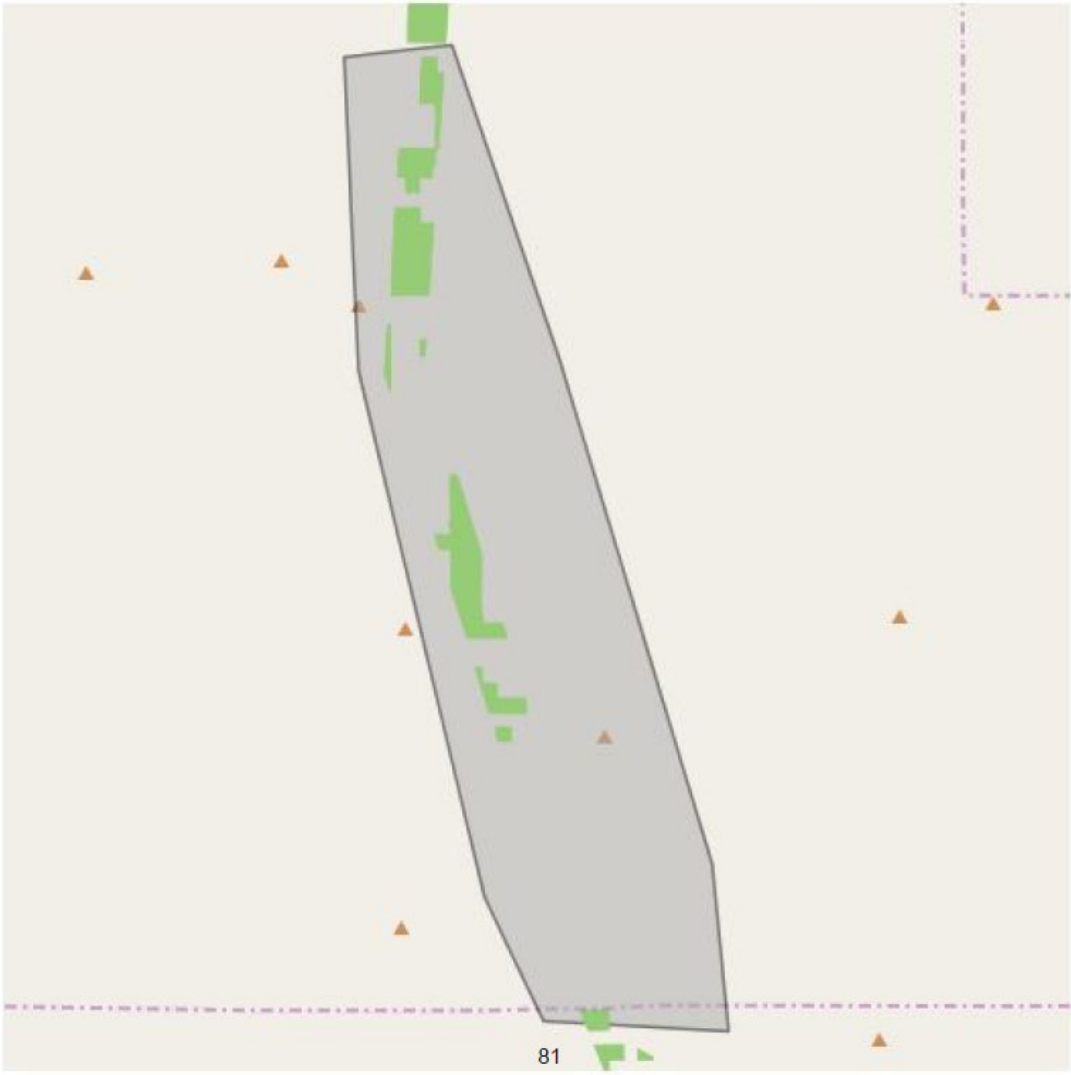
Input

If you choose to relocate the corridor please consider shifting the corridor 1 mi. east to follow WPCI ROW 4 corridor and co-locate with existing pipeline.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10222] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:13:03 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10222**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:12:40 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

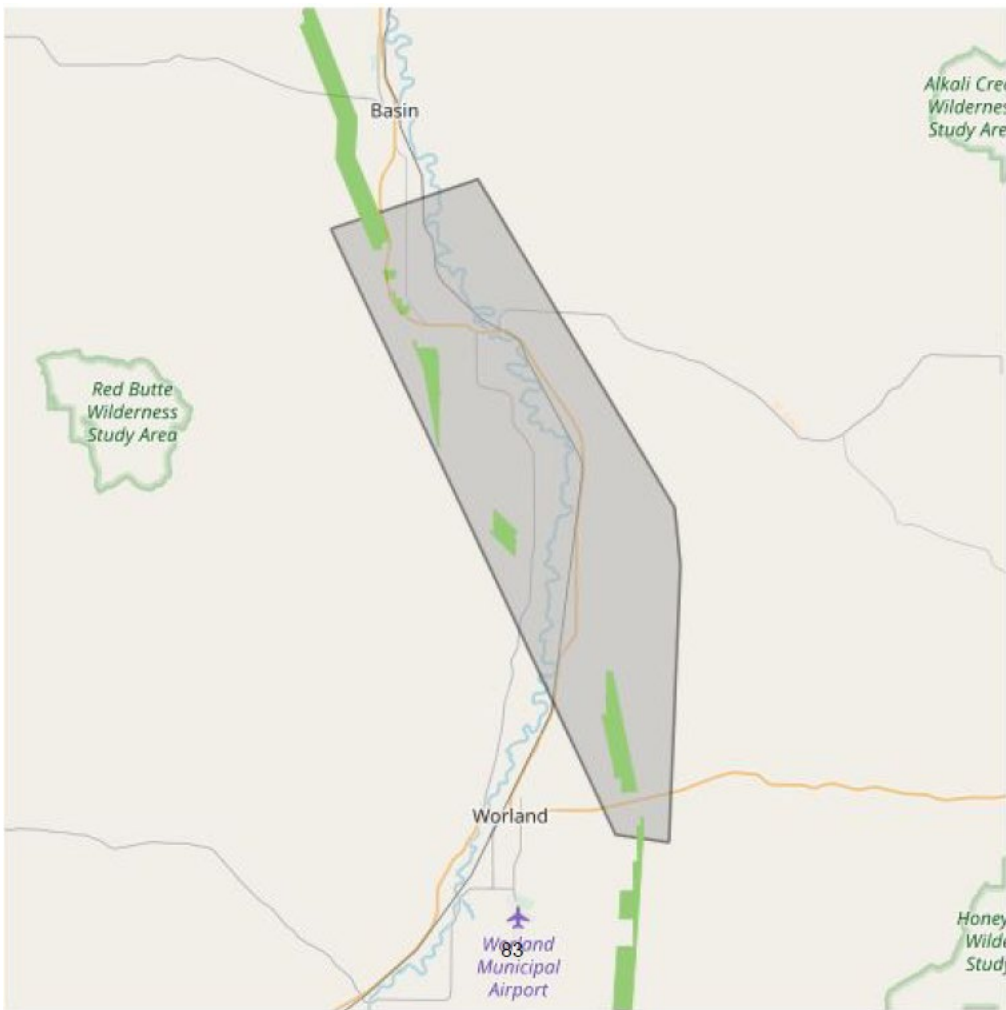
Input

If you choose to relocate the corridor please consider shifting the corridor 1 mi. east to follow WPCI ROW 4 corridor and co-locate with existing pipeline.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10223] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:14:59 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10223**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:14:27 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

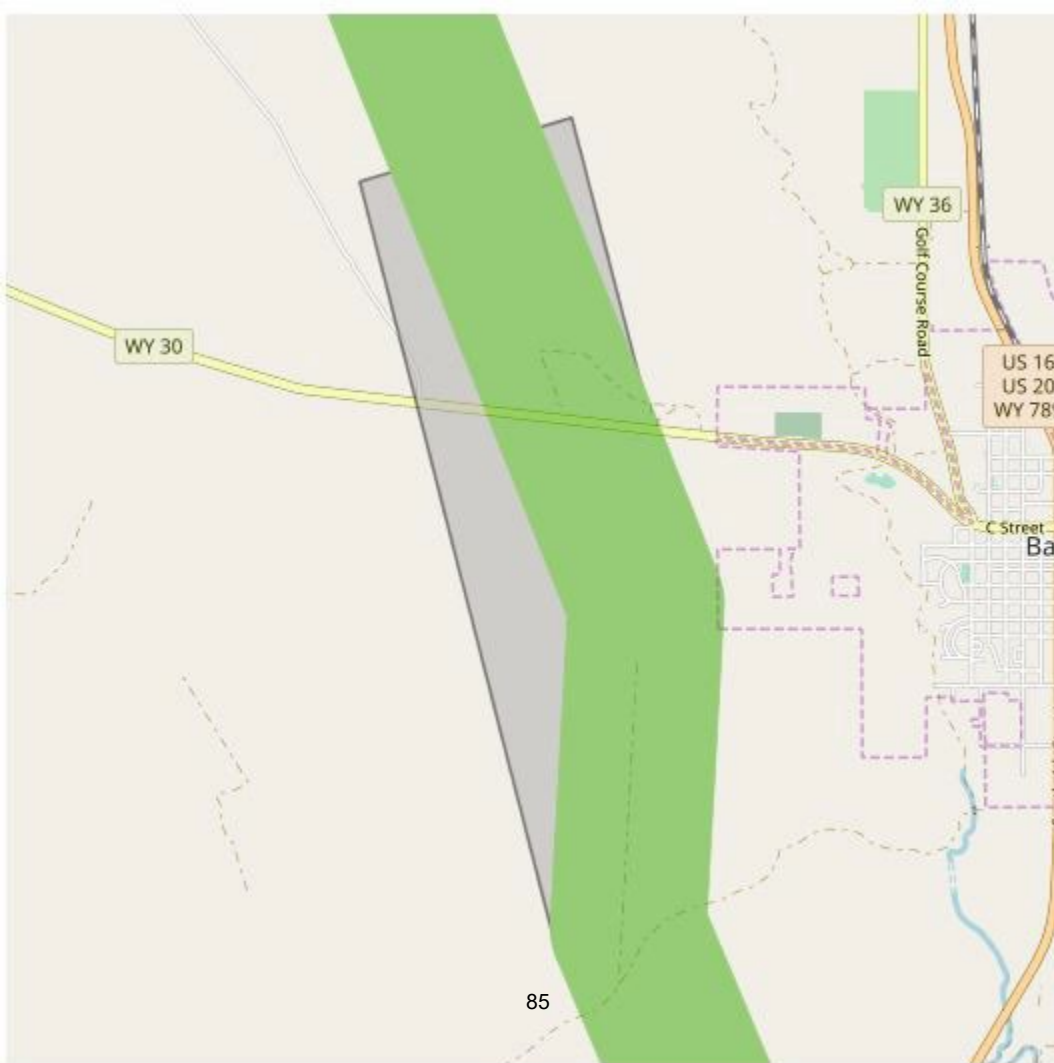
Input

If you choose to relocate the corridor please consider shifting the corridor 3,000' west to follow WPCI ROW 4 corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



WY 30

WY 36

Golf Course Road

US 16
US 20
WY 78

C Street
Ba

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10224] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:16:57 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10224**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:16:13 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

If you choose to relocate the corridor please consider shifting the corridor about 3 mi. east to follow WPCI ROW 4 corridor and co-locate with existing pipeline.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10225] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:17:42 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10225**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:17:15 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

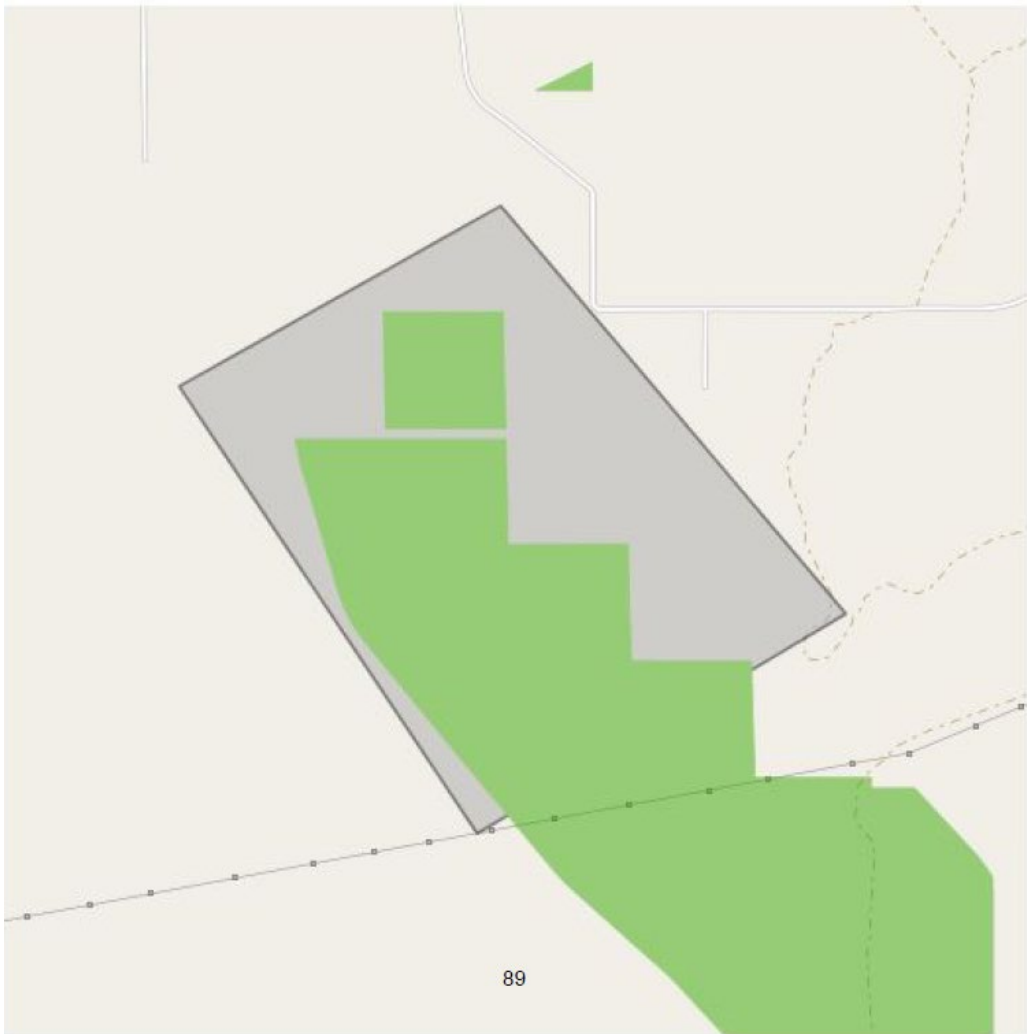
Input

If you choose to relocate the corridor please consider shifting the corridor 1,000' east to follow WPCI ROW 4 corridor and co-locate with existing pipeline.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10226] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:19:31 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10226**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:19:09 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

Move WWEC 5 mi. north to follow WPCI ROW 4 corridor and existing pipelines to avoid Greater Sage-grouse Priority habitat.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

*Alkali Draw
Wilderness
Study Area*

*South Pinnacles
Wilderness
Study Area*

121-221

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10227] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:22:13 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10227**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:21:20 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

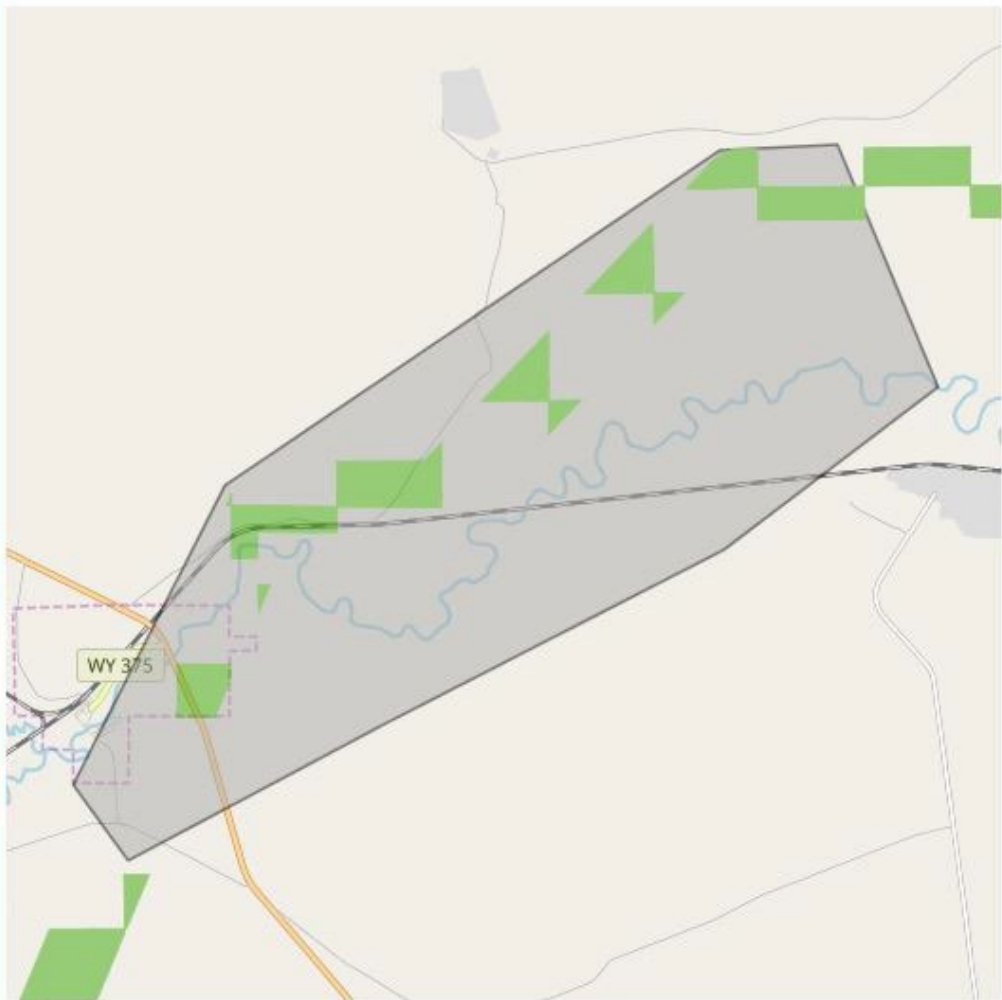
Input

If you choose to relocate the corridor please consider shifting the corridor to the south then southwest to utilize existing pipeline corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10228] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:23:03 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10228**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:22:34 CDT

First Name: Kellie
Last Name: Vlastos
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Wyoming Pipeline Authority

Topics

Energy Planning Issues
Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

If you choose to relocate the corridor please consider shifting the corridor east to co-locate corridor with a gas pipeline corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

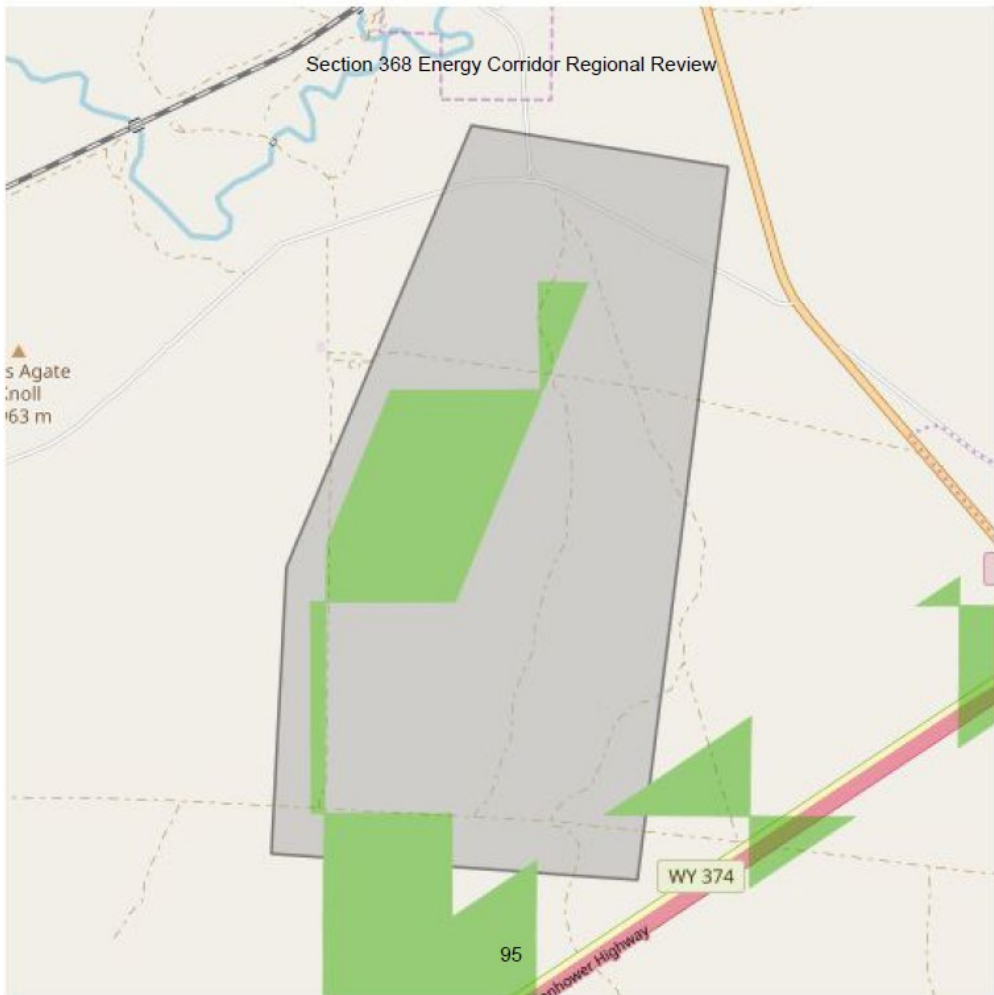
Section 368 Energy Corridor Regional Review

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WY 374

Shower Highway



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10229] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:33:59 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10229**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:33:24 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

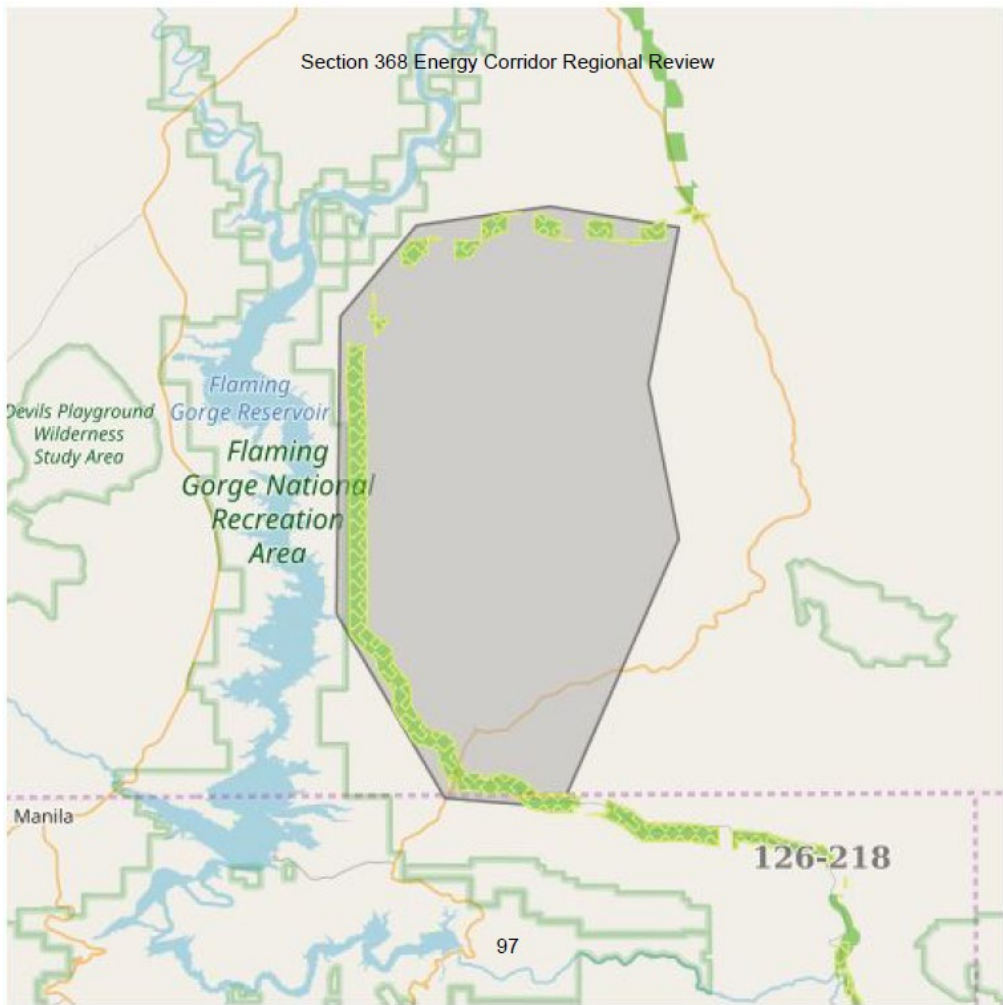
If you choose to relocate the corridor please consider shifting the corridor 10 mi. east to fall within existing transmission corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

Section 368 Energy Corridor Regional Review



Devils Playground
Wilderness
Study Area

Flaming
Gorge Reservoir
**Flaming
Gorge National
Recreation
Area**

Manila

126-218

97

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10230] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:35:47 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10230**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:35:33 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

If you choose to relocate the corridor please consider shifting the corridor 2500' north to follow WPCI ROW 2 corridor

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10231] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:36:44 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10231**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:36:34 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Opportunities

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

If you choose to relocate the corridor please consider shifting the corridor 3200' north to follow WPCI ROW 2 corridor

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10232] - Webmaster Receipt
Date: Wednesday, April 3, 2019 4:40:05 PM

Thank you for your input, Kellie Vlastos.

The tracking number that has been assigned to your input is **10232**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 03, 2019 16:39:38 CDT

First Name: Kellie

Last Name: Vlastos

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Wyoming Pipeline Authority

Topics

Energy Planning Issues

Existing infrastructure/available space

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

If you choose to relocate the corridor please consider shifting the corridor 2 mi. east to fall within Western Transmission Corp corridor.

If you choose to relocate the corridor please consider shifting the corridor to follow the Western Transmission Corp pipeline SW to WWEC corridor.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

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US 30

73-138

103



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10233] - Webmaster Receipt
Date: Thursday, April 4, 2019 12:25:49 PM
Attachments: [ID_10233_WestWideEnergyCorridor_GovLetterhead_040219_Signed.pdf](#)

Thank you for your input, Beth Callaway.

The tracking number that has been assigned to your input is **10233**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 04, 2019 12:25:29 CDT

First Name: Beth
Last Name: Callaway
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Wyoming Governor Mark Gordon

Topics

Energy Planning Opportunities
Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues
Interagency Operating Procedures

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

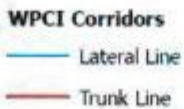
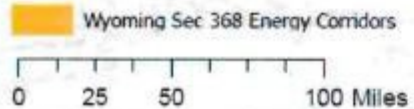
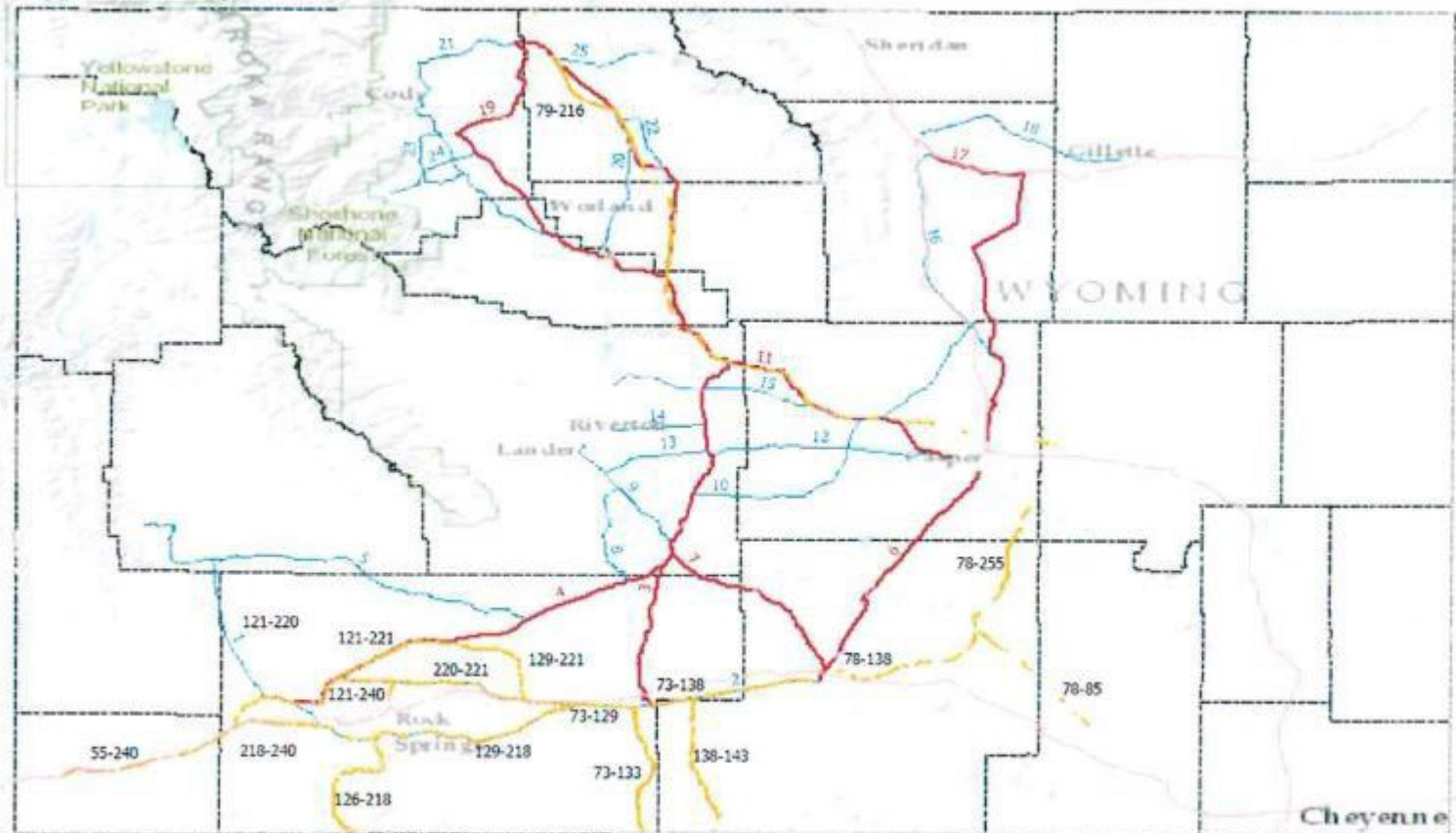
Input

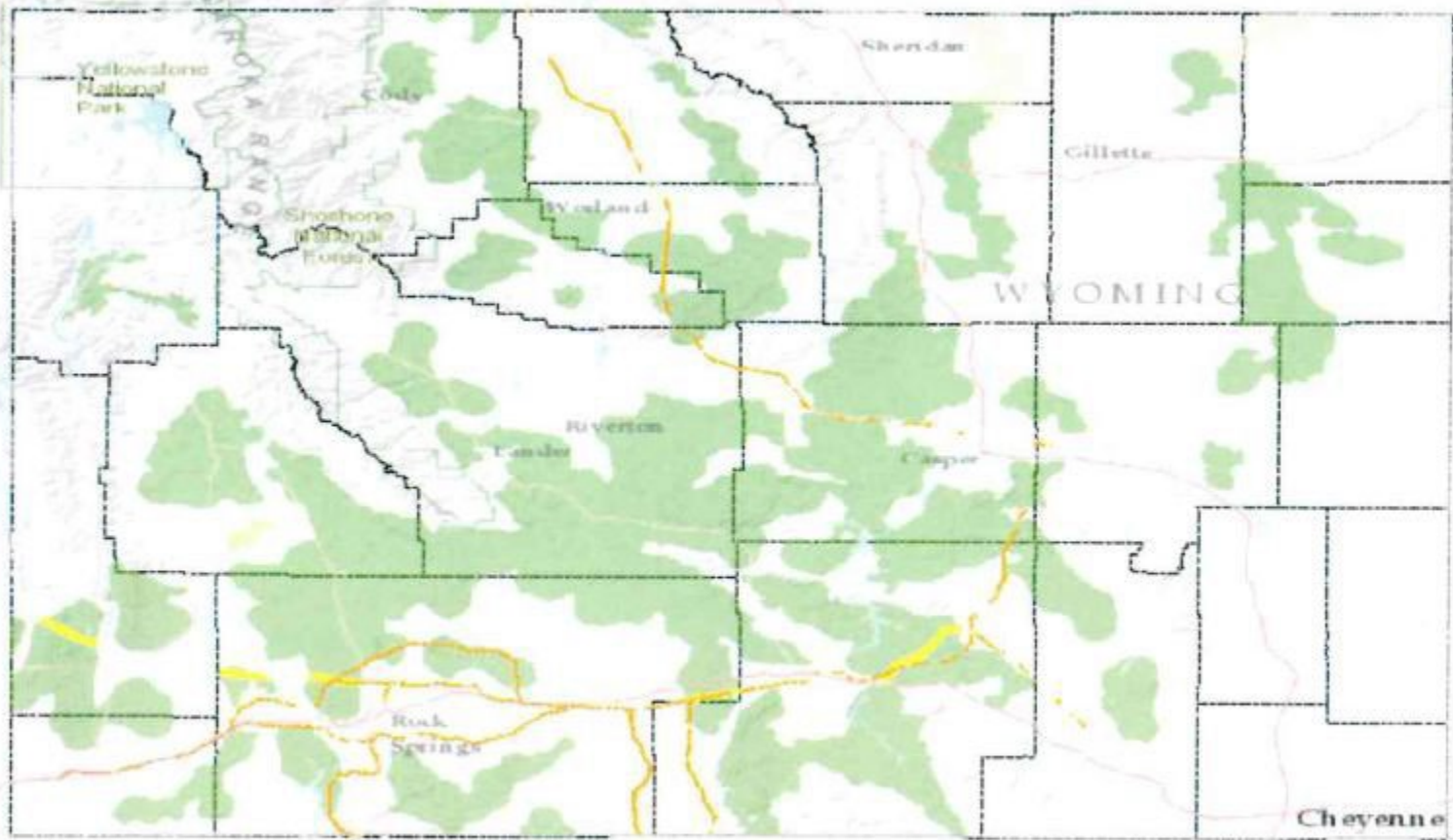
Please see Wyoming Governor Mark Gordon's comment letter attached concerning the Section 368 and WVEC request for comments.

Attachments

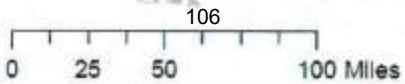
West Wide Energy Corridor_Gov Letterhead_040219_Signed.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov





- Wyoming Sec 368 Energy Corridors
- Established Transmission Corridors
- Sage-Grouse Connectivity Areas v.4
- Sage-Grouse Winter Concentration Areas v.4
- Sage-Grouse Core Management Areas v.4





April 8, 2019

Bureau of Land Management, U.S. Forest Service and U.S. Department of Energy
West-Wide Energy Corridor
Regions 4, 5, 6
Draft Energy Corridor Abstracts

To Whom It May Concern:

Thank you for the opportunity to provide comments on the Regions 4, 5, and 6 draft corridor abstracts as part of the Bureau of Land Management (BLM), the U.S. Forest Service, and the Department of Energy's West Wide Energy Corridors (WVEC). I understand that the request to review corridor abstracts is designed to help determine whether the designated corridors are achieving their intended purpose. After thorough review, the State of Wyoming does not request any specific changes to the existing WVEC.

In addition to the specific considerations I have outlined below, I want to call attention to Wyoming's own complementary efforts under the Wyoming Pipeline Corridor Initiative (WPCI). WPCI is a proposed pipeline right-of-way network designed to connect sources of carbon dioxide in the state with existing oil fields suitable for enhanced oil recovery. WPCI will enable shorter time tables for pipeline construction and cross federal lands in most counties across Wyoming. I encourage you to engage with the State to ensure that WVEC efforts are in alignment upon completion.

If the federal agencies propose modifications to the existing WVEC, please consider the following:

- The analyses to develop and map the WPCI were completed at a much more precise scale than those used to develop the WVEC. In instances where the WPCI deviates from the WVEC, following the WPCI adjustments would benefit future development scenarios.
- There are three major electrical transmission lines that have completed their EIS processes and have received Records of Decision for their right-of-way grants in Wyoming (Gateway West, Gateway South, TransWest Express). As these transmission lines proceed it would benefit future development scenarios if the WVEC shifts to account for micro-siting of infrastructure associated **with** these projects.
- The State of Wyoming has identified and delineated Greater Sage-grouse Core Areas that are intended to conserve Sage-grouse habitats and populations. There are specific state requirements for development of infrastructure within these Core Areas pursuant to

Executive Order 2015-4 and associated documents, many of which are addressed in the BLM and Forest Service federal land management plan amendments. The Core Areas specifically address overhead transmission lines and there are established corridors that specify how they are to be routed. The WWEC should consider their relationship with these state established transmission corridors in order to facilitate future development scenarios.

Enclosed you will find are two maps that depict the potential adaptations of the WWEC that are based on more fine scale analyses and approved project data. The State can provide shapefiles of the data used to generate the attached maps upon request.

Thank you for your consideration. Please contact Beth Callaway in my office if you have any questions: beth.callaway@wyo.gov or 307-777-8204.

Sincerely,

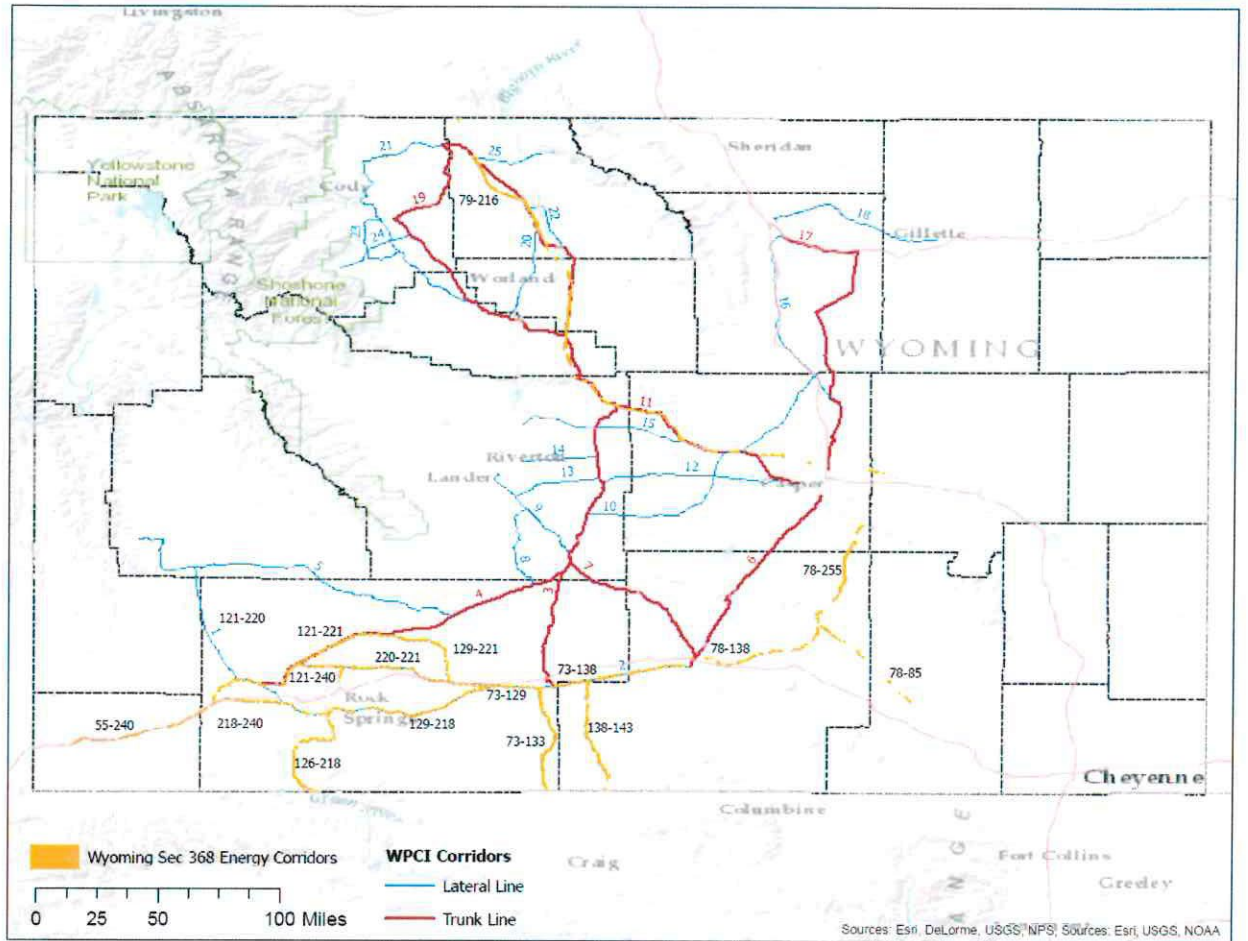


Mark Gordon
Governor

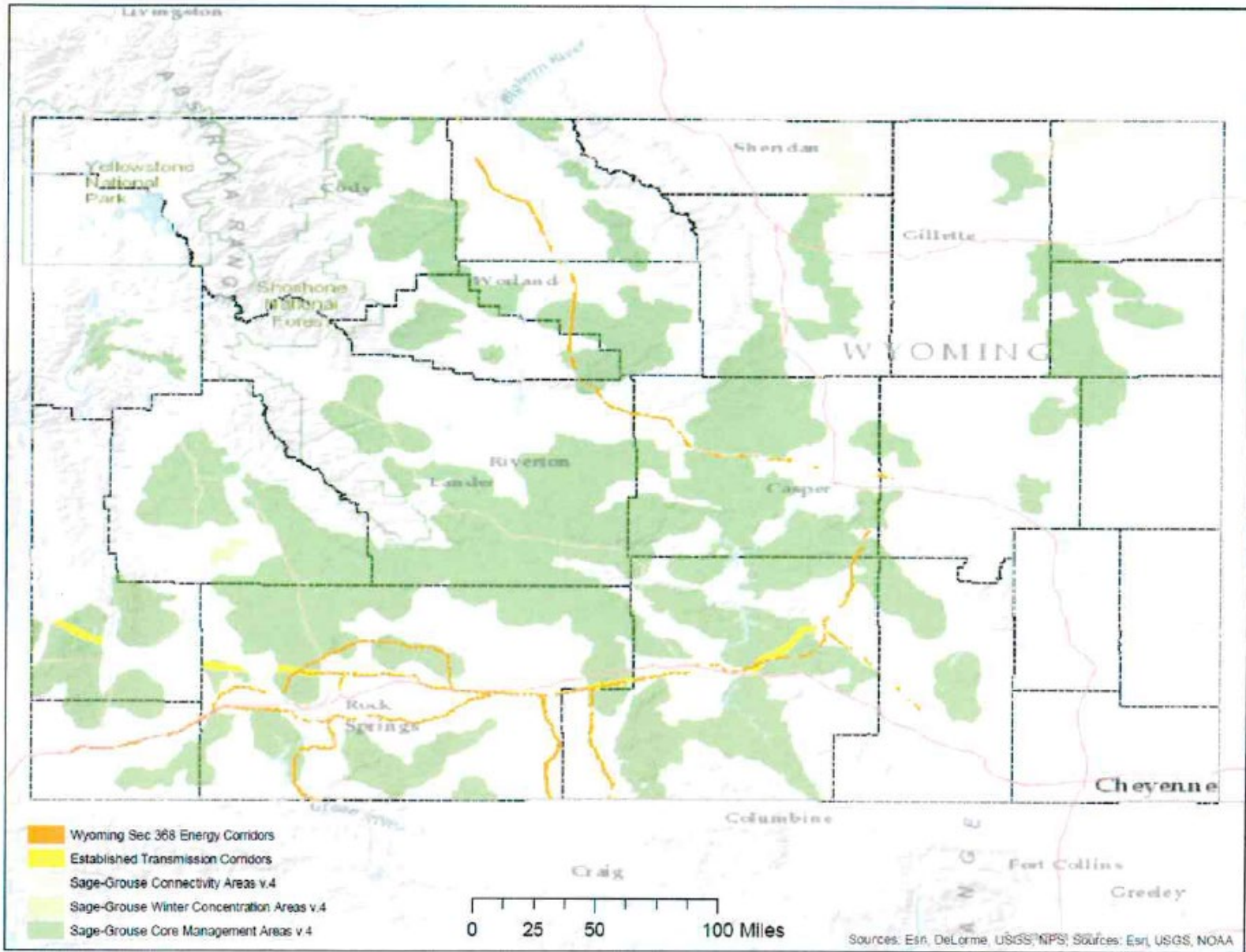
Encl. 2

cc: Jason Begger, Executive Director, Wyoming Infrastructure Authority
Carla Hubbard, Administrator, Wyoming Pipeline Authority

Attachment 1: WWEC and WPCI Basemap



Attachment 2: WWEC Established Transmission Lines and Sage-Grouse Habitat



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10234] - Webmaster Receipt
Date: Thursday, April 4, 2019 12:26:41 PM
Attachments: [ID_10234_WWECreviewcomments.pdf](#)

Thank you for your input, Brenna Bell.

The tracking number that has been assigned to your input is **10234**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 04, 2019 12:26:19 CDT

First Name: Brenna

Last Name: Bell

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Bark

Topics

Land Management Responsibilities and Environmental Resource Issues

Ecological resources

Hydrological resources

Lands with wilderness characteristics

Public access and recreation

Soils/erosion

Specially designated areas

Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

230-248 [blank, blank]

Input

Please see attachment for Bark's comments.

Attachments

WWEC review comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



Bark
P.O. Box 12065
Portland, OR 97212
503-331-0374

April 5, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

Via: corridors@anl.gov and the web form at
<http://corridoreis.anl.gov/involve/stakeholder-input/>

Dear Mr. Leverette, Mr. Woodruff and Dr. Smith,

Please accept these comments, which are focused on the Corridor Abstract for Corridor 230-248 in Regions 6 of the Section 368 West-wide Energy Corridors (WWEC).

Since 1999, Bark has been actively working to protect and restore the ecosystems of Mt. Hood National Forest. Our mission is to bring about a transformation of Mt. Hood National Forest into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. As of writing these comments, we represent over 30,000 people who support our mission.

Bark has been tracking this corridor since 2007 when it was proposed as the “Palomar Pipeline,” a controversial Liquefied Natural Gas (LNG) pipeline. Shortly after, Bark members hiked the entire length of the 47-mile corridor and participated extensively in the public comment process. Bark identified many concerns about the corridor, including:

“Construction of the pipeline corridor would initially require more than 700 acres of clearcutting, including through several old growth forests. The pipeline route

crosses 15 streams and rivers, as well as countless unnamed tributaries, drainages and wetlands. In addition, the construction and maintenance of this pipeline will require use of currently decommissioned roads, as well as construction of new roads for access to remote parts of the pipeline route.”¹

In July, 2009, Bark joined several other conservation groups in a lawsuit challenging the WVEC EIS and associated energy corridor designations. Our particular concern was proposed corridor 230-248, which overlapped the route of the Palomar Pipeline.

As you know, on July 11th, 2012, the Bureau of Land Management, Forest Service, Department of Energy and the Department of Justice reached a Settlement Agreement with the plaintiffs. In the settlement, corridor 230-248 was designated a “Corridor of Concern” as it has environmental issues including affecting critical habitat, National Register of Historic Places, Pacific Crest Trail, Clackamas Wild and Scenic River and other “eligible” segments under Wild and Scenic Rivers Act, and conflicting with Northwest Forest Plan Late-Successional Reserves.²

Corridor 230-248 is not located in a favorable landscape. Since its identification as a corridor of concern, new conflicts have arisen since this designation that also pose legal and ecological barriers to corridor development. The following comments highlight conflicts not adequately discussed in the Abstract. Because of the breadth and depth of these conflicts, and the fact that many of them are not easily resolved, Bark believes that these conflicts would be best remedied by deleting this corridor.

1. Inaccuracy in the Corridor Purpose and Rationale

The Abstract inaccurately portrays both the purpose and rationale for Corridor 230-248 and fails to recognize the potential for pipeline development in the near future.

This corridor was never intended to facilitate the movement of energy from west to east across Mt. Hood National Forest. It was included in the WVEC as a corridor to facilitate the export of liquefied natural gas (LNG). PacifiCorp, the aspirant developer of the Palomar Pipeline in conjunction with NW Natural, eventually withdrew its FERC application when the proposed export terminal was halted but repeatedly stated it is still considering developing the corridor. After the initial withdrawal of the Palomar pipeline, officials from NW Natural Gas stated, “[t]here’s no question another pipeline will be built. The question is when.”³

The possibility of a new pipeline along this corridor is re-emerging because of the potential needs of a proposed methanol refinery in Kalama, Washington. In July 2015, the Northwest Gas Association stated, “a large enough project (roughly over 150,000

¹ Bark’s scoping comments for the Palomar Pipeline, January 9, 2009

² http://corridoreis.anl.gov/documents/docs/Settlement_Agreement_Package.pdf

³ <http://bark-out.org/content/oregonian-nw-naturals-calm-shareholders-meeting-doesnt-reflect-shareholder-happiness>

Dth/d of demand) would likely *need new infrastructure* regardless of their preferred gas transportation type simply due to high utilization of the existing pipeline systems.”⁴ The Gas Association affirmed its perspective again in its 2016 Gas Outlook, stating that new methanol-related gas demand could push the regional pipeline system to an “inflection point,” prompting new gas pipeline development.⁵

This new pipeline could be proposed for corridor 230-248. NW Natural and Gas Transmission Northwest have discussed this route, now called the Trail West Pipeline, as an option to supply gas to the proposed Kalama refinery or to free up capacity in other pipelines to supply it. Indeed, the Gas Association estimated that the Trail West Pipeline may begin operating in 4th Quarter of 2021.⁶

Please correct the abstract to reflect the fact that this corridor, since its inception, has been intended to move fracked gas across the Cascades for the purpose of export. As such, neither the past proposal for use, nor the potential future proposal, facilitate transportation of renewable energy.

2. Irreconcilable conflicts with Northern Spotted Owl Critical Habitat

Much of the proposed pipeline route is located within federally designated critical habitat for the threatened northern spotted owl. The rule designating this forest as spotted owl Critical Habitat determined that all unoccupied and likely occupied areas in these subunits are **essential** for the conservation of the species to meet the recovery criterion. Given the spotted owl’s continued decline, the Revised Recovery Plan for the Spotted Owl emphasizes conserving older moist forest stands **wherever they occur**, regardless of the NWFP’s system of reserved or non-reserved lands.

Critical habitat is becoming ever more important as Northern Spotted Owl populations are declining throughout the range of the subspecies and annual rates of decline are accelerating in many areas.⁷ The continued decline of owl populations and low occupancy rates in large habitat reserves, and the growing negative impact from barred owl invasions of spotted owl habitats, is greater than anticipated in the 1994 Northwest Forest Plan. Increased conservation and restoration of spotted owl sites and high-value spotted owl habitat is needed to help ameliorate this impact.⁸

Bark concurs with the Abstract’s conclusion that “Northern Spotted Owl critical habitat . . . may not be compatible with future development in an area without existing

⁴ Power and Natural Gas Planning Taskforce. “The Northwest Gas Landscape – Looking Forward.” NW Gas Association and Pacific Northwest Utilities Conference Committee (PNUCC). July 2015. P. 14.

⁵ NW Gas Association. 2016 Gas Outlook. P. 3.

⁶ NW Gas Association. 2016 Gas Outlook. P. 20.

⁷ Dugger, Kate, et. al., The effects of habitat, climate, and Barred Owls on long-term demography of Northern Spotted Owls, *The Condor* 2016 118:1, 57-116.

⁸ Revised Recovery Plan for the Northern Spotted Owl, Recovery goal, objectives, criteria and strategy II-11.

infrastructure.” This incompatibility is a major factor pointing to the need to delete this corridor.

3. The corridor intersects the unstable, flashy Fish Creek watershed

Fish Creek provides important habitat for several fish species: Endangered Species Act-listed winter steelhead, coho salmon, and spring Chinook; Pacific lamprey; and cutthroat trout. While the Abstract acknowledges that Fish Creek is a Wild and Scenic River, it fails to discuss the extremely unstable nature of the watershed, its history of major flooding and landside events, and the dangers that poses to energy development in the corridor.

The Fish Creek Watershed has the greatest potential for landslides compared to other watersheds on the Mt. Hood National Forest. The Fish Creek Watershed experienced a 100-year flood event in February of 1996 which resulted in some of the most large-scale landslides and debris torrents anywhere in the Pacific Northwest. A total of 236 landslides occurred throughout the watershed and 15 miles of stream channels were scoured and rearranged by debris torrents. This powerful flood swept away a 100 foot long, steel and concrete road bridge on Wash Creek and the mainstem Fish Creek bridge at Music Creek had an abutment damaged by flood scour. A landslide study conducted after the 1996 storm event found that landslide incidence on roads was 0.5 landslides per road mile, and landslide incidence within young harvest units was 12.2 landslides per square mile. A pipeline corridor across Fish Creek watershed will likely create conditions similar to roads and young harvest units. It should also be noted that similar large floods occurred in Fish Creek causing geologic reshaping and damage to human infrastructure in 1927 and 1964.

The significant scale and comprehensive nature of this watershed restoration effort after the flood was unprecedented at its time in the Pacific Northwest. It is due to these concerns and watershed management history discussed that Bark requests the corridor not intersect with Fish Creek. If it cannot be re-routed to avoid the Fish Creek watershed, it should be deleted.

4. The Corridor overlaps the home range of the new White River wolf pack

For the first time in almost 70 years, there is an ESA-listed wolf pack in Mt. Hood National Forest, dubbed the “White River Pack.” The Oregon Department of Fish & Wildlife confirmed evidence of the wolves using areas near White River and the Mount Hood National Forest and has designated the region an “area of known wolf activity.” An announcement from the Confederated Tribes of Warm Springs’ wildlife department notes that wolf pups born in August 2018 represent the first verified wild wolf pups born on the tribe’s land since the 1940s.⁹

Corridor 230-248 runs along the entire boundary area between the White River on Mt. Hood National Forest and the Warm Springs Reservation. As the wolves are a new presence in the area, the potential conflict between their home range and future development of the energy corridor has not been examined in any detail. Bark requests

⁹ https://www.dfw.state.or.us/Wolves/wolf_program_updates.asp

that the next phase of the corridor analysis probe into the potential that developing the corridor would increase human/wolf conflict.

5. The corridor intersects the Pacific Crest National Scenic Trail and other important recreation areas, violating protective Visual Quality Objectives.

If developed, this corridor would cross the Pacific Crest Trail, a federally designated National Scenic Trail. It would also disrupt the experience of users at the popular Timothy Lake recreation area, with its extensive system of trails, and it would also cross a federally designated Wild and Scenic River. These crossings would significantly diminish these distinctive recreational resources. Developing this corridor is inconsistent with the Visual Quality Objectives (VQOs) for sensitivity level 1 trails and designated viewsheds in the Forest Plan, and would require amending to the standards and guidelines in that Plan.

Those standards are in place precisely to deter this sort of incremental damage at the project-by-project level, and the cumulative effects of that damage. MHNH has identified recreation as its largest niche, surpassing logging and other forms of resource extraction. In order to preserve the appeal that serves the recreating public and brings in the recreation revenue that sustains it, the MHNH must prioritize its landscapes and scenery preservation. This cannot be achieved by further diminishing the already low standards set by the Forest Plan's Visual Quality Objectives.

The PCT follows the crest of the mountains and offers vistas of the landscape at many different places where the permanently-cleared pipeline corridor would be visible within the Middleground (.25 to 5 miles from the trail.) Considering the recreational importance of vistas from a trail a National Scenic Trail renowned for its wilderness character ought to have a minimum VQO of "retention" for the Middleground. This could not be achieved if corridor 230-248 was developed.

6. The corridor's many river crossings conflict with the Wild & Scenic Rivers Act and Northwest Forest Plan

The Wild and Scenic Clackamas River is classified as "scenic" at its intersection with the energy corridor. The river has five categories determined "outstandingly remarkable": recreation, fish, wildlife, historic, and vegetation. Section 7 of the Wild and Scenic Rivers Act specifically prohibits the FERC from permitting projects that would interfere with the outstanding or its scenic, recreational, fish or wildlife values. The appropriate standard under Section 7(a) is whether the project would invade the designated river or unreasonably diminish the scenic, recreational, fish or wildlife values present at the date of designation.

In addition, the corridor crosses six Tier 1 key watersheds Mt. Hood National Forest: Fish Creek, Upper Clackamas, Oak Grove Fork of the Clackamas River, Clear Creek,

East Fork of the Hood River and the White River. Tier 1 Key watersheds should be managed for the conservation of at-risk salmonids and other resident fish species.¹⁰

The corridor also crosses through Key Site Riparian Areas, where rights-of-ways are prohibited, and more than a dozen Riparian Reserves, which must be managed to comply with the Aquatic Conservation Strategy. Regarding rights-of-way, the Northwest Forest Plan requires adjustments made to projects "to eliminate adverse effects that retard or prevent the attainment of Aquatic Conservation Strategy objectives. If adjustments are not effective, eliminate the activity."¹¹

The two most controversial river crossings in the Mt. Hood National Forest, Clackamas River and Fish Creek, are both virtually unavoidable if the corridor remains in the southside of Mt. Hood National Forest.

7. Clearcutting Late-Successional Reserves conflicts with the Northwest Forest Plan

The Northwest Forest Plan is clear about logging in Late-successional Reserves (LSRs): "There is no harvest allowed in stands over 80 years old."¹² Corridor 230-248 passes through an LSR adjacent to the Clackamas River with forest stands that are clearly more than 80 years old. The loss of these forests would have lasting impacts to the ecosystem and undeniably degrade habitat in this watershed. Any corridor development would require a total loss of forest characteristics, including removal of all snags, downed woody debris and other integral decadent components to terrestrial habitat. This degradation is yet another way that developing this corridor would be out of compliance with the Northwest Forest Plan.

8. Developing this corridor conflicts with the Mt. Hood Land & Resource Management Plan

When corridor 230-248 was being evaluated for the development of the Palmar Pipeline the Forest Service prepared comments for FERC that included a detailed list of the specific forestwide guidelines that a pipeline on this route would not comply with. These include:

- FW-018 – “The combined cumulated detrimental impacts, occurring from both past and planned activities, or detrimental soil compaction, puddling, displacement, erosion or several burned soil should not exceed 8 percent of the activity area.”
- FW-019 – “Landings, non-transportation system roads, and dispersed recreation sites should be included within the 8 percent.”
- FW-020 – “Ground machine yarding of logs should not occur.”
- FW-022 – “The combined cumulated detrimental impacts, occurring from both past and planned activities, or detrimental soil compaction, puddling,

¹⁰ Northwest Forest Plan Standards & Guidelines, B-18.

¹¹ Northwest Forest Plan Standards & Guidelines, C-37.

¹² Northwest Forest Plan Standards & Guidelines, C-12.

displacement, erosion or severely burned soil should not exceed 15 percent of the activity area.”

- FW-023 – “Landings, non-transportation system roads, and dispersed recreation sites should be included within the 15 percent.”
- FW-080 – “Within 100 feet of a riparian management area, no more than 10 percent of a project activity area (e.g. timber harvest unit or recreation site) should have exposed or compacted soils.”
- FW-081 – “No more than 5 percent of a project activity area (within a riparian area) shall be in a compacted, puddled, or displaced soil condition.”
- FW-082 – “At least 95 percent ground cover (e.g. vegetation, duff or litter) shall be maintained within all project activity areas (within riparian areas).”
- FW-083 – “Ground disturbing activities should not occur in saturated soil areas.”
- FW-104 – “Special aquatic habitat (e.g. alcoves, secondary and overflow channels, ponds and wetlands) and associated subsurface aquatic habitat (hyporheic zone) shall be maintained in natural condition or enhanced in both quantity and quality.”
- FW-498 – “Within recreational segments, a VQO of Partial Retention in the foreground and middleground shall be prescribed – as seen from the river, river banks, U.S. and State Highways, Forest Highways and roads, trails and recreation facilities within the corridor.” The corridor refers to a Wild and Scenic River corridor.

9. The abstract does not address the danger of pipeline leaks to natural resources

As the infrastructure to transport fossil fuels across the United States grows ever larger, this corresponds to an increase in pipeline-related accidents. Fossil fuel pipelines leak and even explode. Hundreds of pipeline accidents, spilling millions of gallons of gas and oil into the waterways of the United States, have occurred over the past 20 years.¹³ For example, during the first *half* of 2017, fossil fuel pipelines in the United States had four major explosions, leaked 19 million cubic feet of natural gas and spilled 388,744 gallons of crude oil.¹⁴ The nation’s most controversial pipeline, the Dakota Access pipeline, had three oil leaks in 2017.¹⁵ After the third spill in April 2017, Dallas Goldtooth, a campaigner with the Indigenous Environmental Network, commented that “[t]his spill serves as a reminder that it is not a matter of if a pipeline spills, it’s a matter of when a pipeline spills.”¹⁶

Along with being Wild & Scenic, the Clackamas River provides the municipal drinking water supply for nine municipalities and hundreds of thousands of people. If the

¹³https://en.wikipedia.org/wiki/List_of_pipeline_accidents_in_the_United_States_in_the_21st_century, see also <https://www.nrdc.org/onearth/spill-tracker>

¹⁴https://en.wikipedia.org/wiki/List_of_pipeline_accidents_in_the_United_States_in_the_21st_century

¹⁵ <http://www.businessinsider.com/the-dakota-access-pipeline-sprung-2-new-leaks-2017-5>

¹⁶ *Id.*

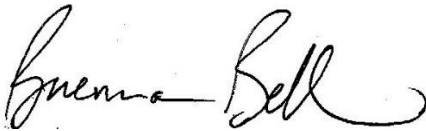
corridor were ever developed to transport oil a pipeline leak would pose a significant threat to the drinking water supply. If the corridor carried gas, any leaks this could increase the chance of igniting a wildland fire. The abstract should examine the very real conflicts that arise from pipeline leaks along this route.

Conclusion

For the above reasons, as well as all the conflicts identified in the WWEC Settlement agreement and the Corridor Abstract, Bark strongly urges that Corridor 230-248 be deleted from the WWEC. Any future energy development that requires transport in northern Oregon should use pre-existing corridors or identify routes that do not have such extensive conflicts with federal laws and regulations, as well as the potential for so many adverse ecological impacts.

Thanks for considering this comment. We look forward to further participation in the corridor review process.

Sincerely,

A handwritten signature in black ink that reads "Brenna Bell". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brenna Bell
Staff Attorney/Policy Coordinator

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10235] - Webmaster Receipt
Date: Friday, April 5, 2019 11:50:47 AM
Attachments: [ID_10235_Regions456WWECCorridorAbstractsCommentsTWSandpartners4519.pdf](#)

Thank you for your input, Alex Daue.

The tracking number that has been assigned to your input is **10235**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 05, 2019 11:50:16 CDT

First Name: Alex
Last Name: Daue
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: The Wilderness Society

Topics

Energy Planning Opportunities
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Lands with wilderness characteristics
Public access and recreation
Specially designated areas
Tribal concerns
Visual resources
Interagency Operating Procedures

Geographic Area

General (not corridor-specific)

Input

Please accept the attached comments on behalf of The Wilderness Society and the other groups signed on. We appreciate the opportunity to comment.

Attachments

Regions 4,5,6 WWEC Corridor Abstracts Comments (TWS and partners - 4-5-19).pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

April 5, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

Via: corridors@anl.gov and the web form at <http://corridoreis.anl.gov/involve/stakeholder-input/>

Re: Comments on Corridor Abstracts for Section 368 West-wide Energy Corridors Regions 4, 5 and 6 Regional Review

Dear Mr. Leverette, Mr. Woodruff and Dr. Smith,

Please accept the comments of The Wilderness Society, Friends of the Inyo, Idaho Conservation League, Bark, Wildlands Network, Montana Wilderness Association, NRDC, New Mexico Wilderness Alliance, Oregon Natural Desert Association, KS Wild, Wyoming Wilderness Association, Great Old Broads for Wilderness, Sierra Club Wyoming Chapter, Sierra Club – Grand Canyon Chapter, Yellowstone to Yukon Conservation Initiative, National Parks Conservation Association and Center for Large Landscape Conservation on the Corridor Abstracts for Regions 4, 5 and 6 of the Section 368 West-wide Energy Corridors (WWEC). We support the ongoing commitment shown by the BLM, the U.S. Forest Service, and the Department of Energy (the Agencies) to improving the siting and functionality of the WWEC to meet the terms of the Settlement Agreement reached by the Agencies and The Wilderness Society and other plaintiffs in 2012, including through the Regional Reviews. The comments we submitted on the 2014 WWEC Request for Information, the 2016 initiation of the Region 1 Review and the Corridor Abstracts for Regions 2-3 are incorporated by reference.

Key issues addressed in these comments:

These comments are focused on the need for the Agencies to address the following key issues to meet the terms of the Settlement Agreement and help ensure that future changes to corridors comply with the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), and Section 368 of the Energy Policy Act of 2005 (EPA) by:

- 1) making additional improvements to the way that environmental concerns are addressed in this process;
- 2) adjusting or deleting corridors to eliminate intersections with protected areas such as Wilderness Areas, Wilderness Study Areas, and other sensitive wildlands and wildlife habitat;
- 3) better addressing corridor intersections between with wilderness-quality lands;

- 4) better addressing corridor intersections with greater sage-grouse habitat;
- 5) better addressing impacts to National Park Service lands; and
- 6) better addressing conflicts identified for the specific corridors highlighted in this letter.

We also recommend improvements to other elements of the Agencies methods such as the online mapping tool. Additional organizations are submitting comments focused on other important issues including addressing impacts to wildlife habitat and improving access to renewable energy development.

We acknowledge and appreciate that the Agencies have made significant improvements to some of their methods between the start of the Region Reviews, including to issues in our previous comments. The Agencies significantly improved the way environmental concerns are addressed in the corridor abstracts by moving away from the binary “this is a constraint/this is not a constraint” approach used in the Region 1 corridor abstracts, as well as by clearly indicating in some cases that there are issues that need to be addressed through the Regional Reviews. In addition, the increased information available in the Mapping Tool and corridor abstracts is very helpful in supporting effective and informed stakeholder engagement.

That said, the Agencies need to make significant additional improvements to the way environmental impacts are addressed to ensure a consistent and appropriate approach. In addition, the Agencies have not yet published recommended comprehensive adjustments to Interagency Operating Procedures (which we understand will be included in the Regional Review Reports), though it is encouraging that some possible adjustments to IOPs are identified in some corridor abstracts. It remains to be seen whether the Agencies are focusing and prioritizing efforts on key corridors; we strongly recommend that the Agencies do so as they complete additional steps in the process for the Regional Reviews.

The value of establishing an appropriate system of WWEC:

The WWEC Regional Reviews are a major opportunity to re-evaluate and improve the WWEC throughout the West, with the promise of supporting the fundamental concepts of guided development and landscape-scale planning that the WWEC should ultimately embody. Successes such as the Dry Lake Solar Energy Zone in Nevada show that a ‘smart from the start’ approach has the potential to not only protect sensitive wildlands and wildlife habitat by driving development to low-conflict places but can also provide important benefits to developers with regards to permitting efficiency and predictability for mitigation costs and obligations, helping achieve the nation’s infrastructure needs in a responsible way.

BLM’s selection of WWEC 30-52 as its preferred alternative route for the proposed Ten West Link transmission line in the Draft EIS published in 2018 is one example of the parallel promise that WWEC could offer. By following 30-52 along Interstate Hwy 10 in Arizona, Ten West Link can avoid the Kofa National Wildlife Refuge, a crucial area for wildlife that is not appropriate for infrastructure development, while benefiting from reduced conflicts and controversy as well as the environmental analyses the Agencies have completed on 30-52. In the coming years, we hope to help the Agencies build off these successes on our public lands by applying similar principles to the WWEC around the west.

To achieve these goals, the Agencies must gather and synthesize information in a way that helps make corridors attractive and functional for appropriate transmission development to support renewable energy, and

effectively limits impacts to wildlands and wildlife, cultural resources, local communities, and other resources. This must be done in accordance with the “siting principles” established in the Settlement Agreement. To comply with the siting principles, the Agencies must follow the recommendations in these comments.

We strongly encourage the Agencies to continue to use the Regional Reviews process to learn, adapt and improve their approach.

Summary of the detailed recommendations in this letter:

1) The Agencies must further improve their methods for considering and addressing environmental concerns in the corridor abstracts and through the Regional Reviews, including by acknowledging and addressing intersections with wilderness-quality lands. We acknowledge and appreciate that the Agencies have moved away from the binary “this is a constraint/this is not a constraint” approach used in the Region 1 corridor abstracts. The new approach used in the Regions 4, 5 and 6 corridor abstracts is a major improvement because it describes a variety of considerations in the column labeled “Potential Resolutions Based on Siting Principle Analysis.” There are numerous cases in the Regions 4, 5 and 6 corridor abstracts where the Agency Review and Analysis acknowledges that there are resource conflict issues and identifies potential corridor adjustments to address impacts to wilderness-quality lands, Areas of Critical Environmental Concern and other sensitive resources and values. However, additional significant improvements are needed because the corridor abstracts are still inconsistent in how intersections with wilderness-quality lands and other resources are addressed; in many cases the way the intersections are addressed is inadequate to address the resource conflicts that are present; and many intersections with wilderness-quality lands are not acknowledged. **Because all wilderness-quality lands are inappropriate for infrastructure development, the Agencies should use a consistent approach that commits to avoiding intersections with wilderness-quality lands, identifies a path to making needed revisions to corridors and requires the use of mitigation measures where unavoidable impacts occur. The Agencies should do the same for other sensitive and important resources intersected by the corridors.**

2) The Agencies should adjust or delete corridors to eliminate intersections with protected lands and key wildlands and wildlife habitat. Several corridors currently intersect with protected lands such as designated Wilderness Areas and Wilderness Study Areas where infrastructure development is prohibited by law. The Agencies must eliminate these intersections by adjusting or deleting these corridors. Many corridors also intersect with other protected lands and key wildlands and wildlife habitat that are inappropriate for infrastructure development. The Agencies should adjust the Conflicts Assessment Table to appropriately classify additional categories of land as “high conflict” and the Agencies should adjust or delete corridors to eliminate any intersections with all “high conflict” lands.

3) The Agencies must better address corridor intersections with wilderness-quality lands. Wilderness-quality lands are inappropriate for infrastructure development, there are dozens of intersections between the corridors in Regions 4, 5 and 6 and wilderness-quality lands. The Agencies must ensure that all of these intersections are acknowledged and addressed, including 1) making a clear commitment to addressing any intersections with wilderness-quality lands by revising corridors to eliminate the intersections; and 2) providing details on opportunities to do so through corridor revisions whenever possible.

4) The Agencies must better address corridor intersections with greater sage-grouse habitat. The Agencies should use a consistent approach to addressing intersections with sage-grouse habitats that commits to avoiding intersections, identifies a path to making needed revisions to corridors, and requires the use of mitigation measures where unavoidable impacts occur. In the case of the Bi-state Distinct Population Segment of the greater sage-grouse, we believe that corridor 18-23, which traverses nearly 75 miles of habitat critical to their survival, must be deleted.

5) The Agencies must better address impacts to National Park Service lands. The Agencies should use a more thorough and consistent approach to addressing impacts to NPS lands that includes close coordination with the NPS and commits to avoiding intersections, identifies a path to making needed revisions to corridors where there are direct and indirect impacts on park resources and visitor experiences, and requires the use of mitigation measures where unavoidable impacts occur.

6) The Agencies must better address the conflicts raised for specific corridors highlighted in this letter. In addition to our general recommendations for changing the way the Agencies are addressing intersections with key categories of lands, we also recommend specific changes to individual corridors.

Additional recommendations:

The Agencies should make additional improvements to the Mapping Tool and corridor abstracts. The Agencies have made significant improvements to the Mapping Tool and corridor abstracts, many of which address recommendations we made in previous comments. The Agencies should make additional improvements, including ensuring the Mapping Tool includes all existing inventories of BLM wilderness-quality lands and addressing future updates; addressing updates to inventories of FS wilderness-quality lands; consistently incorporating data across agency planning areas; including all the resources and designations in the Conflicts Assessment Table; and including more information on siting opportunities and challenges on non-federal lands.

The Agencies should also maintain a strong public engagement process for the Regional Reviews. A strong public engagement process is crucial for meeting the terms of the Settlement Agreement and for achieving the Agencies' goals for improving the WWEC. The Agencies should maintain the process they have established, which provides multiple opportunities for public engagement in a variety of formats during each Regional Review.

We also direct the Agencies' attention to our October 2016 comments (incorporated by reference) for full details on the following recommendations:

- The Agencies should adjust the Interagency Operating Procedures to reflect the Agencies' recognition of the need to improve mitigation approaches and outcomes. Updated IOPs should be consistent with applicable law and practice requiring use of the entire mitigation hierarchy (avoid, minimize, offset), evaluating mitigation alternatives and seeking ways to protect other resources and uses to the maximum extent practicable. The Agencies should also incorporate the excellent Design Features from the Solar Programmatic Environmental Impact Statement into the IOPs.

Note that for all our recommendations, when we recommend that the Agencies adjust or delete corridors to address conflicts, we are recommending that the Agencies do so a) in the corridor abstracts; b) in their recommendations in the Regional Reports; and c) through future land use planning.

- I. The Agencies must further improve their methods for considering and addressing environmental concerns in the corridor abstracts and through the Regional Reviews to meet the terms of the Settlement Agreement and ensure that future changes to corridors comply with the Settlement Agreement and other relevant laws and agency policies**

The Settlement Agreement directs the Agencies to conduct Regional Reviews, and to do so in a way that improves WWEC through future revision, deletion, or addition to the system. As stated in the Settlement Agreement, “The objectives of these settlement provisions are to ensure that future revision, deletion, or addition to the system of corridors designated pursuant to section 368 of EAct consider the following general principles: location of corridors in favorable landscapes, facilitation of renewable energy projects where feasible, avoidance of environmentally sensitive areas to the *maximum* extent practicable, diminution of the proliferation of dispersed rights-of-way (“ROWS”) crossing the landscape, and improvement of the long-term benefits of reliable and safe energy transmission.” Settlement Agreement at II A (emphasis added).

Likewise, the Settlement Agreement establishes four siting principles, which includes that “Section 368 corridors are thoughtfully sited to provide maximum utility and *minimum impact to the environment.*” Settlement Agreement at II A.1.c (emphasis added).

While the Agencies have significantly improved their approach to addressing environmental concerns, they must further improve their approach to meet the terms of the Settlement Agreement. Doing so is also crucial to help ensure that future changes to corridors comply with the Settlement Agreement, FLPMA, NEPA and Section 368 of EAct. We also note that while the Settlement Agreement highlights specific issues of concern for the Corridors of Concern, it requires the Agencies to address environmental and other issues for *all* of the corridors.

- a. The Agencies should maintain the improvements they have made to methods for addressing environmental concerns in the corridor abstracts and through the Regional Reviews (while making additional improvements going forward)**

We acknowledge and appreciate that the Agencies have moved away from the binary “this is a constraint/this is not a constraint” approach used in the Region 1 corridor abstracts. As detailed in our October 2016 comments, this approach was highly problematic because it did not allow for *any* environmental concerns to qualify as “constraints” and thus to receive recommendations for improvements, which did not meet the terms of the Settlement Agreement.

The approach used in the Regions 4, 5 and 6 corridor abstracts is a major improvement because it describes a variety of considerations in the column labeled “Potential Resolutions Based on Siting Principle Analysis.” According to the Agencies’ webpage describing the Regions 4, 5 and 6 corridor abstracts, the intent of the analysis in this column is to:

- Confirm the existing corridor best meets the siting principles (e.g., the corridor is located in the best place given the siting principles - maximum utility, minimum environmental impact);
- Identify opportunities to improve corridor placement or interagency operating procedures (IOPs) (e.g., shift a corridor segment, widen or narrow the corridor, remove a corridor, or add a new corridor elsewhere) or to add new or revise existing IOPs; or
- Identify opportunities to resolve potential conflicts through future changes to land use plans.¹

With regards to wilderness-quality lands, ACECs and other sensitive resources and values, there are numerous cases in the Regions 4, 5 and 6 corridor abstracts where the Agency Review and Analysis acknowledges that there are resource conflict issues. There are also several cases where the Potential Resolutions Based on Siting Principle Analysis identifies opportunities to address those issues. As detailed below, the Agencies must further improve their approach to ensure that these resource conflicts are consistently and appropriately addressed, and that the basis for any conclusion that impacts are unavoidable is clearly documented and justified by showing, at minimum, that less environmentally harmful alternatives routes or route modifications are infeasible.

b. The Agencies must further improve their methods for addressing environmental concerns in the corridor abstracts and through the Regional Reviews

As detailed in Section III of these comments, the Agencies must acknowledge and address intersections with wilderness-quality lands and other sensitive resources and values. Although the Regions 4, 5 and 6 corridor abstracts do have significant improvements (including acknowledging some environmental resource conflicts and identifying some opportunities to address them), they are still quite inconsistent in how intersections with wilderness-quality lands are addressed, and in many cases the way the intersections are addressed is inadequate to address the resource conflicts that are present. The Agencies must also address *all* intersections with wilderness-quality lands; as detailed in Section III, there are many more intersections with wilderness-quality lands than are currently reflected in the corridor abstracts.

While many corridors follow existing transmission lines and pipelines and we generally support co-location to reduce impacts from additional linear infrastructure development, the Agencies must still address impacts to sensitive resources and values from co-located corridors. In addition, there are circumstances where additional infrastructure development is not appropriate despite the presence of existing transmission lines or pipelines. However, the Agencies should place the highest priority on addressing impacts from corridors that are not co-located with existing transmission lines and pipelines because of the increased level of impacts that projects in undeveloped landscapes cause.²

¹ Available at: <http://corridoreis.anl.gov/regional-reviews/regions-4-5-6/>

² There is at least one exception to this overarching principle and that is corridor 18-23 which runs through western Nevada and the Eastern Sierra region of California. The combination of sensitive resources within this corridor, including extensive habitat for the Bi-state sage grouse (a candidate for the federal threatened/endangered species list), wilderness and related lands with special designations (e.g., WSA, inventoried roadless areas, National Conservation Lands, National Scenic Area, etc.), and the Owens Valley with its abundance of sensitive visual, biological and archaeological/cultural resources make a strong case for deleting this corridor in its entirety. In its abstract BLM notes that the Owens Valley is “a highly scenic area of national significance. The Owens Valley and Owens River contain habitat for a range of sensitive, threatened, endangered and endemic species, including many avian species.” See 18-23 abstract at p. 16. This corridor also intersects biologically sensitive lands encompassed by the northern edge of the DRECP planning area.

i. The current approach for addressing intersections with wilderness-quality lands is inconsistent and inadequate

Although wilderness-quality lands are identified and managed by the Agencies in different ways (including inventoried and managed Lands with Wilderness Characteristics on BLM lands and Inventoried Roadless Areas, Colorado Roadless Areas and potential wilderness areas on FS lands), they are all inappropriate for infrastructure development (as detailed in Section III) and should be excluded from the WWEC. Intersections between WWEC and BLM LWC in Regions 4, 5 and 6 are shown in Attachment 1. Citizen-inventoried wilderness-quality lands and citizen wilderness proposals are also inappropriate for infrastructure development and should be excluded from the WWEC. **For this reason, the Agencies should use a consistent approach to addressing intersections with wilderness-quality lands that commits to avoiding intersections, identifies a path to making needed revisions to corridors and requires the use of mitigation measures where unavoidable impacts occur.**

The Regions 4, 5 and 6 corridor abstracts currently contain a variety of different approaches to addressing intersections with wilderness-quality lands. While some include helpful information on possible adjustments to avoid intersections, **none of them includes all the necessary elements to ensure wilderness characteristics are safeguarded.**

The abstracts contain the following types of language regarding LWC:

1. General language regarding LWC:

Most corridor abstracts that mention LWC include the following general language: “Lands with undetermined status for wilderness characteristics intersect and are adjacent to the corridor.” It is unclear what BLM means by “undetermined status,” and BLM should clarify this. We recommend that BLM characterize BLM-inventoried LWC as: “inventoried LWC, managed for protection,” “inventoried LWC, not managed for protection,” or “inventoried LWC, management direction pending.” The Agencies should update the corridor abstracts to include this information.

Some corridor abstracts contain the following language, “The BLM’s current inventory findings will be used in land use planning analyses related to the revision, deletion, or addition to the energy corridors. At such time that citizen’s inventory information is formally submitted, the BLM will compare its official Agency inventory information with the submitted materials, determine if the conclusion reached in previous BLM inventories remains valid, and update findings regarding the lands ability to qualify as wilderness in character.” Corridor abstract 7-24 p. 9. We appreciate BLM acknowledging its responsibility to revise inventories and review citizen information.

Most corridor abstracts also include the following general language regarding LWC: “The BLM retains broad discretion regarding the multiple use management of lands possessing wilderness characteristics without Wilderness or WSA designations. Agencies could consider a new IOP to assist with avoiding and/or minimizing impacts of developing energy infrastructure on lands with wilderness characteristics.” In other cases, the abstracts state, “Agencies could consider an IOP to provide guidance on the review process for applications within corridors with incomplete inventories. The potential IOP would assist with avoiding, minimizing, and/or mitigating impacts on lands with wilderness characteristics.” Corridor abstract 7.24 p. 9. We appreciate the

Agencies noting the possibility of creation of a new IOP to assist with avoiding and/or minimizing impacts to LWC. The Agencies should refine these approaches and create a new IOP to address wilderness-quality lands, consistent with the new IOP we recommended, which is described in Attachment 2.

2. States that the corridor location appears to best meet the siting principles and/or states that the corridor cannot be adjusted to avoid LWC:

Some corridor abstracts include statements such as, “The corridor location appears to best meet siting principles. The corridor is collocated with transmission lines for its entire length. In general, the corridor cannot be shifted to avoid the potential lands with wilderness characteristics because those lands are located along both sides of the corridor or include all federal lands in close proximity to the corridor.” Corridor abstract 7-11 p. 6. We appreciate the Agencies including details describing why adjusting corridors would be challenging. We also generally support co-location with existing infrastructure whenever possible, although there are some locations where additional infrastructure development is not appropriate even though there is existing development. The Agencies should ensure that if impacts cannot be avoided, they are addressed with mitigation, and we also encourage the Agencies to follow our recommendations on LWC intersections detailed below.

3. Identifies opportunities to adjust corridors to eliminate intersections:

Some corridor abstracts include potential adjustments to avoid LWC. For example, the corridor abstract for 79-216 states, “The corridor could be rerouted to the east to follow existing infrastructure and avoid the potential lands with wilderness characteristics.” Corridor abstract 79-216 p. 6. We appreciate the Agencies noting these opportunities to adjust corridors to avoid LWC, but the Agencies must improve on this, as detailed below.

The abstracts contain the following types of language regarding U.S. Forest Service Roadless Areas:

“The Roadless Area Conservation Rule (2001) prohibits road construction, reconstruction, and timber harvest in inventoried roadless areas.” Corridor abstract 218-240 p. 6.

“In this area the corridor is designated underground only. The Roadless area encompasses a broad area both north and south of the corridor that likely cannot be avoided. The corridor is collocated with existing pipelines. Because management prescriptions prevent new roads in roadless areas, it is possible that the opportunity to expand or shift the corridor would be more limited. Agencies could consider a coordination IOP related to Roadless Areas to help minimize conflicts with the Roadless Rule.” Corridor abstract 218-240 p. 6.

“Generally, inventoried roadless areas do not contain structures such as electrical transmission corridors.” Corridor abstract 229-254 p. 8.

“It appears that the Roadless Area could be avoided by shifting the corridor to USFS lands to the southwest, such that the northeast boundary of the corridor was at the existing transmission line.” Corridor abstract 229-254 p. 8.

We appreciate the Agencies finding opportunities to adjust corridors to avoid Roadless Areas, describing why adjusting corridors would be challenging in certain situations, and offering mitigation measures to reduce impacts on roadless character. We request that the Agencies continue to work towards finding opportunities to adjust corridors where intersections with Roadless Areas remain.

ii. The Agencies must use a consistent approach that makes clear commitments to addressing intersections with wilderness-quality lands *and* provides details on opportunities to do so through corridor revisions

To meet the terms of the Settlement Agreement, the Agencies must use an approach that includes: 1) making a clear commitment to addressing any intersections with wilderness-quality lands by revising corridors to eliminate the intersections; and 2) providing details on opportunities to do so through corridor revisions whenever possible. There may be some situations where the Agencies do not yet have enough information to provide details on possible corridor revisions; if that is the case, the Agencies should commit to developing that information through the Regional Review process and ultimately including recommendations for revisions in the Regional Review Report.

In some rare instances it may not be possible to revise corridors to eliminate intersections with wilderness-quality lands. In these cases, the Agencies should commit to adding Interagency Operating Procedures that would require mitigation to minimize and offset unavoidable impacts.

The Agencies must carry these commitments through the entire Regional Review process and include them in their recommendations for corridor revisions in the Regional Review Report.

iii. The Agencies must use a consistent approach that makes clear commitments to addressing intersections with ACECs and other special designations and key wildlands and wildlife habitat *and* provides details on opportunities to do so through corridor revisions

The corridor abstracts also include inconsistent approaches to addressing intersections with ACECs and other special designations and key wildlands and wildlife habitat. To meet the terms of the Settlement Agreement, the Agencies must use an approach that includes: 1) making a clear commitment to addressing any intersections with ACECs, other special designations and key wildlands and wildlife habitat by revising corridors to eliminate the intersections; and 2) providing details on opportunities to do so through corridor revisions whenever possible. There may be some situations where the Agencies do not yet have enough information to provide details on possible corridor revisions; if that is the case, the Agencies should commit to developing that information through the Regional Review process and ultimately including recommendations for revisions in the Regional Review Report.

In some rare instances it may not be possible to revise corridors to eliminate intersections with ACECs, other special designations and key wildlands and wildlife habitat. In these cases, the Agencies should commit to adding Interagency Operating Procedures that would require mitigation to minimize and offset unavoidable impacts.

We have included an analysis of the intersections of corridors with ACECs as Attachment 3.

II. The Agencies should adjust or delete corridors to eliminate intersections with protected lands and key wildlands and wildlife habitat.

a. The Agencies must adjust or delete corridors to eliminate intersections with Wilderness Areas and Wilderness Study Areas.

Several corridors currently intersect with protected lands such as designated Wilderness Areas and Wilderness Study Areas where infrastructure development is prohibited by law. See Attachments 4 and 5 for details. The Agencies must eliminate these intersections by adjusting or deleting these corridors. *See*, Manual 6340 – Management of Designated Wilderness Areas, including Section 1.6.C.16.b (new rights of way are prohibited in Wilderness Areas); Manual 6330—Management of BLM Wilderness Study Areas, including Section 1.6.D.4.ii (new rights of way are prohibited in Wilderness Study Areas unless they can meet the non-impairment standard).

b. The Agencies should revise the Conflicts Assessment Table and associated mapping by appropriately including several additional resources and designations as “High Potential Conflict Areas;” the Agencies should adjust or delete corridors to eliminate intersections with these resources and designations.

We appreciate the Agencies developing a resource conflict assessment and associated mapping (included in the Mapping Tool and corridor abstracts) to help identify the corridors’ proximity to environmentally sensitive areas.³ The Agencies’ Conflict Assessment Criteria Table currently classifies the following resources and designations as “High Potential Conflict Areas”:

- Lands designated by Congress, the President, or the Secretary for the protection of sensitive viewsheds, resources, and values (e.g., units of the National Park System, Fish and Wildlife Service Refuge System, some National Forest System units, and the BLM National Landscape Conservation System), which could be adversely affected by development
 - Units of the National Park System
 - Units of the Fish and Wildlife Refuge System
 - National Monuments
 - Wilderness Areas
 - Wilderness Study Areas
 - National Conservation Areas (except CDNCA)
 - Other Lands in the NLCS
 - EPA Class I Air Quality Areas
 - DRECP California Desert National Conservation Lands
 - DRECP National Scenic Cooperative Management Areas
 - USFS Roadless Areas
 - National Historic Trails
 - National Scenic Trails
 - National Recreation Trails*

³ See the Agencies’ table and description at: http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf

- Wild and Scenic Rivers and Recreational Rivers and river segments deemed suitable for Wild and Scenic River status, if project development could have significant adverse effects on sensitive viewsheds, resources, and values
 - Wild and Scenic Rivers
 - Recreational Rivers*
 - River segments deemed suitable for Wild and Scenic River status*
- Designated critical habitat for federally threatened or endangered species, if project development could result in the destruction or adverse modification of that critical habitat
 - Critical Habitat Areas
 - Critical Habitat Lines
- Lands designated as Visual Resource Management Class I or Class II
 - Visual Resource Management Class I
 - Visual Resource Management Class II
- ROW exclusion areas
 - No explicit linear ROW exclusions areas were available. ROW exclusion information is derived from other land-use management prescriptions identified in land use plan allocations or other designation (e.g., Wilderness).
- Lands designated as no surface occupancy for oil and gas development in BLM land use plans
 - No Surface Occupancy
- * = No data are currently available for inclusion in the graphical display

In addition to the existing High Potential Conflict Areas, the Agencies should also include the following resources and designations as High Potential Conflict Areas (note that some of these areas are currently listed as “Medium Potential Conflict Areas”). **Further, the Agencies should adjust or delete corridors to eliminate intersections with the existing High Potential Conflict Areas and these additional High Potential Conflict Areas. Note that for all our recommendations, when we recommend that the Agencies adjust or delete corridors to address conflicts, we are recommending that the Agencies do so a) in the corridor abstracts; b) in their recommendations in the Regional Reports; and c) through future land use planning.**

1. All areas that have been proposed for conservation designation in pending legislation;
2. Areas of Critical Environmental Concern (ACECs);
3. Threatened, endangered and sensitive species habitat;
4. Other critical cores and linkages for wildlife habitat, such as that identified by state wildlife Agencies through State Comprehensive Wildlife Conservation Strategies;⁴
5. BLM Citizen Proposed Wilderness Areas;
6. Other lands with wilderness characteristics identified or inventoried by the land management Agencies or the public;
7. Forest Service Recommended Wilderness Areas and Wilderness Study Areas;
8. Designated conservation areas (administrative) including, but not limited to, Special Interest Areas and Research Natural Areas;

⁴For example, the Arizona Game and Fish Department has identified the Kaibab-Paunsagunt wildlife corridor as a critical linkage for migrating mule deer between southern Utah and northern Arizona’s Kaibab Plateau. See: Carrel, William K., Richard A. Ockenfels, and Raymond E. Schweinsburg. 1999. An Evaluation of Annual Migration Patterns of the Paunsagunt Mule Deer Herd Between Utah and Arizona. Arizona Game and Fish Department Technical Report 29. Phoenix. 44 pages

9. Potential wilderness area pursuant to Forest Service Handbook 1909.12, Ch. 70, § Ch. 71;
10. Forest Service Citizen Proposed Wilderness Areas;
11. Areas with high scenic integrity in land management plans;
12. Forest Service Primitive and Semi-Primitive Non-Motorized areas as identified in the Recreation Opportunity Spectrum;
13. Identified and managed wildlife corridors;
14. Greater sage-grouse priority habitat management areas;
15. Sagebrush Focal Areas;
16. National Wild, Scenic, and Recreational study rivers and segments, and eligible rivers and segments

Intersections between WWEC and National Monuments are shown in Attachment 6; intersections between WWEC and National Conservation Areas are shown in Attachment 7.

III. The Agencies must acknowledge and address intersections with wilderness-quality lands

a. BLM wilderness-quality lands

i. Wilderness-quality lands are inappropriate for transmission and other energy infrastructure.

Wilderness-quality lands managed by BLM, which include BLM-inventoried lands with wilderness characteristics, citizen-inventoried lands with wilderness characteristics and citizen wilderness proposals, are a valuable public lands resource that is irreparably damaged or destroyed by transmission lines and pipelines. Wilderness resources on our public lands are finite and they contribute critically to the agency's ability to meet its multiple use and sustained yield mandate, so BLM should not designate WWEC in any wilderness-quality lands. Further, BLM should adjustment or delete the WWEC to eliminate any intersections between the existing WWEC and wilderness-quality lands.

FLPMA requires BLM to inventory and consider lands with wilderness characteristics on the public lands. 43 U.S.C. § 1711(a); *see also Ore. Natural Desert Ass'n v. BLM*, 625 F.3d 1092, 1122 (9th Cir. 2008). BLM is obligated to address wilderness resources during land use planning and project-level NEPA, and therefore this review process must give special consideration to wilderness-quality lands. FLPMA also recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" and provides for BLM to exclude or limit certain uses of the public lands. *See*, 43 U.S.C. § 1712(e). Excluding energy corridors from wilderness-quality public lands is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness character and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(c).

Furthermore, there is a wide range of values associated with lands with wilderness characteristics that supplement and benefit other resources that FLPMA requires the agency to manage. These include scenic resources, outdoor recreation, wildlife habitat, and cultural resources. *See* 43 U.S.C. § 1711(a); 43 U.S.C. § 1702(c). These multiple resources and uses of public lands are found in wilderness-quality lands – in fact, many are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife

habitat). Therefore, excluding energy infrastructure from wilderness-quality lands allows BLM to better manage many resources the agency must steward under FLPMA.

It is imperative that BLM exclude energy corridors from all wilderness-quality lands, including BLM-inventoried lands with wilderness characteristics. Protecting lands with wilderness characteristics benefits many other resources and uses that BLM is charged with stewarding and helps the agency achieve its multiple use and sustained yield mandate. Lands with wilderness characteristics enable the agency to provide for multiple uses such as primitive recreation, wildlife habitat and connectivity, scenic values and other resources it is charged with stewarding under FLPMA.

BLM should also exclude energy corridors from citizen-inventoried lands with wilderness characteristics and citizen wilderness proposals. Citizen-inventoried lands with wilderness characteristics and wilderness proposals are areas that are highly valued by communities on a state and local level. These places have constituencies advocating for their protection and therefore transmission or pipeline development within them would be highly controversial and an inappropriate use of public resources. Citizen wilderness proposals often have proposed legislation associated with them and have been heavily vetted and found to be extraordinarily and comparatively high value wildlands. Additionally, BLM is required to respond to citizen-inventoried lands with wilderness characteristics, and so the agency has an obligation regarding those lands and they cannot be simply ignored.

ii. The Agencies must update the Energy Corridor Abstracts to acknowledge all corridors that conflict with wilderness-quality lands.

We appreciate that BLM acknowledges conflicts with some wilderness-quality lands in the corridor abstracts for Regions 4, 5, and 6, as discussed above. However, the corridor abstracts do not include many of the intersections. Attached to these comments is a spreadsheet detailing the specific corridors and mileage posts that intersect BLM-inventoried lands with wilderness characteristics (Attachment 1). The Agencies should update the corridor abstracts to include this information and ensure the agency is accurately describing conflicts with wilderness resources on public lands.

Additionally, BLM currently has ongoing inventory efforts underway in some of the field offices in Regions 4, 5 and 6 such as the Winnemucca, Battle Mountain and Carson City Districts in Nevada.⁵ The Agencies should ensure that the corridor abstracts indicate that inventory work is ongoing in these and other similar circumstances. This will better inform stakeholders and developers when considering potential resource conflicts at the time of development.

iii. The Agencies must commit to addressing conflict in all corridors that intersect wilderness-quality lands.

As stated previously in these comments, the Agencies must include actual commitments to addressing conflicts with wilderness resources wherever those conflicts exist; simply stating the conflict is inadequate. The Agencies

⁵ BLM should also consider doing a statewide planning effort to improve the corridors in Nevada because of the significant new information the agency is developing with its LWC inventories and the importance of the state for renewable energy and transmission development.

should use an approach that includes: 1) making a clear commitment to addressing any intersections with wilderness-quality lands by revising corridors to eliminate the intersections; and 2) providing details on opportunities to do so through corridor revisions whenever possible. Where the Agencies have enough information to put forward alternative routes that would eliminate conflicts with wilderness resources, the agency should do so in the corridor abstracts. Where this information is lacking, the corridor abstracts should commit that the Agencies will determine alternatives to eliminate the conflict at the next land use planning opportunity.

We have identified several locations in Regions 4, 5 and 6 where there appears to be an opportunity to shift corridors away from the wilderness-quality lands and onto other BLM or USFS lands where impacts from transmission line or pipeline development would be lower, shown in Attachment 8. The Agencies should analyze potential impacts to other resources and values when considering possible corridor shifts and should make decisions that appropriately balance impacts to different resources and values. The Agencies should include details on opportunities for corridor shifts to avoid wilderness-quality lands in the Corridor Abstracts, and the Agencies should shift corridors where appropriate.

iv. Inventoried lands with wilderness characteristics lacking management decisions

The Agencies should note in the corridor abstracts areas which the agency has inventoried and found to have wilderness characteristics but have not undergone land use planning. These areas merit special consideration in future RMP revisions and amendments to adjust or delete corridors if management decisions are made to protect wilderness characteristics.

v. Addressing unavoidable impacts to BLM wilderness-quality lands

We expect the Agencies to resolve all conflicts with BLM wilderness-quality lands. If impacts to wilderness-quality lands can't be avoided through changes to corridor designations, the Agencies must commit to mitigation in the Interagency Operating Procedures to minimize and offset unavoidable impacts. BLM is subject to a broad range of authorities supporting mitigation measures to minimize and offset unavoidable impacts. FLPMA requires the BLM to manage for multiple use and sustained yield, and to avoid unnecessary or undue degradation of resources and values.⁶ NEPA and associated Council on Environmental Quality (CEQ) regulations require the BLM to analyze potential impacts and consider ways to avoid, minimize and mitigate impacts,⁷ and the government has recognized previously that such analysis should comport with the mitigation hierarchy. The mitigation hierarchy aims to achieve the maximum benefit to the impacted resource. First and foremost, BLM must seek to avoid impacts by eliminating energy corridors from wilderness-quality lands as discussed throughout these comments. The next steps in the hierarchy are to minimize impacts (e.g., through project modifications, permit conditions, interim and final reclamation, etc.); and, generally, only if those approaches are insufficient to fully mitigate the impacts, will the BLM seek to require compensation for some or all of the remaining impacts (i.e., residual effects). The Interagency Operating Procedures should follow the mitigation hierarchy for impacts to lands with wilderness characteristics, including unavoidable impacts.

b. U.S. Forest Service Roadless Areas and wilderness-quality lands

⁶ See 43 C.F.R. §§ 1701, 1732(b).

⁷ 40 C.F.R. §§ 1508.8, 1502.14, 1502.16.

i. Avoid development of transmission and other energy infrastructure in USFS Roadless Areas and wilderness-quality lands.

U.S. Forest Service (USFS) Roadless Areas⁸ and wilderness-quality lands, which include USFS recommended wilderness areas and wilderness inventory lands where the USFS is currently revising a land management plan, are a valuable public lands resource that are irreparably damaged or destroyed by transmission lines and pipelines. Roadless characteristics and wilderness resources on our public lands are finite, and they contribute critically to the agency's ability to meet its multiple use mandate. To protect these resources, the Agencies must avoid designating WWEC in any recommended wilderness area. Where intersections exist with recommended wilderness areas, the Agencies must recommend adjustments to the corridors through the Regional Reviews to eliminate any intersections. In terms of Roadless Areas and wilderness inventory lands, where possible, the Agencies should avoid designating WWEC that intersect with these areas. The Agencies should recommend adjustments to the WWEC through the Regional Reviews to eliminate any intersections between the existing WWEC and Roadless Areas and wilderness inventory lands.

Inventoried Roadless Areas (IRAs): IRAs refer to those areas identified and mapped in accordance with the Roadless Area Conservation Final Rule (the '2001 Roadless Rule'). Reference 36 Code of Federal Regulations, Part 294 and 66 Federal Register 3244-3272 (Jan. 12, 2001). The 2001 Roadless Rule defines inventoried roadless areas as "Areas identified in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000, which are held at the National headquarters office of the Forest Service, or any subsequent update or revision of those maps." The definition of a roadless area for the 2001 Roadless Rule included: undeveloped areas typically exceeding 5,000 acres that met the minimum criteria for wilderness consideration under the Wilderness Act and that were inventoried during the Forest Service's Roadless Area Review and Evaluation (RARE II) process, subsequent assessments, or forest planning. The rule protects roadless lands by placing them off limits to logging and road construction, with limited exceptions such as logging to reduce the risk to public safety of unnaturally intense fires.

Colorado Roadless Areas (CRAs): CRAs refer to those areas identified and mapped in accordance with the Colorado Roadless Rule, which was adopted in July 2012 and overrides the national 2001 Roadless Rule and standards as applied to national forests in Colorado. The Colorado Roadless Rule added new areas to those identified under the 2001 national rule and removed others. CRAs are divided into two tiers, with upper tier areas receiving elevated management direction above areas in the 2001 roadless areas.

Idaho Roadless Areas (Idaho RAs): Idaho RAs refer to those areas identified and mapped in accordance with the Idaho Roadless Rule (IRR), which was adopted in October 2008. The IRR replaces the national 2001 Roadless Rule and standards as applied to national forests in Idaho. The IRR added new areas to those identified under the 2001 national rule and removed others. The IRR allocates roadless areas into five themes, each with their own management direction for: (1) road construction and reconstruction, 36 C.F.R. § 294.23; (2) timber cutting, sale, and removal, *id.* § 294.24; and (3) mineral activities, *id.* § 294.25. The five themes are Wild Land Recreation; Specific Areas of Historic and Tribal Significance; Primitive; Backcountry Restoration; and General Forest,

⁸ National Inventoried Roadless Areas, Colorado Roadless Areas, and Idaho Roadless Areas are collectively referred to as Roadless Areas.

Rangeland and Grassland. We collectively refer to CRAs, Idaho RAs and national IRAs as Roadless Areas in this letter.

USFS Roadless Areas are heralded for their conservation values. Those values are described at length in the preamble of the 2001 Roadless Rule⁹ and in the Final Environmental Impact Statement for the Rule.¹⁰ They include: high quality or undisturbed soil, water, and air; sources of public drinking water; diverse plant and animal communities; habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land; primitive, semi-primitive non- motorized, and semi-primitive motorized classes of dispersed recreation; reference landscapes; natural appearing landscapes with high scenic quality; traditional cultural properties and sacred sites; and other locally identified unique characteristics (e.g., uncommon geological formations, unique wetland complexes, exceptional hunting and fishing opportunities). While the national, Colorado, and Idaho Roadless Rules do not disallow construction of transmission lines in Roadless Areas, the restrictions on road construction and reconstruction could present challenges. Where possible, the Agencies should avoid developing energy infrastructure in Roadless Areas because of the many conservation values they possess and the regulatory challenges related to limits on road construction and reconstruction.

USFS Wilderness Inventory Areas: As national forests revise their land management plans, Chapter 70 of the USFS Handbook 1909.12 sets out a four-step process for the agency to satisfy its obligation to “[i]dentify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System [NWPS] and determine whether to recommend any such lands for wilderness designation” through a plan revision. 36 C.F.R. § 219.7(c)(2)(v). The agency must: (1) inventory all lands that may be suitable for inclusion in the NWPS; (2) evaluate the wilderness characteristics of each inventoried area using the criteria in section 2(c) of the Wilderness Act of 1964; (3) analyze some or all of the evaluated areas in the applicable NEPA document; and (4) decide which areas to recommend for inclusion in the NWPS. In terms of Step 1 of this process, the absence of roads and other substantially noticeable development is a driving factor in the USFS’s inventory of lands that may be suitable for wilderness. Step 1 of the four-step process culminates with the release of a final USFS wilderness inventory map. We highlight these inventory areas because they indicate where the USFS is currently revising a forest plan and may recommend areas for wilderness in the final plan. While USFS policy does not disallow development of energy corridors in wilderness inventory areas, we recommend that the Agencies avoid designating energy corridors in wilderness inventory areas on those national forests where the USFS is currently revising its forest plan to ensure that a wilderness recommendation is not precluded.

USFS recommended wilderness areas: These are areas that the USFS recommended for wilderness in the applicable forest plan. USFS policy requires that recommended wilderness areas be managed to preserve their wilderness character and potential for congressional designation. The Agencies must avoid the designation of WWEC in recommended wilderness areas.

Roadless characteristics and wilderness values are important resources on our national forests. The Agencies should prioritize maintaining these finite resources where they exist. Where possible, the Agencies should recommend adjustments to the WWEC through the Regional Reviews to eliminate intersections between the

⁹ 66 Fed. Reg. at 3245-47.

¹⁰ Final Environmental Impact Statement, Vol. 1, 3-3 to 3-7, available at <http://www.fs.usda.gov/roaddocument/roadless/2001roadlessrule/finalruledocuments>.

existing WWEC and Roadless Areas and wilderness inventoried lands. Where intersections exist with recommended wilderness areas, the Agencies must recommend adjustments to the corridors through the Regional Reviews to eliminate any intersections.

ii. The Agencies must update Energy Corridor Abstracts to acknowledge all corridors that conflict with USFS Roadless Areas and wilderness quality lands

Attached you will find a spreadsheet with specific corridors and mile posts that intersect with USFS Roadless Areas in Regions 4, 5 and 6 (Attachment 9). For all intersections with Roadless Areas, the Agencies abstracts acknowledge the conflict in the corridor abstracts, which we appreciate. Attachment 10 includes intersections with USFS recommended wilderness areas. The Agencies must update the corridor abstracts to acknowledge conflicts with USFS recommended wilderness areas.

iii. The Agencies must commit to addressing conflict in all corridors that intersect with USFS Roadless Areas and wilderness quality lands and provide details on opportunities to do so through corridor revisions

The Agencies must commit to addressing conflict in corridors with Roadless Areas and wilderness quality lands through corridor revisions. We support the inclusion of statements that address the need to resolve the conflict with Roadless Areas, and request that the Agencies resolve the conflict by realigning the corridor or reducing the corridor width to avoid the Roadless Area. In addition to Roadless Areas, we request that the Agencies also include statements that address conflict with USFS potential wilderness areas. Lastly, we recommend that the abstract go one step further and identify potential revisions to the corridor to resolve the conflict with Roadless Areas and potential wilderness areas.

iv. The Agencies should note in the final reports areas which have been inventoried and found to have wilderness characteristics but have not completed land use planning

For those forest that are currently undergoing a forest plan revision, we request that the Agencies note in the final reports those areas that are identified in a Chapter 70 wilderness inventory.

v. Addressing unavoidable impacts to USFS wilderness-quality lands

We expect the Agencies to resolve all conflicts with USFS wilderness-quality lands and Roadless Areas. If conflicts can't be avoided through changes to corridor designations, we request that the USFS commit to mitigation in the Interagency Operating Procedures to minimize and offset unavoidable impacts. The USFS is subject to a broad range of authorities supporting mitigation measures to minimize and offset unavoidable impacts. NEPA and associated Council on Environmental Quality (CEQ) regulations require the USFS to analyze potential impacts and consider ways to avoid, minimize and mitigate impacts,¹¹ and such analysis should be in accordance with the mitigation hierarchy. The mitigation hierarchy aims to achieve the maximum benefit to the impacted resource. First and foremost, the USFS must seek to avoid impacts by eliminating energy corridors from wilderness-quality lands as discussed throughout these comments. The next steps in the hierarchy are to minimize impacts (e.g., through project modifications, permit conditions, interim and final reclamation, etc.);

¹¹ 40 C.F.R. §§ 1508.8, 1502.14, 1502.16.

and, generally, only if those approaches are insufficient to fully mitigate the impacts, will the USFS seek to require compensation for some or all of the remaining impacts (i.e., residual effects). The Interagency Operating Procedures should follow the mitigation hierarchy for impacts to USFS Roadless Areas and wilderness-quality lands, including unavoidable impacts.

IV. The Agencies must better address corridor intersections with greater sage-grouse habitat.

As recently as 2010, the U.S. Fish and Wildlife Service (USFWS) found the greater sage-grouse warranted listing under the Endangered Species Act. In 2015, the USFWS found the species no longer warranted listing based on state and federal management plans that addressed the primary threats to the species, which specifically include powerlines and infrastructure associated with energy development (See, USFWS FAQ, available at <https://www.fws.gov/greaterSageGrouse/findings.php>). Greater sage-grouse habitat is managed under a series of amendments to existing BLM and Forest Service land use plans. An initial set of plans and amendments were completed in 2015. BLM recently issued records of decision amending the previous plans for Colorado, Utah, Wyoming, Nevada/California, Oregon and Idaho. The Forest Service is in the process of amending its land use plans as well. Overall, the plans continue to prescribe avoidance of sage-grouse habitat for construction of transmission lines and granting rights-of-way. However, since the Agencies are involved in analyzing the appropriate *preferred* locations for energy corridors, they should be taking a more proactive approach than mere avoidance to support conservation of the greater sage-grouse and the USFWS's finding that listing is no longer warranted. This should be evident in the current Region 4, 5, and 6 Regional Assessment, but there appear to be many gaps, as discussed next.

- a. The current approach to addressing impacts to sage-grouse habitat in the corridor abstracts is inadequate and inappropriate. The Corridor Abstracts show that many of the corridors would intersect Greater sage-grouse General Habitat Management Areas (GHMA), Priority Habitat Management Areas (PHMA), and Sagebrush Focal Areas (SFA), as well as other designated habitats.**

Many of the Energy Corridor Abstracts show that there are intersections with important sage-grouse habitats. The Agencies should use a consistent approach to addressing intersections with sage-grouse habitats that commits to avoiding intersections, identifies a path to making needed revisions to corridors, and requires the use of mitigation measures where unavoidable impacts occur.

These are crucial habitats where development must be limited or even prevented, so the corridors should be rerouted to avoid these areas to the extent possible. In many of the abstracts the Agencies claim “[t]he location appears to best meet the siting principles” or “ROW avoidance areas are not compatible with the corridor’s purpose as a preferred location for infrastructure.” But the Agencies cannot ignore the numerous land use plans that the BLM and Forest Service have adopted for the protection of the sage-grouse—the provisions in those Resource Management Plans and Forest Service Land Use Plans must be honored.¹² The best way for the

¹² As noted above, the BLM has just issued six records of decision, which affects numerous land use plans, but still requires avoidance of rights-of-way in sage-grouse habitat management areas. The plans for Montana and North and South Dakota were not amended. <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=90121&dctmId=0b0003e880fb63b3>

Agencies to ensure that ROWs are avoided is by adjusting or deleting WWECs that overlap with these designated habitat areas and not designating new WWEC that overlap. In addition, where corridors cannot be rerouted, the Agencies must incorporate the protective management prescriptions in the plans, including a commitment to avoid ROWs. Further, the Agencies must abide by the requirement in the BLM and Forest Service plans to limit disturbance in habitats to no more than 3 percent of the habitat in Oregon, Idaho, and Nevada and 5 percent in Wyoming and Montana, and they must meet the no surface occupancy limitation in the plans for PHMA and SFA. As also recognized in the Corridor Abstracts for some corridors (*see, e.g.,* corridor 50-203), the Agencies must avoid sage-grouse breeding areas (leks) and areas where the hard and soft trigger adaptive management provisions have been triggered.

In many of these corridors the Agencies claim to be meeting sage-grouse plan requirements by providing for colocation of these corridors with other existing corridors. This is an important means of reducing impacts and we encourage the Agencies to maintain these provisions and expand them where possible to other corridors. However, the abstracts recognize that many of the corridors could be moved or shifted to avoid GHMA, PHMA, or SFA, and this should be done where ever possible. Examples of where this would be possible includes corridors 7-11, 11-103, 218-240, 79-216, all of which recognize corridor movement could be possible to avoid PHMA, GHMA, or SFA. In an attempt to avoid moving corridors out of sage-grouse habitats, the Agencies repeatedly state in the Corridor Abstracts that “[t]he [GHMA, PHMA, or SFA area] encompasses a broad area surrounding the corridor that cannot be avoided.” This statement needs to be reconsidered and the Agencies must seek to move these corridors out of sage-grouse habitats wherever possible. This is needed if the Fish and Wildlife Service’s decision that the sage-grouse does not warrant listing under the Endangered Species Act is going to be maintained.

In some of the Corridor Abstracts the Agencies mention that Required Design Features could be used to protect sage-grouse habitat. We encourage the Agencies to maintain and expand these provisions. In addition, the Agencies should consider developing Interagency Operating Procedures for any development that might occur in sage-grouse habitat.

V. The Agencies must better address impacts to National Park Service lands

The Agencies must significantly improve their approach to addressing impacts to NPS lands. They should use a more thorough and consistent approach that includes close coordination with the NPS and commits to avoiding intersections, identifies a path to making needed revisions to corridors where there are direct and indirect impacts on park resources and the experiences of visitors, and requires the use of mitigation measures where unavoidable impacts occur.

VI. The Agencies should adjust or delete corridors to address specific conflicts.

In addition to following our recommendations for general categories of lands that should be excluded from corridors, the Agencies should adjust or delete the following corridors to address these specific conflicts.

Note that for all our recommendations, when we recommend that the Agencies adjust or delete corridors to address conflicts, we are recommending that the Agencies do so a) in the corridor abstracts; b) in their recommendations in the Regional Reports; and c) through future land use planning.

California

Corridor 18-23: Corridor 18-23 traverses in a north-south direction through western Nevada, northern Mono County and the Owens Valley in Inyo County, and then into Kern County. We have previously objected to this corridor being designated as the extensive region this corridor traverses contains numerous sensitive resources; as a result of our concerns this corridor was identified as a Corridor of Concern in the Settlement Agreement. Again, **we strongly urge that the Agencies delete this corridor.**

While portions of this corridor already exist (and it currently hosts the Pacific DC intertie in Mono County and several additional transmission lines in Inyo County), *it is the possibility of new powerlines, pipelines and other transmission infrastructure, including associated energy and facilities development, that is of concern.* The iconic scenic landscapes, world class tourism and fragile biological, cultural and recreational resources between mile posts 66 and 240 in the California section of this corridor (as well as potential impacts to lands in much of the 18-23 corridor alignment in Nevada) render it particularly problematic for future transmission and related infrastructure.

Key resources of concern in corridor 18-23 include the following:

Bi-State Sage Grouse. Corridor 18-23 crosses public lands, particularly in Mono County and in western Nevada, that contain extensive habitat for the Bi-State Distinct Population Segment (DPS) of Greater sage-grouse (aka Bi-state sage grouse, BSSG). Due to an August 24, 2018 court ruling vacating the Service's 2015 withdrawal of 2013 proposal to list and designate critical habitat for the BSSG under the ESA (Desert Survivors v. U.S. Dept of Interior, 321 F. Supp. 3d 1011 (N.D. Cal. 2018)), the Service is initiating a new status review of the BSSG which will entail updating its assessment of the status of and threats to the BSSG, as well as ongoing and anticipated future conservation actions. The court's ruling reinstated the October 28, 2013 proposed rules to list the BSSG with a 4(d) rule and designate critical habitat (78 Fed. Reg. 64,328). The ruling also directs the Service to provide a new opportunity for public comment on these proposed rules, and then subsequently develop a new and final listing determination on the proposed rules. This final listing determination must be published in the Federal Register by October 1, 2019 with an anticipated comment period in the Federal Register this summer. Mono and Inyo counties, along with other counties in Western Nevada that are host to this unique and threatened bird, are working hard to avert a listing. We are deeply concerned about the potential impacts of development of new transmission lines, gas pipelines and associated infrastructure on the Bi-State sage grouse.

The corridor alignment is located within the Mt. Grant (Nevada), Bodie Hills (California) and South Mono (California) PMUs. *Nearly seventy-five miles of this corridor*, from roughly Mileposts 32 through 104 in Nevada and California, are within or very near proposed critical habitat. See more detail in the Milepost sections for corridor 18-23 below and also in the Nevada section.

The BSSG population as a whole has been declining since 2011. While evidence suggests that the Mt. Grant (Nevada) and Bodie Hills (California) Population Management Units (PMUs) are presently stable or increasing,

nearly every other subpopulation is declining. If population demographics were to change in these two PMUs it could have dire consequences for the population as a whole.¹³

Infrastructure is a high priority threat in the Mt. Grant PMU and a moderate threat in the Bodie Hills and South Mono PMUs. Predation (from raptors, ravens, coyotes and other mammals), originally listed as a low priority threat to survival, is currently an increasing problem in the South Mono PMU, possibly negatively affecting population demographics in that critical PMU. **The development of increased infrastructure in any of these areas could further exacerbate risks to the survival of the BSSG.**

In addition to providing perches for predators, linear structures, like transmission lines, fragment habitat and increase potential for direct mortality from infrastructure strikes. Increased human and vehicle traffic associated with development and maintenance of infrastructure increase the potential for direct mortality through vehicle strikes as well.

Wilderness Study Areas. According to the Abstract, the corridor intersects four BLM Wilderness Study Areas on the Volcanic Tablelands that are home to abundant and highly sensitive archaeological and natural resources. These WSAs are the Casa Diablo, Fish Slough, Volcanic Tablelands and Chidago Canyon WSAs. (See Attachment 5.) The alignment on the Volcanic Tablelands is infeasible since infrastructure development is prohibited by law in WSAs. Local Tribes, who co-manage this area with the BLM, should be consulted for input on the corridor alignment in this important region.¹⁴

Fish Slough Area of Critical Environmental Concern. The Abstract for corridor 18-23 indicates that the corridor intersects the Fish Slough Area of Critical Environmental Concern (ACEC) (see Abstract, p.10). Fish Slough is not only highly important habitat for resident and migratory birds, it contains habitat for rare and endemic fish species and other critical habitat and resource values. The area hosts three of only five small remaining populations of the Owens pupfish (*Cyprinodon radiosus*), an Owens Valley endemic that is not only a California Fully Protected species but is also listed as endangered at the state and federal levels.

The Fish Slough ACEC is an extensive system of springs and marshes cooperatively managed by the California Department of Fish and Wildlife, BLM, Los Angeles Department of Water and Power (LADWP), University of California Natural Reserve System, and USFWS. Two sites within Fish Slough, 'BLM Spring' and the Owens Valley Native Fishes Sanctuary, have lost pupfish populations following illegal introductions of largemouth bass. BLM Spring was restored in cooperation with BLM in 2002, and reintroduction of native-dwelling pupfish occurred in 2003. This project included dam reconstruction, fabrication/installation of a new type of fish migration barrier, vegetation control, and exotic fish removal. Two additional populations tenuously persist in marshy areas of Fish Slough. At present, the federally threatened Fish Slough milk-vetch (*Astragalus lentiginosus* var. *piscinensis*) is restricted to the same range as it was at the time of listing, a 10 kilometer (km) (6 mile (mi)) stretch of alkaline flats paralleling Fish Slough. The slough supports the species on fewer than 540 acres (ac) (219 hectares (ha)).¹⁵

Other ACECs & National Conservation Lands. The California section of corridor 18-23 intersects numerous ACECs and National Conservation Land (NCL) units. These include: Fish Slough, Fossil Falls, Rose Valley,

¹³ See <https://pubs.usgs.gov/of/2018/1177/ofr20181177.pdf>

¹⁴ See https://newsmaven.io/indiancountrytoday/archive/tribes-to-partner-with-feds-manage-public-lands-y7h65ZYKckCAKLfab_XaYw/

¹⁵ See <https://www.wildlife.ca.gov/Regions/6/Desert-Fishes/Owens-pupfish> and https://inyo-monowater.org/wp-content/uploads/2011/09/Fish-Slough_Milk-vetch_5yrReview_2009.pdf

Butterbrecht Spring, Sierra Canyons, Olancha Greasewood and Mohave Ground Squirrel ACECs and/or NCL units. These units are managed for a variety of values including biological, cultural and recreational values. For areas within the NLCS, BLM is mandated to “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” 16 U.S.C. § 7202(a). Allowing transmission development within these locations could adversely impact the values for which these areas were designated.

Owens Valley. The corridor passes through the Owens Valley for a length of approximately 75 miles (from approximately Milepost 135 - Milepost 212). This is a highly scenic area of national significance.¹⁶ The Owens Valley and Owens River contain habitat for a range of sensitive, threatened, endangered and endemic species, including many avian species. The Owens Valley also contains abundant cultural resources. Local Tribes should be consulted about the proposed corridor alignment through the Owens Valley and near Owens Lake. See further discussion below.

Recreation and Tourism. The Eastern Sierra region which corridor 18-23 traverses is a national and international tourist destination that provides abundant wildland and non-wildland based recreational opportunities to millions of visitors annually. The region’s lifeblood is its tourism-based industry. There is substantial concern about the impact not only of new powerlines and transmission infrastructure being developed within this scenic wonderland but also that prioritizing this corridor via the Section 368 process would facilitate development of inappropriately-sited renewable energy facilities and related infrastructure in the greater Eastern Sierra region. See, e.g., letters from Mono County (May 27, 2014) and Inyo County (October 8, 2016).

The following are site-specific comments relative to corridor 18-23 Mileposts (MP) in California.

MP 61-66 (NV-CA), 65-70: The corridor is directly within BSSG critical habitat in the Mt. Grant and Bodie Hills PMUs.

MP 66-80: This corridor is adjacent to the USFS Excelsior Roadless Area and intersects the BLM Excelsior WSA and the Excelsior citizens-proposed wilderness area. This area provides habitat connectivity between the northern White Mountains and the eastern wild lands of the Bodie Hills. It represents a wild, untouched chunk of the western Great Basin, containing extensive intermountain basin big sagebrush shrubland and great basin pinyon juniper woodland with isolated ephemeral lakes, unique geologic dune systems, and locally limited but ecologically critical springs and associated riparian systems. This area has wetlands and dry alkali lakes unique to the Inyo National Forest (INF). The INF recently identified the area between MP 66-80 as having high ecological integrity in its wilderness evaluation narratives for Land Management Plan (LMP) revisions. Rare plant species include globe spring parsley, and dune horse brush; USFS sensitive species include William’s combleaf and Long Valley milkvetch. The corridor footprint is within and adjacent to priority Bi-State Sage Grouse habitat. Desert bighorn sheep occasionally use the area traveling from the White Mountains. Although largely un-inventoried, the area is extremely rich in archeological resources. The INF LMP revision is underway with an expected Final Record of Decision by the end of 2019. The agency should incorporate the new LMP in their assessment of the feasibility of this alignment. The LMP identifies Inventoried Roadless Areas as Designated Areas pursuant to the Roadless Area Conservation Rule.

¹⁶ See, e.g., https://en.wikipedia.org/wiki/Owens_Valley

MP 71-77, 81-88, 94-102: The corridor is directly within BSSG critical habitat in the South Mono PMU.

MP 102-104: The corridor is very near to BSSG critical habitat.

MP 96: Existing transmission lines run outside of the Benton Paiute Reservation however the proposed corridor is routed directly through the reservation. MP 96 is under the jurisdiction of BIA and the agency must receive approval from both BIA and the Tribe on the alignment through their property.

MP 110-111, 114-116: The alignment is within the Casa Diablo WSA and it intersects the Chidago Canyon WSA. Infrastructure development is prohibited by law in WSAs. The abstract contains problematic language indicating Congress will release the WSA. This should be deleted or corrected to state that *if* congress acts to release or designate the WSA as wilderness the corridor will be reevaluated.

MP 112-113: This alignment is within the Fish Slough ACEC which is not appropriate for transmission or pipeline development, as described in detail in the section above.

MP 114-115: This alignment is within the Fish Slough WSA. As noted above, infrastructure development is prohibited by law in WSAs.

MP 116: This alignment is within the Volcanic Tablelands WSA. As noted above, infrastructure development is prohibited by law in WSAs. The abstract contains problematic language indicating Congress will release the WSA. This should be deleted or corrected to state that *if* congress acts to release or designate the WSA as wilderness the corridor will be reevaluated.

MP 156-157: This area is designated a state scenic highway that may conflict with future transmission infrastructure.

MP 183-192: This corridor section is within the newly designated Alabama Hills National Scenic Area, signed into law on March 12, 2019. John D. Dingell, Jr. Conservation, Management, and Recreation Act, Pub. Law 116-9 (2019). The law creating the Alabama Hills National Scenic Area requires the agency to minimize harm to the purposes and values of the Scenic Area from any new utility facility rights-of-way which include “nationally significant scenic, cultural, geological, educational, biological, historical, recreational, cinematographic, and scientific resources.” *Id.* at 1402. The law also requires a determination that any new rights-of-way be the “only technical or feasible location, following consideration of alternatives within existing rights-of-way or outside of the Scenic Area.” *Id.* In addition, the law also mandates that the right-of-way be in accordance with NEPA and other applicable laws, which includes the National Landscape Conservation System Act, established to “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” 16 U.S.C. § 7202(a).

The area has significant national history implications from: a) Paiute – Shoshone inhabitation of the area for thousands of years and the culturally sensitive and significant Native American sites, artifacts, and history there; b) the historic gold mines of the Alabama Hills. It was miners in the 1860s that named the area after the CSS Alabama, a Confederate warship; c) The spectacular rock outcroppings - back dropped by the Sierra Nevada mountain crest - became the birthplace of the ‘*American Western*’ film genre, with over 400 Hollywood films made here from “*The Lone Ranger*” and “*Hopalong Cassidy*” serials to “*How the West was Won*” and more recently “*Ironman*” feature length movies. The area has nationally significant scenic features: a) The incredible

jaw-dropping viewscape that is formed by the wind and water erosion of unique 90 million year old granitic boulders and hundreds of natural arches that dominate the area. Hundreds of thousands of visitors annually are drawn to this very unique and visually stunning landscape; b) the scenic beauty has attracted legendary landscape photographers - like Edward Weston, Ansel Adams and David Muench - to the Alabama Hills; and led to hundreds of films, print ads and commercials, that capture this magical landscape for the viewer; c) spectacular spring wildflower blooms, which serve as a colorful contrast to the stark background of the desert and rocks. The abstract must be corrected to include the new designation and future management direction.

MP 194-210: Owens Lake. We object to the characterization of Owens Lake as “medium conflict” as depicted in the Conflict Map Analysis. See corridor abstract, Figure 3, p. 3. It is known that the shoreline and body of Owens Lake is very important to local Tribes, both historically and present day.¹⁷ Owens Lake and the surrounding shoreline should be characterized on the Conflict Map as “high conflict.” Owens Lake has been nominated by the Native American Heritage Commission to the National Register of Historic Places as an Archaeological District, Cultural Landscape and/or Traditional Cultural Property. This designation was proposed in 2017. Our understanding is that people are presently working to complete the paperwork necessary to allow the nomination to proceed.¹⁸

MP 207: This section of corridor is within Sierra Nevada Bighorn Sheep Critical Habitat, and this particular area is a source population for reintroduction efforts to aid in the recovery of the species. The CA Department of Fish and Wildlife and the U.S. Fish and Wildlife Service should be consulted.

MP 212-224, 230-235, 238-240: These corridor locations are within the Mohave Ground Squirrel (MGS) ACEC and California Desert National Conservation Lands identified in the DRECP (2016). The ACEC was established to protect the long-term survival of this species and ensure connectivity for MGS between this ACEC and the large, mostly undeveloped and protected MGS habitat found within the China Lake Naval Air Weapons Station to the east. The goal in establishing this ACEC/NCL is to allow for unimpeded movement of wildlife in this bottleneck area for the species. The corridor is within one of 11 core population centers for the MGS. The corridor is inconsistent with the goals of the ACEC to protect MGS habitat; maintain wildlife habitat connectivity and characteristics of climate refugia and prevent fragmentation; and to retain healthy desert habitat for this and other sensitive species. (See DRECP App. L, west desert and eastern slopes subregion p. 1293.) The corridor is the site of ongoing studies of MGS core populations. We identify other issues below within these MPs.

MP 222-240: This area has been identified by USFWS as a Desert tortoise connectivity area. Furthermore, there have been recent sightings of tortoise in this area by BLM Ridgecrest Field Office staff as animals are moving northward and up in elevation with warmer and drier temperatures across the species’ habitat.

MP 223-225: This alignment is within the Rose Spring ACEC and the Rose Valley National Conservation Lands (NCL). The ACEC was designated for significant prehistoric cultural resource values. At the Rose Spring archaeological site complex, excavations revealed a well stratified subsurface archaeological deposit which was successfully used to date the introduction of bow and arrow technology to Eastern California. The bow-and-arrow event, about 1,500 to 1,000 years ago, changed the patterns of prehistory not only in this region but

¹⁷ See, e.g., <http://nahc.ca.gov/wp-content/uploads/2018/01/Owens-Valley-Investiagtion-Memo.pdf>

¹⁸ See <http://nahc.ca.gov/wp-content/uploads/2017/07/Resolution-%E2%80%93-Support-for-Placing-Owens-Lake-on-the-National-Register-of-Historic-Resources.pdf>

throughout the Great Basin and neighboring southwest (DRECP App A, pg 19-20). The alignment runs along the Pacific migratory bird flyway. Songbirds, shorebirds, and waterfowl pass through Rose Valley on their way to breeding grounds. The flyway has stopover riparian and wetland habitat in the Sierra Nevada canyons and at Little Lake, Owens Lake and Haiwee Reservoir. This area also includes MGS core habitat within the MGS Conservation Area. This is one of only 11 core population centers for the MGS.

MP224-226, 229-240: This alignment is within the Sierra Canyons ACEC and overlapping NCLs, which have important cultural significance and history as well as recreational resources. These canyons provided a critical water source, access points to the hunting grounds of the Sierra Nevada, and routes for trade with people on the other side of the mountains. Multiple sites within this corridor include many large, prehistoric National Register of Historic Places eligible properties in relatively undisturbed contexts and have high densities of obsidian and other types of lithic material. The sites in these canyons have the potential to answer some of the most pressing questions in California archaeology, particularly about trade, human adaptation to changing environments, and culture contact and interaction (DRECP appendix A p. 20). The area provides habitat for numerous special status plant species including Charlotte's phacelia and Latimer's woodland gilia. The area also contains excellent habitat for the federally and state-listed threatened desert tortoise and the East Monache mule deer herd. This is the largest of the three winter ranges and runs for approximately 30 miles along the base of the Sierra Nevada range between Olanca Creek and Five Mile Canyon. About 600-700 deer spend their winters here. Healthy creosote habitat supports a high variety and density of resident bird species such as the Le Conte's thrasher and loggerhead shrikes (DRECP appendix L, west desert and east slope subregion).

MP 234-237: This alignment is within the Fossil Falls ACEC. This ACEC was designated for wildlife values, significant prehistoric and historic cultural values, unique geological formations east of the Sierra Nevada Mountains and west of the Coso Range Volcanic Field. It contains sites associated with the earliest prehistoric Native American occupation in California and is listed on the National Register of Historic Places as the Fossil Falls Archaeological District. In this district cultural research attributes the rock art as a distinctive style termed Coso Representation, associated with local Numic-speaking groups such as the Northern Paiute, Panamint Shoshone, Coso Shoshone, and Kawaiisu. Studies including excavations at the Stahl Site, south of Fossil Falls, have identified cultural components from more than 10,000 years before present. Such significant history draws thousands of visitors each year to Fossil Falls (DRECP App L, Basin and Range subregion). There is also a popular BLM campground located in the vicinity of the corridor.

Other Corridors of Concern in California in Region 5 that the Agencies should address:

101-263: This corridor was identified as a Corridor of Concern in the Settlement Agreement because of conflicts with the following resources: critical habitat; WSR; CA-proposed Wilderness, citizen-proposed Wilderness, USFS Inventoried Roadless Area.

Idaho

Corridor 229-254: Increasing transmission capacity between Montana and Washington is important for achieving the region's clean energy goals. The Bonneville Power Administration had a proposal to increase the capacity of the existing transmission grid by upgrading the existing transmission line in or near corridor 229-254, which would have lower impacts than building a new transmission line. The Agencies, transmission developers and utilities should focus on increasing the capacity of the existing lines in corridor 229-254 before building

additional lines. Note that this corridor is identified as a Corridor of Concern in the Settlement Agreement; the following resources of concern are identified: critical habitat, National Register of Historic Places properties, “suitable” segment under Wild & Scenic Rivers Act. The Agencies should ensure that any future upgrades to existing transmission or new development in this corridor address impacts to these resources through avoidance, minimization and compensatory mitigation.

Corridor 36-228: This corridor crosses the Morley Nelson Snake River Birds of Prey NCA in three locations, from MP 23-32, MP 74-78 and MP 83-89. The portion of the corridor intersecting the NCA follows the approved Gateway West transmission line route from MP 23-32, but not from MP 74-78 and MP 83-89. Because of the conflicts with the NCA, the Agencies should delete this corridor.

Corridor 50-203: This corridor runs through an important linkage area between the Greater Yellowstone Ecosystem and the Central Idaho wilderness complex. This landscape connection must be protected to foster wildlife movement of grizzlies, wolves, wolverines, bighorns and other species between these two large areas. Though this route does follow an existing interstate highway, which poses its own set of problems to wildlife movement, the Agencies should ensure that any further infrastructure work within this corridor includes avoidance, minimization and mitigation measures to ensure that additional development does not further compromise the already-somewhat compromised values of this linkage area.

Corridor 24-228: The continuation of this corridor into Oregon includes serious conflicts including priority and general sage-grouse habitat, BLM LWC and citizen-proposed wilderness areas, and we are recommending that the Agencies delete the corridor in Oregon. The Agencies should also delete the portion of the corridor in Idaho because it is of no value without the Oregon section.

Corridor 36-226: This corridor parallels an existing transmission for much of its length. The Agencies should consider adjusting the corridor to follow the existing transmission line, unless doing so would increase impacts from development.

Montana

Corridor 229-254: This corridor is identified as a Corridor of Concern in the Settlement Agreement (this includes 229-254, 229-254 (N) and 229-254 (S)); the following resources of concern are identified: critical habitat, National Register of Historic Places properties, “suitable” segment under Wild & Scenic Rivers Act. The Agencies must address these issues through avoidance, minimization and compensatory mitigation.

Nevada

Corridor 18-23: As detailed in the California section of these comments, we recommend that the Agencies delete the California section of corridor 18-23 because of the many serious conflicts that development would cause. The Nevada portion of corridor 18-23 goes through the east side of the Bodie Hills through roadless areas in the Wassuck Range, which are also Bi-state Sage Grouse and Pronghorn habitat. We also recommend that the Agencies delete the Nevada part of corridor 18-23 because of the potential for any development within this corridor to have significant deleterious impacts on the Bi-state sage grouse (BSSG) population as described in more detail in the California section.

The section of corridor 18-23 that goes through the Wassuck Range northeast of the Bodie Hills could impact the BSSG in the Bodie Hills and Mount Grant Population Management Units (PMUs). The following Mileposts are directly within critical habitat in these PMUs: 39-46, 55-57 & 61-66 in Mt. Grant and 65-70 within the Bodie Hills PMU. Additionally, the lands between Milepost 32 – 39 also touch on critical BSSG habitat.

The Bodie Hills sub-population is the largest and the anchor population for the species. Detailed information on this population can be found in the 2017 BSSG Progress Report and the NDOW action plan.¹⁹ The population trends went in decline with the 5-year drought. It is very important that their nesting and lekking habitat in this area not be disturbed. As public visitation to the Bodie Hills increases, it will increase pressure on the BSSG population and may force them east into Nevada.

Corridor 16-24: This corridor is identified as a Corridor of Concern in the Settlement Agreement because of the following resource conflicts in Nevada: Wilderness, National Conservation Area, National Historic Place. It runs along the southern boundary of the Black Rock Desert - High Rock Canyon Emigrant Trails NCA and intersects the NCA from MP 33-35. The historic Lassen-Applegate trail runs through there and transmission or pipeline development within the corridor would make it hard to imagine the life of the emigrants crossing the Black Rock desert. Development in the corridor would also impact the experience of looking at the old historic water tower in Gerlach.

The legislation designating the NCA included standard language withdrawing the land from disposal, which usually means that new ROWs and new development within existing ROWs is prohibited. The Agencies should clarify whether additional linear infrastructure is legally permitted in the corridor. The Agencies should consider adjusting the corridor to follow the existing transmission line further south; if the corridor can't be adjusted to follow the existing transmission line, the Agencies should delete the corridor.

18-224: This corridor intersects numerous BLM LWC inventory units, as detailed in Attachment 1. The Agencies must address these conflicts, as detailed in Section III of these comments.

Oregon

Under a court-approved settlement agreement reached in 2010, until BLM completes the RMP amendment for the Vale and Lakeview Resource Management Plans BLM is precluded from approving any activity on lands that have been identified as having wilderness characteristics, where that activity would disturb the surface of the land and would either cause the wilderness unit to shrink, or cause the unit to no longer meet the criteria for wilderness character. *See Or. Natural Desert Ass'n v. Bureau of Land Mgmt.*, No. 3:03-cv-1017-JE, ECF 129 (Sept. 28, 2010) and *Or. Natural Desert Ass'n v. Gammon*, No. 6:06-cv-523-HO, ECF 99 (Nov. 17, 2010) (orders approving settlement agreement and granting parties' motion for voluntary dismissal). Mirroring the Federal Land Policy and Management Act, the settlement agreement also requires BLM to prepare and maintain a current and up-to-date inventory of lands with wilderness characteristics and other resources and values on these public lands to inform current and proposed land management and agency decisions. Due to the new LWC inventories in the BLM Vale and Lakeview Districts, the agency must take a new look at intersections with LWC

¹⁹ <https://bistatesagegrouse.com/general/page/2017-bi-state-action-plan-progress-report>

and citizen LWC because three corridors (7-24, 24-228, 11-228) intersect with both in multiple areas of SE Oregon

Corridor 7-24: Corridor 7-24 was identified as a “corridor of concern” in the Settlement Agreement because of the many conflicts along its route. It traverses large portions of southeastern Oregon in Malheur, Harney and Lake Counties, bisecting the region between the Hart Mountain Antelope Refuge and the Sheldon National Wildlife Refuges. These are two of the largest wildlife refuges in the lower 48 that are managed in concert as a complex for migrating wildlife that would be negatively impacted by corridor 7-24. The corridor crosses sage-grouse focal areas, priority and general sage-grouse habitat, pygmy rabbit habitat, the Steens Mountain geothermal withdrawal area, numerous BLM-inventoried lands with wilderness characteristics (LWC) units recently identified by the BLM Vale and Lakeview Districts and citizen-proposed wilderness areas (see Attachment 1 for specific BLM LWC units intersected). Due to the significant acreage of priority and general sage-grouse habitat along the corridor as well as possible impacts to the Steens Mountain CMPA values and other wilderness quality lands, the Agencies should delete this corridor.

Corridor 16-24: Corridor 16-24 crosses large areas of priority and general sage-grouse habitat, pygmy rabbit habitat, BLM LWC and citizen-proposed wilderness areas. This corridor traverses a large area of a sage-grouse focal area and priority sage-grouse habitat that provides critical habitat connectivity for sage-grouse populations in Malheur and Harney Counties. Due to the configuration of priority sage-grouse habitat in this region, acceptable modifications to reroute this corridor and avoid sage-grouse impacts would be unlikely. The Agencies should delete this corridor.

Corridor 24-228 (note that this corridor also continues into Idaho): Corridor 24-228 in Oregon runs through areas of priority and general sage-grouse habitat, BLM LWC and citizen-proposed wilderness areas. Significant modifications would be necessary to avoid sage-grouse habitat and wilderness resources. It is also important to note that corridor 24-228 may not be viable due to significant resource conflicts along corridors 7-24 and 16-24 to which 24-228 would connect. The Agencies should delete this corridor.

Corridor 230-248: The abstract inaccurately portrays both the purpose and rationale for Corridor 230-248 and fails to recognize the potential for pipeline development in the near future. This corridor has never been intended to facilitate the movement of energy from west to east across Mt. Hood National Forest. It was included in the WWEC as a corridor to facilitate the export of liquified natural gas (LNG). PacifiCorp, the aspirant developer of the Palomar Pipeline in conjunction with NW Natural, eventually withdrew its FERC application when the proposed export terminal was halted but repeatedly stated it is still considering developing the corridor. Renamed “Trail West,” plans to develop this corridor continue to appear in NW Natural's integrated resource planning documents. Last year, the developer of a proposed methanol export terminal suggested the Trail West route may be developed if the export terminal is approved.

Please correct the abstract to reflect the fact that this corridor, since its inception, has been intended to move fracked gas across the Cascades for the purpose of export. As such, neither the past proposal for use, nor the potential future proposal, facilitate transportation of renewable energy.

Corridor 230-248 is not located in a favorable landscape. It is identified as a corridor of concern because of major conflicts with environmentally sensitive areas, some of which are accurately captured in the abstract, including:

- Critical habitat for the ESA-listed Northern Spotted Owl overlaps a significant portion of the route
- The corridor borders the recently created Clackamas Wilderness
- Critical habitat for ESA-listed Steelhead, Coho & Chinook Salmon intersect the corridor
- The corridor intersects the Pacific Crest National Scenic Trail and the Riverside National Recreation Trail
- The corridor crosses the Wild & Scenic Clackamas River and the Oregon Wilde & Scenic Fish Creek

In addition to the concerns included in the abstract, the following are major points of concern **not** included in the list of potential compatibility issues or concerns to examine:

- For the first time in almost 70 years, there is an ESA-listed wolf pack in Mt. Hood National Forest, the “White River Pack.” Their home range directly overlaps the corridor’s path.
- Not only is the Clackamas River Wild & Scenic, but also it provides the municipal drinking water supply for nine municipalities and hundreds of thousands of people.
- The clearcut needed to facilitate the corridor conflicts with Late Successional Reserves and Tier 1 Key Watersheds designated by the NW Forest Plan

Because there are few ways to minimize these conflicts aside from deleting this corridor, the Agencies should delete it.

Other Corridors in Oregon that the Agencies should address:

Corridor 4-247: This corridor is identified in the Settlement Agreement as a Corridor of Concern because of conflicts with the following resources: not close enough to QRA, old-growth forests, critical habitat, late-successional reserves, riparian reserves.

Two other corridors in Oregon, 7-11 and 11-228, generally follow existing transmission line or road ROWs. In general, co-locating with existing facilities even where there is slight LWC overlap is preferable to some other unknown and likely higher-impact alignment. While these corridors are much less concerning than the corridors highlighted above that cut through undeveloped wildlands, development in these corridors would still have impacts that must be addressed. In most cases where these two corridors intersect LWC, the corridor is wider than the existing disturbance or has slightly different alignment in specific areas. In some cases, the Agencies may be able to adjust the corridors one way or another to reduce overlap with LWC, and the Agencies should make those adjustments where possible. For many of the intersections of with the Vale and Lakeview LWC inventories, directional adjustment of the corridor wouldn’t alleviate LWC conflict because LWC is on both sides of the corridor. The best option would be for the Agencies to make the corridor narrower to fit between the units where possible.

Washington

It is good that the corridors in Washington follow disturbed routes for the most part, which will limit impacts compared to greenfields development.

That said, both Washington corridors do run through important core habitat and corridors in Washington for a wide range of species from low to high mobility. The Agencies should reference the Washington Wildlife Habitat Connectivity Working Group products for GIS layers to see the overlap to connectivity patterns that are key in Washington.²⁰

A key species for consideration of impacts of any tree removal in both Washington corridors should be spotted owls, as many functional late successional forests can be found directly adjacent to disturbances in these two areas and they cut right through Northwest Forest Plan allocations that favor late successional habitat. The Agencies should disclose impacts to older forest and owl Critical Habitat.

Washington has also developed information for the Western Governors Association's Crucial Habitat Assessment (CHAT) tool that looks at areas of high terrestrial and aquatic integrity including connectivity. The Agencies should include CHAT information in the corridor abstracts.

Corridor 102-105: This corridor was identified as a Corridor of Concern in the Settlement agreement because of conflicts with the following resources: numerous "suitable" segments under Wild & Scenic Rivers Act, borders designated Wilderness, Northwest Forest Plan critical habitat and late-successional/adaptive management reserves, crosses Pacific Crest Trail, tracks America's Byway within 1 mile, National Register of Historic Places property.

This corridor largely follows Highway 2 with exceptions, and where there are exceptions they are within the North Cascades grizzly bear recovery zone. Any impacts to core should be analyzed as well as what the extended footprint of the highway/disturbance zone would be, given that this is already a fracture zone for wildlife in our state, including for wolverines that may have home ranges extending on both sides of Highway 2.

Corridor 244-245: This corridor was identified as a Corridor of Concern in the Settlement agreement because of conflicts with the following resources: conflicts with Northwest Forest Plan, critical habitat, tracks America's Byway. Development should stay within the area already disturbed by the existing powerlines.

Wyoming

Corridor 126-218: This north-south corridor runs through the Greater Little Mountain area, a region that is being considered for special management in the ongoing Rock Springs Resource Management Plan revision. This area is highly valued by hunting-and-fishing enthusiasts in the nearby towns of Green River and Rock Springs and the hunting areas here are sought after by in-state and out-of-state hunters. Eastman's Hunting Journal often identifies elk and mule deer hunting areas in this region in the top 5 hunting areas in Wyoming. Since 1990, organizations and Agencies have spent over \$6 million on conservation projects, enhancing and maintaining critical habitats, like elk and mule deer range and trout fisheries. Local families flock to this area for camping and outdoor recreation. The Greater Little Mountain area hosts crucial and year-round habitats for pronghorn, mule deer, and elk. There is also a large area of Greater sage-grouse priority habitat and blue-ribbon trout fisheries. A diverse coalition of hunting and fishing organizations, labor unions and miners, and over 2,500 hunters and

²⁰ See www.waconnected.org

recreationists have submitted proposals to the Bureau of Land Management designed to balance these important wildlife habitats and outdoor recreation opportunities with oil and gas development.

This corridor cuts directly through some of the highest priority areas this coalition has identified for limiting surface development that could fragment wildlife habitats. The most concerning portion of this corridor is between MP 71-108. This section cuts directly through sage-grouse priority habitat management areas and big game habitats and runs through the Greater Red Creek ACEC from MP 92-106. Improvements can be made to better avoid the ACEC from MP 100-106, but the corridor can't be easily re-routed to avoid the ACEC from MP 92-100, as noted in the Agencies' Corridor Abstracts. Large portions of this corridor do not follow existing disturbance, and development in the corridor would lead to unnecessary impacts to undeveloped lands and fragmentation of existing wildlife habitats in a place highly valued for its undeveloped nature. It is imperative the Agencies delete this corridor in order to avoid these impacts.

Corridor 121-221: This corridor is identified as a Corridor of Concern in the Settlement Agreement because of conflicts with the following resources: sage-grouse core area and habitat, National Historic Trail, BLM special management area. This east-west corridor is highly redundant and would be highly disruptive for two large Greater sage-grouse priority habitat management areas. From MP 0-21 and again from 28-60, this 63-mile long corridor is almost entirely within this crucial habitat type. It is also adjacent to highly scenic places, like the Boar's Tusk, North and South Table Mountain, and the Killpecker Sand Dunes, all places important for outdoor recreation for locals and tourists alike. It would be visually disruptive to visitors to the nearby archeologically rich Cedar Mountain and White Mountain Petroglyph Area of Critical Environmental Concerns, especially as it cuts across the White Mountain uplift across existing undeveloped lands. There are many other east-west corridors in the Rock Springs area that could provide pathways for future transmission or pipeline development in this area, which makes this corridor redundant and unnecessary. Large portions of this corridor do not follow existing disturbance, and development in the corridor would lead to unnecessary impacts to undeveloped lands and fragmentation of wildlife habitats in a place highly valued for its scenery, archeological sites, sage-grouse habitat, and big game ranges. Because corridor 121-221 is redundant with other existing east-west corridors and development within it would cause unacceptable impacts, we recommend that the Agencies delete this corridor.

Corridor 79-216: This corridor is identified as a Corridor of Concern in the Settlement Agreement because of conflicts with the following resources: sage-grouse core area and habitat, National Register of Historic Places properties, National Historic Trail. This corridor does not always co-locate with existing infrastructure where co-location is possible and development in the corridor would impact undeveloped lands. It would also impact lands with wilderness characteristics (LWC) and impacts the viewshed for an important Traditional Cultural Property, Cedar Ridge. From MP 125-147, the corridor follows existing pipelines across a unit of Greater sage-grouse priority habitat. Here, the corridor could be shifted west to co-locate with an existing transmission line and to eliminate the impacts to the grouse habitat from overhead transmission lines. Farther to the north the corridor intersects with an LWC unit from MP 185-198 and could and should be adjusted to avoid this impact. We recommend that the Agencies re-route the corridor to better co-locate with existing disturbance across important sage-grouse habitats and to avoid LWC impacts and to minimize impacts to the viewshed of Cedar Ridge. Co-locating within this viewshed will help maintain the cultural and spiritual setting of this site, which is important to many tribal nations.

Additional Corridors of Concern in Wyoming that the Agencies should address:

Corridor 78-255: This corridor is identified as a Corridor of Concern in the Settlement Agreement because of conflicts with the following resources: sage-grouse core area and habitat.

VII. Additional recommendations

a. The Agencies should better address wildlife movement corridors and linkages

The Agencies should evaluate opportunities for mitigating impacts to wildlife movement, or improving wildlife crossings, in conjunction with any planned or proposed work on, over, or adjacent to highways in the corridors.

Even where corridors follow existing highways and other infrastructure, the Agencies should ensure that any further infrastructure work within corridors includes avoidance, minimization and mitigation measures to ensure that additional development does not further compromise the values of wildlife linkage areas.

b. The Agencies should make additional improvements to the Mapping Tool and corridor abstracts

The Agencies have made significant improvements to the Mapping Tool and corridor abstracts, many of which address recommendations we made in our previous comments. For example, these include adding details on existing infrastructure (including the locations of existing transmission lines, pipelines and other infrastructure in the Mapping Tool, which is extremely helpful); additional data layers showing areas of environmental concern; and the conflict rating from the Conflicts Assessment Table. The Agencies should make additional improvements, as detailed below.

i. Include all existing inventories of BLM wilderness-quality lands and address future updates

The Mapping Tool should include all BLM-inventoried lands with wilderness characteristics, including areas being managed for protection in a land use plan and other inventory units. The Mapping Tool at this point is not comprehensive or accurate regarding this data. The Agencies should ensure the complete portfolio of BLM-inventoried lands with wilderness characteristics is encompassed in the Mapping Tool as soon as possible. Furthermore, FLPMA obligates BLM to maintain and update its inventory of lands with wilderness characteristics, and so inventory efforts are ongoing on a continuous basis. Since this Mapping Tool will inform future land use plan revisions and proposed projects, it is critical that lands with wilderness characteristics data is continually updated and reflected in the Mapping Tool. If overlap is found between updated lands with wilderness characteristics inventory and WWEC when developing corridor abstracts, the Agencies should identify the intersections in the corridor abstracts and ensure that their recommendations for corridor revisions address them by adjusting the corridors to eliminate the intersection.

ii. Address updates to inventories of FS wilderness-quality lands

There are multiple national forests across the west where both Forest Service and citizen wilderness inventories are underway to inform land management planning processes. Since this mapping tool will inform land use plan revisions and proposed projects, it is critical that all Forest Service lands with wilderness character (i.e., Forest Service and citizen wilderness inventories) are continually updated and reflected in the Mapping Tool. If overlap is found between updated lands that possess wilderness character and WWEC when developing corridor abstracts, the Agencies should identify the intersections in the corridor abstracts and ensure that their recommendations for corridor revisions address them by adjusting the corridors to eliminate the intersection. Additionally, if the Forest Service is actively revising a land management plan and conducting a wilderness inventory for a national forest when the Agencies are creating corridor abstracts, the Agencies should ensure that the corridor abstracts note that final wilderness recommendations have not yet been made. This will better inform stakeholders and developers when considering potential resource conflicts at the time of development.

iii. Consistently incorporate data across agency planning areas into the Mapping Tool

The Mapping Tool includes Recreation Opportunity Spectrum, Scenic Integrity, and Visual Quality data for only some national forests. We request that the Agencies ensure that they include this information for all national forests that intersect with a corridor.

iv. Include all the resources and designations in the Conflicts Assessment Table in the Mapping Tool

We acknowledge and appreciate that the Agencies have improved the Mapping Tool by adding more data layers on environmental concerns. The Agencies should ensure that all of the resources and designations in the Conflicts Assessment Table are also included in the Mapping Tool, including the additional areas listed in Section II.b. of these comments.

v. Include more information on siting opportunities and challenges on non-federal lands

For the WWEC to be truly functional, there must be a reasonable basis to assume that all segments of the WWEC, including likely connections across non-federal lands, avoid environmentally sensitive areas to the maximum extent practicable. While the Agencies do not have the authority to designate WWEC on non-federal lands, they do have the capacity to extend environmental assessments done on federal lands to non-federal lands. In other words, they Agencies can and should analyze whether potential environmental impacts on non-federal lands could be avoided by alternative routes for the WWEC as part of reviewing whether the routes minimize environmental harm. The Restoration Design Energy Project planning process conducted by the Arizona BLM serves as an important precedent and example of how such an assessment can be extended to non-federal lands. The Regions 4, 5 and 6 corridor abstracts do contain some information on non-federal lands, which we appreciate, but we recommend that the Agencies add more information on potential concerns or conflicts with county land use plans, conservation resources on private lands, and other important considerations on non-federal lands.

c. The Agencies should incorporate additional data into the Regional Reviews

The Agencies should incorporate additional data into the Regional Reviews, including:

- Wildlife corridors identified through processes set out in Secretarial Order 3362 and any intersections with WWEC; and
- Rare and at-risk plants and animals data from the Nevada Natural Heritage Program

d. The Agencies should maintain a strong public engagement process for the Regional Reviews

A strong public engagement process is crucial for meeting the terms of the Settlement Agreement and for achieving the Agencies' goals for improving the WWEC. The Agencies should maintain the process they have established, which provides multiple opportunities for public engagement in a variety of formats during each Regional Review.²¹ This includes maintaining a website with a large amount of information and resources, sending emails with project updates, hosting webinars, providing comment periods on corridor abstracts and Draft Regional Review Reports, and hosting public workshops to gather input on potential corridor revisions.

We appreciate the opportunity to comment and look forward to following up with you.

Sincerely,

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²¹ See the Agencies' website: <http://corridoreis.anl.gov/regional-reviews/regions-4-5-6/>

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Attachments:

- Attachment 1: intersections between WWEC and BLM-inventoried lands with wilderness characteristics in Regions 4, 5 and 6
- Attachment 2: proposed new Interagency Operating Procedures on wilderness-quality lands
- Attachment 3: intersections between WWEC and ACECs
- Attachment 4: intersections between WWEC and Wilderness Areas
- Attachment 5: intersections between WWEC and Wilderness Study Areas
- Attachment 6: intersections between WWEC and National Monuments
- Attachment 7: intersections between WWEC and National Conservation Areas
- Attachment 8: opportunities to adjust WWEC to avoid BLM-inventoried lands with wilderness characteristics in Regions 4, 5 and 6
- Attachment 9: intersections between WWEC and USFS Roadless Areas in Regions 4, 5 and 6
- Attachment 10: intersections between WWEC and USFS recommended wilderness areas

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Attachment 1 - WWEC Intersections with BLM LWC in Regions 4,5,6

State	Field Office	BLM LWC Unit Name	Filename for BLM LWC GIS Data	Agency	WWEC Zone ID	Mile Posts	New or Previously Designated	Corridor Width (feet)	Acres of overlap	WWEC Region
Oregon	Lakeview	Duncan Creek	LWC_Units_9_11_18	BLM	7-11	75-81	Previously Designated	1500	416	6
Oregon	Lakeview	Duncan Creek	LWC_Units_9_11_18	BLM	7-11	75-81	New	3500	666	6
Oregon	Lakeview	Hayes Butte	LWC_Units_9_11_18	BLM	7-11	89	Previously Designated	1500	19	6
Oregon	Lakeview	Hayes Butte	LWC_Units_9_11_18	BLM	7-11	89	New	3500	112	6
Oregon	Lakeview	Buckaroo Pass	LWC_Units_9_11_18	BLM	7-24	120-121	New	3500	739	6
Oregon	Lakeview	Greaser Ridge	LWC_Units_9_11_18	BLM	7-24	87-89	New	3500	1,152	6
Oregon	Lakeview	Shirk Rim	LWC_Units_9_11_18	BLM	7-24	104	New	3500	311	6
Oregon	Lakeview	Little Juniper Mountain	LWC_Units_9_11_18	BLM	7-24	101	New	3500	444	6
Oregon	Lakeview	Lone Grave Butte	LWC_Units_9_11_18	BLM	7-24	117-119	New	3500	1,001	6
Oregon	Lakeview	Mahogany Mountain	LWC_Units_9_11_18	BLM	7-24	119-124	New	3500	947	6
Oregon	Lakeview	South Warner Rim	LWC_Units_9_11_18	BLM	7-24	75-77	New	3500	1,307	6
Oregon	Lakeview	Wilson Spring	LWC_Units_9_11_18	BLM	7-24	123-128	New	3500	1,999	6
Oregon	Lakeview	Coleman Rim	LWC_Units_9_11_18	BLM	7-24	90-92	New	3500	1,157	6
Oregon	Lakeview	Collins Rim - Deep Creek	LWC_Units_9_11_18	BLM	7-24	67-73	New	3500	2,680	6
Oregon	Jordan	Red Mountain	wild_char_poly	BLM	7-24	185.5	New	3500	26	6
Oregon	Jordan	Blue Mountain	wild_char_poly	BLM	7-24	201-206	Previously Designated	1500	1,105	6
Oregon	Jordan	Blue Mountain	wild_char_poly	BLM	7-24	201-206	New	3500	1,436	6
Oregon	Malheur	Slaughter Gulch	wild_char_poly	BLM	11-228	151-155	New	3500	84	6
Oregon	Malheur	Granite Creek	wild_char_poly	BLM	11-228	153	New	3500	53	6
Oregon	Malheur	Prava Peak	wild_char_poly	BLM	11-228	163-164	New	3500	60	6
Oregon	Malheur	Hunter Springs	wild_char_poly	BLM	11-228	175-179	New	3500	178	6
Oregon	Malheur	Rufino Butte	wild_char_poly	BLM	11-228	172	New	3500	11	6
Oregon	Malheur	Sand Hollow	wild_char_poly	BLM	11-228	192-194	New	3500	95	6
Oregon	Malheur	Sourdough Mountain	wild_char_poly	BLM	11-228	183-185	Previously Designated	1500	228	6
Oregon	Malheur	Sourdough Mountain	wild_char_poly	BLM	11-228	183-188	New	3500	525	6
Oregon	Jordan	Blue Mountain	wild_char_poly	BLM	16-24	189-190	Previously Designated	1500	125	6
Oregon	Jordan	Blue Mountain	wild_char_poly	BLM	16-24	177-190	New	3500	1,039	6
Nevada	Tonopah	NV-050-306A	Tonopah FO Inventory_2017	BLM	18-224	89-90	Previously Designated	10560	809	5
Nevada	Tonopah	NV-050-352A	Tonopah FO Inventory_2017	BLM	18-224	163-167	Previously Designated	3500	682	5
Nevada	Tonopah	NV-050-363	Tonopah FO Inventory_2017	BLM	18-224	207-210	Previously Designated	3500	1,669	5
Nevada	Tonopah	NV-050-03R-15	Tonopah FO Inventory_2017	BLM	18-224	146-149	Previously Designated	3500	1,219	5
Nevada	Tonopah	NV-050-336A	Tonopah FO Inventory_2017	BLM	18-224	134-140	Previously Designated	3500	2,697	5
Nevada	Tonopah	NV-050-330B	Tonopah FO Inventory_2017	BLM	18-224	120-124	Previously Designated	3500	1,813	5
Nevada	Tonopah	NV-050-320	Tonopah FO Inventory_2017	BLM	18-224	125-128	Previously Designated	3500	1,734	5
Nevada	Tonopah	NV-050-306A	Tonopah FO Inventory_2017	BLM	18-224	90-94	Previously Designated	3500	2,001	5
Wyoming	Rawlins	Rotten Springs	RFO_LWC	BLM	73-133	40	New	3500	173	4
Wyoming	Rawlins	WY-030-25N79W10a-2012	RFO_LWC	BLM	78-255	13-14	New	3500	429	4
Montana	Billings	Timber Canyon	Billings_LWC	BLM	79-216	240-245	New	3500	257	4

Attachment 2 – Proposed new IOPs on wilderness-quality lands

Proposed new BLM IOP on wilderness-quality lands

BLM shall conduct an initial assessment to determine if the agency has up-to-date lands with wilderness characteristics inventory information for the project area. BLM must update its inventory for the project area if BLM has never inventoried the area before; if BLM has new information concerning resource conditions since the area was last inventoried; or if BLM has received wilderness inventory information from the public. If lands with wilderness characteristics are known to be present in the project area or are identified through inventory efforts associated with the project review, BLM must analyze impacts to those wilderness resources from the proposed project and consider alternative development routes and mitigation measures to avoid, minimize, or mitigate adverse effects.

Proposed new USFS IOP on wilderness-quality lands:

If the project may impact wilderness character of lands within the project area, the USFS must analyze impacts to those wilderness resources from the proposed project and consider alternative development routes and mitigation measures to avoid, minimize, or mitigate adverse effects. The USFS will consider information submitted by the public when determining whether lands within the project area may possess wilderness character.

ACEC Name	Resource Management Plan	State	Previously Designated		Corridor	Corridor width (feet)	Acres overlap
			Corridor?	Uses			
Sandy River	Northwestern and Coastal Oregon RMP 2016	OR	No	Electric-only	10-246	1,320	559
Sandy River	Northwestern and Coastal Oregon RMP 2016	OR	No	Electric-only	10-246	3,500	727
Owyhee Below Dam	Southeastern Oregon RMP 2002	OR	Yes	All	11-228	1,500	584
Mormon Mesa	Caliente MFP	NV	No	All	113-114	3,500	139
Beaver Dam Slope	Caliente MFP	NV	No	All	113-114	3,500	2,247
Stateline	St George Field Office RMP Amendment	UT	Yes	All	113-116	5,280	6
FORT PEARCE ACEC	Arizona Strip Field Office RMP and ROD	AZ	Yes	All	113-116	5,280	142
Lower Virgin River	St. George Field Office RMP	UT	Yes	All	113-116	5,280	465
KANAB CREEK ACEC	Arizona Strip Field Office RMP and ROD	AZ	Yes	All	113-116	5,280	671
Mormon Mesa	Caliente MFP	NV	No	All	113-116	5,280	701
Beaver Dam Slope	Caliente MFP	NV	No	All	113-116	5,280	4,696
BEAVER DAM SLOPE ACEC	Arizona Strip Field Office RMP and ROD	AZ	Yes	All	113-116	5,280	6,265
LOWER GILA TERRACES AND HISTORIC TRAILS ACEC	Lower Sonoran RMP	AZ	No	All	115-208	5,280	622
Plank Road	DRECP/ISDRA	CA	Yes	All	115-238	10,560	328
Table Mountain	East San Diego	CA	No	All	115-238	10,560	675
Ocotillo	DRECP	CA	No	All	115-238	10,560	1,527
Yuha Basin	DRECP	CA	No	All	115-238	10,560	1,594
Lake Cahuilla - C	DRECP	CA	Yes	All	115-238	10,560	2,987
Picacho	DRECP	CA	No	All	115-238	10,560	3,632
East Mesa	DRECP	CA	Yes	All	115-238	10,560	4,308
Ocotillo	DRECP	CA	Yes	All	115-238	10,560	4,462
Yuha Basin	DRECP	CA	Yes	All	115-238	10,560	9,993
Picacho	DRECP	CA	Yes	All	115-238	10,560	12,814
JOHNSON SPRING ACEC	Arizona Strip Field Office RMP and ROD	AZ	No	All	116-206	3,500	614
Greater Sand Dunes ACEC	Green River Resource Management Plan	WY	No	All	121-221	3,500	175
Greater Red Creek ACEC (Currant Creek Watershed)	Green River Resource Management Plan	WY	No	Underground-only	126-218	3,500	405
Browns Park	Vernal Field Office RMP	UT	No	All	126-218	3,500	783
Greater Red Creek ACEC (Sage Creek Watershed)	Green River Resource Management Plan	WY	No	Underground-only	126-218	3,500	1,313
Browns Park	Vernal Field Office RMP	UT	No	All	126-218	3,500	1,521
Red Creek Watershed	Vernal Field Office RMP	UT	No	All	126-218	3,500	3,164
White River ACEC	White River RMP ROD	CO	Yes	Underground-only	132-133	(1)	6
White River ACEC	White River RMP ROD	CO	No	Underground-only	132-133	(1)	87
South Shale Ridge ACEC	Grand Junction Field Office ROD	CO	Yes	Underground-only	132-133	5,280	196
Mount Logan Foothills ACEC	CRVFO ROD	CO	Yes	All	132-136	26,400	26
South Shale Ridge ACEC	Grand Junction Field Office ROD	CO	Yes	All	132-136	26,400	380
Atwell Gulch ACEC	Grand Junction Field Office ROD	CO	Yes	All	132-136	26,400	690
Pyramid Rock ACEC	Grand Junction Field Office ROD	CO	Yes	All	132-136	26,400	1,130
Magpie Gulch ACEC	Roan Plateau Plan Amendment	CO	No	Electric-only	132-276	3,500	121
Mojave Ground Squirrel	DRECP	CA	Yes	All	18-23	10,560	3
Fish Slough	Bishop	CA	No	All	18-23	(1)	79
Olancha Greasewood	DRECP	CA	Yes	All	18-23	10,560	111
Rose Spring	DRECP	CA	Yes	All	18-23	10,560	757

ACEC Name	Resource Management Plan	State	Previously Designated		Corridor	Corridor width (feet)	Acres overlap
			Corridor?	Uses			
Fossil Falls	DRECP	CA	Yes	All	18-23	10,560	1,608
Sierra Canyons	DRECP	CA	Yes	All	18-23	10,560	3,460
Mojave Ground Squirrel	DRECP	CA	Yes	All	18-23	10,560	13,820
Elkhorn Mountains	Butte RMP	MT	No	Electric-only	229-254	1,000	1,268
Sand Canyon	DRECP	CA	Yes	All	23-106	10,560	120
Eagles Flyway	DRECP	CA	Yes	All	23-106	10,560	3,358
Mojave Ground Squirrel	DRECP	CA	Yes	All	23-106	10,560	6,571
Sierra Canyons	DRECP	CA	Yes	All	23-106	10,560	9,226
Jawbone/Butterbredt	DRECP	CA	Yes	All	23-106	10,560	13,419
Kane Springs	Caliente MFP	NV	No	All	232-233 (E)	3,500	690
Kane Springs	Caliente MFP	NV	No	All	232-233 (E)	3,500	712
Kane Springs	Caliente MFP	NV	No	All	232-233 (E)	3,500	4,381
Kane Springs	Caliente MFP	NV	Yes	All	232-233 (W)	2,640	3
Sierra Canyons	DRECP	CA	Yes	All	23-25	10,560	36
Barstow Woolly Sunflower	DRECP	CA	Yes	All	23-25	10,560	696
Mojave Ground Squirrel	DRECP	CA	Yes	All	23-25	10,560	952
Western Rand Mountains	DRECP	CA	Yes	All	23-25	10,560	1,159
El Paso to Golden	DRECP	CA	Yes	All	23-25	10,560	11,487
Fremont-Kramer	DRECP	CA	Yes	All	23-25	10,560	26,987
Cronese Basin	DRECP	CA	Yes	All	27-225	10,560	15
Manix	DRECP	CA	Yes	All	27-225	10,560	20
Soda Mountains WSA	DRECP	CA	Yes	All	27-225	10,560	65
Afton Canyon	DRECP	CA	Yes	All	27-225	10,560	1,306
Ivanpah	Silver State South ROD	NV	No	All	27-225	3,500	1,797
Mojave Fringe-toed Lizard	DRECP	CA	Yes	All	27-225	10,560	2,535
Superior-Cronese	DRECP	CA	Yes	All	27-225	10,560	4,884
Ivanpah	DRECP	CA	Yes	All	27-225	10,560	10,741
Soda Mountains Expansion	DRECP	CA	Yes	All	27-225	10,560	16,580
Shadow Valley	DRECP	CA	Yes	All	27-225	10,560	40,642
Brisbane Valley Monkey Flower	DRECP	CA	Yes	All	27-266	10,560	8
Northern Lucerne Wildlife Linkage	DRECP	CA	Yes	All	27-266	10,560	1,721
Ord-Rodman	DRECP	CA	Yes	All	27-266	10,560	4,381
Dagget Ridge Monkey Flower	DRECP	CA	Yes	All	27-266	10,560	5,856
Dagget Ridge Monkey Flower	DRECP	CA	Yes	All	27-41	10,560	5
Dead Mountains	DRECP	CA	No	All	27-41	3,500	74
Ord-Rodman	DRECP	CA	Yes	All	27-41	10,560	3,048
Piute-Fenner	DRECP	CA	No	All	27-41	3,500	3,489
Pisgah	DRECP	CA	Yes	All	27-41	10,560	12,400
Piute-Fenner	DRECP	CA	Yes	All	27-41	10,560	21,965
Bristol	DRECP	CA	Yes	All	27-41	10,560	31,212
Chemehuevi	DRECP	CA	Yes	All	27-41	10,560	42,736
Chuckwalla Valley Dune Thicket	DRECP	CA	Yes	All	30-52	10,560	1

ACEC Name	Resource Management Plan	State	Previously Designated		Corridor	Corridor width (feet)	Acres overlap
			Corridor?	Uses			
Coachella Valley Fringe-toed Lizard	DRECP	CA	Yes	All	30-52	10,560	6
Alligator Rock	DRECP	CA	Yes	All	30-52	10,560	25
Mule McCoy Linkage	DRECP	CA	Yes	All	30-52	10,560	1,872
Palen Ford	DRECP	CA	Yes	All	30-52	10,560	7,285
Chuckwalla	DRECP	CA	Yes	All	30-52	10,560	21,852
Coyote Springs	Las Vegas RMP	NV	No	All	37-223 (N)	3,500	209
Coyote Springs	Las Vegas RMP	NV	No	Underground-only	37-223 (S)	2,400	309
Coyote Springs	Las Vegas RMP	NV	Yes	All	37-232	(1)	35
Coyote Springs	Las Vegas RMP	NV	No	All	37-232	3,500	1,708
Coyote Springs	Las Vegas RMP	NV	Yes	All	37-232	2,640	6,155
Coyote Springs	Las Vegas RMP	NV	No	All	37-39	3,500	214
Mormon Mesa	Las Vegas RMP	NV	No	All	39-113	3,500	3,343
Mormon Mesa	Caliente MFP	NV	No	All	39-113	3,500	3,639
Rainbow Gardens	SNDO RMP	NV	No	All	39-231	500	91
Rainbow Gardens	SNDO RMP	NV	No	All	39-231	(1)	380
Rainbow Gardens	SNDO RMP	NV	No	All	39-231	3,500	2,621
BULLHEAD BAJADA NATURAL & CULTURAL ACEC	Lake Havasu RMP	AZ	Yes	All	41-46	5,280	876
BLACK MOUNTAINS ECOSYSTEM MANAGEMENT ACEC	Kingman RMP	AZ	Yes	All	41-47	5,280	3,705
Cottage Grove Old Growth	Northwestern and Coastal Oregon RMP 2016	OR	No	All	4-247	3,500	9
THREE RIVERS RIPARIAN ACEC	Lake Havasu RMP	AZ	Yes	Underground-only	46-269	5,280	201
HARQUAHALA MOUNTAINS ACEC	Bradshaw-Harquahala RMP	AZ	No	All	46-269	3,500	1,139
THREE RIVERS RIPARIAN ACEC	Kingman RMP	AZ	Yes	All	46-270	3,500	339
McCRACKEN DESERT TORTOISE HABITAT ACEC	Kingman RMP	AZ	Yes	All	46-270	3,500	751
BURRO CREEK RIPARIAN AND CULTURAL ACEC	Kingman RMP	AZ	Yes	All	46-270	3,500	1,054
BLACK MOUNTAINS ECOSYSTEM MANAGEMENT ACEC	Kingman RMP	AZ	Yes	Electric-only	47-231	5,280	1,895
Piute/Eldorado	Las Vegas RMP	NV	Yes	All	47-231	2,000	2,053
Elkhorn Mountains	Butte RMP	MT	No	All	51-204	3,500	292
Behind the Rocks	Moab Field Office RMP	UT	No	All	66-212	(1)	151
Highway 279 Corridor/Shafer Basin/Long Canyon	Moab Field Office RMP	UT	No	All	66-212	(1)	257
Mill Creek Canyon	Moab Field Office RMP	UT	No	All	66-212	(1)	523
Paleocene, Eocene Thermal Maximum (PETM) ACEC	Cody Resource Management Plan	WY	No	All	79-216	3,500	445
River Tracts ACEC	Farmington Resource Management Plan	NM	No	All	80-273	3,500	5
Dzil'na'oodlii (Huerfano Mesa) ACEC	Farmington Resource Management Plan	NM	No	All	80-273	3,500	11
San Luis Mesa	Rio Puerco Resource Management Plan	NM	No	All	80-273	3,500	214
North Road ACEC	Farmington Resource Management Plan	NM	No	All	80-273	3,500	241
Ladron Mountain - Devil's Backbone Complex	Socorro RMP	NM	No	All	81-272	3,500	1,383
Phantom Canyon ACEC	Royal Gorge Land Use Plan	CO	Yes	All	87-277	3,500	28
South Beaver Creek ACEC	Gunnison Resource Area RMP	CO	Yes	All	87-277	1,000	121
ROSWELL CAVE COMPLEX ACEC	Roswell RMP	NM	No	All	89-271	3,500	797

Attachment 4 - WWEC intersections with Wilderness Areas

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Wilderness Area	State	Previously Designated Corridor?	Uses	Corridor	Corridor Width (feet)	Agency	Mileposts	Acres overlap
Alpine Lakes Wilderness	WA	Yes	Elec-only, Upgr-only	102-105	-1	USFS	22	0.08
Wild Sky Wilderness	WA	Yes	Elec-only, Upgr-only	102-105	-1	USFS	10	0.02
High Schells Wilderness	NV	No	All	110-114	3500	USFS	40-42	34.93
Jacumba Wilderness	CA	Yes	All	115-238	10560	BLM	220--222	10.55
Clackamas Wilderness	OR	No	All	230-248	3500	USFS	2	0.20
Owens Peak Wilderness	CA	Yes	All	23-106	10560	BLM	7	13.67
Soda Mountains Wilderness	CA	Yes	All	27-225	10560	BLM	39	56.36
Bigelow Cholla Garden Wilderness	CA	Yes	All	27-41	10560	BLM	120	0.50
Old Woman Mountains Wilderness	CA	Yes	All	27-41	10560	BLM	96-98	42.03
Piute Mountains Wilderness	CA	Yes	All	27-41	10560	BLM	102 & 106	1.29
Trilobite Wilderness	CA	Yes	All	27-41	10560	BLM	82	0.25
Chuckwalla Mountains Wilderness	CA	Yes	All	30-52	10560	BLM	67 & 71	0.43
Orocopia Mountains Wilderness	CA	Yes	All	30-52	10560	BLM	42	29.89
Warm Springs Wilderness	AZ	Yes	All	41-46	5280	BLM	14-19	1.84

Attachment 5 - WVEC intersections with Wilderness Study Areas

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Wilderness Study Area	State	Previously Designated Corridor?	Uses	Corridor	Corridor Width (feet)	Agency	MilePost	Acres overlap
Cady Mountains Wilderness Study Area	CA	Yes	All	27-225	10560	BLM	27	0.67
Casa Diablo Wilderness Study Area	CA	No	All	18-23	1320	BLM	110	0.33
Casa Diablo Wilderness Study Area	CA	No	All	18-23	-1	BLM	114-115	73.75
Chidago Canyon Wilderness Study Area	CA	No	All	18-23	-1	BLM	110	0.14
Excelsior Wilderness Study Area	CA	No	All	18-23	1320	BLM	67	0.18
Fish Slough Wilderness Study Area	CA	No	All	18-23	-1	BLM	114-115	39.07
Volcanic Tablelands Wilderness Study Area	CA	No	All	18-23	1320	BLM	116	0.12
Volcanic Tablelands Wilderness Study Area	CA	No	All	18-23	-1	BLM	116	0.31

Attachment 6 - WWEC intersections with National Monuments

National Monument	State	Agency	Previously Designated Corridor?	Uses	Corridor	Corridor width (feet)	Agency	MilePost	Acres overlap
San Gabriel Mountains National Monument	CA	USFS	Yes	Electric-only	107-268	1000	USFS	10-19	1,549.64
Tule Springs Fossil Beds National Monument	NV	NPS	No	All	223-224	3500	BLM	0-3	3,581.34
Tule Springs Fossil Beds National Monument	NV	NPS	No	All	223-224	-1	BLM	7-9	639.92
Mojave Trails National Monument	CA	BLM	Yes	All	27-225	10560	BLM	29-34	9,007.13
Mojave Trails National Monument	CA	BLM	Yes	All	27-41	10560	BLM	25-137	177,656.61
Mojave Trails National Monument	CA	BLM	No	All	27-41	3500	BLM	139-148	5,334.68
Grand Staircase-Escalante National Monument	UT	BLM	No	All	68-116	3500	BLM	20-41	13,532.16

Attachment 7 - WVEC intersections with National Conservation Areas

National Conservation Area	State	Previously	Uses	Corridor	Corridor Width (feet)	Agency	Mileposts	Acres overlap
		Designated						
Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area	NV	Yes	All	16-24	2640	BLM	33-35	1,418.79
Morley Nelson Snake River Birds of Prey National Conservation Area	ID	No	All	29-36	1000	BLM	31-32	453.68
Morley Nelson Snake River Birds of Prey National Conservation Area	ID	No	All	36-228	1000	BLM	24-33, 75-78, 83-89	3,279.03
Morley Nelson Snake River Birds of Prey National Conservation Area	ID	No	All	29-36	3500	BLM	37	44.37

Attachment 8 - Opportunities to adjust WWEC to avoid BLM LWC in Regions 4, 5 and 6

State	Field Office	BLM LWC Unit Name	Filename for BLM LWC GIS Data	Agency	WWEC Zone ID	Mile posts for Potential Adjustment	New or Previously Designated	Corridor Width (feet)	Direction for Corridor Adjustment	WWEC Region
Oregon	Lakeview	Duncan Creek	LWC_Units_9_11_18	BLM	7-11	77-81	Previously Designated	1500	West	4
Oregon	Lakeview	Duncan Creek	LWC_Units_9_11_18	BLM	7-11	77-81	New	3500	West	4
Oregon	Malheur	Slaughter Gulch	wild_char_poly	BLM	11-228	151, 153-155	New	3500	South	6
Oregon	Malheur	Prava Peak	wild_char_poly	BLM	11-228	163-164	New	3500	South	6
Oregon	Malheur	Hunter Springs	wild_char_poly	BLM	11-228	177-199	New	3500	South	6
Oregon	Malheur	Sand Hollow	wild_char_poly	BLM	11-228	192-194	New	3500	North	6
Oregon	Malheur	Sourdough Mountain	wild_char_poly	BLM	11-228	183-185	Previously Designated	1500	South	6
Oregon	Malheur	Sourdough Mountain	wild_char_poly	BLM	11-228	183-188	New	3500	South	6
Nevada	Tonopah	NV-050-306A	Tonopah FO Inventory_2017	BLM	18-224	89-90	Previously Designated	10560	West	5
Nevada	Tonopah	NV-050-352A	Tonopah FO Inventory_2017	BLM	18-224	163-167	Previously Designated	3500	Northeast	5
Nevada	Tonopah	NV-050-363	Tonopah FO Inventory_2017	BLM	18-224	207-210	Previously Designated	3500	West	5
Nevada	Tonopah	NV-050-03R-15	Tonopah FO Inventory_2017	BLM	18-224	146-149	Previously Designated	3500	Northeast	5
Nevada	Tonopah	NV-050-336A	Tonopah FO Inventory_2017	BLM	18-224	134-140	Previously Designated	3500	East	5
Nevada	Tonopah	NV-050-306A	Tonopah FO Inventory_2017	BLM	18-224	90-94	Previously Designated	3500	West	5
Wyoming	Rawlins	Rotten Springs	RFO_LWC	BLM	73-133	40	New	3500	East	4

Attachment 9 - WWEC intersections with USFS IRAs in Regions 4, 5 and 6

STATE	IRA	Forest	WWEC Zone ID	New or Previously Designated Corridor?	Agency	WWEC Region	Mile Posts	Acres of Overlap
Wyoming	0401035	Ashley National Forest	218-240	New	USFS	4	6	39
Wyoming	0401036	Ashley National Forest	218-240	New	USFS	4	5	128
Montana	Silver King	Beaverhead-Deerlodge National Forest	229-254	New	USFS	6	181-182	64

Attachment 10 - WWEC intersections with USFS recommended wilderness areas

STATE	FOREST	NAME	WWEC Zone ID	Previously Designated Corridor?	Agency	Mile Posts	WWEC Region	Acres of Overlap
California	Inyo National Forest	Pizona-Truman Meadows (Alternative C Recommended Wilderness)	18-23	No	USFS	84-85	5	93
California	Inyo National Forest	Adobe Hills (Alternative C Recommended Wilderness)	18-23	No	USFS	77-80	5	130
California	Inyo National Forest	South Huntoon Creek (Alternative C Recommended Wilderness)	18-23	No	USFS	72-76	5	439
California	Inyo National Forest	Huntoon Creek (Alternative C Recommended Wilderness)	18-23	No	USFS	69-70	5	70
Arizona	Tonto National Forest	86 (Moderate Rating Evaluation Unit)	62-211	No	USFS	11-21	2	3,243
Arizona	Tonto National Forest	96 (High Rating Evaluation Unit)	62-211	No	USFS	9-12	2	1,300
Arizona	Tonto National Forest	102 (Moderate Rating Evaluation Unit)	62-211	No	USFS	36	2	198
Arizona	Tonto National Forest	112 (Moderate Rating Evaluation Unit)	62-211	No	USFS	37-49	2	1,454
Arizona	Tonto National Forest	97 (Moderate Rating Evaluation Unit)	62-211	No	USFS	21	2	80

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10236] - Webmaster Receipt
Date: Friday, April 5, 2019 4:10:29 PM
Attachments: [ID_10236_LtrBLMFSEnergyCorridorSec368.pdf](#)

Thank you for your input, Sandra Beeman.

The tracking number that has been assigned to your input is **10236**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 05, 2019 16:10:07 CDT

First Name: Sandra
Last Name: Beeman
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Campbell County Government

Topics

Energy Planning Opportunities
Energy Planning Issues
Existing infrastructure/available space
Land Management Responsibilities and Environmental Resource Issues
Lands and realty
Interagency Operating Procedures

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

Please find attached a comment letter from the Campbell County Board of Commissioners regarding Section 368 Energy Corridors.

Attachments

LtrBLM&FSEnergyCorridorSec368.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

OFFICE

500 South Gillette Avenue
Suite 1100
Gillette, Wyoming 82716
(307) 682-7283
(307) 687-6325 FAX
www.ccgov.net



Robert P. Palmer, Commissioners
Administrative Director

BOARD OF COMMISSIONERS

Rusty Bell, Chairman
Mark A. Christensen
Bob Maul
DG Reardon
Del Shelstad

5 April 2019

Mr. Jeremy Bluma
National Project Manager
Bureau of Land Management
jbluma@blm.gov

Mr. Reggie Woodruff
Energy Program Manager
United States Forest Service

Email submittal to: blm wo 368corridors@blm.gov and <http://corridoreis.anl.gov>

RE: Section 368 Energy Corridors

Dear Mr. Bluma and Mr. Woodruff:

On behalf of the Campbell County Board of Commissioners located in Gillette, Wyoming, I would like to thank you, the Bureau of Land Management (BLM), the United States Forest Service (FS) and the Department of Energy (DOE) for allowing us the opportunity to submit comments regarding the above referenced document. Proper planning regarding transportation and infrastructure issues are critical to the long-term economic health of our county and state and we are committed to engaging in those discussions at all levels.

Campbell County is situated in northeast Wyoming, which is included in Region 4 on your map, and where currently there are no energy corridors identified. Our county is unique as it is comprised of roughly 12% federal surface and an estimated 83% federal minerals. We are an energy rich area with approximately forty percent (40%) of the nation's BTU's being produced from the surface coal mines, oil and natural gas located in the county. We acknowledge Campbell County currently has a significant portion of private surface development, multiple pipelines, transmission lines, railroads, state highways, and Interstate 90 in place and that traverse through the county. As such, we believe there may be additional corridor options that have not been thoroughly vetted.

The Campbell County Board of Commissioners would appreciate the opportunity to meet with members of the Section 368 Energy Corridor team and explore potential energy corridors in northeast Wyoming.

The mission of Campbell County is to provide quality, efficient, and cost-effective services for all Campbell County residents through sound decision making and fiscal responsibility.

Mr. Bluma - BLM & Mr. Woodruff - USFS
Section 368 Energy Corridors
Page Two - 5 April 2019

By doing so, we may be able to identify options that could efficiently facilitate the movement of energy resources and better serve the nations' energy needs.

Again, we appreciate the opportunity to provide comments. Should you have questions or require additional information, do not hesitate to contact Mr. Robert Palmer in our office at 307-682-7283. We look forward to continued discussions regarding this important matter. Thank you.

Sincerely,



Rusty Bell
Chairman

xc: The Honorable Mark Gordon, Governor of Wyoming
United States Senator Mike Enzi
United States Senator John Barrasso
United States Congresswoman Liz Cheney
Jerimiah Rieman, Wyoming County Commissioners Association

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10237] - Webmaster Receipt
Date: Friday, April 5, 2019 5:27:20 PM
Attachments: [ID_10237_SweetwaterCountyWyomingcommentsonSection368EnergyCorridorRegionalReviewsRegion452019.doc.pdf](#)

Thank you for your input, Wally J. Johnson.

The tracking number that has been assigned to your input is **10237**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 05, 2019 17:26:58 CDT

First Name: Wally J.
Last Name: Johnson
Email:

Are you submitting input on the behalf of an organization? No

Topics

- Energy Planning Issues
- Existing infrastructure/available space
- Land Management Responsibilities and Environmental Resource Issues
- Cultural resources
- Ecological resources
- Hydrological resources
- Public access and recreation
- Specially designated areas
- Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

- 121-221 [blank, blank]
- 121-220 [blank, blank]
- 220-221 [blank, blank]
- 126-218 [71, 108]

Input

Sweetwater County, Wyoming supports the ongoing commitment by the BLM, the U.S. Forest Serve, and Department of Energy to improving the siting and functionality of the West Wide Energy Corridor. Sweetwater County's specific comments are found under Attachment 1.

Thank you for this opportunity to comment.

Sweetwater County

Attachments

Sweetwater County Wyoming comments on Section 368 Energy Corridor Regional Reviews

Region 4-5-2019.doc.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



BOARD OF COUNTY COMMISSIONERS

- o **WALLY J. JOHNSON, CHAIRMAN**
- o **ROY LLOYD, COMMISSIONER**
- o **JEFFREY SMITH, COMMISSIONER**
- o **DON VANMATRE, COMMISSIONER**
- o **RANDAL M. WENDLING, COMMISSIONER**

80 WEST FLAMING GORGE WAY, SUITE 109
GREEN RIVER, WY82935

PH: (307-872-3890) FAX: (307-872-3992)

Friday, April 05, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals and Realty
Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and
Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

Via: corridors@anl.gov and the web form at <http://corridoreis.anl.gov/involve/stakeholder-input/>

Re: Comments on Corridors 121-221, 121-220, 220-221, and 126-218 of the Section 368 West-wide Energy Corridors - Region 4 review.

Dear Mr. Leverette, Mr. Woodruff and Dr. Smith:

Sweetwater County appreciates the opportunity to provide comments on Region 4 - Section 368 West-wide Draft Energy Corridors: 121-221, 121-220, 220-221 and 126-218. Our comments regarding these corridors are provided below:

Energy Corridor 121-221 (Rock Springs Bypass Corridor - multi-modal): Sweetwater County recommends that this corridor be reclassified from a multi-modal (above and underground) corridor to an underground corridor only. This corridor parallels a significant portion of the Tri-territory Scenic Loop Tour and is in close proximity to many natural and scenic features including Boars Tusk, the Kill pecker Sand Dunes, Table Mountains, sage grouse core areas and others. We believe that, by eliminating the above ground component of this corridor and the related potential construction of electrical transmission lines and towers, the scenic views and natural features of this corridor will receive better protection. Designating this corridor as underground only will recognize its existing use as a pipeline corridor and will help support the Wyoming Pipeline Corridor Initiative.

If this recommended change is made, any above ground electrical energy facilities that were planned for this corridor could be placed within Corridors 121-220 and 220-221 where the existing Jim Bridger Transmission Line is located and the Gateway West Transmission Line is planned.

Energy Corridors 121-220 and 220-221 (North and Northwest Rock Springs Corridors - Electrical Only): Sweetwater County recommends that these corridors remain designated as electrical only. As electrical corridors, they provide a right of way for the existing Jim Bridger Transmission Lines, the future Gateway West Transmission Lines and other future electrical transmission lines. As previously stated, with these electrical only corridors in place, the need for Corridor 121-221 to accommodate above ground electrical transmission is eliminated.

Energy Corridor 126-218 (Vernal to Rock Springs Corridor - Under-ground Only Portion): Sweetwater County strongly recommends that this corridor, from milepost 71 to 108, should be completely removed from consideration. Within this milepost range, this corridor parallels the Flaming



BOARD OF COUNTY COMMISSIONERS

- o **WALLY J. JOHNSON, CHAIRMAN**
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- o **RANDAL M. WENDLING, COMMISSIONER**

**80 WEST FLAMING GORGE WAY, SUITE 109
GREEN RIVER, WY 82935**

PH: (307-872-3890) FAX: (307-872-3992)

Gorge National Recreation Area and Reservoir and cuts through prime crucial big game habitat and outstanding scenic landscapes. Sweetwater County believes that petroleum product pipelines, constructed within this corridor, would be a threat to these natural and recreational values. If a pipeline ruptured within this corridor segment, it could cause irreparable damage to the world class fisheries of the Flaming Gorge Reservoir, valuable wildlife habitat and scenic resources. This could cause an economic loss to the multi-million dollar recreation industry of the region.

Sweetwater County supports the ongoing commitment by the BLM, the U.S. Forest Service, and the Department of Energy to improving the siting and functionality of WWEC

If you have any questions, please contact me at 307-872-3897.

Wally J. Jo
Sweetwater County Board of County Commissioners

cc: Renny MacKay, Senior Policy Advisor, Governor Mark Gordon
Tim Wakefield, District Manager, BLM High Desert District
Kimberlee Foster, Manager, BLM Rock Springs Field Office
Kent Connelly, President, Coalition of Local Governments
Cody Doig, Attorney, Coalition of Local Governments
David Allison, Consultant Coalition of Local Governments
Greater Little Mountain Coalition
Wyoming Game and Fish Department
Mary Thoman, President, Sweetwater County Conservation District

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10238] - Webmaster Receipt
Date: Sunday, April 7, 2019 12:29:08 PM
Attachments: [ID_10238_AHSGWestWideEnergyCorridorReviewCommentsFINAL.docx](#)
[ID_10238_110718AlabamaHillsNationalScenicAreaMap.pdf](#)

Thank you for your input, Kevin Mazzu.

The tracking number that has been assigned to your input is **10238**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 07, 2019 12:28:55 CDT

First Name: Kevin

Last Name: Mazzu

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Alabama Hills Stewardship Group, Inc.

Topics

Energy Planning Opportunities

Energy Planning Issues

Land Management Responsibilities and Environmental Resource Issues

Cultural resources

Ecological resources

Public access and recreation

Specially designated areas

Tribal concerns

Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

18-23 [180, 195]

Input

To: West-Wide Energy Corridor Regional Review

From: Alabama Hills Stewardship Group, Inc., Lone Pine, CA

Date: April 5, 2019

Re: Stakeholder Input for 2019 Section 368 Energy Corridor Regional Review - Region 5, Abstract No. 18-23

Dear West-Wide Energy Corridors Regional Review,

This letter responds to your request for stakeholder input regarding the current Section 368 Energy Corridor Regional Review. Comments provided herein pertain to the Region 5 Review and are specific to Corridor 18-23 and the portion thereof located within the Alabama Hills,

west of Lone Pine in Inyo County, California (Milepost 180 to 195).

As you are aware, Corridor 18-23 is legally recognized as a “Corridor of Concern” that has “specific environmental issues” per the Settlement Agreement related to the Record of Decision that designated this corridor in January 2009. We are writing to provide new and relevant information concerning the significant environmental issues associated with this corridor, as well as to correct inaccurate information provided in the current version of Abstract No. 18-23. We are also writing to request the Agencies’ full recognition and thoughtful consideration of two pre-Section 368 BLM designated utility corridors within the Eastern Sierra region of California; two corridors that better meet Section 368 siting principles and provide better options for utility infrastructure placement, resource conservation and conflict resolution. Our comments and recommendations are provided below.

The Alabama Hills Stewardship Group (AHSG), representing our board of directors, as well as 30 stakeholder groups and 40 user groups that are aligned behind our stewardship efforts in the Alabama Hills, are writing:

To oppose any new energy or utility infrastructure development or expansion through the recently designated Alabama Hills National Scenic Area (NSA) and the historic Alabama Hills Special Recreation Management Area (SRMA).

The John D. Dingell, Jr. Conservation, Management, and Recreation Act (Public Law 116-9) was signed on March 12, 2019. This law established the Alabama Hills National Scenic Area and requires the Secretary of the Interior to manage the Scenic Area “in a manner that conserves, protects, and enhances” the “nationally significant scenic, cultural, geological, educational, biological, historical, recreational, cinematographic, and scientific resources” of the area. *Id.* at 1402. By law, the Secretary must conserve, protect, and enhance the purposes and values of the Scenic Area, which includes avoiding and/or minimizing any harm to the area’s Congressionally recognized purposes and values that any new utility facilities or rights-of-ways would cause. The law also requires that any new utilities or rights-of-ways within the Scenic Area must be the “only technical or feasible location, following consideration of alternatives within existing rights-of-way or outside of the Scenic Area.” *Id.* at (n)(1)(C)(iii).

The law establishing the Alabama Hills NSA also mandates that any new utility facilities or rights-of-way must conform to the requirements of the National Environmental Policy Act (42 U.S.C. § 4321 et seq.) and other applicable laws, which includes the National Landscape Conservation System Act (16 U.S.C. § 7202 et seq.). The purpose of the latter act is to “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” *Id.* at 7202(a). Pursuant to Public Law 116-9, the Secretary of the Interior shall manage the Alabama Hills NSA as “a component of the Bureau of Land Management National Landscape Conservation System” (NCLS). *Id.* at 1402(d)(1). Current law clearly requires that the conservation, protection, and enhancement of the nationally significant values of the Alabama Hills be given strong consideration and the highest level of deference during the current Region 5, Section 368 Energy Corridor Review of Corridor 18-23.

The current draft of Abstract No. 18-23 fails to recognize that the Bishop Resource Management Plan (RMP) established two, one-half mile wide designated utility corridors located east of the Alabama Hills (Bishop RMP, 1993). Both of these corridors better meet Section 368 siting principles and provide better options for utility infrastructure placement, resource conservation and conflict resolution. These corridors are currently operational; they

include existing transmission lines, have room for additional infrastructure and are technically, feasibly and environmentally superior alignments for a utility corridor when compared to Corridor 18-23.

These pre-Section 368 corridors are also identified in your Potential Resolution Bases on Siting Principle Analysis and should be strongly considered as preferred alternatives to the current alignment of Corridor 18-23. While these corridors are not comprised solely of public lands, private lands within these corridors are owned and managed by the City of Los Angeles Department of Water and Power (LADWP), one of the utility entities most likely to construct and benefit from additional utility infrastructure development in the area. Public lands in Inyo County should not bear the burden of additional utility infrastructure development for the principle benefit of the LADWP. Particularly at the expense of nationally significant areas such as the Alabama Hills. Especially when nearby lands owned and managed by the LADWP are available for such use. In addition, no new transmission lines or corridor development should be necessary, or even considered, when there are already existing infrastructure, rights-of-way and alternative corridors suitable for consideration in place.

The current version of Abstract No. 18-23 also incorrectly states that the Alabama Hills Special Recreation Management Area was designated in the 2016 Desert Renewable Energy Conservation Plan (DRECP), subsequent to the designation of the Section 368 Energy Corridors. In fact, this SRMA was established by the Bishop RMP in 1993, about 23 years prior to the DRECP and over 16 years prior to the designation of the Section 368 Energy Corridors. The SRMA as designated by the Bishop RMP, was merely amended by the DRECP, to include a “Cooperative Scenic Management Zone” that mirrors the boundary of the now Congressionally designated Alabama Hills National Scenic Area. The inaccurate and misleading characterization of the timing and context of the Alabama Hills SRMA designation provided in the current abstract must be corrected.

BLM NLCS policy provides that the Bureau should “avoid granting new ROWs through NLCS units” and “exercise its discretion to deny ROW applications in NLCS units” where such proposals are “inconsistent with the authority that designated the unit” or “incompatible with the protection of the values for which the unit was designated.” Id at BLM Manual 6100, 1.6(J)4(a and b). BLM NLCS policy further provides that the Bureau should “avoid authorizing use of ... utility corridors within NLCS units” and consider “designating the NLCS unit as an exclusion or avoidance area” or “relocating any existing designated ... utility corridors outside the NLCS unit.” Id at 1.6(J)5(a and c).

As further prescribed by BLM policy, “SRMAs (and this new designation) are high-priority areas for outdoor recreation as defined in the BLM Land Use Planning Handbook H-1601-1 (2005). It is a public lands unit identified in land use plans to direct recreation funding and personnel to manage for a specific set of recreation activities, experiences, opportunities and benefits. Both land use plan decisions and subsequent implementing actions for recreation in each SRMA are geared to a strategically identified primary market-destination, community, or undeveloped areas.”

Corridor 18-23, and the potential consideration of additional utility development or new rights-of-way within this corridor, is clearly inconsistent with both Federal law and BLM policy. We strongly encourage the elimination or realignment of this corridor in the vicinity of the Alabama Hills. Because of the nationally significant scenic, cultural, geological, educational, biological, historical, recreational, cinematographic, and scientific resources of this area, the AHSG is opposed to any increase in the current utility infrastructure, or the location and use of any new utility infrastructure within the Congressionally designated

Alabama Hills NSA or the historic Alabama Hills SRMA. The iconic nature and fragility of this desert landscape clearly demonstrate why this area is totally unsuitable for any new energy development or corridors. Transmission lines or similar utilities running through the Alabama Hills would not be compatible with the stated purposes and nationally significant values of the NSA and SRMA.

The recent NSA designation for the Alabama Hills area is the result of extensive and exhaustive public input on how to best manage this area for current and future generations; perspectives gathered over the last 10 years via a collaborative, community-based effort that involved numerous stakeholders and user groups with diverse perspectives on land management. Stakeholders such as the Inyo County Board of Supervisors, local Chambers of Commerce, Central California Resource Advisory Committee, Advocates for Access to Public Lands, Friends of the Inyo, Eastern Sierra 4WD Club, Alabama Hills Stewardship Group and Lone Pine Paiute-Shoshone Reservation strongly support the conservation, protection, and enhancement of the stated purposes and nationally significant values that characterize the Alabama Hills NSA and SRMA.

In closing, we strongly recommend that the Alabama Hills National Scenic Area and Alabama Hills Special Recreation Management Area be excluded from consideration for any future utility corridor/infrastructure development. We also strongly recommend that the portion of Corridor 18-23 that currently runs through the Alabama Hills in Inyo County, California be eliminated or realigned to a more suitable location. Such measures are needed to resolve the significant environmental issues associated with potential utility corridor/infrastructure development in this area.

Sincerely,

Kathy Bancroft
President, Alabama Hills Stewardship Group, Inc.

Attachments

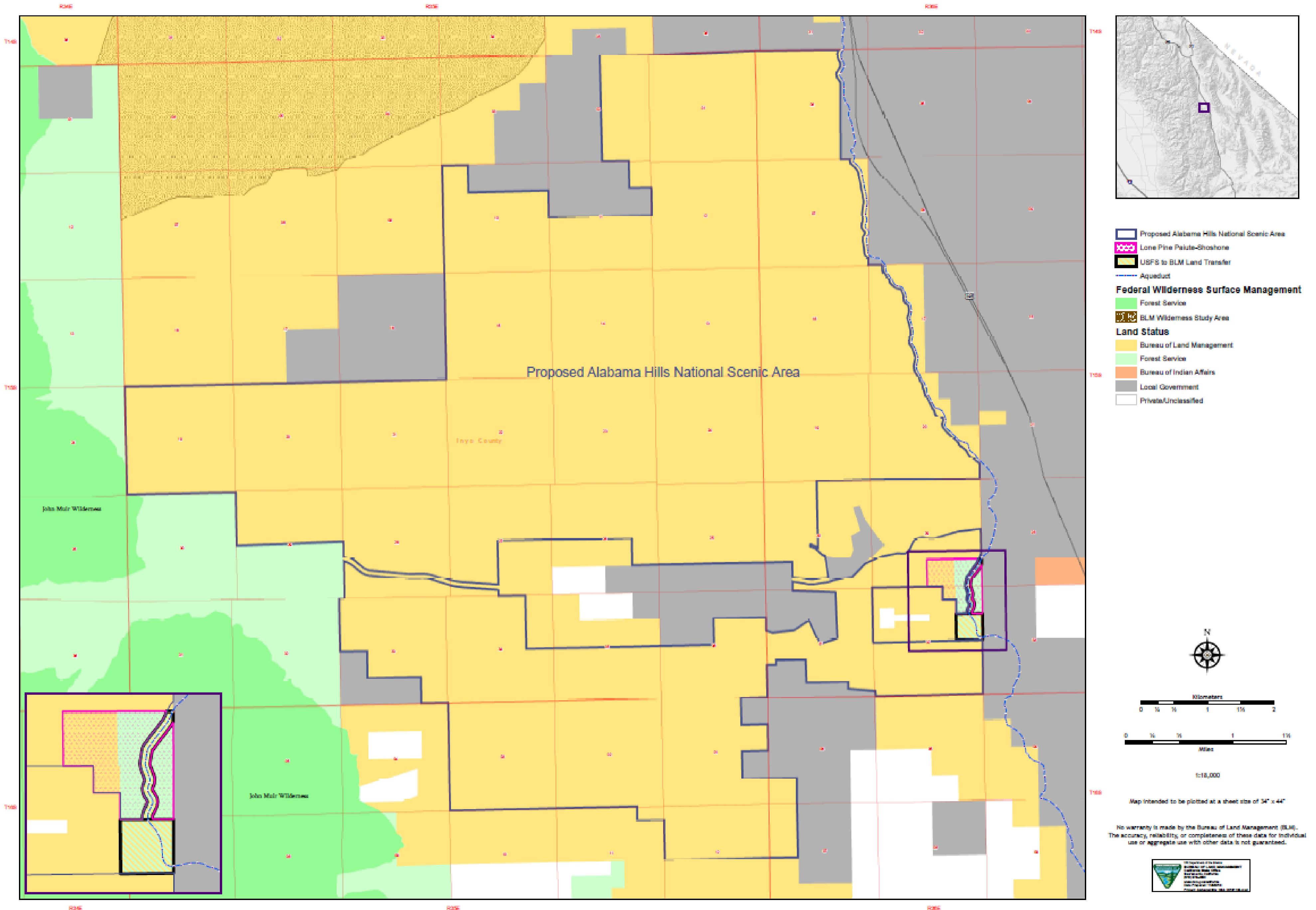
AHSG West-Wide Energy Corridor Review Comments - FINAL .docx, 11-07-18 Alabama Hills National Scenic Area Map.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Proposed Alabama Hills National Scenic Area

November 7, 2018

This map prepared at the request of Senator Dianne Feinstein





ALABAMA HILLS

STEWARDSHIP GROUP

To: West-Wide Energy Corridor Regional Review
From: Alabama Hills Stewardship Group, Inc., Lone Pine, CA
Date: April 5, 2019
Re: Stakeholder Input for 2019 Section 368 Energy Corridor Regional Review -
Region 5, Abstract No. 18-23

Dear West-Wide Energy Corridors Regional Review,

This letter responds to your request for stakeholder input regarding the current Section 368 Energy Corridor Regional Review. Comments provided herein pertain to the Region 5 Review and are specific to Corridor 18-23 and the portion thereof located within the Alabama Hills, west of Lone Pine in Inyo County, California (Milepost 180 to 195).

As you are aware, Corridor 18-23 is legally recognized as a “*Corridor of Concern*” that has “*specific environmental issues*” per the Settlement Agreement related to the Record of Decision that designated this corridor in January 2009. We are writing to provide new and relevant information concerning the significant environmental issues associated with this corridor, as well as to correct inaccurate information provided in the current version of Abstract No. 18-23. We are also writing to request the Agencies’ full recognition and thoughtful consideration of two pre-Section 368 BLM designated utility corridors within the Eastern Sierra region of California; two corridors that better meet Section 368 siting principles and provide better options for utility infrastructure placement, resource conservation and conflict resolution. Our comments and recommendations are provided below.

The **Alabama Hills Stewardship Group** (AHSG), representing our board of directors, as well as 30 stakeholder groups and 40 user groups that are aligned behind our stewardship efforts in the Alabama Hills, are writing:

To oppose any new energy or utility infrastructure development or expansion through the recently designated *Alabama Hills National Scenic Area (NSA)* and the historic *Alabama Hills Special Recreation Management Area (SRMA)*.

The John D. Dingell, Jr. Conservation, Management, and Recreation Act (Public Law 116-9) was signed on March 12, 2019. This law established the ***Alabama Hills National Scenic Area*** and requires the Secretary of the Interior to manage the Scenic Area “*in a manner that conserves, protects, and enhances*” the “*nationally significant*

scenic, cultural, geological, educational, biological, historical, recreational, cinematographic, and scientific resources” of the area. *Id.* at 1402. By law, the Secretary must conserve, protect, and enhance the purposes and values of the Scenic Area, which includes avoiding and/or minimizing any harm to the area’s Congressionally recognized purposes and values that any new utility facilities or rights-of-ways would cause. The law also requires that any new utilities or rights-of-ways within the Scenic Area must be the “*only technical or feasible location, following consideration of alternatives within existing rights-of-way or outside of the Scenic Area.*” *Id.* at (n)(1)(C)(iii).

The law establishing the Alabama Hills NSA also mandates that any new utility facilities or rights-of-way must conform to the requirements of the National Environmental Policy Act (42 U.S.C. § 4321 *et seq.*) and other applicable laws, which includes the National Landscape Conservation System Act (16 U.S.C. § 7202 *et seq.*). The purpose of the latter act is to “*conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.*” *Id.* at 7202(a). Pursuant to Public Law 116-9, the Secretary of the Interior shall manage the Alabama Hills NSA as “a component of the Bureau of Land Management National Landscape Conservation System” (NCLS). *Id.* at 1402(d)(1). Current law clearly requires that the conservation, protection, and enhancement of the nationally significant values of the Alabama Hills be given strong consideration and the highest level of deference during the current Region 5, Section 368 Energy Corridor Review of Corridor 18-23.

The current draft of Abstract No. 18-23 fails to recognize that the Bishop Resource Management Plan (RMP) established two, one-half mile wide designated utility corridors located east of the Alabama Hills (Bishop RMP, 1993). Both of these corridors better meet Section 368 siting principles and provide better options for utility infrastructure placement, resource conservation and conflict resolution. These corridors are currently operational; they include existing transmission lines, have room for additional infrastructure and are technically, feasibly and environmentally superior alignments for a utility corridor when compared to Corridor 18-23.

These pre-Section 368 corridors are also identified in your *Potential Resolution Bases on Siting Principle Analysis* and should be strongly considered as preferred alternatives to the current alignment of Corridor 18-23. While these corridors are not comprised solely of public lands, private lands within these corridors are owned and managed by the City of Los Angeles Department of Water and Power (LADWP), one of the utility entities most likely to construct and benefit from additional utility infrastructure development in the area. Public lands in Inyo County should not bear the burden of additional utility infrastructure development for the principle benefit of the LADWP. Particularly at the expense of nationally significant areas such as the Alabama Hills. Especially when nearby lands owned and managed by the LADWP are available for such use. In addition, no new transmission lines or corridor development should be necessary, or even considered, when there are already existing infrastructure, rights-of-way and alternative corridors suitable for consideration in place.

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The recent NSA designation for the Alabama Hills area is the result of extensive and exhaustive public input on how to best manage this area for current and future generations; perspectives gathered over the last 10 years via a collaborative,

community-based effort that involved numerous stakeholders and user groups with diverse perspectives on land management. Stakeholders such as the Inyo County Board of Supervisors, local Chambers of Commerce, Central California Resource Advisory Committee, Advocates for Access to Public Lands, Friends of the Inyo, Eastern Sierra 4WD Club, Alabama Hills Stewardship Group and Lone Pine Paiute-Shoshone Reservation strongly support the conservation, protection, and enhancement of the stated purposes and nationally significant values that characterize the Alabama Hills NSA and SRMA.

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Sincerely,

Kathy Bancroft
President, Alabama Hills Stewardship Group, Inc.

From: corridoreiswebmaster@anl.gov
To: [mail_corridoreiswebmaster](mailto:corridoreiswebmaster); [mail_corridoreisarchives](mailto:corridoreisarchives)
Subject: Section 368 Stakeholder Input [10239] - Webmaster Receipt
Date: Sunday, April 7, 2019 6:23:54 PM
Attachments: [ID_10239_WestWideEnergyCorridorAHSGFeedbackSigned.pdf](#)
[ID_10239_110718AlabamaHillsNationalScenicAreaMap.pdf](#)

Thank you for your input, Kathy Bancroft.

The tracking number that has been assigned to your input is **10239**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 07, 2019 18:23:47 CDT

First Name: Kathy
Last Name: Bancroft
Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Alabama Hills Stewardship Group, Inc.

Topics

Energy Planning Opportunities
Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Livestock grazing
Public access and recreation
Specially designated areas
Tribal concerns

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

18-23 [180, 195]

Input

To: West-Wide Energy Corridor Regional Review
From: Alabama Hills Stewardship Group, Inc., Lone Pine, CA
Date: April 5, 2019
Re: Stakeholder Input for 2019 Section 368 Energy Corridor Regional Review - Region 5, Abstract No. 18-23

Dear West-Wide Energy Corridors Regional Review,

This letter responds to your request for stakeholder input regarding the current Section 368 Energy Corridor Regional Review. Comments provided herein pertain to the Region 5 Review and are specific to Corridor 18-23 and the portion thereof located within the Alabama Hills,

west of Lone Pine in Inyo County, California (Milepost 180 to 195).

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Attachments

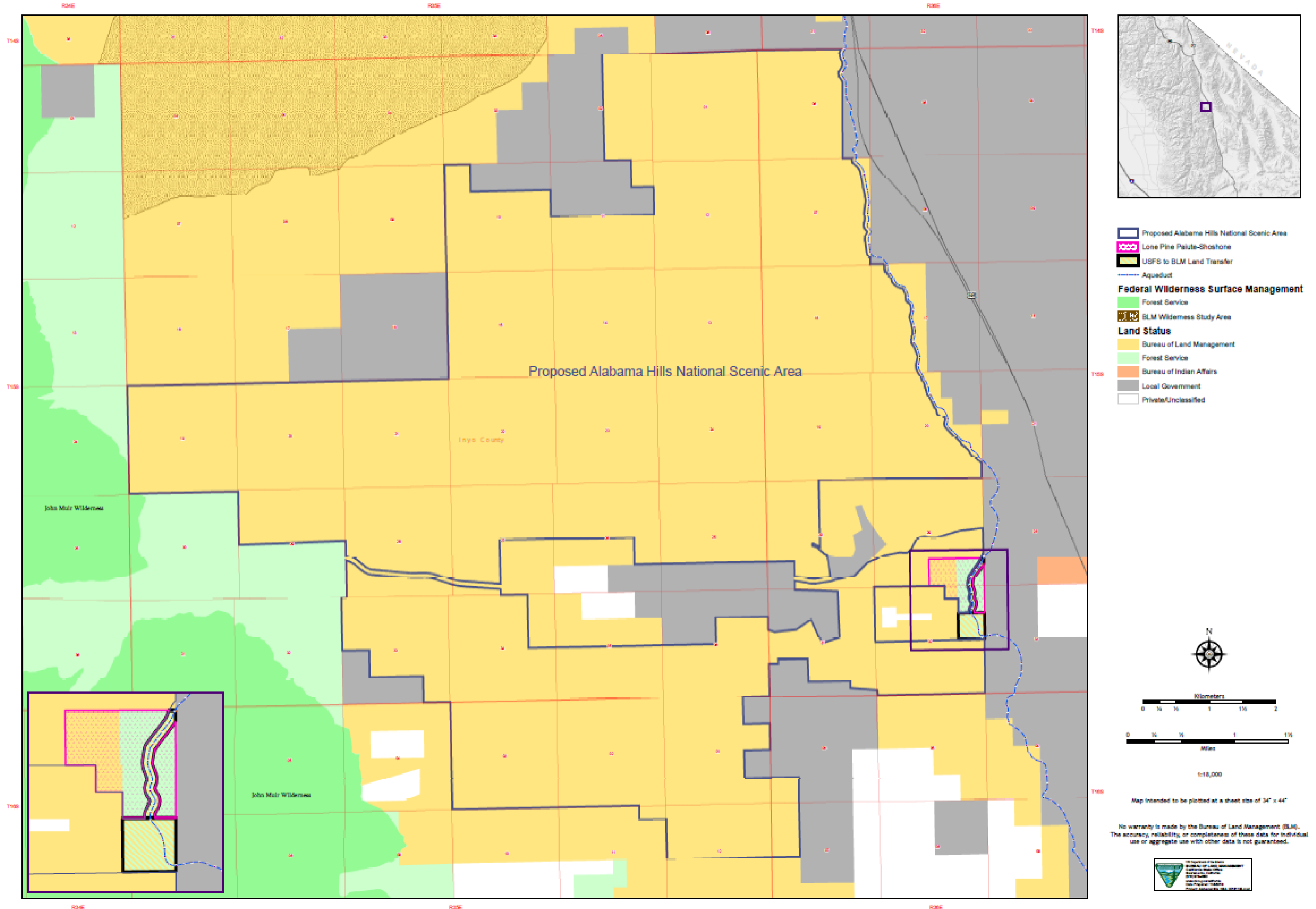
West-Wide Energy Corridor AHSG Feedback - Signed.pdf, 11-07-18 Alabama Hills National Scenic Area Map.pdf

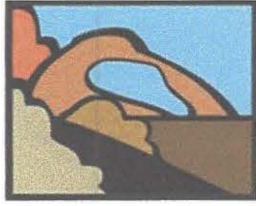
Questions? Contact us at: corridoreiswebmaster@anl.gov

Proposed Alabama Hills National Scenic Area

November 7, 2018

This map prepared at the request of Senator Dianne Feinstein





ALABAMA HILLS

STEWARDSHIP GROUP

To: West-Wide Energy Corridor Regional Review
From: Alabama Hills Stewardship Group, Inc., Lone Pine, CA
Date: April 5, 2019
Re: Stakeholder Input for 2019 Section 368 Energy Corridor Regional Review -
Region 5, Abstract No. 18-23

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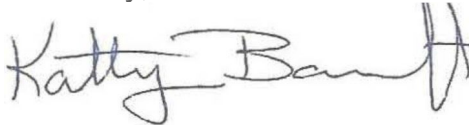
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Sincerely,

A handwritten signature in cursive script that reads "Kathy Bancroft". The signature is written in black ink and is positioned below the word "Sincerely,".

Kathy Bancroft
President, Alabama Hills Stewardship Group, Inc.

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10240] - Webmaster Receipt
Date: Monday, April 8, 2019 10:08:56 AM
Attachments: [ID_10240_GLMC_WWEC_comments_4_8_19.pdf](#)

Thank you for your input, Tasha Sorensen.

The tracking number that has been assigned to your input is **10240**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 10:07:42 CDT

First Name: Tasha
Last Name: Sorensen
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Greater Little Mountain Coalition

Topics

Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources
Public access and recreation
Soils/erosion
Specially designated areas

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

126-218 [blank, blank]

Input

[Blank]

Attachments

GLMC_WWEC_comments_4_8_19.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



April 8, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

Via: corridors@anl.gov and the web form at <http://corridoreis.anl.gov/involve/stakeholder-input/>

Re: Comments on Corridor Abstracts for Section 368 West-wide Energy Corridors Regions 4, 5 and 6 Regional Review (**Corridor 126-218**)

Dear Mr. Leverette, Mr. Woodruff and Dr. Smith:

Please accept the following comments of the Greater Little Mountain Coalition (the Coalition) on the Corridor Abstracts for Regions 4, 5 and 6 of the Section 368 West-wide Energy Corridors (WWEC). We support the ongoing commitment shown by the Bureau of Land Management (BLM), the U.S. Forest Service, and the Department of Energy to improve the siting and functionality of WWEC.

The Greater Little Mountain Coalition

The Coalition is an assembly of sportsmen and sportswomen organizations, community leaders, local governments, union members and more than 2,500 engaged hunters, anglers, and recreationists who want to see the Greater Little Mountain Area's (GLMA) valuable landscapes continue to support abundant fish and wildlife populations including the protection of federal and state recognized sensitive species and to provide ample recreation opportunities. The Coalition partners include: Bowhunters of Wyoming, Muley Fanatic Foundation, Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership, Trout Unlimited and Wyoming Wildlife Federation. The Coalition was established in 2008 in response to development threats and has greatly appreciated the BLM deferring any oil and gas lease parcels in the area until the completion and signed Record of Decision from the Rock Springs Resource Management Plan revision.

The Greater Little Mountain Area

The north-south underground corridor 126-218 runs directly through the GLMA. This unique high desert habitat region is considered by biologists and resource managers to be some of the most sensitive fish and wildlife habitat in Wyoming. Located in southwestern Wyoming, about 30 miles south of the town of Rock Springs, elevation ranges from 6,040 feet at Flaming Gorge Reservoir to 9,060 feet at the top of Little Mountain. The area supports populations of elk, mule deer, moose and antelope (Figure 1).

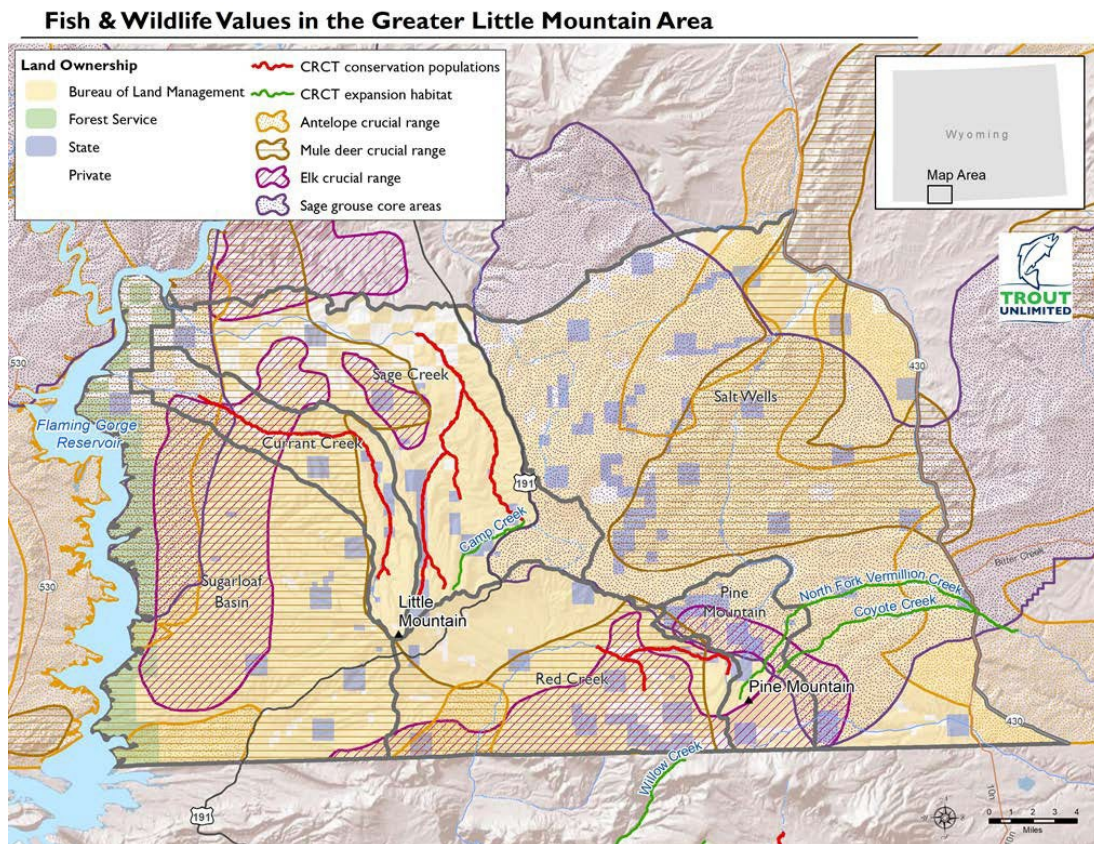


Figure 1. High-value water resources, wildlife and coldwater fisheries in the Greater Little Mountain Area, Wyoming.

Known by locals and non-residents alike for its highly coveted limited quota big game licenses, it remains one of the best hunting areas in Wyoming. Eastman's Hunting Journal often identifies elk and mule deer hunt areas in this region in the top five of the state. The GLMA is home to 37 terrestrial species identified in the Wyoming Comprehensive Wildlife Conservation Strategy as "species of greatest conservation need." Healthy Greater sage-grouse populations inhabit the GLMA with swaths of acreage under the Wyoming Core Area Habitat designation. This high desert ecosystem also includes streams that provide great trout fisheries for the sensitive Colorado River cutthroat trout with more than 130 miles of stream habitat (critical and reintroduction habitat) occurring within the GLMA. Six streams host native, conservation populations of Colorado River cutthroat trout – Currant Creek, Gooseberry Creek, Little Red Creek, Red Creek, Trout Creek and Upper Sage Creek. Colorado River cutthroat trout is a sensitive species recognized by the Conservation Agreement for Colorado River cutthroat signed by the Wyoming BLM, Wyoming Game and Fish Department, US Fish and Wildlife Service, BLM and Wyoming Trout Unlimited with a goal, "To assure the long-term viability of Colorado River cutthroat trout throughout their history range." In fact, Red Creek contains one of the purest genetic strains of Colorado River cutthroat trout.

Water Resources

The western flank of the GLMA contains numerous direct tributaries to Flaming Gorge Reservoir, which is part of the Upper Colorado River system. Salinity and increased sediment load are already a huge concern for this system. Sugarloaf Basin encompasses a major portion of the corridor and is an important upstream watershed recharge area. Any released contaminates, both above and below ground, could move directly into Flaming Gorge Reservoir harming a multimillion-dollar National Recreation Area and water supply for seven state beneficiaries of [the Upper Colorado River Compact](#). Also, the proximity of the corridor to Flaming Gorge, multiple springs and recharge areas associated with this area suggest that deeper regions of shallow groundwater may be encountered with disturbance and development.

Wildlife Resources

This area is crucial winter range for the South Rock Springs elk herd unit and the South Rock Springs mule deer herd unit. Winter is a critical time for ungulate survival and this area provides much needed refuge habitat for these animals. If there ever was an actual need for this corridor in the future, the Coalition recommends a plan Amendment with a full federal NEPA analysis. Of note, the University of Wyoming has new big game collar data for Sugarloaf Basin that needs reviewed and incorporated into any action on this landscape.

Summary

The Coalition submitted proposals to the BLM designed to balance these important wildlife habitats and outdoor recreation opportunities with oil and gas development (Appendix 1). This corridor cuts directly through some of the highest priority areas the Coalition has identified for limiting surface development that could fragment wildlife habitats (Figure 2). The most concerning portion of this corridor is between MP 71-108. This section cuts directly through sage-grouse priority habitat management areas and big game habitats and runs through the Greater Red Creek ACEC from MP 92-106. Improvements can be made to better avoid the ACEC from MP 100-106, but the corridor can't be easily re-routed to avoid the ACEC from MP 92-100, as noted in the Agencies' Corridor Abstracts. Large portions of this corridor do not follow existing disturbance, and development in the corridor would lead to unnecessary impacts to undeveloped lands and fragmentation of existing wildlife habitats in a place highly valued for its undeveloped nature.

There is not a good north-south route for this corridor and it is imperative the Agencies delete this corridor in order to avoid these impacts. Furthermore, there has not been a clearly defined economic need or market that this corridor would serve.

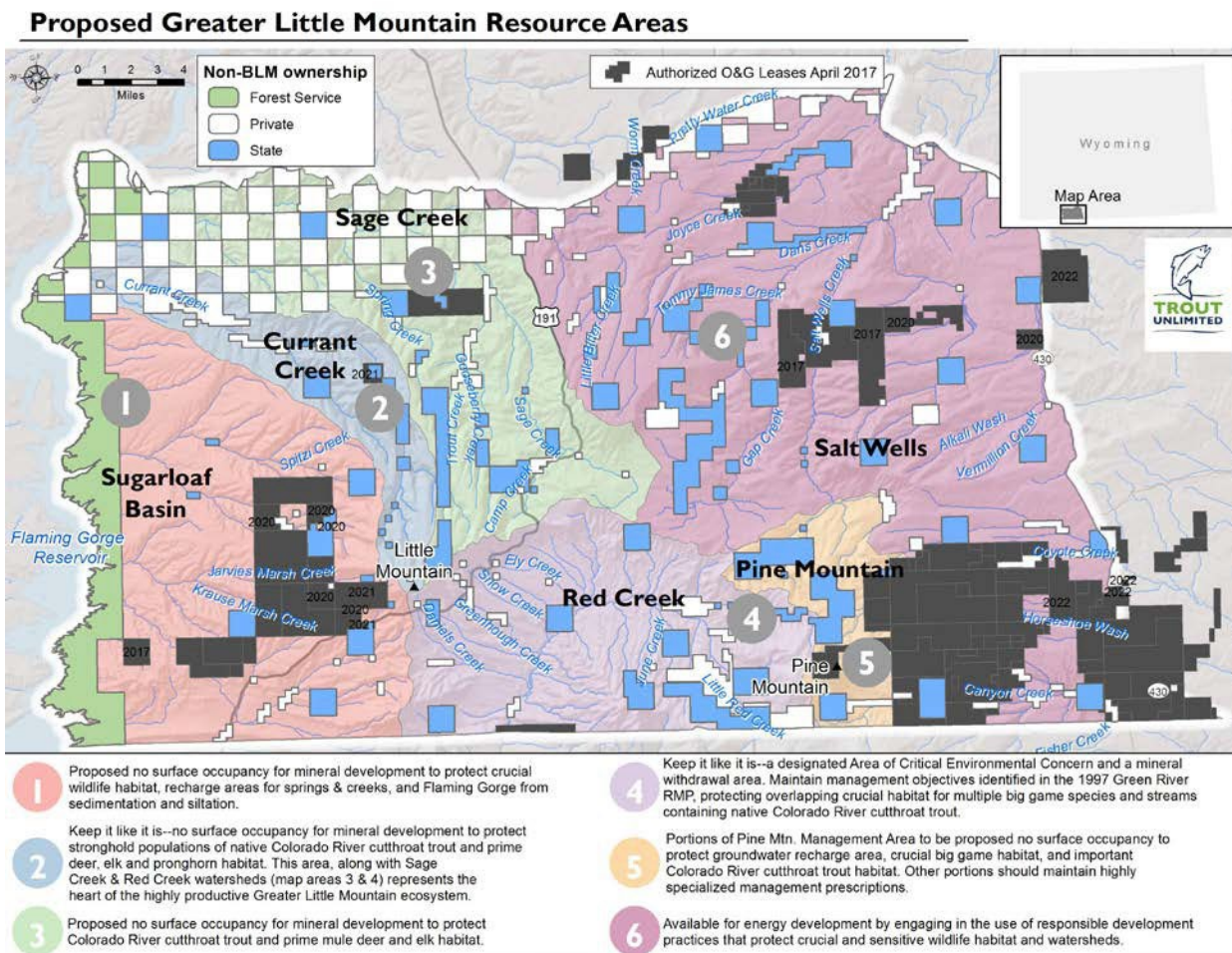


Figure 2. Proposed Greater Little Mountain Resource Areas and Management Prescriptions.

Since 1990, the Little Mountain region has benefited from over \$6 million in habitat restoration and enhancement projects funded by various state and federal agencies, conservation organizations and private individuals. The local, state, regional and federal entities who contributed financially with both sweat equity and dollars expect a return on their investment by maintaining functionality

and connectivity of the GLMA for fish and wildlife objectives. The economic contribution for Sweetwater County alone generated from world-class game and sportfish speak to the high-value outdoor recreation resources of this area. More than 15,000 fishing licenses sold annually in Sweetwater County with anglers spending over \$48.4 million in the last 5 years. Big game hunters in GLMA spent over \$12.7 million in the last 5 years.

We look forward to continued dialogue to adequately conserve and protect the GLMA. Should you have any questions with respect to our comments or would like to have a conversation with the Coalition, please feel free to contact us.

Sincerely,

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Craig Thompson, GLMA landowner
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Steve Martin, Bowhunters of Wyoming
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Monte Morlock, United Steelworkers Local 13214
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Cc

Communities Protecting the Green
Matt Fry, Wyoming Game and Fish Department
Kimberlee Foster, Field Manager, Rock Springs BLM Field Office
Renny MacKay, Policy Advisor, Governor Gordon's Office
Mary Jo Rugwell, State Director, BLM Wyoming State Office
Sweetwater County Board of Commissioners
Jeremy Bluma, BLM National Project Manager



January 26, 2016

Kimberlee Foster
Field Manager
Bureau of Land Management
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901

RE: Proposal for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision

Dear Ms. Foster,

The Greater Little Mountain Coalition (Coalition) is pleased to submit the following proposal to be considered in the Bureau of Land Management's (BLM) development of alternatives in the Rock Springs BLM Draft Resource Management Plan Revision (DRMP). This proposal is specific to the Greater Little Mountain Area (GLMA).

The Coalition is proposing the following resource management prescriptions:

- Implementation of a Master Leasing Plan (MLP) for the GLMA;
- Creation of additional no surface occupancy (NSO)/right of way avoidance (ROW) areas in the specific management areas of Sugarloaf Basin, Sage Creek and Pine Mountain to protect fish and wildlife habitat and recreational opportunities;
- Maintain existing management in Currant Creek and Red Creek management areas;
- Controlled surface use stipulations (CSU); and
- Management for responsible energy development.

Background

The Coalition is an assembly of sportsmen and women organizations, union members and more than 2,500 concerned hunters, anglers, and recreationists who want to see the GLMA's valuable multiple-use landscape continue to support abundant fish and wildlife populations, protect federal and state recognized sensitive species and provide ample recreation opportunities. The Coalition partners include: Bowhunters of Wyoming, Muley Fanatic Foundation, Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership, Trout Unlimited and Wyoming Wildlife Federation.

Proposal Discussion

Master Leasing Plan. As one of Sweetwater County's and Wyoming's most popular hunting, fishing, recreation and wildlife viewing areas, the GLMA is a perfect place to showcase the Master Leasing Plan (MLP) process and how it meets the MLP criteria set forth by Department of Interior's Instruction

Memorandum (IM) No. 2010-117.¹ IM 2010-117 and subsequent requirements in the BLM's Planning for Fluid Mineral Resources Handbook (H-1624-1, Chapter V) provide the BLM guidance for developing MLPs. In short, the concept is to take a proactive, focused look at oil and gas leasing decisions, displacing the traditional broad planning area-wide leasing decisions that accompany RMPs. In doing so, it effectively provides a specific fluid minerals leasing decision for a defined portion of the planning area that is tiered to the broader RMP.

To be successful, a MLP should include objectives, allowable uses and management actions for a defined portion of the planning area. The MLP components should be compatible with overall planning area goals for the Rock Springs resource area, but they must be distinct and applicable to a defined location, such as the GLMA.

The data provided by the BLM's Reservoir Management Group has identified the GLMA within the Rock Springs Planning Area as very low to low in terms of conventional oil and gas potential for the period 2012-2031² (see Map A). This creates a more favorable setting for establishing an MLP within the GLMA. Thus, the BLM should first catalogue and analyze resources and uses that may be impacted by oil and gas development in the Affected Environment Chapter of the DRMP in order to effectively avoid and mitigate impacts to resource values within an MLP area. Then, the BLM should establish resource condition objectives and develop resource protection measures as detailed in H-1624-1, Chapter V.

These elements are critical for a successful MLP for the GLMA. We hope that our suggestions assist the BLM to 1) ensure that an adequate level of analysis is undertaken to support MLP development, 2) help the public understand the MLP process, rationale and decision, and 3) provide certainty for both industry and conservation interests.

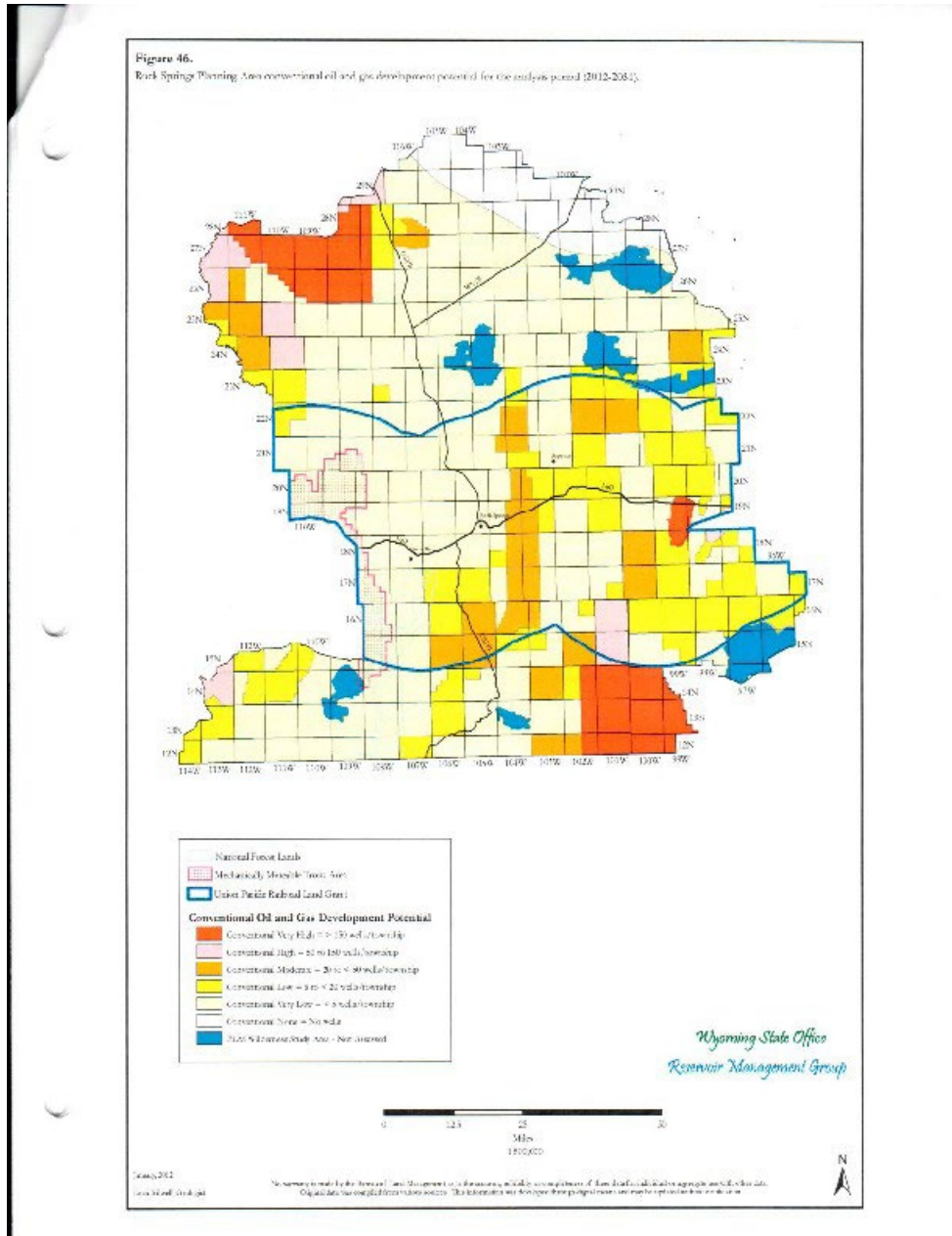
As noted in our 2010 and 2011 letters (attached) to the BLM,³ the Coalition believes the GLMA is the ideal place to showcase the MLP process. The MLP concept will serve as a proactive solution to create balanced multiple-use management, reduce stakeholder conflict over time and protect fish and wildlife species.

While the Coalition is concerned about potential direct and indirect long-term impacts from leasing proposals, simultaneously, we are proactive in advocating for responsible energy development in the GLMA. This approach ensures that critical habitat areas have limited surface use from energy development while other areas are open for development using specialized management prescriptions protecting high value ecological resources, recreational opportunities and quality fishing and hunting activities for future generations. We continue to encourage the BLM to consider retiring leases that are due to expire and are located within GLMA resource areas that contain crucial habitat for fish and wildlife. Such actions are supported in the IM 2010-117 and similar actions are recommended in the current GRRMP.

¹ BLM. 2010. Instruction Memorandum No. 2010-117. Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews. Section II: Master Leasing Plans.

² BLM. January 2012. Wyoming State Office Reservoir Management Group – Description of Oil and Gas Potential Analysis in the BLM Rock Springs Resource Planning Area's "Reasonable Foreseeable Development Report for the Rock Springs BLM Resource Management Plan. 2013". Figure 46.

³ Greater Little Mountain Coalition. 2010. Letter to Don Simpson, Wyoming State Director, BLM regarding *Master Leasing Plan Proposal for Greater Little Mountain Area in Southwest Wyoming*. Dated July 15, 2010. Copy to Lance Porter, Wyoming BLM Rock Springs Field Manager and John Ruhs, Wyoming BLM High Desert District Manager (among others).



Map A. BLM Reservoir Management Group’s analysis of conventional oil and gas development for the Rock Springs resource planning area.

Proposed Resource Protection Areas. The GLMA contains a diverse and sensitive ecosystem. The current Green River Resource Management Plan (GRRMP) recognizes the unique qualities of the GLMA by providing specific management direction to protect this exceptional area. Over the years, Trout Unlimited, Muley Fanatic Foundation, Rocky Mountain Elk Foundation and the Wyoming Game and Fish Department have completed extensive habitat work within the GLMA that improves fish and wildlife habitat conditions. These partners and others have contributed more than \$3 million to the GLMA since 1990, working with BLM on habitat projects designed to conserve and enhance native cutthroat trout and big game habitat, improve grazing management and provide opportunities for hunting, angling and other outdoor recreation activities. These habitat improvements have increased angling and hunting activities translating to an impressive \$12.7 million in total hunter expenditures in the GLMA in the last

five years and \$48.4 million in angling activities expenditures over the last five years in the GLMA and surrounding Sweetwater County. The GLMA is not only valuable in terms of its habitat component but also in its outdoor recreational economic contributions.⁴

The Coalition appreciates the importance of energy development to the economies of Sweetwater County and the state. Our proposal recognizes current mineral leaseholders and does not affect their valid existing rights. Our proposed recommendations are for all new leasing activities.

Sugarloaf Basin Special Management Area—No Surface Occupancy

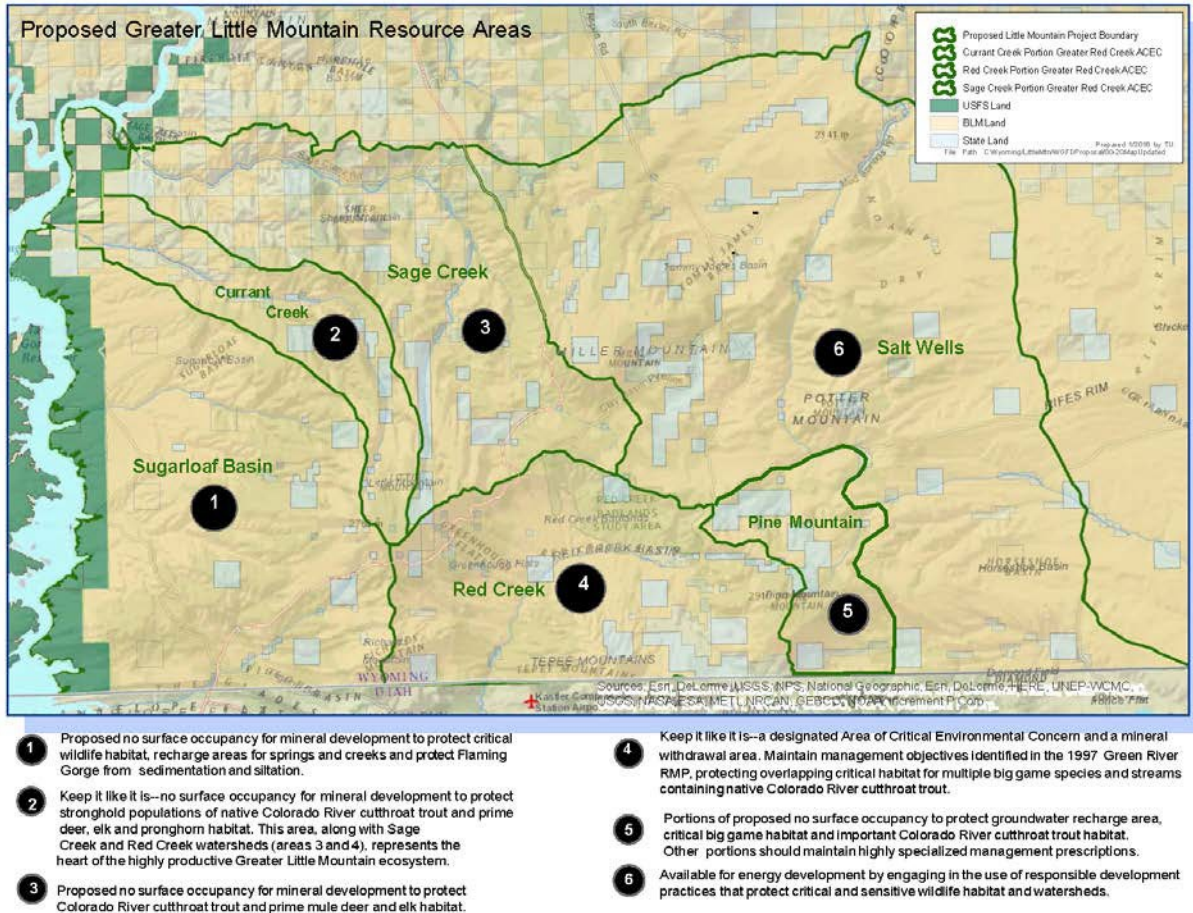
The importance of the Sugarloaf Basin Special Management Area (SMA) to trout and other fish has increased over the years due to sensitivity of the Marsh Creeks watershed to soil erosion. The Marsh Creeks flow directly to Flaming Gorge Reservoir, and could be a significant contributor to the increasing levels of siltation and sedimentation to the reservoir if surface impacts are not avoided. In addition, the SMA is a known groundwater recharge area, providing local aquifers important water supplies for plants, springs and streams in the area. The addition of roads (from energy development activities) can create hard surfaces that prevent rain and snow from soaking back into the ground and replenishing these valuable groundwater recharge zones.

The Marsh Creeks complex is a series of short, first order perennial streams that flow directly into Flaming Gorge Reservoir. We recommend NSO in the area to prevent surface disturbance (through roads, well pads, heavy vehicle use, etc.) that creates and thus conveys large amounts of sediment into Flaming Gorge. Incorporating more restrictive management options will minimize the amount of cumulative phosphorus loading and eutrophic conditions in the reservoir and help to protect the important and popular recreational fishery. In addition, the short distance each of the Marsh Creeks travel before entering the Gorge heightens the vulnerability of these watersheds, not just to sediment loading, but real significant threats of a petroleum spill escaping and reaching the reservoir before being noticed or contained. These potential issues could have direct impacts on the Gorge's salmonids and other sport fish populations.

The Sugarloaf Basin SMA also provides crucial winter-yearlong habitat for mule deer, elk and pronghorn antelope. In addition, a portion of the SMA is designated Greater sage-grouse core habitat while other portions contain habitat for midget-faded rattlesnakes, a sensitive species in Wyoming. Finally, the SMA provides a significant Utah juniper habitat complex, supporting an assemblage of juniper-obligate mammal and bird species.

Because of the important reasons described above, the Coalition is proposing NSO for mineral development in the SMA to protect critical wildlife habitat, groundwater recharge areas for springs and creeks and the Flaming Gorge Reservoir from sedimentation and siltation.

⁴ Economics and harvest data for the GLMA and Sweetwater County compiled by Trout Unlimited using BLM, Wyoming Game and Fish Department and Sweetwater County data.



Map B. Greater Little Mountain resource areas depicting proposed alternative for consideration in the Rock Springs BLM Draft Resource Management Plan.

Currant Creek Portion of the Red Creek ACEC – Maintain Existing Management

The Current Creek watershed is currently managed as NSO under the current GRRMP and is part of the Greater Red Creek ACEC (Area of Critical Environmental Concern). The Coalition recommends this management objective (for mineral development) be maintained. Currant Creek is one of the numerous streams in the GLMA that provides an important stronghold for conservation populations of native Colorado River cutthroat trout (CRCT) as these populations are located in one of the driest regions of CRCT’s historic range and are the only remaining population that still occupies this semi-arid zone⁵. Considerable habitat work has occurred in this watershed to improve and stabilize this sensitive stream. In addition, the area contains critical big game habitat for elk, mule deer and pronghorn antelope. Maintaining current management will result in the continued improvement of healthy fish and wildlife habitat.

Sage Creek Portion of the Red Creek ACEC – No Surface Occupancy

The Sage Creek portion of the Greater Red Creek ACEC should be managed as NSO for mineral development in order to protect sensitive CRCT habitat and elk and mule deer crucial winter and parturition areas. Due to the highly erodible nature of the soils in this area, surface disturbing activities

⁵ Trout Unlimited. 2009. Internal white paper titled “Analysis of the Potential Impacts of BLM Proposed Oil and Gas Development Leases on Colorado River cutthroat trout in the Little Mountain Area of Wyoming.” Amy L. Haak. January 2009.

will increase the sedimentation problem the drainage is currently experiencing. Under the Coalition's proposal, the Sage Creek management area would be strengthened from the current level of management objectives identified in the GRRMP by increasing protective measures for critical habitat for CRCT and big game species.

Red Creek ACEC—Maintain Existing Management

The Red Creek watershed and entire landscape is a designated ACEC and a mineral withdrawal area. The Coalition supports maintaining the continued management objectives for this unique place due to its importance of overlapping crucial habitat for multiple big game species and streams containing conservation populations of CRCT.

Pine Mountain Management Area—Part NSO-Part Special Management Guidelines

The Pine Mountain Management Area is a designated management area in the GRRMP because of its significant fish and wildlife habitat. The Coalition recommends that a portion of the Pine Mountain MA be designated NSO in order to protect groundwater recharge areas, crucial big game habitat and important CRCT habitat. Outside of the proposed NSO, the Coalition supports mineral leasing with specialized management prescriptions such as CSU stipulations, utilization of mandatory best management practices, potential implementation of a phased development scenario and mandatory reclamation standards prior to more development. Additional recommendations for mineral management include directional drilling from a minimal number of well pads and implementing the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat."⁶

Salt Wells Resource Area—Responsible Energy Development Practices

Engaging in the use of responsible development practices that protect crucial and sensitive wildlife habitat and watersheds should remain at the forefront of any current or proposed management actions and objectives. The Salt Wells Resource Area contains crucial wildlife ranges, steep erodible slopes and high recreational value for elk and mule deer hunting. The area is also important to existing and future oil and gas production in Sweetwater County. Based on a specific scientific review of the GLMA, the Coalition supports removing big game timing stipulations on development in the Salt Wells Resource Area so long as NSO management is implemented in Sage Creek, Sugarloaf Basin Special Management Area, and a portion of Pine Mountain, and the management prescriptions for Sage Creek and Red Creek remain the same.

Development proposals should be vetted through the Wyoming Game and Fish Department to determine best placement for well pads and associated structures. The BLM should highlight the need for industry to use gold book standards for reclamation and maintenance of native vegetation.

Summary

The GLMA continues to provide some of the best hunting and angling for residents and non-residents alike, offer abundant opportunities for outdoor recreation, is an important contributor for livestock operations, a significant economic engine for outdoor recreation in the County and provides energy development opportunities for a variety of energy resources. Like many landscapes in the West, research is proving that increased development of our valuable natural resources impacts fish and wildlife habitats. Much of the GLMA is leased and the Coalition believes development can be completed responsibly in identified areas using a Master Leasing Plan component. With the application of new technologies, impacts to our waters and landscapes can be minimized. However, there are places that should be

⁶ Wyoming Game and Fish Department. 2010. *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat*. Cheyenne, Wyoming.

conserved and protected that provide the life support essential for fish and wildlife. For these reasons, we ask that the BLM apply NSO stipulations to Sugarloaf Basin, Sage Creek and portions of Pine Mountain and maintain existing management in Red Creek and Carrant Creek. To help strike a balance, we would then support relaxation of timing stipulations in the Salt Wells area.

The Coalition requests that our proposed recommendations be included in the proposed action and preferred alternative currently being formulated for the Draft RMP. We look forward to working with the BLM on this important resource document.

Sincerely,

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Monte Morlock
United Steelworkers and Southwest Labor Council

Josh Coursey
Muley Fanatic Foundation

Steve Martin
Bowhunters of Wyoming

Nick Dobric
Theodore Roosevelt Conservation Partnership

Attached in pdf: GLM Coalition 2010 Letter to the BLM on MLPs in the Greater Little Mountain Area



June 10, 2011

Don Simpson
State Director, Bureau of Land Management
Wyoming State Office
5353 Yellowstone Road P.O. Box 1828
Cheyenne, WY 82003

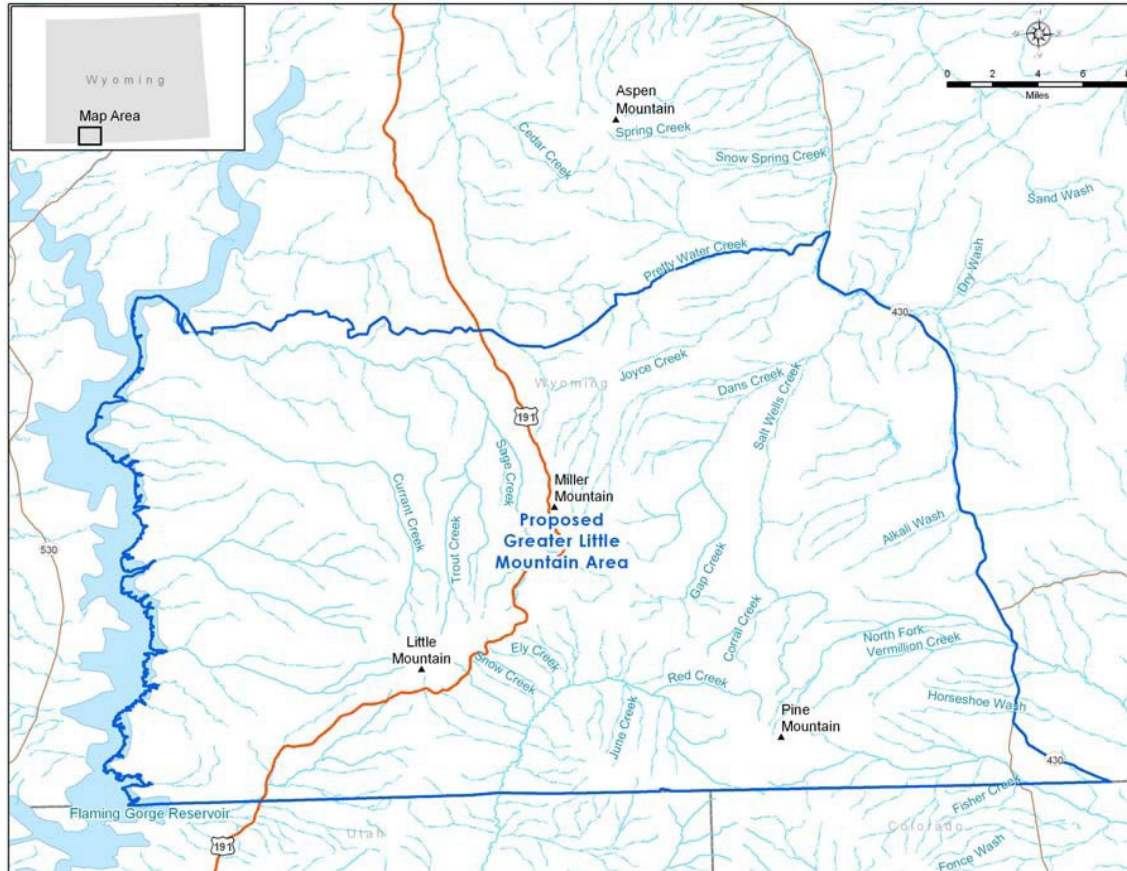
RE: April 1, 2011 response letter to MLP recommendations

Dear Mr. Simpson,

On behalf of the Greater Little Mountain Coalition we thank you and your staff for responding to our Master Leasing Plan Proposal for the Greater Little Mountain Area (GLMA). We appreciate the time and energy that was spent analyzing our proposal as well as others throughout the state. Based on your response letter and reading the Wyoming Oil and Gas Leasing Reform Implementation Plan we understand that you “expect” to incorporate MLP analysis of the Greater Little Mountain Area into the RMP revision process.

We understand that this is a new process for all of us and wanted to take this opportunity to express our willingness to work collaboratively with the BLM, and other stakeholders, to ensure that this becomes a useful part of the land use planning process. Since the BLM first created the MLP concept we felt it could be an effective way to reduce stakeholder conflict and to manage the GLMA on a landscape scale for the benefit of all.

Since we are identified as the MLP proponents for the GLMA in the Leasing Reform Implementation Plan we wanted to make a couple of clarifications regarding our proposal and the implementation plan. Of greatest significance the implementation plan uses two different maps for the Greater Little Mountain boundary. The first map is contained in the executive summary under “Wyoming Category 2 Nominations” and this boundary is consistent with the boundary map submitted in our MLP proposal (Map A). The second map is figure 15 on page 42 of the implementation plan and is not the same map we submitted with our proposal. The difference in these two maps has the following ramifications.



A. MLP boundary proposed by Greater Little Mountain Coalition

The map on page 42 contains all of the checkerboard land south of I-80, to the border and between Flaming Gorge and Highway 430. The map submitted by the Greater Little Mountain Coalition uses the same West, East and Southern boundaries but uses the bottom of the checkerboard for the Northern boundary. The checkerboard area in question falls outside the area of focus for the Coalition. For this reason we would like to clarify that we are not proposing an MLP analysis for the portions of checkerboard contained within the map on page 42 of the Leasing Reform Implementation Plan.

Additionally, the map on page 42 was used in the Leasing Reform Plan for all of the analysis of the Greater Little Mountain MLP. This resulted in data that is drastically different than what was presented in our proposal and potentially how it has been considered. For example, when using the map on page 42, that includes the checkerboard, to determine if the GLMA meets the MLP criteria in IM 2010-117, you are correct in saying that only 24 percent of the acreage is unleased (Leasing Implementation Plan p.41). However, when you use the map we submitted and that you use in your executive summary, 47 percent of the area is unleased. These percentages paint a different picture of how the area fits within the criteria. While determining if the area meets the MLP criteria may be a mute point at this time we feel it is important to note that there are distinct differences in how each map relates to the criteria. It was our belief that when using the map on page 42 the area was not well suited to a MLP analysis, but that when the checkerboard is removed the area is well suited to a MLP analysis. As you move forward implementing MLP analysis for the GLMA we recommend that you clarify which boundary will be used.

We would also like to offer our support in developing a plan for implementing the MLP analysis for the GLMA and would appreciate if you would inform us of any plans for how this process might occur. For instance, timelines, communication strategies, how the MLP will be wrapped into the RMP process and how the public will be involved are examples of information that interest the Coalition. Through continued collaboration we hope to be a positive partner in implementing a MLP for the GLMA that will result in greater certainty for stakeholders and ensuring that the areas multiple resources are managed in a balanced manner.

Thank you for your time and consideration.

Respectfully representing the Greater Little Mountain Coalition,

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cc: Bob Abbey, BLM Director
Larry Claypool, Deputy State Director, Minerals and Lands
John Ruhs, Wyoming BLM High Desert District Manager
Lance Porter, Wyoming BLM Rock Springs Field Office Manager
Trisha Cartmell, Petroleum Engineer, Rock Springs BLM
Vera-Lynn Harrison, Project Manager, Rock Springs RMP



July 15, 2010

Mr. Don Simpson, Wyoming State Director
Bureau of Land Management
5353 Yellowstone Road
P.O. Box 1828
Cheyenne, Wyoming 82003

Re: Master Leasing Plan Proposal for Greater Little Mountain Area in southwest Wyoming

Dear Mr. Simpson:

The Greater Little Mountain Coalition applauds the recent energy policy revisions pertaining to the Onshore Oil and Gas Leasing Reforms (Instruction Memorandum No. 2010-117). These reforms bring some much needed balance back to our oil and gas leasing and development programs. As these reforms are implemented within each state office, it is imperative to ensure that these concepts are put into action.

With this in mind, the Greater Little Mountain Coalition (referred to as Coalition) would like to be an active participant in developing ideas to aid in the implementation of these leasing reforms. We are particularly interested in the Master Leasing Plan (MLP) concept as it is a strong mechanism that incorporates the needed balance by identifying areas that would benefit from further evaluation, scientific analysis, and updated management actions. Our letter to you today offers a proposal for consideration of a pilot project using the MLP concept.

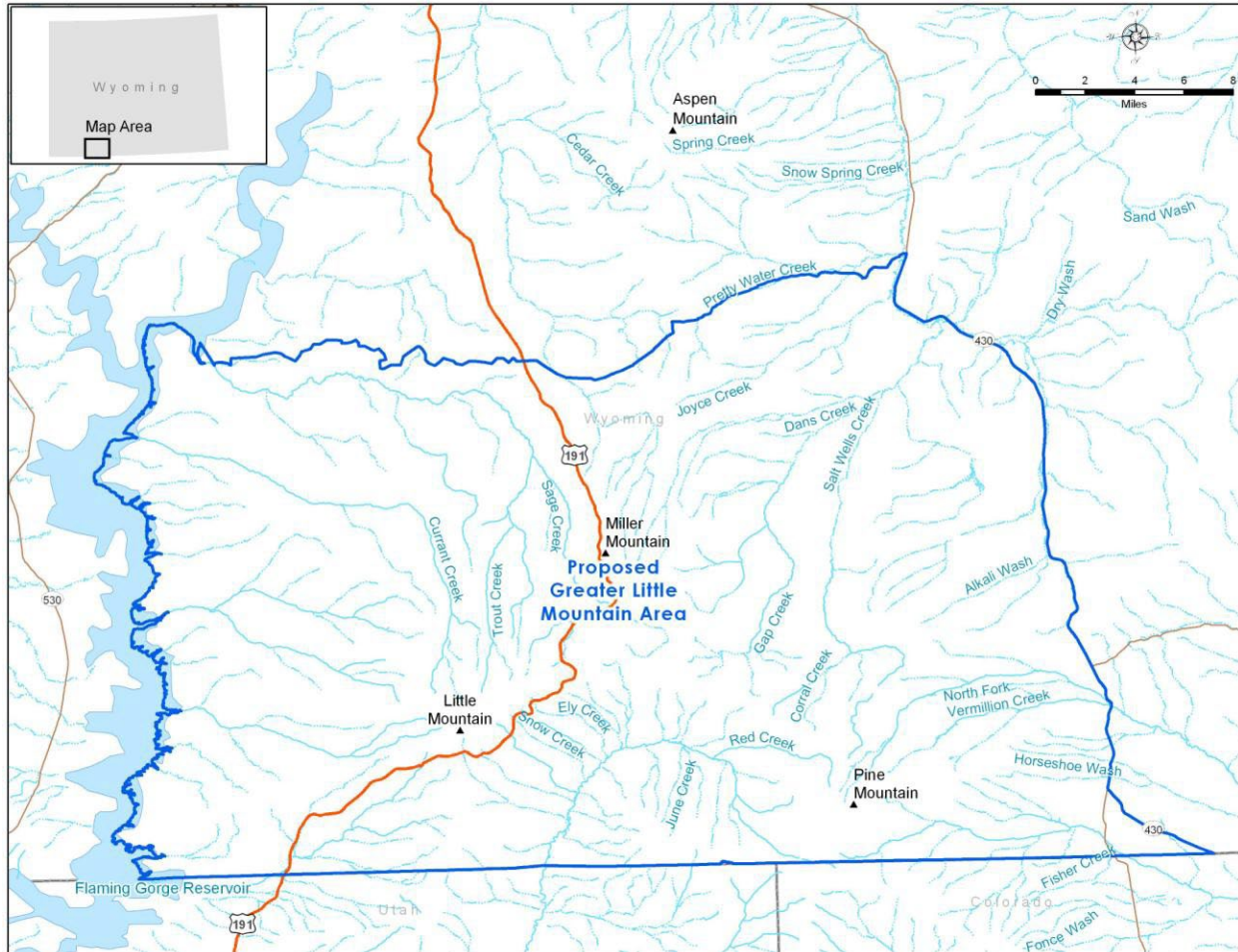
Our Coalition believes the Greater Little Mountain Area (GLMA) is a perfect place to showcase the MLP process. The GLMA is a unique landscape of BLM lands in southwest Wyoming that not only meets the criteria for an MLP, as described in the IM, it also has a number of other unique circumstances that make it a prime candidate for a MLP designation. This concept will serve as a proactive solution to create balanced multiple use management, reducing stakeholder conflict over time.

For the last three years, our Coalition of sportsmen groups, labor union members, local anglers and hunters, citizens and businesses have been working to advocate for responsible energy development in the GLMA. Additionally, the Governor of Wyoming, local, county and city government, industry and more traditional interests like livestock operators have all voiced a desire for a balanced multiple use solution in the GLMA. This combination of interests are coming together in a way which presents an opportunity for delineating areas where energy development is not appropriate, areas where specified stipulations dictate how development will occur, and areas that use responsible energy development practices.

It is clear that the existing Green River Resource Management Plan (GRRMP) for the Rock Springs BLM office is outdated, having been completed in 1997. However, the field office just received funding to revise the plan. A public notice is said to be released in November of 2010. If an MLP is initiated for the GLMA, it could be combined with the GRRMP revision rather than as an RMP amendment. Without comprehensive analysis that incorporates current resource science and management scenarios, along with a landscape scale look at this special area, we feel that the GLMA will be placed in jeopardy. It is our recommendation that the GLMA be considered for a Master Leasing Plan.

PURPOSE: The MLP concept represents a great opportunity to take a landscape scale approach to leasing and development of oil and gas resources in important natural resource areas prior to an area being leased. It is our belief that the GLMA in southwest Wyoming (Map A) meets the MLP criteria set forth by IM No. 2010-117 and would be a great place to showcase this concept.

The Coalition believes this mechanism could resolve or greatly reduce future public land management conflicts among the numerous stakeholders. A landscape scale review that accounts for cumulative impacts followed by a balanced multiple use strategy for the region will consider the multitude of energy activities that have the potential to impact this area. With natural gas drilling activities up by more than 900 rigs, compared to this time last year, it seems obvious that there is increased interest in developing natural gas. In addition, with increased interest in developing wind energy and other resources in the GLMA, a more proactive management scenario suggests that the MLP would be a prudent course of action. Increases in energy development in this area could potentially mimic the conflict among various stakeholders (i.e., ranchers, hunters, anglers, community, wildlife advocates, and businesses) within the Pinedale, Wyoming resource area, such as loss of wildlife habitat, loss of animal unit months (AUM) for ranchers, big game population declines, sage grouse impacts, and water and air quality concerns. By implementing a MLP in the GLMA prior to further development, stakeholders will have increased buy-in in the long-term management of the area, and hopefully avoid many of the conflicts we have seen in other areas of Wyoming.



Map A. Greater Little Mountain Area Boundary Map

CRITERIA: Below are the BLM’s four criteria for the preparation of a MLP and our supportive rationale for a MLP in the GLMA. In addition, the following information can aid the Wyoming BLM office in writing their Implementation Plan and timeline for accomplishing those tasks outlined in the IM and due August 16, 2010 to the Washington office.

Criteria 1: *A substantial portion of the area to be analyzed in the MLP is not currently leased.*

The GLMA includes lands north of the Colorado and Utah border, east of the Flaming Gorge Reservoir, west of highway 430 and south of the checkerboard (Map A). To be more specific, the GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased and of that 74,585 acres (14%) are held in production. The IM does not define “substantial” and the Coalition would like to suggest that this first criterion be given some broad leeway. This terminology becomes more unclear when, under Criteria 2, the word "majority" is used to describe how much federal mineral interest is held in an area. Using the word “substantial” in Criteria 1 shows a clear intent to set a lower threshold for the standard used

when applied to the area leased. When compared to “majority” this means that a “substantial” threshold could be met with less than 50% of the area being un-leased.

As Director of this state’s BLM agency, you are very aware that a majority of BLM lands in Wyoming and most of the West have been leased during the last ten-year period. However, not all have been developed. In addition, a significant portion of the leased parcels within the GLMA have expired this spring or are due to expire over the next few years. These expiring leases will increase the percentage of un-leased lands over time. We understand that not all of these leases will necessarily expire. However, given that many leases in the area have expired in the past couple of years we feel it is an important statistic that adds to our case that a “substantial” portion of the area is un-leased. We are not advocating a particular outcome for these leased areas but simply providing reasoning for why the GLMA meets the MLP criteria. For clarification, a BLM primary lease term is 10 years and will continue beyond that primary term if oil and gas is produced in paying quantities. The following data in Table 1 represent leases projected to expire in the coming years within the GLMA. Note that many of these leased acreages lie within sensitive and critical fish and wildlife habitat, highlighting our interest in these particular leases.

Year	Projected Acres Expiring	Percent of Projected Acres Expiring based on GLMA total acreage	Percent of Projected Acres Leased within GLMA
2010	49,191 acres	9%	Leaving 44% of the GLMA leased
2011	40,387 acres	7%	Leaving 37% of the GLMA leased
2012	1,989 acres	0.3%	Leaving 37% of the GLMA leased
2013	46,204 acres	8.8%	Leaving 28.2% of the GLMA leased

Table 1. Oil and Gas Lease Parcels Projected to Expire

While there has been significant leasing in this area, there has been relatively little development. Since 2008, just one well has been drilled within the boundaries of the GLMA, creating a further need for a comprehensive leasing and development plan that the MLP concept would provide.

The following table (Table 2) illustrates the amount of acreage under lease within several of the highly sensitive fish and wildlife areas in the GLMA. These areas have been identified as special designated areas in the GRRMP of 1997. Our interest includes those acreages in the Sage Creek ACEC, the Currant Creek ACEC, the Red Creek ACEC, Pine Mountain SMA, and the Sugarloaf Basin SMA, which totals 275,820 of Federal GIS acres. Many lease parcels within the identified areas are currently under review by the BLM and according to the IM it is entirely appropriate to apply this new policy to such parcels.

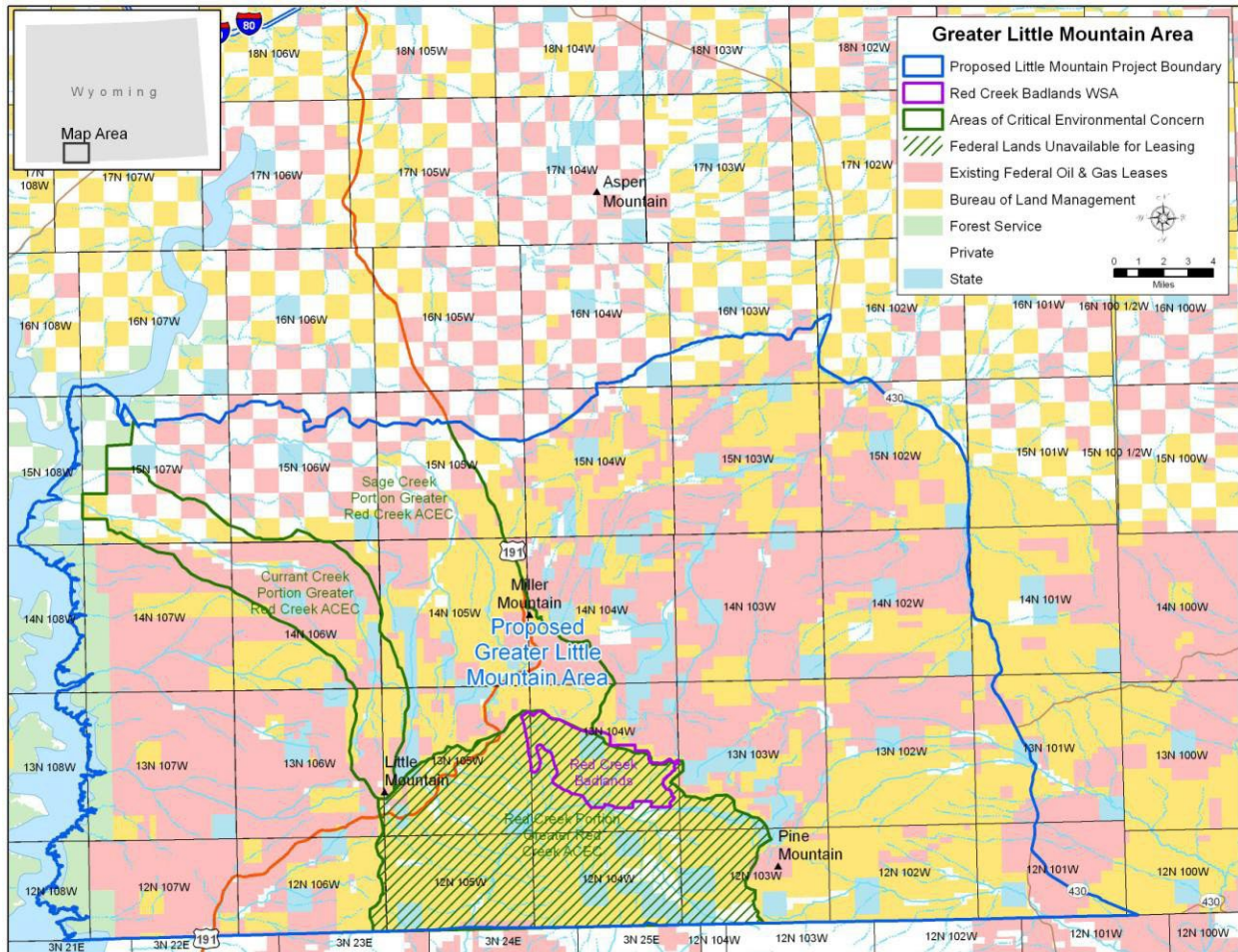
	Federal Acres (GIS)	GR RMP Acres (plats)	No O&G Leasing Areas	NSO Acres	CSU Acres	Acres Leased to Oil and Gas	% Acres Leased	Comments
Red Creek Wilderness Study Area	8,051	8,020	8,051	-	-	-	0	
Sage Creek Portion of the Greater Red Creek ACEC	52,199	52,270	-	-	52,199	31,698	61%	Northern Portion is within checkerboard
Current Creek Portion of the Greater Red Creek ACEC	25,924	23,740	-	25,924	-	17,171	66%	Northern Portion is within checkerboard
Red Creek Portion of the Greater Red Creek ACEC	47,696	55,880	46,226	-	-	1,470	3.10%	Leases pre-date WSA
Pine Mountain Special Management Area	62,758	64,200	-	-	62,758	56,007	89%	-
Sugarloaf Special Management Area	87,243	85,880	-	1,600	85,643	74,896	86%	-
Remaining BLM Lands within GLMA	150,601	144,482	-	-	-	97,069		
State and Private Lands within GLMA	87,764	87,764	-	-	-	-		
Total	522,236	522,236	54,277	27,524	200,600	278,311		

Table 2. Greater Little Mountain Area Acreage

*The acreages presented above are subject to slight variations due to differences in GIS layers.

Criteria 2: *There is a majority Federal mineral interest.*

The BLM manages a majority of the GLMA (83%) and nearly all of the mineral interests in this area are federally owned. The GRRMP FEIS, Map B, shows this ownership. Our Coalition has also created a map (Map B) to view mineral interest designation.



Map B. GLMA Mineral Interest Designation

Criteria 3: *The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the area.*

The GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased by oil and gas companies and of that 74,585 acres (14%) are held in production. From January 2008 through January 2010, five BLM WY Oil and Gas Competitive Lease Sales have included parcels within the sensitive areas of the GLMA. Due to protests from sporting groups, conservation organizations, citizens and the Governor, parcels within the GLMA were deferred from issuance in three of those five sales until further environmental analysis could be completed. In addition, the upcoming lease sale on August 3, 2010 is offering four leases totaling

6,361 acres (of which 6,161 acres are within the GLMA boundary) near the Potter Mountain Elk Butte region of the GLMA. We request that the BLM reevaluate the adequacy and environmental analysis, including the new lease parcel review process and issuance of leases for this August 2010 lease sale. This would provide a case example for which you could include in your Implementation Plan to the Washington office.

Also since 2008, the BLM has approved Devon Energy's Baxter Natural Gas Drilling proposal (EA FONSI), the Rubicon 3D Seismic Survey proposal (also Devon's) (EA FONSI), the Horseshoe Basin 3D Seismic Survey proposal (EA FONSI), and is in the process of writing the final environmental assessment for the North Dutch John 2D Seismic Survey proposal (Azalea Oil Co.). All of these projects are located within the GLMA. Finally, Devon Energy had approval to drill two exploratory wells in their Baxter Natural Gas southern platform in late 2008. Devon drilled one well in 2008 with a result of both oil and gas deposits in significant quantities. Devon Energy has yet to drill the second well that was approved within the Trout Creek drainage.

Criteria 4: *Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are the following:*

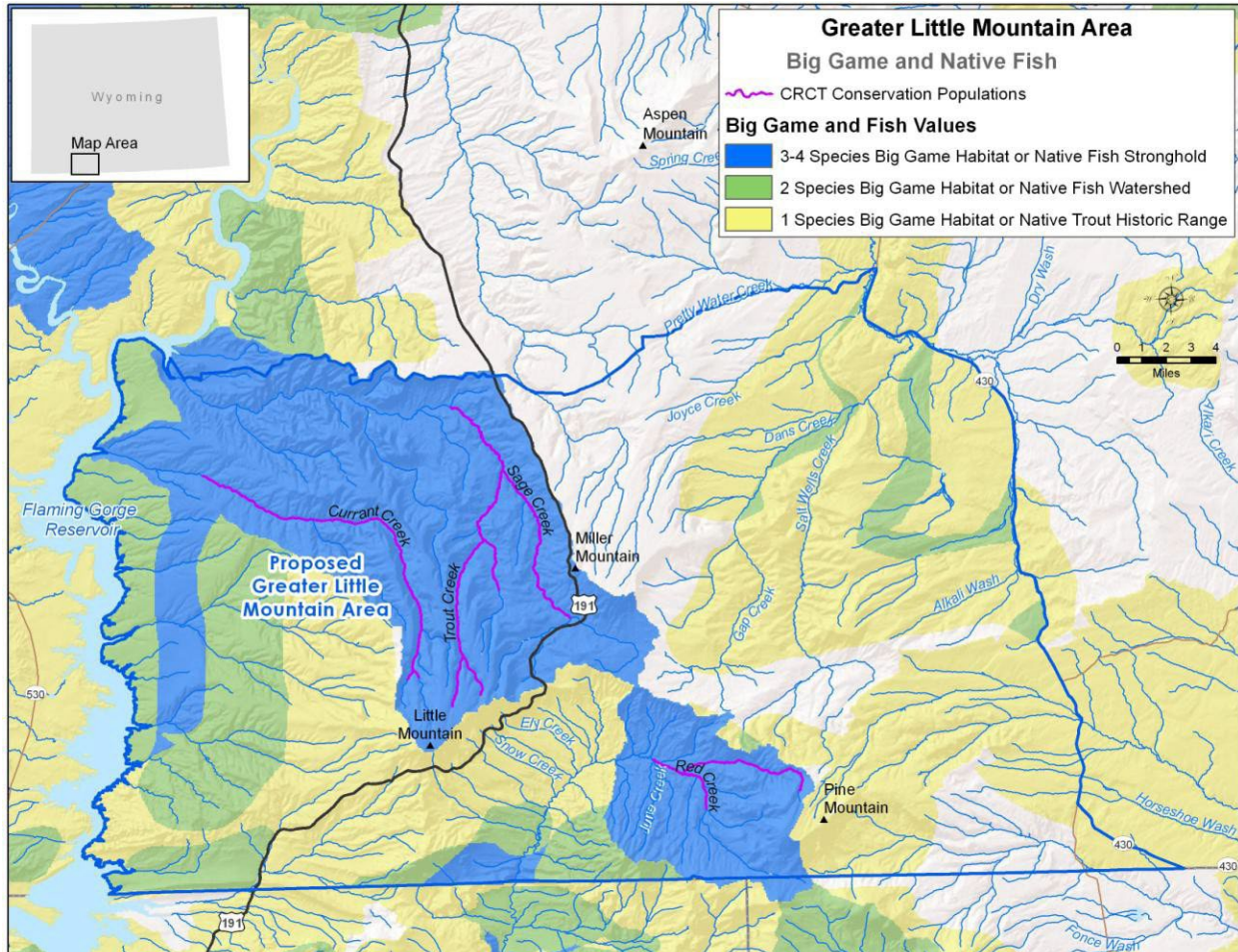
- ***Multiple-use or natural/cultural resource conflicts***

Both the Wyoming Game and Fish Department and the Governor of Wyoming have been very vocal in their opposition to further lease sales and oil and gas projects in sensitive fish and wildlife habitats within the GLMA. Indeed, the BLM has long recognized the outstanding fish and wildlife resource values of this area as described in the GRRMP and evidenced by the over \$2 million worth of habitat improvement projects that have been initiated here since 1990. The BLM contributed the largest amount at \$1,652,814 and the Wyoming Game and Fish Department spent the second largest amount at \$341,174, while other contributors interested in protecting and improving this area included Trout Unlimited, Rocky Mountain Elk Foundation, National Fish and Wildlife Foundation, Bowhunters of Wyoming, local donors, and others.

The GRRMP of 1997 recognized the significance of the valuable resources in this area. Establishments of No Surface Occupancy (NSO) stipulations, Controlled Surface Use (CSU) areas, no lease areas, and rights-of-way exclusion and avoidance areas exist in the GRRMP for large portions of this landscape. As earlier described, the BLM designated several Areas of Critical Environmental Concern (ACEC) containing important watersheds and wildlife habitat (Carrant Creek, Sage Creek and Red Creek ACEC's). Additionally, the Red Creek Badlands Wilderness Study Area (WSA), the Pine Mountain Special Management Area (SMA), and the Sugarloaf Basin Special Management Area also exist within the GLMA.

The GLMA is a biologically rich landscape with abundant and diverse terrestrial and aquatic species. Some of the species include: elk, mule deer, antelope, sage grouse, mountain lion, black bear, numerous raptors (such as the Bald Eagle and the Ferruginous Hawk), and waterfowl. Overlapping critical winter habitat for elk, mule deer, pronghorn, along with yearlong big game habitat, exist in significant quantities (Map C). Migration routes for big game crisscross the GLMA and important breeding and rearing habitat for sage grouse exist. Portions of the

landscape are within Wyoming’s Sage Grouse Core Area designated by Governor Freudenthal’s Sage Grouse Implementation Team. And the entire area is within the Rock Springs BLM Field Office that is involved in the National Environmental Policy Act (NEPA) process for Instruction Memorandum (IM) 2010-012 and 2010-013 to revise sage grouse and sagebrush management direction in their resource management plans.



Map C. GLMA Big Game and Native Fish Strongholds

Colorado River cutthroat trout (identified as a Sensitive Species and a Species of Greatest Concern by the State of Wyoming and the BLM) are located within Upper Sage Creek, Curreant Creek, Trout Creek, Red Creek, Gooseberry Creek, and Little Red Creek within the GLMA. Map C illustrates the significance of the specific high value fish and wildlife areas in the GLMA. Highly fragile and sensitive soils, subject to erosion, sedimentation, and washouts from sudden event storms, natural or manmade fires, or from heavy road traffic occur in this area. Current and past sedimentation and erosion events have impacted both the streams and riparian areas in addition to Flaming Gorge itself. This directly impacts future population survival of Colorado River cutthroat trout. The hydrology in this area represents an important groundwater recharge

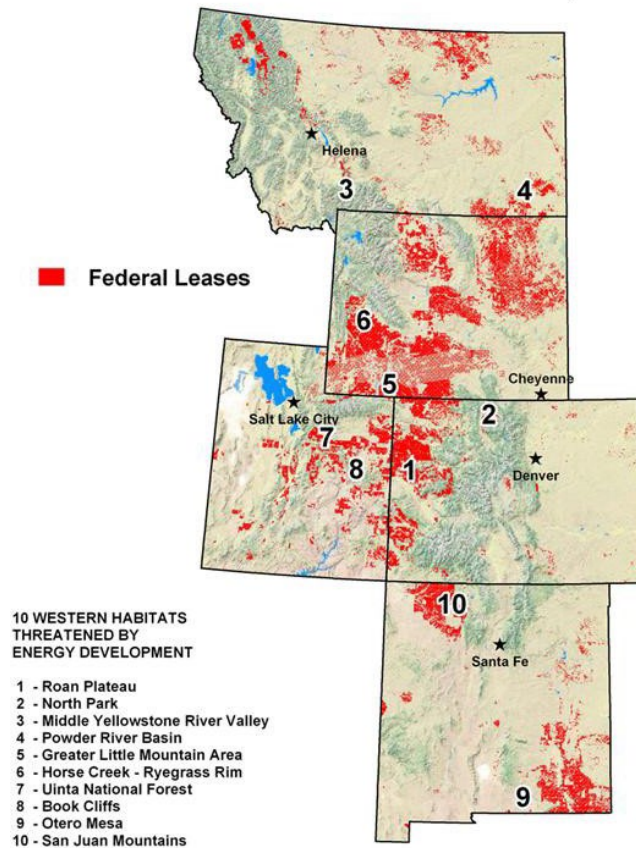
area for the numerous springs and coldwater streams in addition to providing the much needed water for wildlife in this high desert environment.

The GLMA also includes unique habitat for other state and federally recognized sensitive and threatened or endangered wildlife species such as the Pygmy Rabbit and the Midget-faded rattlesnake. Because of the contrasting aspen mountain community, juniper woodland and high desert sagebrush steppes, several raptor species occupy the GLMA that are considered as special status species, which include the Ferruginous Hawk, Golden Eagle, and the Bald Eagle.

The GLMA is a significant source for hunting and fishing opportunities for the public and simultaneously provides a vital role in contributing to the economic diversity for communities within this region. Flaming Gorge borders the western portion of the GLMA and is one of the largest reservoirs in the state. Obtaining the highly prized limited quota big game licenses in this area is often a life-long pursuit by the residents of Sweetwater County and the state. In fact, the GLMA is one of three most popular elk hunting spots in the state, the most popular deer area for both non-resident and resident hunters, and is an outstanding outdoor and backcountry recreation area.

In 2009, Sportsmen for Responsible Energy Development (SFRED) designated the GLMA as one of their top 10 western habitats threatened by energy development (Map D). It was chosen because of the area's ecologically balanced components, world class wildlife (both aquatic and terrestrial) that inhabit the GLMA. Conversely, this area is also valuable from a minerals perspective and as earlier discussed, more than 50% of the area is leased to oil and gas companies that have the right to develop those parcels. This combination leads to a natural/cultural resource conflict and calls for a plan that will mitigate this conflict. To date, leasing and development in this area have taken a case-by-case approach and a large landscape scale analysis has not been performed to address the likely cumulative impacts.

Public Land Leased for Oil and Gas Development



Map D. Top 10 Western habitats on public lands threatened by oil and gas development (SFRED map 2009).

- ***Impacts to air quality.***

The GLMA is composed of Class II, III, and IV visual airsheds. None of the recently approved projects within the GLMA were thoroughly evaluated for future air or greenhouse gas emissions or climate change impacts. New NEPA guidance will require this evaluation and the establishment of environmental mitigation commitments will need to be implemented. For this region of Wyoming, significant air quality issues exist with airsheds being compromised. Quantification of cumulative emissions over the life of the projects proposed for this area need to be considered and completed.

- ***Impacts on the resources or values of any unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the NPS, the FWS, or the FS; or Impacts another specially designated areas.***

As mentioned earlier, the GLMA contains three ACEC's, two SMA's and one WSA. Impacts to these special areas from oil and gas development and other cumulative impacts could be significant and would include air quality, water quality, and surface impacts.

OTHER CIRCUMSTANCES:

A. Identifying and Evaluating Potential Resource Conflicts in a MLP

The following provides a non-exhaustive list of potential resource conflicts that should be considered when developing an MLP. All of the items listed under Section A, page 2 of IM 2010-117 are of concern for the GLMA. We have attempted to illustrate many of those in the previous discussion above. Potential resource conflicts that are not mentioned, but should be, include alternate and renewable energy development within the area.

This section of Wyoming has been identified as a significant area for oil shale development. It is also being considered for carbon sequestration projects, a water pipeline project from the Green River to the Colorado's front range, and has significant wind development opportunities. These potentially conflicting resource development issues need to be addressed. The impacts from numerous energy development projects on the surface and subsurface areas significantly increase the potential impacts to fish and wildlife.

B. Potential MLP Decisions.

The following examples identified in Section B on page 2 of IM 2010-117 include other planning decisions that may be made through the MLP process with supporting NEPA analysis. The approach and outcomes described in the IM mirror the type of analysis and approach we have been advocating for in the GLMA. The IM calls for resource protections identified through the MLP to be addressed as new or modified plan decisions that may include lease stipulations for new leases and/or closing certain areas to leasing. The GLMA recognizes that the 1997 GRRMP has designated specific stipulations for much of the GLMA that include NSO, Timing Limitations, Controlled Surface Use, planned unitization, and the implementation of best management practices in certain cases. Despite these fairly restrictive stipulations in recognition of the high value of this area, leasing of the lands occurred in these sensitive areas anyway.

However, the GRRMP is outdated in its energy resource information, lacks detailed discussion for phased leasing and development, as well as any requirements for the capture or reduction of air emissions, liquid gathering systems, multiple well installation, or caps on new surface disturbances. These items all represent recent management efforts at mitigation on federal lands in the West. The Coalition feels that by implementing the MLP in the GLMA, these planning decisions can be incorporated.

SUMMARY: The GLMA is uniquely positioned to utilize the Master Leasing Plan concept. An MLP in this area will serve as a positive solution which can guide energy development in a balanced manner for years to come. By strengthening guidelines for development of areas where no leasing and/or surface occupancy is appropriate, areas where stipulations and best management practices are appropriate, and areas where responsible energy development practices are acceptable, we can cooperatively create a strategy that will manage the numerous valuable resources of the GLMA while allowing for responsible energy development.

We thank you for this opportunity to present our reasoning for implementing a Master Leasing Plan in the Greater Little Mountain Area. We are available for any further assistance or involvement.

Respectfully representing the Greater Little Mountain Coalition,

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cc: Bob Abbey, BLM Director
Ned Farquhar, BLM Deputy Assistant Secretary for Land and Minerals Management
Mike Pool, BLM Deputy Director (Operations)
Marcilynn Burke, BLM Deputy Director (Programs and Policy)
John Ruhs, Wyoming BLM High Desert District Manager
Lance Porter, Wyoming BLM Rock Springs Field Office Manager
Wyoming Governor Dave Freudenthal
US Senator John Barrasso
US Senator Mike Enzi
US Representative Cynthia Lummis



December 14, 2018

Kimberlee Foster
Field Manager
Bureau of Land Management
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901

RE: Alternative for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision

Dear Ms. Foster,

The Greater Little Mountain Coalition (Coalition) is pleased to submit the following document to be considered in the Bureau of Land Management's (BLM) development of alternatives in the Rock Springs BLM Draft Resource Management Plan Revision. The alternative is specific to the Greater Little Mountain Area (GLMA). This crown jewel of Sweetwater County, Wyoming consists of 522,236 acres bounded to the west by Flaming Gorge Reservoir, to the north by Pretty Water Creek, to the east by Highway 430 and to the south by the Utah-Colorado state line. This document falls within the range of existing alternatives; therefore, no additional analysis should be needed, however, we trust this information helps in forming the preferred alternative.

The Coalition is proposing the following resource management prescriptions:

- Implementation of an upfront plan for responsible oil and gas leasing in the proposed GLMA boundary by the Coalition that includes the Sage Creek watershed;
- Creation of additional no surface occupancy (NSO) and right of way exclusion (ROW) areas in the specific management areas of Sugarloaf Basin, Sage Creek and Pine Mountain to protect fish and wildlife habitat, improve watershed conditions and recreational opportunities;
- Maintenance of existing management in Currant Creek and Red Creek management areas and;
- Application of controlled surface use stipulations (CSU) in the Pine Mountain management area.

Background

The Coalition is an assembly of sportsmen and sportswomen organizations, union members, miners and more than 2,500 hunters, anglers and recreationists who want to see the GLMA's valuable multiple-use landscape continue to support abundant fish and wildlife populations, protect federal and state recognized sensitive species and provide ample outdoor recreation opportunities. The Coalition partners include: Bowhunters of Wyoming (BOW), Muley Fanatic Foundation (MFF), Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership (TRCP), Trout Unlimited (TU) and Wyoming Wildlife Federation (WWF).

Alternative

The GLMA comprises 14% of the entire BLM Rock Springs Field Office public land surface estate yet provides some of the most highly valued fish and wildlife habitat and hunting opportunities in the Rock Springs planning area. In fact, the GLMA holds some of the most sought after big-game hunting units in the state and Eastman's Hunting Journal regularly names these deer and elk units in their top five hunts for Wyoming. Since 1990, organizations and agencies have placed

over \$6 million dollars on-the-ground enhancing and maintaining the land and water value that the Coalition and the public hold dear. Wyoming Game and Fish Department (WGFD), BLM, Wyoming Conservation Landscape Initiative (WCLI), BOW, Western Wyoming Mule Deer Foundation, Doris Duke Foundation, Wyoming Governor’s Big Game Licensing Coalition (WGBGLC), The Nature Conservancy (TNC), MFF, Bureau of Reclamation (BOR), Central Utah Project Completion Act, U.S. Fish and Wildlife Service (USFWS), National Fish and Wildlife Foundation, Wyoming Wildlife Natural Resource Trust Fund (WNNRT), Natural Resources Conservation Service (NRCS), Rocky Mountain Elk Foundation (RMEF), and TU to name several have completed extensive habitat work within the GLMA that enhances native cutthroat trout and big game habitat, improves grazing management and provides opportunities for hunting, angling and other outdoor recreation activities.

Rather than continue the fragmented small-scale land management approach through Applications for Permit to Drill (APD), the Coalition recommends implementing habitat conservation parameters on an area that includes the entire proposed boundary of the GLMA, including Sage Creek watershed, and incorporates upfront planning with specific oil and gas lease parcel stipulations to mitigate anticipated impacts and protect resources on public lands in accordance with the BLM’s multiple-use and sustained yield mandate. As noted in previous letters and our Proposal (dated 1.26.16 and attached to this alternative), the Coalition believes the GLMA is the ideal place to showcase an upfront planning process for oil and gas leasing that would define responsible energy development and take in to account the cumulative impacts of industrial uses on our public lands.

These recommendations are for all new leasing activities within the GLMA. The Coalition’s Proposal highlights the fish, wildlife and outdoor recreation values found in the GLMA. This alternative defines those values for the six areas using Geographic Information Systems (GIS) science and highlights the boundary compromise the Coalition made since its inception in 2008 (Figures 1 and 2) and the new-collar data available for big game movements. The Coalition recognizes the 1997 Green River Resource Management Plan as the current land use plan for the GLMA.

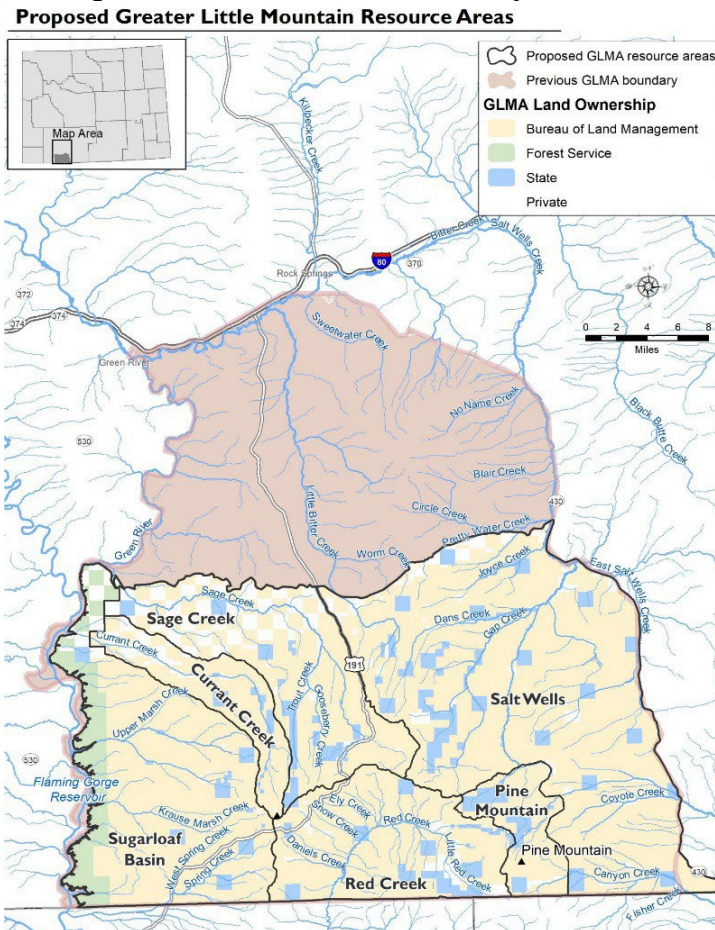


Figure 1. Leading back to negotiations in 2008, the northern boundary was shifted south to avoid conflict in the checkerboard in the Greater Little Mountain Area and to honor a compromise with the Rock Springs Grazing Association.

Sugarloaf Basin Special Management Area

1. No Surface Occupancy (NSO) for Sugarloaf Basin
2. Rights-Of-Way (ROW): Upgrade Sugarloaf Basin SMA from avoidance to exclusion.

The Coalition requests the BLM consider new movement data from big game collared as part of the University of Wyoming's Deer-Elk Ecology Research. More important than originally proposed, research data indicates Sugarloaf Basin provides high value habitat for wintering deer and elk.

Currant Creek Portion of the Red Creek ACEC

1. Maintain NSO for Currant Creek ACEC of the Greater Red Creek ACEC
2. Maintain ROW exclusion within Currant Creek ACEC
3. No new leasing of contiguous blocks of land identified in December 2009 letter from BLM to Governor Freudenthal, that fall within the Currant Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks. There are several large, contiguous blocks of unleased parcels including parcels in Marsh Creek, Currant Creek, Sage Creek and Trout Creek.

Sage Creek Portion of the Red Creek ACEC

1. NSO for Sage Creek
2. ROW: Upgrade Sage Creek ACEC from avoidance to exclusion
3. No new leasing of contiguous blocks of land identified in December 2009 letter from BLM to Governor Freudenthal, that fall within the Sage Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks.

Red Creek ACEC

1. Maintain designated ACEC and fluid mineral withdrawal area.
2. ROW: maintain exclusion area.

Pine Mountain Management Area

1. NSO for 14,982 acres
2. CSU for 2,513 acres

The Coalition recommends NSO of 14,982 acres in the Pine Mountain area to protect groundwater recharge areas, crucial big game habitat and parturition areas and important Colorado River cutthroat trout (CRCT) habitat. Outside of the proposed NSO, the Coalition recommends 2,513 acres of CSU stipulations, utilization of mandatory best management practices, implementation of a phased development scenario and mandatory reclamation standards prior to more development. Additional recommendations for mineral management include directional drilling from a minimal number of well pads and implementing the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat."¹

Salt Wells Resource Area

1. Remove big game timing stipulations on development in the Salt Wells Resource Area if;
 - a. NSO management is implemented in Sage Creek, Sugarloaf Basin Special Management Area and a portion of Pine Mountain and;
 - b. the management for Currant Creek and Red Creek remain the same.

¹ Wyoming Game and Fish Department. 2010. *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat*. Cheyenne, Wyoming.

	Federal Acres (GIS)	GR RMP Acres (plats)	Closed to minerals leasing	NSO acres	CSU acres	Acres Leased to Oil & Gas as of Dec 2018	Comments
Sage Creek Portion of the Greater Red Creek ACEC	52,190	52,270	-	52,190	-	0	Northern boundary of GLMA to include Sage Creek watershed-important CRCT ² occupied and expansion habitat
Current Creek Portion of the Greater Red Creek ACEC	23,699	23,740	-	23,699	-	0	Important big game crucial habitat and CRCT habitat
Red Creek Portion of the Greater Red Creek ACEC (including WSA)	55,691	63,900	55,691	-	-	551	Leases pre-date federal mineral withdrawals and FLPMA. Extremely fragile soils and high watershed values. Habitat for pure strain CRCT
Pine Mountain Special Management Area	17,495	64,200	-	14,982	2513	1,012	Combination of NSO and CSU to protect crucial big game habitat and watershed integrity
Sugarloaf Special Management Area	106,266	85,880	-	106,266	-	3,887	New collar data from UW -very important area for wintering deer and elk. Marsh Creeks flow directly into Flaming Gorge Reservoir-important for coldwater sport fish
Salt Wells Management Area	178,235	229,508	-	-	-	16,958	Crucial wildlife ranges, steep slopes, and high recreational hunting values for elk and mule deer
Totals	433,576	519,498	55,691	197,137	2513	22,408	-
% of Total	-	-	12.8%	45%	.58%	5.2%	-

Figure 2. Management recommendations and approximate acreage for six areas identified within the Greater Little Mountain Area. The total acreage of the GLMA is 522,236 (BLM 80%, USFS 4%, State 8%, Private 8%).

²Colorado River cutthroat trout (CRCT) is the only trout native to the Green and Little Snake river drainages in Wyoming. CRCT prefer clear, cold water, naturally-fluctuating flows, low levels of fine sediment and complex habitats. The GLMA is habitat for genetically pure CRCT.

In the GLMA, any APDs and development proposals should be coordinated through the WGFD to determine best placement for well pads and associated structures. This includes maintaining functionality and connectivity of the GLMA for fish and wildlife objectives. The BLM should require industry to use gold book standards for reclamation and maintenance of native vegetation. The GLMC requests to be notified about any APD that effects fish and wildlife resources in the GLMA, as well as APD's for parcels leased in the GLMA.

A review of cumulative impacts in the GLMA from development proposals should take place before further leasing and permitting continues to best protect traditional land uses such as livestock grazing, hunting and fishing. Developing a monitoring and mitigation matrix for wildlife, wildlife habitat, fisheries, aquatic habitat and watershed recharge values with thresholds and indicators prior to a mineral extraction project supports an upfront plan for oil and gas leasing.

The Coalition sincerely thanks the BLM for their work on the draft RS RMP. We respectfully request that the concepts offered in this letter be considered for incorporation into the BLM's preferred alternative for the draft RS RMP. We look forward to continuing to work with the BLM on this important resource management plan.

Sincerely,

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Craig Thompson, Landowner
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April 8, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

Via: corridors@anl.gov and the web form at <http://corridoreis.anl.gov/involve/stakeholder-input/>

Re: Comments on Corridor Abstracts for Section 368 West-wide Energy Corridors Regions 4, 5 and 6
Regional Review (**Corridor 126-218**)

Dear Mr. Leverette, Mr. Woodruff and Dr. Smith:

Please accept the following comments of the Greater Little Mountain Coalition (the Coalition) on the Corridor Abstracts for Regions 4, 5 and 6 of the Section 368 West-wide Energy Corridors (WWEC). We support the ongoing commitment shown by the Bureau of Land Management (BLM), the U.S. Forest Service, and the Department of Energy to improve the siting and functionality of WWEC.

The Greater Little Mountain Coalition

The Coalition is an assembly of sportsmen and sportswomen organizations, community leaders, local governments, union members and more than 2,500 engaged hunters, anglers, and recreationists who want to see the Greater Little Mountain Area's (GLMA) valuable landscapes continue to support abundant fish and wildlife populations including the protection of federal and state recognized sensitive species and to provide ample recreation opportunities. The Coalition partners include: Bowhunters of Wyoming, Muley Fanatic Foundation, Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership, Trout Unlimited and Wyoming Wildlife Federation. The Coalition was established in 2008 in response to development threats and has greatly appreciated the BLM deferring any oil and gas lease parcels in the area until the completion and signed Record of Decision from the Rock Springs Resource Management Plan revision.

The Greater Little Mountain Area

The north-south underground corridor 126-218 runs directly through the GLMA. This unique high desert habitat region is considered by biologists and resource managers to be some of the most sensitive fish and wildlife habitat in Wyoming. Located in southwestern Wyoming, about 30 miles south of the town of Rock Springs, elevation ranges from 6,040 feet at Flaming Gorge Reservoir to 9,060 feet at the top of Little Mountain. The area supports populations of elk, mule deer, moose and antelope (Figure 1).

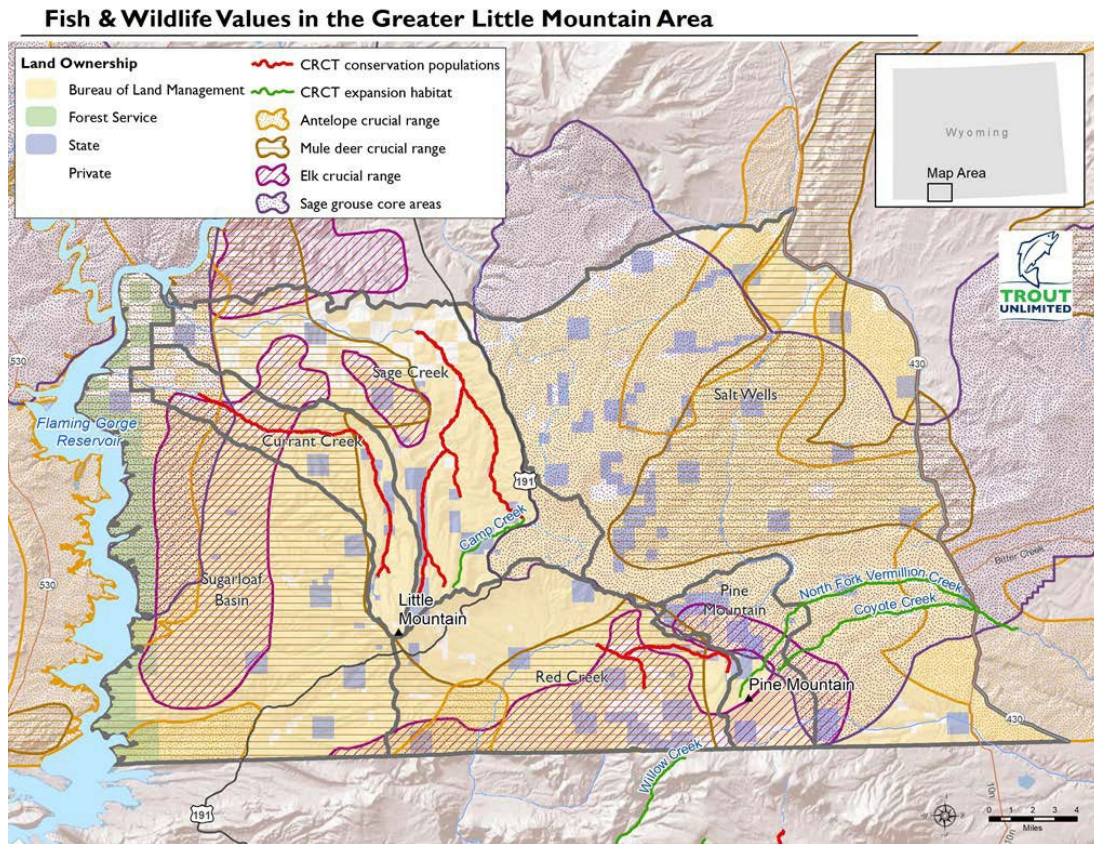


Figure 1. High-value water resources, wildlife and coldwater fisheries in the Greater Little Mountain Area, Wyoming.

Known by locals and non-residents alike for its highly coveted limited quota big game licenses, it remains one of the best hunting areas in Wyoming. Eastman's Hunting Journal often identifies elk and mule deer hunt areas in this region in the top five of the state. The GLMA is home to 37 terrestrial species identified in the Wyoming Comprehensive Wildlife Conservation Strategy as "species of greatest conservation need." Healthy Greater sage-grouse populations inhabit the GLMA with swaths of acreage under the Wyoming Core Area Habitat designation. This high desert ecosystem also includes streams that provide great trout fisheries for the sensitive Colorado River cutthroat trout with more than 130 miles of stream habitat (critical and reintroduction habitat) occurring within the GLMA. Six streams host native, conservation populations of Colorado River cutthroat trout – Currant Creek, Gooseberry Creek, Little Red Creek, Red Creek, Trout Creek and Upper Sage Creek. Colorado River cutthroat trout is a sensitive species recognized by the Conservation Agreement for Colorado River cutthroat signed by the Wyoming BLM, Wyoming Game and Fish Department, US Fish and Wildlife Service, BLM and Wyoming Trout Unlimited with a goal, "To assure the long-term viability of Colorado River cutthroat trout throughout their history range." In fact, Red Creek contains one of the purest genetic strains of Colorado River cutthroat trout.

Water Resources

The western flank of the GLMA contains numerous direct tributaries to Flaming Gorge Reservoir, which is part of the Upper Colorado River system. Salinity and increased sediment load are already a huge concern for this system. Sugarloaf Basin encompasses a major portion of the corridor and is an important upstream watershed recharge area. Any released contaminates, both above and below ground, could move directly into Flaming Gorge Reservoir harming a multimillion-dollar National Recreation Area and water supply for seven state beneficiaries of [the Upper Colorado River Compact](#). Also, the proximity of the corridor to Flaming Gorge, multiple springs and recharge areas associated with this area suggest that deeper regions of shallow groundwater may be encountered with disturbance and development.

Wildlife Resources

This area is crucial winter range for the South Rock Springs elk herd unit and the South Rock Springs mule deer herd unit. Winter is a critical time for ungulate survival and this area provides much needed refuge habitat for these animals. If there ever was an actual need for this corridor in the future, the Coalition recommends a plan Amendment with a full federal NEPA analysis. Of note, the University of Wyoming has new big game collar data for Sugarloaf Basin that needs reviewed and incorporated into any action on this landscape.

Summary

The Coalition submitted proposals to the BLM designed to balance these important wildlife habitats and outdoor recreation opportunities with oil and gas development (Appendix 1). This corridor cuts directly through some of the highest priority areas the Coalition has identified for limiting surface development that could fragment wildlife habitats (Figure 2). The most concerning portion of this corridor is between MP 71-108. This section cuts directly through sage-grouse priority habitat management areas and big game habitats and runs through the Greater Red Creek ACEC from MP 92-106. Improvements can be made to better avoid the ACEC from MP 100-106, but the corridor can't be easily re-routed to avoid the ACEC from MP 92-100, as noted in the Agencies' Corridor Abstracts. Large portions of this corridor do not follow existing disturbance, and development in the corridor would lead to unnecessary impacts to undeveloped lands and fragmentation of existing wildlife habitats in a place highly valued for its undeveloped nature.

There is not a good north-south route for this corridor and it is imperative the Agencies delete this corridor in order to avoid these impacts. Furthermore, there has not been a clearly defined economic need or market that this corridor would serve.

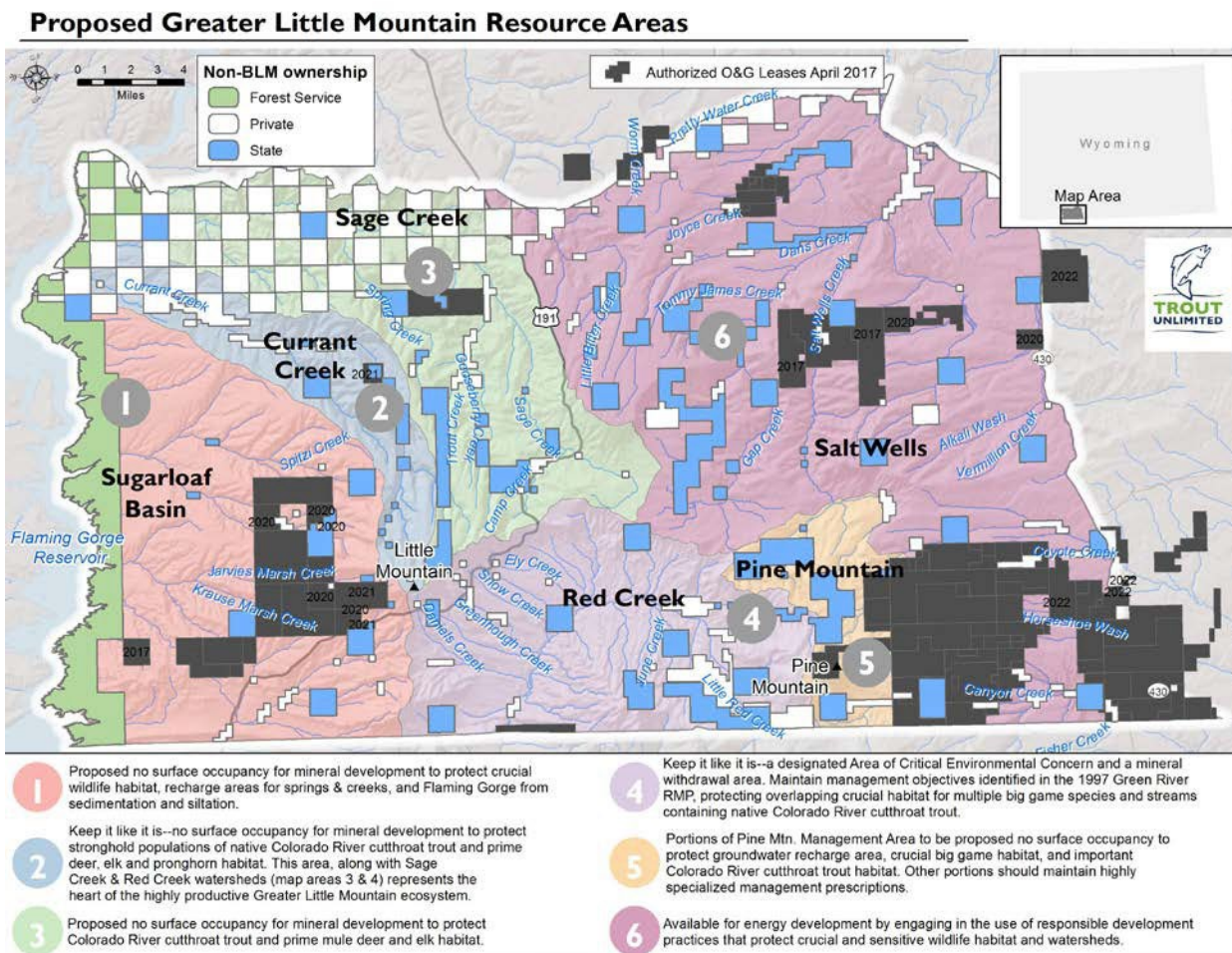


Figure 2. Proposed Greater Little Mountain Resource Areas and Management Prescriptions.

Since 1990, the Little Mountain region has benefited from over \$6 million in habitat restoration and enhancement projects funded by various state and federal agencies, conservation organizations and private individuals. The local, state, regional and federal entities who contributed financially with both sweat equity and dollars expect a return on their investment by maintaining functionality

and connectivity of the GLMA for fish and wildlife objectives. The economic contribution for Sweetwater County alone generated from world-class game and sportfish speak to the high-value outdoor recreation resources of this area. More than 15,000 fishing licenses sold annually in Sweetwater County with anglers spending over \$48.4 million in the last 5 years. Big game hunters in GLMA spent over \$12.7 million in the last 5 years.

We look forward to continued dialogue to adequately conserve and protect the GLMA. Should you have any questions with respect to our comments or would like to have a conversation with the Coalition, please feel free to contact us.

Sincerely,

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Craig Thompson, GLMA landowner
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Steve Martin, Bowhunters of Wyoming
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Monte Morlock, United Steelworkers Local 13214
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Cc

Communities Protecting the Green
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Renny MacKay, Policy Advisor, Governor Gordon's Office
Mary Jo Rugwell, State Director, BLM Wyoming State Office
Sweetwater County Board of Commissioners
Jeremy Bluma, BLM National Project Manager



January 26, 2016

Kimberlee Foster
Field Manager
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Rock Springs Field Office
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RE: Proposal for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision

Dear Ms. Foster,

The Greater Little Mountain Coalition (Coalition) is pleased to submit the following proposal to be considered in the Bureau of Land Management's (BLM) development of alternatives in the Rock Springs BLM Draft Resource Management Plan Revision (DRMP). This proposal is specific to the Greater Little Mountain Area (GLMA).

The Coalition is proposing the following resource management prescriptions:

- Implementation of a Master Leasing Plan (MLP) for the GLMA;
- Creation of additional no surface occupancy (NSO)/right of way avoidance (ROW) areas in the specific management areas of Sugarloaf Basin, Sage Creek and Pine Mountain to protect fish and wildlife habitat and recreational opportunities;
- Maintain existing management in Currant Creek and Red Creek management areas;
- Controlled surface use stipulations (CSU); and
- Management for responsible energy development.

Background

The Coalition is an assembly of sportsmen and women organizations, union members and more than 2,500 concerned hunters, anglers, and recreationists who want to see the GLMA's valuable multiple-use landscape continue to support abundant fish and wildlife populations, protect federal and state recognized sensitive species and provide ample recreation opportunities. The Coalition partners include: Bowhunters of Wyoming, Muley Fanatic Foundation, Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership, Trout Unlimited and Wyoming Wildlife Federation.

Proposal Discussion

Master Leasing Plan. As one of Sweetwater County's and Wyoming's most popular hunting, fishing, recreation and wildlife viewing areas, the GLMA is a perfect place to showcase the Master Leasing Plan (MLP) process and how it meets the MLP criteria set forth by Department of Interior's Instruction

Memorandum (IM) No. 2010-117.¹ IM 2010-117 and subsequent requirements in the BLM's Planning for Fluid Mineral Resources Handbook (H-1624-1, Chapter V) provide the BLM guidance for developing MLPs. In short, the concept is to take a proactive, focused look at oil and gas leasing decisions, displacing the traditional broad planning area-wide leasing decisions that accompany RMPs. In doing so, it effectively provides a specific fluid minerals leasing decision for a defined portion of the planning area that is tiered to the broader RMP.

To be successful, a MLP should include objectives, allowable uses and management actions for a defined portion of the planning area. The MLP components should be compatible with overall planning area goals for the Rock Springs resource area, but they must be distinct and applicable to a defined location, such as the GLMA.

The data provided by the BLM's Reservoir Management Group has identified the GLMA within the Rock Springs Planning Area as very low to low in terms of conventional oil and gas potential for the period 2012-2031² (see Map A). This creates a more favorable setting for establishing an MLP within the GLMA. Thus, the BLM should first catalogue and analyze resources and uses that may be impacted by oil and gas development in the Affected Environment Chapter of the DRMP in order to effectively avoid and mitigate impacts to resource values within an MLP area. Then, the BLM should establish resource condition objectives and develop resource protection measures as detailed in H-1624-1, Chapter V.

These elements are critical for a successful MLP for the GLMA. We hope that our suggestions assist the BLM to 1) ensure that an adequate level of analysis is undertaken to support MLP development, 2) help the public understand the MLP process, rationale and decision, and 3) provide certainty for both industry and conservation interests.

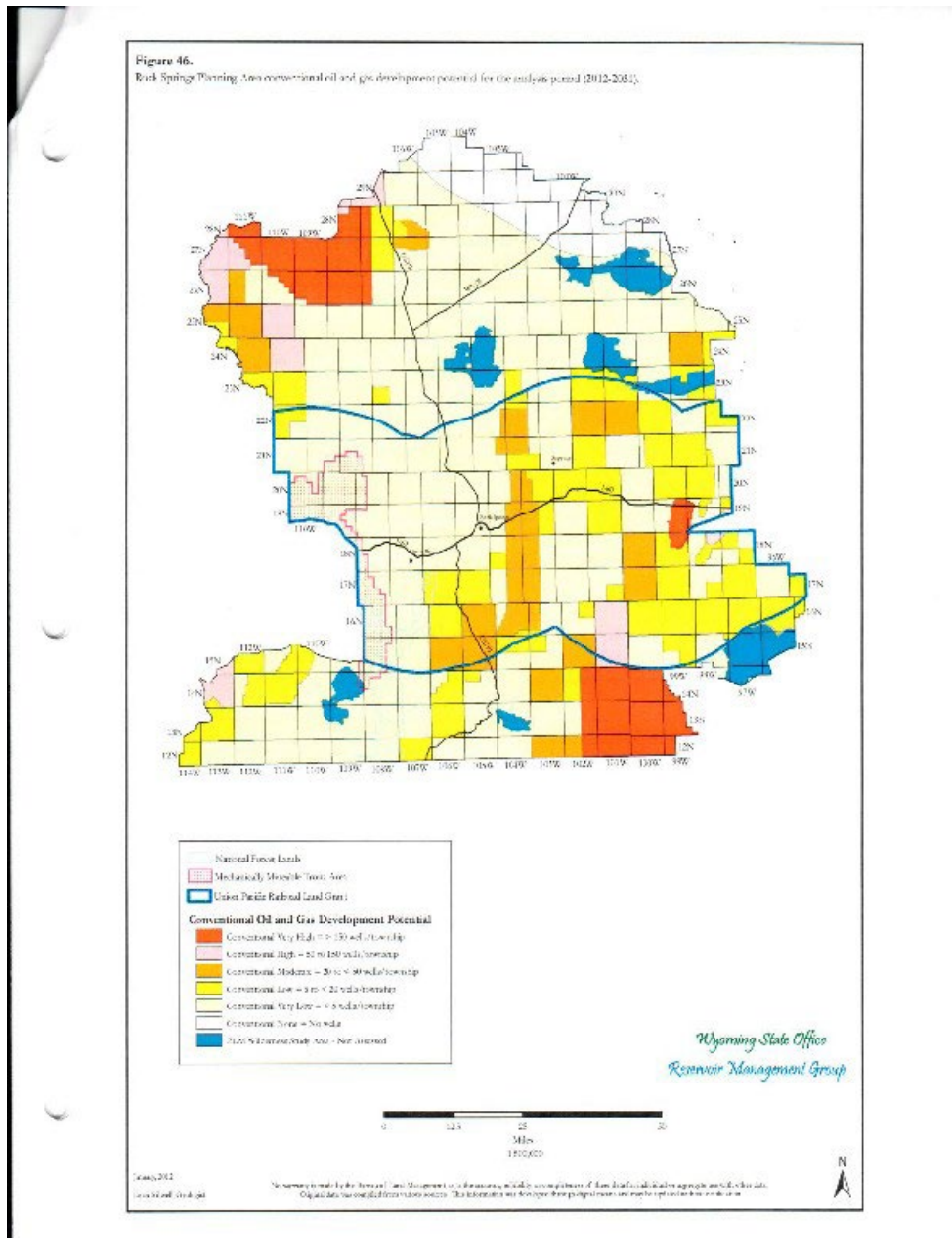
As noted in our 2010 and 2011 letters (attached) to the BLM,³ the Coalition believes the GLMA is the ideal place to showcase the MLP process. The MLP concept will serve as a proactive solution to create balanced multiple-use management, reduce stakeholder conflict over time and protect fish and wildlife species.

While the Coalition is concerned about potential direct and indirect long-term impacts from leasing proposals, simultaneously, we are proactive in advocating for responsible energy development in the GLMA. This approach ensures that critical habitat areas have limited surface use from energy development while other areas are open for development using specialized management prescriptions protecting high value ecological resources, recreational opportunities and quality fishing and hunting activities for future generations. We continue to encourage the BLM to consider retiring leases that are due to expire and are located within GLMA resource areas that contain crucial habitat for fish and wildlife. Such actions are supported in the IM 2010-117 and similar actions are recommended in the current GRRMP.

¹ BLM. 2010. Instruction Memorandum No. 2010-117. Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews. Section II: Master Leasing Plans.

² BLM. January 2012. Wyoming State Office Reservoir Management Group – Description of Oil and Gas Potential Analysis in the BLM Rock Springs Resource Planning Area's "Reasonable Foreseeable Development Report for the Rock Springs BLM Resource Management Plan. 2013". Figure 46.

³ Greater Little Mountain Coalition. 2010. Letter to Don Simpson, Wyoming State Director, BLM regarding *Master Leasing Plan Proposal for Greater Little Mountain Area in Southwest Wyoming*. Dated July 15, 2010. Copy to Lance Porter, Wyoming BLM Rock Springs Field Manager and John Ruhs, Wyoming BLM High Desert District Manager (among others).



Map A. BLM Reservoir Management Group’s analysis of conventional oil and gas development for the Rock Springs resource planning area.

Proposed Resource Protection Areas. The GLMA contains a diverse and sensitive ecosystem. The current Green River Resource Management Plan (GRRMP) recognizes the unique qualities of the GLMA by providing specific management direction to protect this exceptional area. Over the years, Trout Unlimited, Muley Fanatic Foundation, Rocky Mountain Elk Foundation and the Wyoming Game and Fish Department have completed extensive habitat work within the GLMA that improves fish and wildlife habitat conditions. These partners and others have contributed more than \$3 million to the GLMA since 1990, working with BLM on habitat projects designed to conserve and enhance native cutthroat trout and big game habitat, improve grazing management and provide opportunities for hunting, angling and other outdoor recreation activities. These habitat improvements have increased angling and hunting activities translating to an impressive \$12.7 million in total hunter expenditures in the GLMA in the last

five years and \$48.4 million in angling activities expenditures over the last five years in the GLMA and surrounding Sweetwater County. The GLMA is not only valuable in terms of its habitat component but also in its outdoor recreational economic contributions.⁴

The Coalition appreciates the importance of energy development to the economies of Sweetwater County and the state. Our proposal recognizes current mineral leaseholders and does not affect their valid existing rights. Our proposed recommendations are for all new leasing activities.

Sugarloaf Basin Special Management Area—No Surface Occupancy

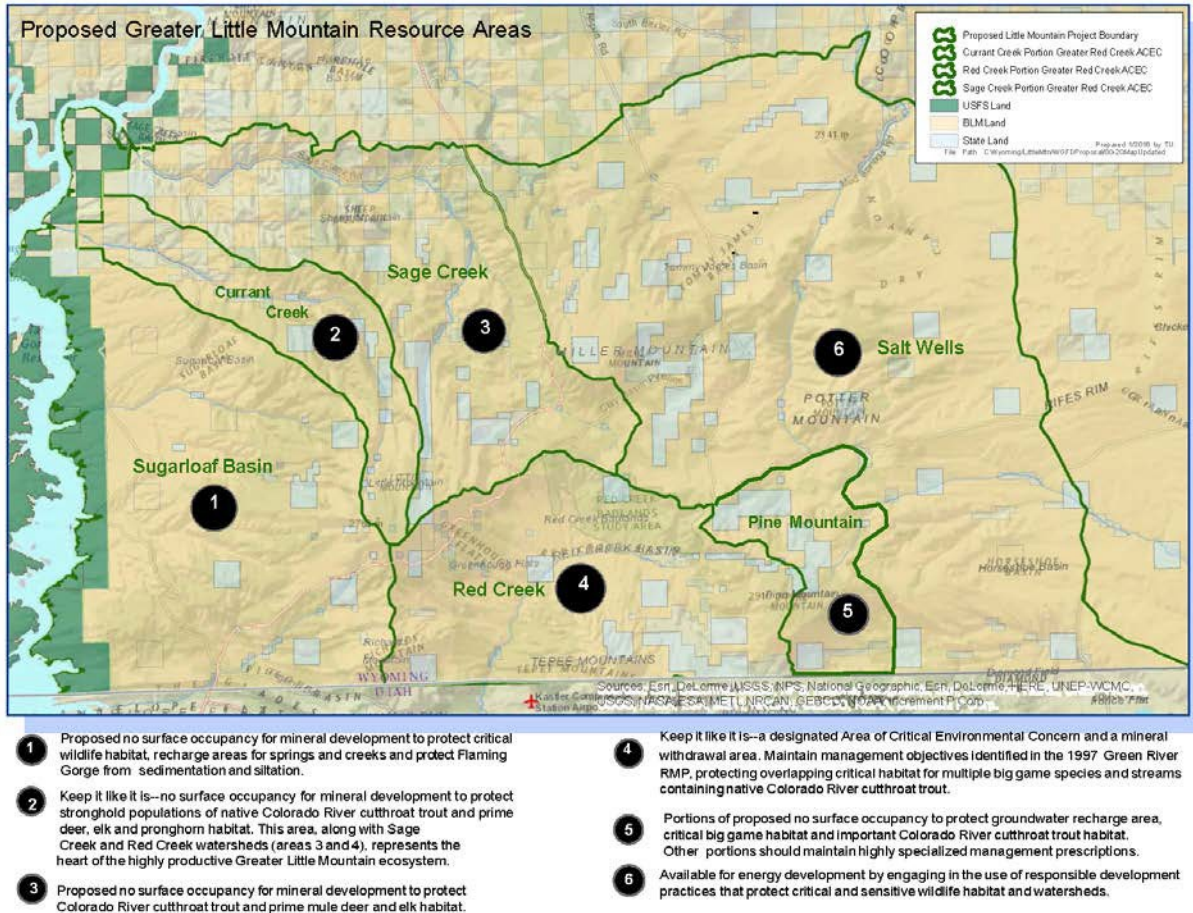
The importance of the Sugarloaf Basin Special Management Area (SMA) to trout and other fish has increased over the years due to sensitivity of the Marsh Creeks watershed to soil erosion. The Marsh Creeks flow directly to Flaming Gorge Reservoir, and could be a significant contributor to the increasing levels of siltation and sedimentation to the reservoir if surface impacts are not avoided. In addition, the SMA is a known groundwater recharge area, providing local aquifers important water supplies for plants, springs and streams in the area. The addition of roads (from energy development activities) can create hard surfaces that prevent rain and snow from soaking back into the ground and replenishing these valuable groundwater recharge zones.

The Marsh Creeks complex is a series of short, first order perennial streams that flow directly into Flaming Gorge Reservoir. We recommend NSO in the area to prevent surface disturbance (through roads, well pads, heavy vehicle use, etc.) that creates and thus conveys large amounts of sediment into Flaming Gorge. Incorporating more restrictive management options will minimize the amount of cumulative phosphorus loading and eutrophic conditions in the reservoir and help to protect the important and popular recreational fishery. In addition, the short distance each of the Marsh Creeks travel before entering the Gorge heightens the vulnerability of these watersheds, not just to sediment loading, but real significant threats of a petroleum spill escaping and reaching the reservoir before being noticed or contained. These potential issues could have direct impacts on the Gorge's salmonids and other sport fish populations.

The Sugarloaf Basin SMA also provides crucial winter-yearlong habitat for mule deer, elk and pronghorn antelope. In addition, a portion of the SMA is designated Greater sage-grouse core habitat while other portions contain habitat for midget-faded rattlesnakes, a sensitive species in Wyoming. Finally, the SMA provides a significant Utah juniper habitat complex, supporting an assemblage of juniper-obligate mammal and bird species.

Because of the important reasons described above, the Coalition is proposing NSO for mineral development in the SMA to protect critical wildlife habitat, groundwater recharge areas for springs and creeks and the Flaming Gorge Reservoir from sedimentation and siltation.

⁴ Economics and harvest data for the GLMA and Sweetwater County compiled by Trout Unlimited using BLM, Wyoming Game and Fish Department and Sweetwater County data.



Map B. Greater Little Mountain resource areas depicting proposed alternative for consideration in the Rock Springs BLM Draft Resource Management Plan.

Carrant Creek Portion of the Red Creek ACEC – Maintain Existing Management

The Current Creek watershed is currently managed as NSO under the current GRRMP and is part of the Greater Red Creek ACEC (Area of Critical Environmental Concern). The Coalition recommends this management objective (for mineral development) be maintained. Carrant Creek is one of the numerous streams in the GLMA that provides an important stronghold for conservation populations of native Colorado River cutthroat trout (CRCT) as these populations are located in one of the driest regions of CRCT’s historic range and are the only remaining population that still occupies this semi-arid zone⁵. Considerable habitat work has occurred in this watershed to improve and stabilize this sensitive stream. In addition, the area contains critical big game habitat for elk, mule deer and pronghorn antelope. Maintaining current management will result in the continued improvement of healthy fish and wildlife habitat.

Sage Creek Portion of the Red Creek ACEC – No Surface Occupancy

The Sage Creek portion of the Greater Red Creek ACEC should be managed as NSO for mineral development in order to protect sensitive CRCT habitat and elk and mule deer crucial winter and parturition areas. Due to the highly erodible nature of the soils in this area, surface disturbing activities

⁵ Trout Unlimited. 2009. Internal white paper titled “Analysis of the Potential Impacts of BLM Proposed Oil and Gas Development Leases on Colorado River cutthroat trout in the Little Mountain Area of Wyoming.” Amy L. Haak. January 2009.

will increase the sedimentation problem the drainage is currently experiencing. Under the Coalition's proposal, the Sage Creek management area would be strengthened from the current level of management objectives identified in the GRRMP by increasing protective measures for critical habitat for CRCT and big game species.

Red Creek ACEC—Maintain Existing Management

The Red Creek watershed and entire landscape is a designated ACEC and a mineral withdrawal area. The Coalition supports maintaining the continued management objectives for this unique place due to its importance of overlapping crucial habitat for multiple big game species and streams containing conservation populations of CRCT.

Pine Mountain Management Area—Part NSO-Part Special Management Guidelines

The Pine Mountain Management Area is a designated management area in the GRRMP because of its significant fish and wildlife habitat. The Coalition recommends that a portion of the Pine Mountain MA be designated NSO in order to protect groundwater recharge areas, crucial big game habitat and important CRCT habitat. Outside of the proposed NSO, the Coalition supports mineral leasing with specialized management prescriptions such as CSU stipulations, utilization of mandatory best management practices, potential implementation of a phased development scenario and mandatory reclamation standards prior to more development. Additional recommendations for mineral management include directional drilling from a minimal number of well pads and implementing the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat."⁶

Salt Wells Resource Area—Responsible Energy Development Practices

Engaging in the use of responsible development practices that protect crucial and sensitive wildlife habitat and watersheds should remain at the forefront of any current or proposed management actions and objectives. The Salt Wells Resource Area contains crucial wildlife ranges, steep erodible slopes and high recreational value for elk and mule deer hunting. The area is also important to existing and future oil and gas production in Sweetwater County. Based on a specific scientific review of the GLMA, the Coalition supports removing big game timing stipulations on development in the Salt Wells Resource Area so long as NSO management is implemented in Sage Creek, Sugarloaf Basin Special Management Area, and a portion of Pine Mountain, and the management prescriptions for Sage Creek and Red Creek remain the same.

Development proposals should be vetted through the Wyoming Game and Fish Department to determine best placement for well pads and associated structures. The BLM should highlight the need for industry to use gold book standards for reclamation and maintenance of native vegetation.

Summary

The GLMA continues to provide some of the best hunting and angling for residents and non-residents alike, offer abundant opportunities for outdoor recreation, is an important contributor for livestock operations, a significant economic engine for outdoor recreation in the County and provides energy development opportunities for a variety of energy resources. Like many landscapes in the West, research is proving that increased development of our valuable natural resources impacts fish and wildlife habitats. Much of the GLMA is leased and the Coalition believes development can be completed responsibly in identified areas using a Master Leasing Plan component. With the application of new technologies, impacts to our waters and landscapes can be minimized. However, there are places that should be

⁶ Wyoming Game and Fish Department. 2010. *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat*. Cheyenne, Wyoming.

conserved and protected that provide the life support essential for fish and wildlife. For these reasons, we ask that the BLM apply NSO stipulations to Sugarloaf Basin, Sage Creek and portions of Pine Mountain and maintain existing management in Red Creek and Currant Creek. To help strike a balance, we would then support relaxation of timing stipulations in the Salt Wells area.

The Coalition requests that our proposed recommendations be included in the proposed action and preferred alternative currently being formulated for the Draft RMP. We look forward to working with the BLM on this important resource document.

Sincerely,

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Attached in pdf: GLM Coalition 2010 Letter to the BLM on MLPs in the Greater Little Mountain Area



June 10, 2011

Don Simpson
State Director, Bureau of Land Management
Wyoming State Office
5353 Yellowstone Road P.O. Box 1828
Cheyenne, WY 82003

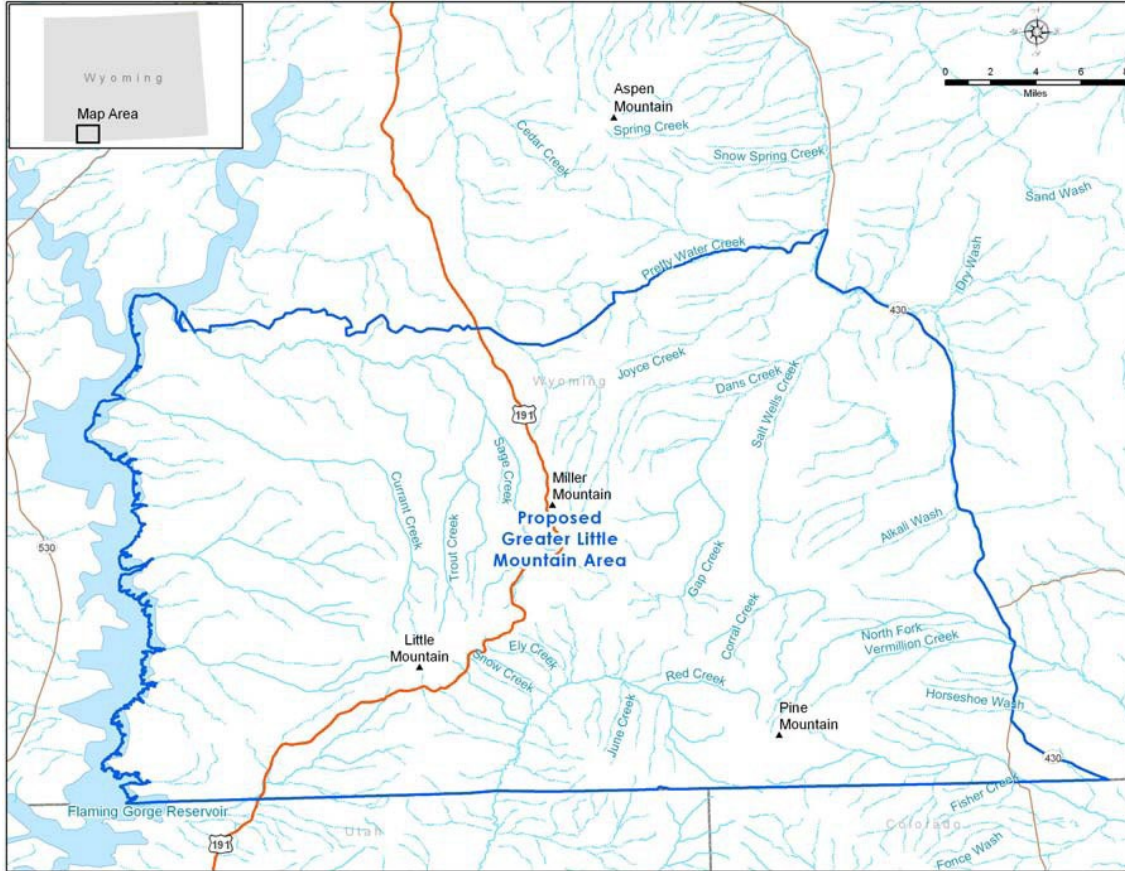
RE: April 1, 2011 response letter to MLP recommendations

Dear Mr. Simpson,

On behalf of the Greater Little Mountain Coalition we thank you and your staff for responding to our Master Leasing Plan Proposal for the Greater Little Mountain Area (GLMA). We appreciate the time and energy that was spent analyzing our proposal as well as others throughout the state. Based on your response letter and reading the Wyoming Oil and Gas Leasing Reform Implementation Plan we understand that you “expect” to incorporate MLP analysis of the Greater Little Mountain Area into the RMP revision process.

We understand that this is a new process for all of us and wanted to take this opportunity to express our willingness to work collaboratively with the BLM, and other stakeholders, to ensure that this becomes a useful part of the land use planning process. Since the BLM first created the MLP concept we felt it could be an effective way to reduce stakeholder conflict and to manage the GLMA on a landscape scale for the benefit of all.

Since we are identified as the MLP proponents for the GLMA in the Leasing Reform Implementation Plan we wanted to make a couple of clarifications regarding our proposal and the implementation plan. Of greatest significance the implementation plan uses two different maps for the Greater Little Mountain boundary. The first map is contained in the executive summary under “Wyoming Category 2 Nominations” and this boundary is consistent with the boundary map submitted in our MLP proposal (Map A). The second map is figure 15 on page 42 of the implementation plan and is not the same map we submitted with our proposal. The difference in these two maps has the following ramifications.



A. MLP boundary proposed by Greater Little Mountain Coalition

The map on page 42 contains all of the checkerboard land south of I-80, to the border and between Flaming Gorge and Highway 430. The map submitted by the Greater Little Mountain Coalition uses the same West, East and Southern boundaries but uses the bottom of the checkerboard for the Northern boundary. The checkerboard area in question falls outside the area of focus for the Coalition. For this reason we would like to clarify that we are not proposing an MLP analysis for the portions of checkerboard contained within the map on page 42 of the Leasing Reform Implementation Plan.

Additionally, the map on page 42 was used in the Leasing Reform Plan for all of the analysis of the Greater Little Mountain MLP. This resulted in data that is drastically different than what was presented in our proposal and potentially how it has been considered. For example, when using the map on page 42, that includes the checkerboard, to determine if the GLMA meets the MLP criteria in IM 2010-117, you are correct in saying that only 24 percent of the acreage is unleased (Leasing Implementation Plan p.41). However, when you use the map we submitted and that you use in your executive summary, 47 percent of the area is unleased. These percentages paint a different picture of how the area fits within the criteria. While determining if the area meets the MLP criteria may be a mute point at this time we feel it is important to note that there are distinct differences in how each map relates to the criteria. It was our belief that when using the map on page 42 the area was not well suited to a MLP analysis, but that when the checkerboard is removed the area is well suited to a MLP analysis. As you move forward implementing MLP analysis for the GLMA we recommend that you clarify which boundary will be used.

We would also like to offer our support in developing a plan for implementing the MLP analysis for the GLMA and would appreciate if you would inform us of any plans for how this process might occur. For instance, timelines, communication strategies, how the MLP will be wrapped into the RMP process and how the public will be involved are examples of information that interest the Coalition. Through continued collaboration we hope to be a positive partner in implementing a MLP for the GLMA that will result in greater certainty for stakeholders and ensuring that the areas multiple resources are managed in a balanced manner.

Thank you for your time and consideration.

Respectfully representing the Greater Little Mountain Coalition,

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cc: Bob Abbey, BLM Director
Larry Claypool, Deputy State Director, Minerals and Lands
John Ruhs, Wyoming BLM High Desert District Manager
Lance Porter, Wyoming BLM Rock Springs Field Office Manager
Trisha Cartmell, Petroleum Engineer, Rock Springs BLM
Vera-Lynn Harrison, Project Manager, Rock Springs RMP



July 15, 2010

Mr. Don Simpson, Wyoming State Director
Bureau of Land Management
5353 Yellowstone Road
P.O. Box 1828
Cheyenne, Wyoming 82003

Re: Master Leasing Plan Proposal for Greater Little Mountain Area in southwest Wyoming

Dear Mr. Simpson:

The Greater Little Mountain Coalition applauds the recent energy policy revisions pertaining to the Onshore Oil and Gas Leasing Reforms (Instruction Memorandum No. 2010-117). These reforms bring some much needed balance back to our oil and gas leasing and development programs. As these reforms are implemented within each state office, it is imperative to ensure that these concepts are put into action.

With this in mind, the Greater Little Mountain Coalition (referred to as Coalition) would like to be an active participant in developing ideas to aid in the implementation of these leasing reforms. We are particularly interested in the Master Leasing Plan (MLP) concept as it is a strong mechanism that incorporates the needed balance by identifying areas that would benefit from further evaluation, scientific analysis, and updated management actions. Our letter to you today offers a proposal for consideration of a pilot project using the MLP concept.

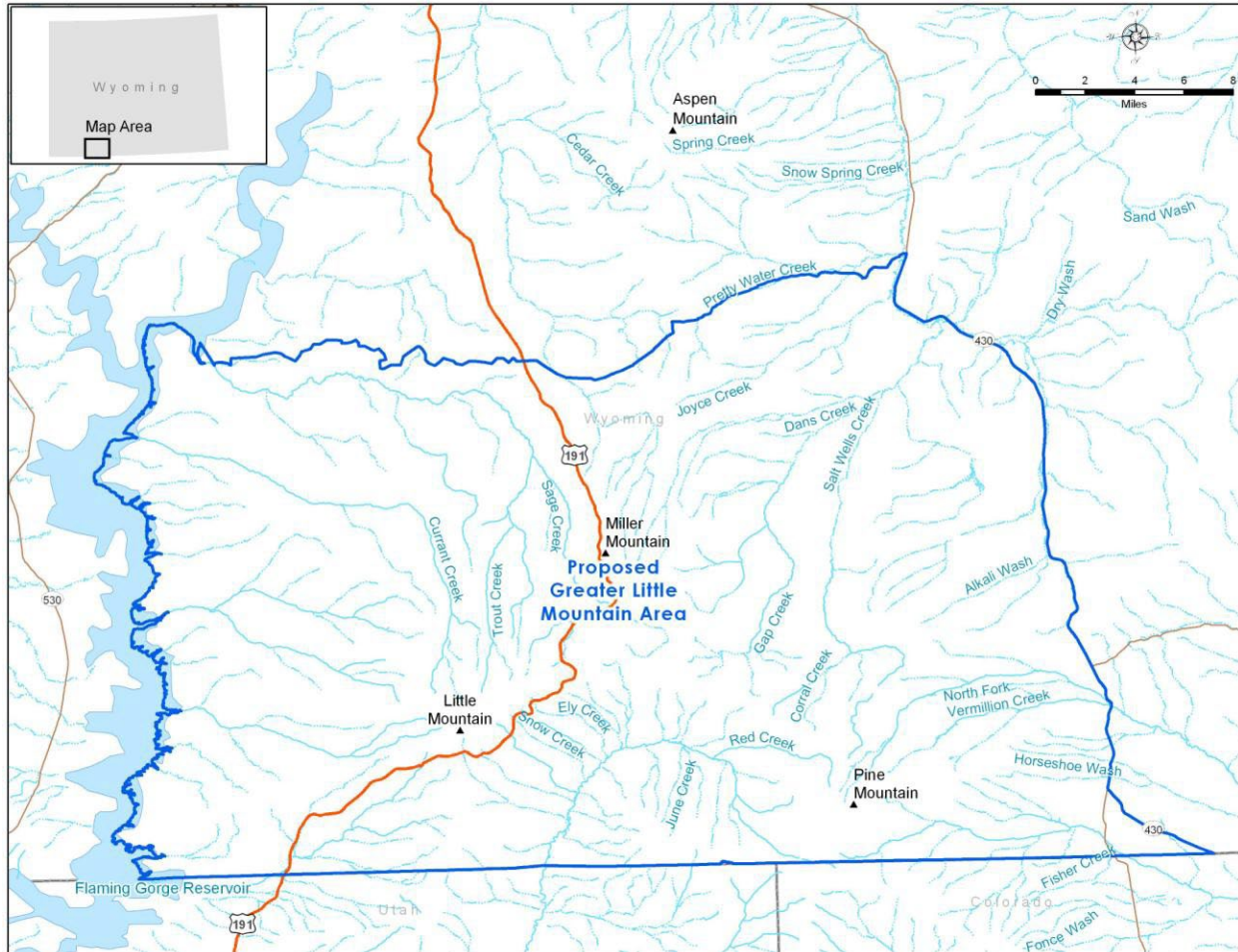
Our Coalition believes the Greater Little Mountain Area (GLMA) is a perfect place to showcase the MLP process. The GLMA is a unique landscape of BLM lands in southwest Wyoming that not only meets the criteria for an MLP, as described in the IM, it also has a number of other unique circumstances that make it a prime candidate for a MLP designation. This concept will serve as a proactive solution to create balanced multiple use management, reducing stakeholder conflict over time.

For the last three years, our Coalition of sportsmen groups, labor union members, local anglers and hunters, citizens and businesses have been working to advocate for responsible energy development in the GLMA. Additionally, the Governor of Wyoming, local, county and city government, industry and more traditional interests like livestock operators have all voiced a desire for a balanced multiple use solution in the GLMA. This combination of interests are coming together in a way which presents an opportunity for delineating areas where energy development is not appropriate, areas where specified stipulations dictate how development will occur, and areas that use responsible energy development practices.

It is clear that the existing Green River Resource Management Plan (GRRMP) for the Rock Springs BLM office is outdated, having been completed in 1997. However, the field office just received funding to revise the plan. A public notice is said to be released in November of 2010. If an MLP is initiated for the GLMA, it could be combined with the GRRMP revision rather than as an RMP amendment. Without comprehensive analysis that incorporates current resource science and management scenarios, along with a landscape scale look at this special area, we feel that the GLMA will be placed in jeopardy. It is our recommendation that the GLMA be considered for a Master Leasing Plan.

PURPOSE: The MLP concept represents a great opportunity to take a landscape scale approach to leasing and development of oil and gas resources in important natural resource areas prior to an area being leased. It is our belief that the GLMA in southwest Wyoming (Map A) meets the MLP criteria set forth by IM No. 2010-117 and would be a great place to showcase this concept.

The Coalition believes this mechanism could resolve or greatly reduce future public land management conflicts among the numerous stakeholders. A landscape scale review that accounts for cumulative impacts followed by a balanced multiple use strategy for the region will consider the multitude of energy activities that have the potential to impact this area. With natural gas drilling activities up by more than 900 rigs, compared to this time last year, it seems obvious that there is increased interest in developing natural gas. In addition, with increased interest in developing wind energy and other resources in the GLMA, a more proactive management scenario suggests that the MLP would be a prudent course of action. Increases in energy development in this area could potentially mimic the conflict among various stakeholders (i.e., ranchers, hunters, anglers, community, wildlife advocates, and businesses) within the Pinedale, Wyoming resource area, such as loss of wildlife habitat, loss of animal unit months (AUM) for ranchers, big game population declines, sage grouse impacts, and water and air quality concerns. By implementing a MLP in the GLMA prior to further development, stakeholders will have increased buy-in in the long-term management of the area, and hopefully avoid many of the conflicts we have seen in other areas of Wyoming.



Map A. Greater Little Mountain Area Boundary Map

CRITERIA: Below are the BLM’s four criteria for the preparation of a MLP and our supportive rationale for a MLP in the GLMA. In addition, the following information can aid the Wyoming BLM office in writing their Implementation Plan and timeline for accomplishing those tasks outlined in the IM and due August 16, 2010 to the Washington office.

Criteria 1: *A substantial portion of the area to be analyzed in the MLP is not currently leased.*

The GLMA includes lands north of the Colorado and Utah border, east of the Flaming Gorge Reservoir, west of highway 430 and south of the checkerboard (Map A). To be more specific, the GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased and of that 74,585 acres (14%) are held in production. The IM does not define “substantial” and the Coalition would like to suggest that this first criterion be given some broad leeway. This terminology becomes more unclear when, under Criteria 2, the word "majority" is used to describe how much federal mineral interest is held in an area. Using the word “substantial” in Criteria 1 shows a clear intent to set a lower threshold for the standard used

when applied to the area leased. When compared to “majority” this means that a “substantial” threshold could be met with less than 50% of the area being un-leased.

As Director of this state’s BLM agency, you are very aware that a majority of BLM lands in Wyoming and most of the West have been leased during the last ten-year period. However, not all have been developed. In addition, a significant portion of the leased parcels within the GLMA have expired this spring or are due to expire over the next few years. These expiring leases will increase the percentage of un-leased lands over time. We understand that not all of these leases will necessarily expire. However, given that many leases in the area have expired in the past couple of years we feel it is an important statistic that adds to our case that a “substantial” portion of the area is un-leased. We are not advocating a particular outcome for these leased areas but simply providing reasoning for why the GLMA meets the MLP criteria. For clarification, a BLM primary lease term is 10 years and will continue beyond that primary term if oil and gas is produced in paying quantities. The following data in Table 1 represent leases projected to expire in the coming years within the GLMA. Note that many of these leased acreages lie within sensitive and critical fish and wildlife habitat, highlighting our interest in these particular leases.

Year	Projected Acres Expiring	Percent of Projected Acres Expiring based on GLMA total acreage	Percent of Projected Acres Leased within GLMA
2010	49,191 acres	9%	Leaving 44% of the GLMA leased
2011	40,387 acres	7%	Leaving 37% of the GLMA leased
2012	1,989 acres	0.3%	Leaving 37% of the GLMA leased
2013	46,204 acres	8.8%	Leaving 28.2% of the GLMA leased

Table 1. Oil and Gas Lease Parcels Projected to Expire

While there has been significant leasing in this area, there has been relatively little development. Since 2008, just one well has been drilled within the boundaries of the GLMA, creating a further need for a comprehensive leasing and development plan that the MLP concept would provide.

The following table (Table 2) illustrates the amount of acreage under lease within several of the highly sensitive fish and wildlife areas in the GLMA. These areas have been identified as special designated areas in the GRRMP of 1997. Our interest includes those acreages in the Sage Creek ACEC, the Currant Creek ACEC, the Red Creek ACEC, Pine Mountain SMA, and the Sugarloaf Basin SMA, which totals 275,820 of Federal GIS acres. Many lease parcels within the identified areas are currently under review by the BLM and according to the IM it is entirely appropriate to apply this new policy to such parcels.

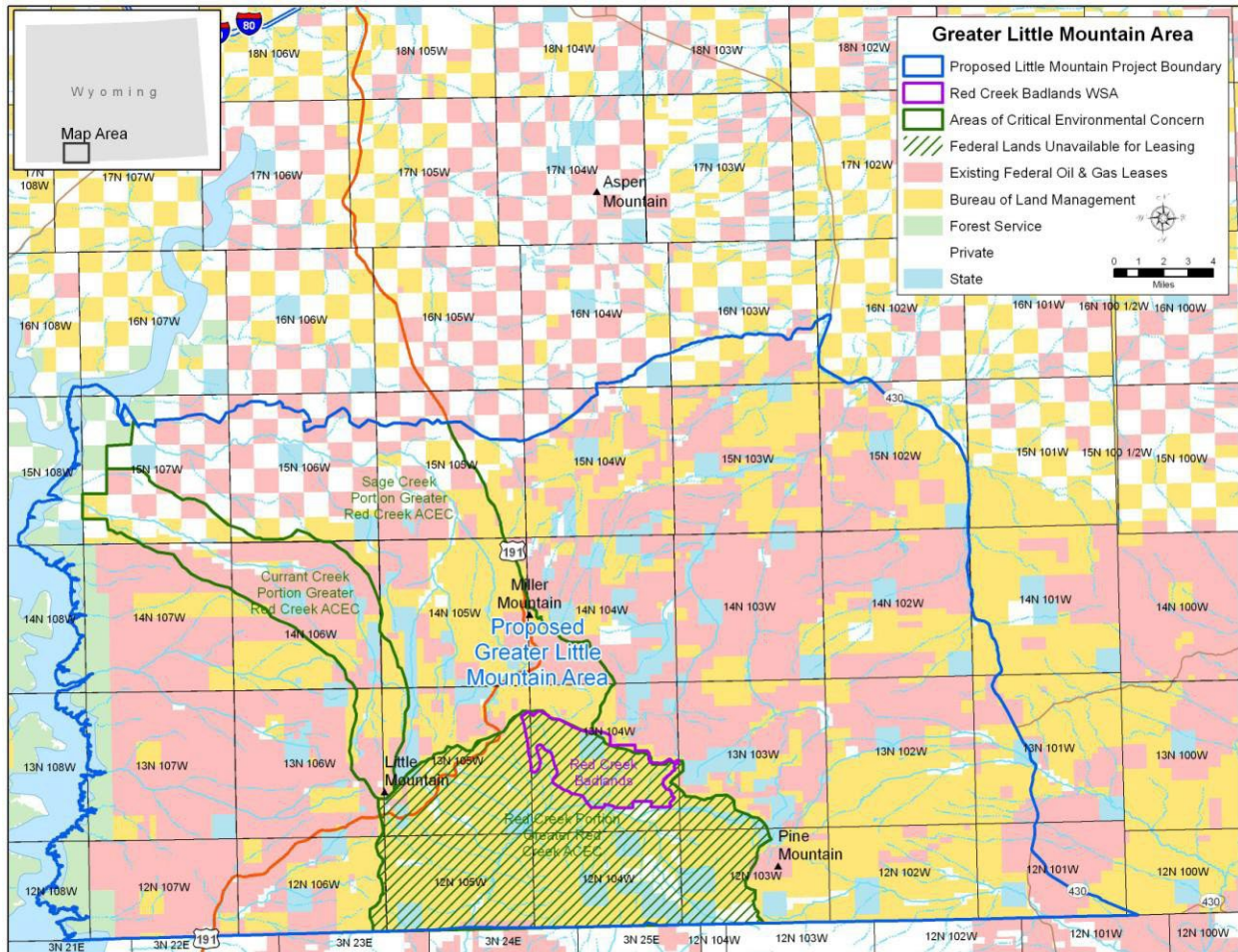
	Federal Acres (GIS)	GR RMP Acres (plats)	No O&G Leasing Areas	NSO Acres	CSU Acres	Acres Leased to Oil and Gas	% Acres Leased	Comments
Red Creek Wilderness Study Area	8,051	8,020	8,051	-	-	-	0	
Sage Creek Portion of the Greater Red Creek ACEC	52,199	52,270	-	-	52,199	31,698	61%	Northern Portion is within checkerboard
Current Creek Portion of the Greater Red Creek ACEC	25,924	23,740	-	25,924	-	17,171	66%	Northern Portion is within checkerboard
Red Creek Portion of the Greater Red Creek ACEC	47,696	55,880	46,226	-	-	1,470	3.10%	Leases pre-date WSA
Pine Mountain Special Management Area	62,758	64,200	-	-	62,758	56,007	89%	-
Sugarloaf Special Management Area	87,243	85,880	-	1,600	85,643	74,896	86%	-
Remaining BLM Lands within GLMA	150,601	144,482	-	-	-	97,069		
State and Private Lands within GLMA	87,764	87,764	-	-	-	-		
Total	522,236	522,236	54,277	27,524	200,600	278,311		

Table 2. Greater Little Mountain Area Acreage

*The acreages presented above are subject to slight variations due to differences in GIS layers.

Criteria 2: *There is a majority Federal mineral interest.*

The BLM manages a majority of the GLMA (83%) and nearly all of the mineral interests in this area are federally owned. The GRRMP FEIS, Map B, shows this ownership. Our Coalition has also created a map (Map B) to view mineral interest designation.



Map B. GLMA Mineral Interest Designation

Criteria 3: *The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the area.*

The GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased by oil and gas companies and of that 74,585 acres (14%) are held in production. From January 2008 through January 2010, five BLM WY Oil and Gas Competitive Lease Sales have included parcels within the sensitive areas of the GLMA. Due to protests from sporting groups, conservation organizations, citizens and the Governor, parcels within the GLMA were deferred from issuance in three of those five sales until further environmental analysis could be completed. In addition, the upcoming lease sale on August 3, 2010 is offering four leases totaling

6,361 acres (of which 6,161 acres are within the GLMA boundary) near the Potter Mountain Elk Butte region of the GLMA. We request that the BLM reevaluate the adequacy and environmental analysis, including the new lease parcel review process and issuance of leases for this August 2010 lease sale. This would provide a case example for which you could include in your Implementation Plan to the Washington office.

Also since 2008, the BLM has approved Devon Energy's Baxter Natural Gas Drilling proposal (EA FONSI), the Rubicon 3D Seismic Survey proposal (also Devon's) (EA FONSI), the Horseshoe Basin 3D Seismic Survey proposal (EA FONSI), and is in the process of writing the final environmental assessment for the North Dutch John 2D Seismic Survey proposal (Azalea Oil Co.). All of these projects are located within the GLMA. Finally, Devon Energy had approval to drill two exploratory wells in their Baxter Natural Gas southern platform in late 2008. Devon drilled one well in 2008 with a result of both oil and gas deposits in significant quantities. Devon Energy has yet to drill the second well that was approved within the Trout Creek drainage.

Criteria 4: *Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are the following:*

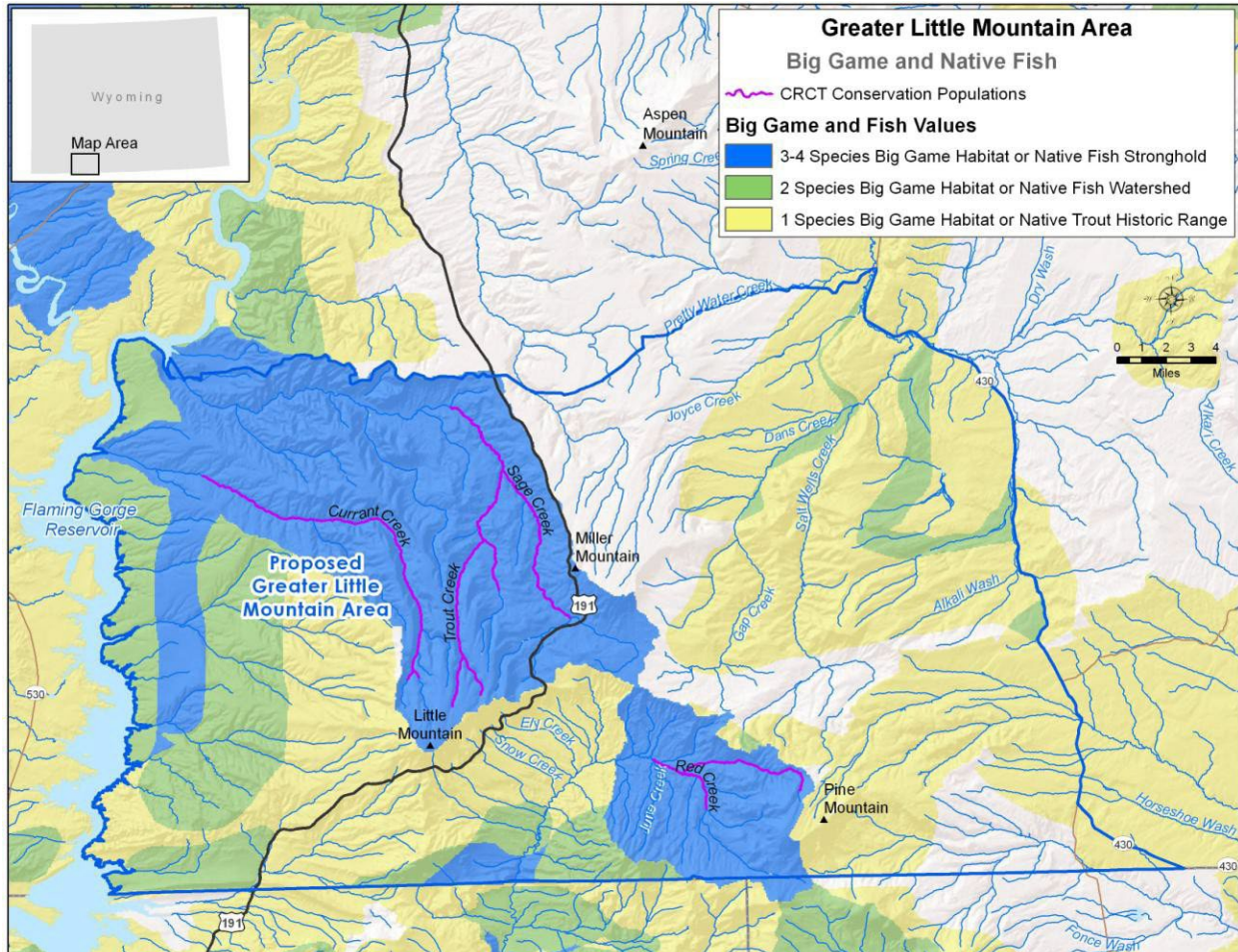
- ***Multiple-use or natural/cultural resource conflicts***

Both the Wyoming Game and Fish Department and the Governor of Wyoming have been very vocal in their opposition to further lease sales and oil and gas projects in sensitive fish and wildlife habitats within the GLMA. Indeed, the BLM has long recognized the outstanding fish and wildlife resource values of this area as described in the GRRMP and evidenced by the over \$2 million worth of habitat improvement projects that have been initiated here since 1990. The BLM contributed the largest amount at \$1,652,814 and the Wyoming Game and Fish Department spent the second largest amount at \$341,174, while other contributors interested in protecting and improving this area included Trout Unlimited, Rocky Mountain Elk Foundation, National Fish and Wildlife Foundation, Bowhunters of Wyoming, local donors, and others.

The GRRMP of 1997 recognized the significance of the valuable resources in this area. Establishments of No Surface Occupancy (NSO) stipulations, Controlled Surface Use (CSU) areas, no lease areas, and rights-of-way exclusion and avoidance areas exist in the GRRMP for large portions of this landscape. As earlier described, the BLM designated several Areas of Critical Environmental Concern (ACEC) containing important watersheds and wildlife habitat (Carrant Creek, Sage Creek and Red Creek ACEC's). Additionally, the Red Creek Badlands Wilderness Study Area (WSA), the Pine Mountain Special Management Area (SMA), and the Sugarloaf Basin Special Management Area also exist within the GLMA.

The GLMA is a biologically rich landscape with abundant and diverse terrestrial and aquatic species. Some of the species include: elk, mule deer, antelope, sage grouse, mountain lion, black bear, numerous raptors (such as the Bald Eagle and the Ferruginous Hawk), and waterfowl. Overlapping critical winter habitat for elk, mule deer, pronghorn, along with yearlong big game habitat, exist in significant quantities (Map C). Migration routes for big game crisscross the GLMA and important breeding and rearing habitat for sage grouse exist. Portions of the

landscape are within Wyoming’s Sage Grouse Core Area designated by Governor Freudenthal’s Sage Grouse Implementation Team. And the entire area is within the Rock Springs BLM Field Office that is involved in the National Environmental Policy Act (NEPA) process for Instruction Memorandum (IM) 2010-012 and 2010-013 to revise sage grouse and sagebrush management direction in their resource management plans.



Map C. GLMA Big Game and Native Fish Strongholds

Colorado River cutthroat trout (identified as a Sensitive Species and a Species of Greatest Concern by the State of Wyoming and the BLM) are located within Upper Sage Creek, Curreant Creek, Trout Creek, Red Creek, Gooseberry Creek, and Little Red Creek within the GLMA. Map C illustrates the significance of the specific high value fish and wildlife areas in the GLMA. Highly fragile and sensitive soils, subject to erosion, sedimentation, and washouts from sudden event storms, natural or manmade fires, or from heavy road traffic occur in this area. Current and past sedimentation and erosion events have impacted both the streams and riparian areas in addition to Flaming Gorge itself. This directly impacts future population survival of Colorado River cutthroat trout. The hydrology in this area represents an important groundwater recharge

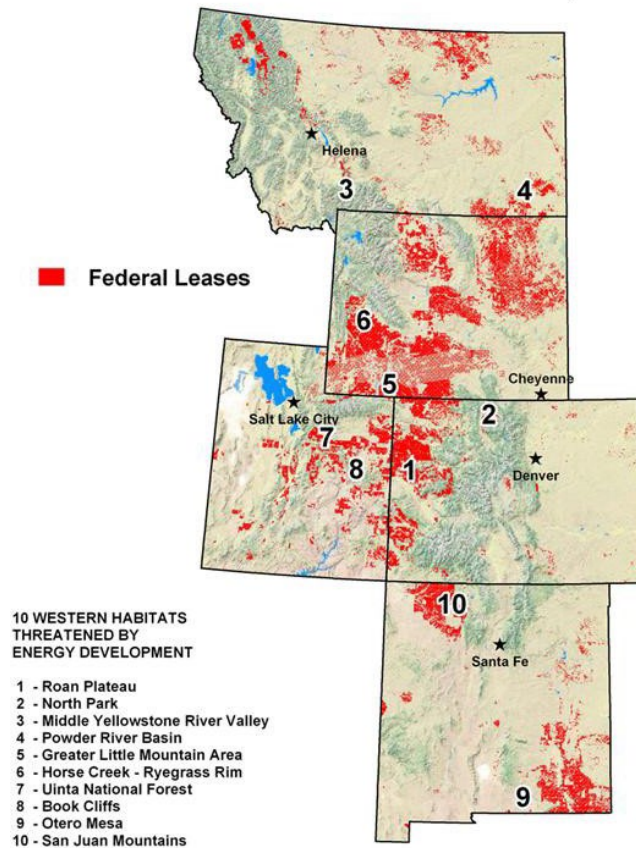
area for the numerous springs and coldwater streams in addition to providing the much needed water for wildlife in this high desert environment.

The GLMA also includes unique habitat for other state and federally recognized sensitive and threatened or endangered wildlife species such as the Pygmy Rabbit and the Midget-faded rattlesnake. Because of the contrasting aspen mountain community, juniper woodland and high desert sagebrush steppes, several raptor species occupy the GLMA that are considered as special status species, which include the Ferruginous Hawk, Golden Eagle, and the Bald Eagle.

The GLMA is a significant source for hunting and fishing opportunities for the public and simultaneously provides a vital role in contributing to the economic diversity for communities within this region. Flaming Gorge borders the western portion of the GLMA and is one of the largest reservoirs in the state. Obtaining the highly prized limited quota big game licenses in this area is often a life-long pursuit by the residents of Sweetwater County and the state. In fact, the GLMA is one of three most popular elk hunting spots in the state, the most popular deer area for both non-resident and resident hunters, and is an outstanding outdoor and backcountry recreation area.

In 2009, Sportsmen for Responsible Energy Development (SFRED) designated the GLMA as one of their top 10 western habitats threatened by energy development (Map D). It was chosen because of the area's ecologically balanced components, world class wildlife (both aquatic and terrestrial) that inhabit the GLMA. Conversely, this area is also valuable from a minerals perspective and as earlier discussed, more than 50% of the area is leased to oil and gas companies that have the right to develop those parcels. This combination leads to a natural/cultural resource conflict and calls for a plan that will mitigate this conflict. To date, leasing and development in this area have taken a case-by-case approach and a large landscape scale analysis has not been performed to address the likely cumulative impacts.

Public Land Leased for Oil and Gas Development



Map D. Top 10 Western habitats on public lands threatened by oil and gas development (SFRED map 2009).

- ***Impacts to air quality.***

The GLMA is composed of Class II, III, and IV visual airsheds. None of the recently approved projects within the GLMA were thoroughly evaluated for future air or greenhouse gas emissions or climate change impacts. New NEPA guidance will require this evaluation and the establishment of environmental mitigation commitments will need to be implemented. For this region of Wyoming, significant air quality issues exist with airsheds being compromised. Quantification of cumulative emissions over the life of the projects proposed for this area need to be considered and completed.

- ***Impacts on the resources or values of any unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the NPS, the FWS, or the FS; or Impacts another specially designated areas.***

As mentioned earlier, the GLMA contains three ACEC's, two SMA's and one WSA. Impacts to these special areas from oil and gas development and other cumulative impacts could be significant and would include air quality, water quality, and surface impacts.

OTHER CIRCUMSTANCES:

A. Identifying and Evaluating Potential Resource Conflicts in a MLP

The following provides a non-exhaustive list of potential resource conflicts that should be considered when developing an MLP. All of the items listed under Section A, page 2 of IM 2010-117 are of concern for the GLMA. We have attempted to illustrate many of those in the previous discussion above. Potential resource conflicts that are not mentioned, but should be, include alternate and renewable energy development within the area.

This section of Wyoming has been identified as a significant area for oil shale development. It is also being considered for carbon sequestration projects, a water pipeline project from the Green River to the Colorado's front range, and has significant wind development opportunities. These potentially conflicting resource development issues need to be addressed. The impacts from numerous energy development projects on the surface and subsurface areas significantly increase the potential impacts to fish and wildlife.

B. Potential MLP Decisions.

The following examples identified in Section B on page 2 of IM 2010-117 include other planning decisions that may be made through the MLP process with supporting NEPA analysis. The approach and outcomes described in the IM mirror the type of analysis and approach we have been advocating for in the GLMA. The IM calls for resource protections identified through the MLP to be addressed as new or modified plan decisions that may include lease stipulations for new leases and/or closing certain areas to leasing. The GLMA recognizes that the 1997 GRRMP has designated specific stipulations for much of the GLMA that include NSO, Timing Limitations, Controlled Surface Use, planned unitization, and the implementation of best management practices in certain cases. Despite these fairly restrictive stipulations in recognition of the high value of this area, leasing of the lands occurred in these sensitive areas anyway.

However, the GRRMP is outdated in its energy resource information, lacks detailed discussion for phased leasing and development, as well as any requirements for the capture or reduction of air emissions, liquid gathering systems, multiple well installation, or caps on new surface disturbances. These items all represent recent management efforts at mitigation on federal lands in the West. The Coalition feels that by implementing the MLP in the GLMA, these planning decisions can be incorporated.

SUMMARY: The GLMA is uniquely positioned to utilize the Master Leasing Plan concept. An MLP in this area will serve as a positive solution which can guide energy development in a balanced manner for years to come. By strengthening guidelines for development of areas where no leasing and/or surface occupancy is appropriate, areas where stipulations and best management practices are appropriate, and areas where responsible energy development practices are acceptable, we can cooperatively create a strategy that will manage the numerous valuable resources of the GLMA while allowing for responsible energy development.

We thank you for this opportunity to present our reasoning for implementing a Master Leasing Plan in the Greater Little Mountain Area. We are available for any further assistance or involvement.

Respectfully representing the Greater Little Mountain Coalition,

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cc: Bob Abbey, BLM Director
Ned Farquhar, BLM Deputy Assistant Secretary for Land and Minerals Management
Mike Pool, BLM Deputy Director (Operations)
Marcilynn Burke, BLM Deputy Director (Programs and Policy)
John Ruhs, Wyoming BLM High Desert District Manager
Lance Porter, Wyoming BLM Rock Springs Field Office Manager
Wyoming Governor Dave Freudenthal
US Senator John Barrasso
US Senator Mike Enzi
US Representative Cynthia Lummis



December 14, 2018

Kimberlee Foster
Field Manager
Bureau of Land Management
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901

RE: Alternative for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision

Dear Ms. Foster,

The Greater Little Mountain Coalition (Coalition) is pleased to submit the following document to be considered in the Bureau of Land Management's (BLM) development of alternatives in the Rock Springs BLM Draft Resource Management Plan Revision. The alternative is specific to the Greater Little Mountain Area (GLMA). This crown jewel of Sweetwater County, Wyoming consists of 522,236 acres bounded to the west by Flaming Gorge Reservoir, to the north by Pretty Water Creek, to the east by Highway 430 and to the south by the Utah-Colorado state line. This document falls within the range of existing alternatives; therefore, no additional analysis should be needed, however, we trust this information helps in forming the preferred alternative.

The Coalition is proposing the following resource management prescriptions:

- Implementation of an upfront plan for responsible oil and gas leasing in the proposed GLMA boundary by the Coalition that includes the Sage Creek watershed;
- Creation of additional no surface occupancy (NSO) and right of way exclusion (ROW) areas in the specific management areas of Sugarloaf Basin, Sage Creek and Pine Mountain to protect fish and wildlife habitat, improve watershed conditions and recreational opportunities;
- Maintenance of existing management in Currant Creek and Red Creek management areas and;
- Application of controlled surface use stipulations (CSU) in the Pine Mountain management area.

Background

The Coalition is an assembly of sportsmen and sportswomen organizations, union members, miners and more than 2,500 hunters, anglers and recreationists who want to see the GLMA's valuable multiple-use landscape continue to support abundant fish and wildlife populations, protect federal and state recognized sensitive species and provide ample outdoor recreation opportunities. The Coalition partners include: Bowhunters of Wyoming (BOW), Muley Fanatic Foundation (MFF), Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership (TRCP), Trout Unlimited (TU) and Wyoming Wildlife Federation (WWF).

Alternative

The GLMA comprises 14% of the entire BLM Rock Springs Field Office public land surface estate yet provides some of the most highly valued fish and wildlife habitat and hunting opportunities in the Rock Springs planning area. In fact, the GLMA holds some of the most sought after big-game hunting units in the state and Eastman's Hunting Journal regularly names these deer and elk units in their top five hunts for Wyoming. Since 1990, organizations and agencies have placed

over \$6 million dollars on-the-ground enhancing and maintaining the land and water value that the Coalition and the public hold dear. Wyoming Game and Fish Department (WGFD), BLM, Wyoming Conservation Landscape Initiative (WCLI), BOW, Western Wyoming Mule Deer Foundation, Doris Duke Foundation, Wyoming Governor’s Big Game Licensing Coalition (WGBGLC), The Nature Conservancy (TNC), MFF, Bureau of Reclamation (BOR), Central Utah Project Completion Act, U.S. Fish and Wildlife Service (USFWS), National Fish and Wildlife Foundation, Wyoming Wildlife Natural Resource Trust Fund (WNNRT), Natural Resources Conservation Service (NRCS), Rocky Mountain Elk Foundation (RMEF), and TU to name several have completed extensive habitat work within the GLMA that enhances native cutthroat trout and big game habitat, improves grazing management and provides opportunities for hunting, angling and other outdoor recreation activities.

Rather than continue the fragmented small-scale land management approach through Applications for Permit to Drill (APD), the Coalition recommends implementing habitat conservation parameters on an area that includes the entire proposed boundary of the GLMA, including Sage Creek watershed, and incorporates upfront planning with specific oil and gas lease parcel stipulations to mitigate anticipated impacts and protect resources on public lands in accordance with the BLM’s multiple-use and sustained yield mandate. As noted in previous letters and our Proposal (dated 1.26.16 and attached to this alternative), the Coalition believes the GLMA is the ideal place to showcase an upfront planning process for oil and gas leasing that would define responsible energy development and take in to account the cumulative impacts of industrial uses on our public lands.

These recommendations are for all new leasing activities within the GLMA. The Coalition’s Proposal highlights the fish, wildlife and outdoor recreation values found in the GLMA. This alternative defines those values for the six areas using Geographic Information Systems (GIS) science and highlights the boundary compromise the Coalition made since its inception in 2008 (Figures 1 and 2) and the new-collar data available for big game movements. The Coalition recognizes the 1997 Green River Resource Management Plan as the current land use plan for the GLMA.

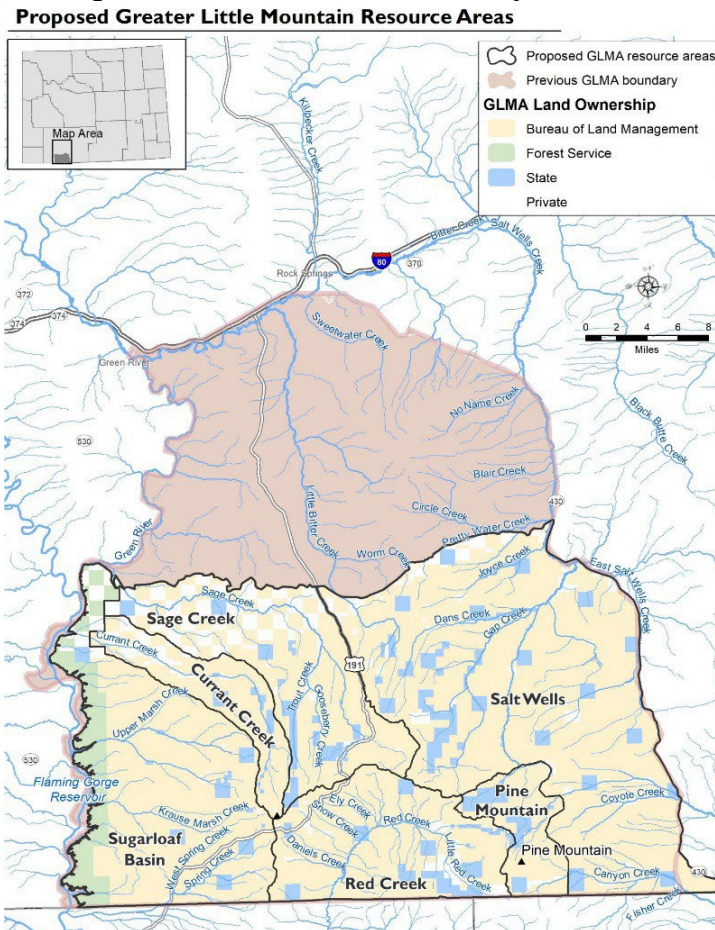


Figure 1. Leading back to negotiations in 2008, the northern boundary was shifted south to avoid conflict in the checkerboard in the Greater Little Mountain Area and to honor a compromise with the Rock Springs Grazing Association.

Sugarloaf Basin Special Management Area

1. No Surface Occupancy (NSO) for Sugarloaf Basin
2. Rights-Of-Way (ROW): Upgrade Sugarloaf Basin SMA from avoidance to exclusion.

The Coalition requests the BLM consider new movement data from big game collared as part of the University of Wyoming's Deer-Elk Ecology Research. More important than originally proposed, research data indicates Sugarloaf Basin provides high value habitat for wintering deer and elk.

Currant Creek Portion of the Red Creek ACEC

1. Maintain NSO for Currant Creek ACEC of the Greater Red Creek ACEC
2. Maintain ROW exclusion within Currant Creek ACEC
3. No new leasing of contiguous blocks of land identified in December 2009 letter from BLM to Governor Freudenthal, that fall within the Currant Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks. There are several large, contiguous blocks of unleased parcels including parcels in Marsh Creek, Currant Creek, Sage Creek and Trout Creek.

Sage Creek Portion of the Red Creek ACEC

1. NSO for Sage Creek
2. ROW: Upgrade Sage Creek ACEC from avoidance to exclusion
3. No new leasing of contiguous blocks of land identified in December 2009 letter from BLM to Governor Freudenthal, that fall within the Sage Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks.

Red Creek ACEC

1. Maintain designated ACEC and fluid mineral withdrawal area.
2. ROW: maintain exclusion area.

Pine Mountain Management Area

1. NSO for 14,982 acres
2. CSU for 2,513 acres

The Coalition recommends NSO of 14,982 acres in the Pine Mountain area to protect groundwater recharge areas, crucial big game habitat and parturition areas and important Colorado River cutthroat trout (CRCT) habitat. Outside of the proposed NSO, the Coalition recommends 2,513 acres of CSU stipulations, utilization of mandatory best management practices, implementation of a phased development scenario and mandatory reclamation standards prior to more development. Additional recommendations for mineral management include directional drilling from a minimal number of well pads and implementing the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat."¹

Salt Wells Resource Area

1. Remove big game timing stipulations on development in the Salt Wells Resource Area if;
 - a. NSO management is implemented in Sage Creek, Sugarloaf Basin Special Management Area and a portion of Pine Mountain and;
 - b. the management for Currant Creek and Red Creek remain the same.

¹ Wyoming Game and Fish Department. 2010. *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat*. Cheyenne, Wyoming.

	Federal Acres (GIS)	GR RMP Acres (plats)	Closed to minerals leasing	NSO acres	CSU acres	Acres Leased to Oil & Gas as of Dec 2018	Comments
Sage Creek Portion of the Greater Red Creek ACEC	52,190	52,270	-	52,190	-	0	Northern boundary of GLMA to include Sage Creek watershed-important CRCT ² occupied and expansion habitat
Current Creek Portion of the Greater Red Creek ACEC	23,699	23,740	-	23,699	-	0	Important big game crucial habitat and CRCT habitat
Red Creek Portion of the Greater Red Creek ACEC (including WSA)	55,691	63,900	55,691	-	-	551	Leases pre-date federal mineral withdrawals and FLPMA. Extremely fragile soils and high watershed values. Habitat for pure strain CRCT
Pine Mountain Special Management Area	17,495	64,200	-	14,982	2513	1,012	Combination of NSO and CSU to protect crucial big game habitat and watershed integrity
Sugarloaf Special Management Area	106,266	85,880	-	106,266	-	3,887	New collar data from UW -very important area for wintering deer and elk. Marsh Creeks flow directly into Flaming Gorge Reservoir-important for coldwater sport fish
Salt Wells Management Area	178,235	229,508	-	-	-	16,958	Crucial wildlife ranges, steep slopes, and high recreational hunting values for elk and mule deer
Totals	433,576	519,498	55,691	197,137	2513	22,408	-
% of Total	-	-	12.8%	45%	.58%	5.2%	-

Figure 2. Management recommendations and approximate acreage for six areas identified within the Greater Little Mountain Area. The total acreage of the GLMA is 522,236 (BLM 80%, USFS 4%, State 8%, Private 8%).

²Colorado River cutthroat trout (CRCT) is the only trout native to the Green and Little Snake river drainages in Wyoming. CRCT prefer clear, cold water, naturally-fluctuating flows, low levels of fine sediment and complex habitats. The GLMA is habitat for genetically pure CRCT.

In the GLMA, any APDs and development proposals should be coordinated through the WGFD to determine best placement for well pads and associated structures. This includes maintaining functionality and connectivity of the GLMA for fish and wildlife objectives. The BLM should require industry to use gold book standards for reclamation and maintenance of native vegetation. The GLMC requests to be notified about any APD that effects fish and wildlife resources in the GLMA, as well as APD's for parcels leased in the GLMA.

A review of cumulative impacts in the GLMA from development proposals should take place before further leasing and permitting continues to best protect traditional land uses such as livestock grazing, hunting and fishing. Developing a monitoring and mitigation matrix for wildlife, wildlife habitat, fisheries, aquatic habitat and watershed recharge values with thresholds and indicators prior to a mineral extraction project supports an upfront plan for oil and gas leasing.

The Coalition sincerely thanks the BLM for their work on the draft RS RMP. We respectfully request that the concepts offered in this letter be considered for incorporation into the BLM's preferred alternative for the draft RS RMP. We look forward to continuing to work with the BLM on this important resource management plan.

Sincerely,

Steve Martin, Bowhunters of Wyoming

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Phone: 307-389-2715

cthompson@westernwyoming.edu

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10241] - Webmaster Receipt
Date: Monday, April 8, 2019 12:15:14 PM
Attachments: [ID_10241_ONDAWWEComments4819.pdf](#)

Thank you for your input, Dan Morse.

The tracking number that has been assigned to your input is **10241**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 12:14:48 CDT

First Name: Dan
Last Name: Morse
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Oregon Natural Desert Association

Topics

Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Lands with wilderness characteristics
Specially designated areas
Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

7-24 [blank, blank]
16-24 [blank, blank]
24-228 [blank, blank]

Input

Please see the attached comment from Oregon Natural Desert Association.

Attachments

ONDA WWEC comments 4-8-19.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Via: electronic submission at <http://corridoreis.anl.gov/involve/stakeholder-input/>

April 8, 2019

Jeremy Bluma
Bureau of Land Management

Reggie Woodruff
U.S. Forest Service

Re: Westwide Energy Corridors Regional Review – Regions 4, 5 and 6

To Whom It May Concern:

Oregon Natural Desert Association (ONDA) appreciates this opportunity to provide input and recommendations on this review of westwide energy corridors (Section 368 Corridors) in Regions 4, 5 and 6 to ensure the well-informed and thoroughly considered management of public lands and resources.

ONDA is an Oregon non-profit, public interest, conservation organization of more than 4,500 members that works to protect, defend, and restore Oregon's high desert. ONDA actively participates in Bureau of Land Management (BLM), State of Oregon and county proceedings and decisions concerning the management of public lands, wildlife and other issues in eastern Oregon, including the siting of energy facilities. ONDA and its members use and enjoy the waters, public lands, and natural resources throughout eastern Oregon for recreational, scientific, spiritual, educational, aesthetic, and other purposes in and around the Section 368 corridors in this region.

ONDA urges the careful reconsideration of several corridors in Oregon due to changes in land management plans since the designation of the corridors that causes unavoidable and irreconcilable conflicts between future development of these corridors and existing management allocations. Avoidance of these management allocations may be possible in some areas while deletion of certain corridors may be necessary in other instances. ONDA urges the reexamination of these conflicts to ensure a minimum of conflicts between the corridors and other sensitive resources.

1. Recommended additional data sources for environmental assessment of WWEC

BLM has completed additional Lands with Wilderness Characteristics (LWC) inventory since the designation of the Section 368 priority corridors, including the inventory completed by the Lakeview BLM District in late 2018. LWC data should be updated and corridors passing through LWC units should be revised to avoid LWC or deleted as a Section 368 corridor by BLM during subsequent land-use planning and environmental review processes.

2. Need to consider additional provisions of the 2015 Greater Sage-grouse Approved Resource Management Plan Amendments

Conserving wildlife affected by climate change will require management that preserves and restores habitat resiliency and connectivity over the long-term. BLM completed and issued Approved Resource Management Plan Amendments for Greater sage-grouse since the designation of the Section 368 priority corridors. BLM must consider and evaluate effects with regard to climate issues including the Oregon ARMPA's Climate Change Consideration Areas and other climate requirements in the ARMPA.

3. General input relating to corridors in Oregon

Under a court-approved settlement agreement reached in 2010, BLM is precluded from approving any activity on lands that have been identified as having wilderness characteristics, where that activity would disturb the surface of the land and would either cause the wilderness unit to shrink, or cause the unit to no longer meet the criteria for wilderness character. DEIS 3-444; *see also Or. Natural Desert Ass'n v. Bureau of Land Mgmt.*, No. 3:03-cv-1017-JE, ECF 129 (Sept. 28, 2010) and *Or. Natural Desert Ass'n v. Gammon*, No. 6:06-cv-523-HO, ECF 99 (Nov. 17, 2010) (orders approving settlement agreement and granting parties' motion for voluntary dismissal). Until BLM completes the RMP amendment for the Vale and Lakeview Resource Management Plans, the settlement agreement precludes the BLM from approving any surface-disturbing activity on lands that the BLM has identified as having wilderness characteristics if the BLM finds that the project would either diminish the size of the inventory unit or cause the entire inventoried unit to no longer meet the criteria for wilderness character. Mirroring the Federal Land Policy and Management Act, the settlement agreement also requires BLM to prepare and maintain a current and up-to-date inventory of wilderness and other resources and values on these public lands to inform current and proposed land management and agency decisions.

4. Specific input relating to corridors in Oregon

7-24: Corridor 7-24 traverses large portions of southeastern Oregon in Malheur, Harney and Lake Counties bisecting the region between the Hart Mountain National Antelope Refuge and the Sheldon National Wildlife Refuges. These are two of the largest wildlife refuges in the lower 48 that are managed in concert as a complex for migrating wildlife that would be negatively impacted by corridor 7-24. The corridor crosses sage-grouse focal areas, priority and general sage-grouse habitat, pygmy rabbit habitat, the Steens Mountain geothermal withdrawal area,

numerous inventoried Lands with Wilderness Characteristics units recently identified by the BLM Vale and Lakeview Districts and citizen-proposed wilderness areas. Due to the significant acreage of priority and general sage-grouse habitat along the corridor as well as possible impacts to the Steens Mountain CMPA values and other wilderness quality lands, this corridor – previously identified as a “corridor of concern” should be deleted as a Section 368 priority corridor by BLM during subsequent land-use planning and environmental review processes.

16-24: Corridor 16-24 crosses large areas of priority and general sage-grouse habitat, pygmy rabbit habitat, BLM Lands with Wilderness Characteristics and citizen-proposed wilderness areas. This corridor traverses a large area of a sage-grouse focal area and priority sage-grouse habitat that provides critical habitat connectivity for sage-grouse populations in Malheur and Harney Counties. Due to the configuration of priority sage-grouse habitat in this region, acceptable modifications to reroute this corridor and avoid sage-grouse impacts would be unlikely. This corridor should be deleted as a Section 368 priority corridor by BLM during subsequent land-use planning and environmental review processes.

24-228 (also in Idaho): Corridor 24-228 in Oregon passes areas of priority and general sage-grouse habitat, BLM Lands with Wilderness Characteristics and citizen-proposed wilderness areas. Significant modifications would be necessary to avoid sage-grouse habitat and wilderness resources. It is also important to note that corridor 24-228 may not be viable due to significant resource conflicts along corridors 7-24 and 16-24 to which 24-228 would connect. This corridor should be deleted as a Section 368 priority corridor by BLM during subsequent land-use planning and environmental review processes.

We appreciate your consideration of this new and additional information relating to Section 368 priority corridors and await its full consideration followed by corresponding adjustments and deletions of corridors. Please contact us should you need additional or clarifying information.

Sincerely,

Dan Morse
Conservation Director
Oregon Natural Desert Association
50 SW Bond St, Ste 4
Bend, OR 97703

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10242] - Webmaster Receipt
Date: Monday, April 8, 2019 12:17:09 PM
Attachments: [ID_10242_WestsideEnergyCorridorComments4519.docx](#)

Thank you for your input, Jane Heisler.

The tracking number that has been assigned to your input is **10242**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 12:16:38 CDT

First Name: Jane
Last Name: Heisler
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Great Old Broads for Wilderness, Cascade Volcanoes Chapter

Topics

Energy Planning Issues
Ecological resources
Hydrological resources
Lands with wilderness characteristics
Specially designated areas

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

230-248 [blank, blank]

Input

[Blank]

Attachments

WestsideEnergyCorridorComments 4-5-19.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

April 5, 2019

Westside Energy Corridors Regional Review
Comments on Warm Springs Corridor 230-248

After reviewing the abstract for the Warm Springs Corridor 230-248, we strongly recommend that the Cascades Field Office/Bureau of Land Management and Mt. Hood National Forest/U.S. Forest Service **remove the designation of this corridor** from their land and resource management plans for the following reasons:

1. The preferred locations for designation of energy transport corridors are supposed to be selected to “promote renewable energy development in the West.” Neither the past proposal for use of the corridor, nor the potential future proposed use, facilitates transportation of **renewable energy**. The original intent for the corridor was construction of a pipeline by PacifiCorp in cooperation with Northwest Natural for the export of liquid natural gas. PacifiCorp withdrew its FERC application when the proposed export terminal was halted, but plans to develop this corridor as “Trail West” continue to appear in Northwest Natural’s integrated resource planning documents. Last year the developer of a proposed methanol export terminal suggested that the Trail West route be developed if the export terminal is approved. The Corridor 230-248 abstract fails to identify this potential use, and that it conflicts with the intent to promote renewable energy development in the West.
2. The preferred locations for designation of the energy transport corridor are to be selected to “avoid significant known resource and environmental conflicts.” Corridor 230-248 is identified as a “Corridor of Concern” under the study that was required under the 2012 Settlement Agreement **because** it has significant conflicts that are identified in the abstract as “potential compatibility issues or concerns.” The Corridor intersects and would be incompatible with:
 - a. Soosap Meadows Area of Critical Environmental Concern (ACEC) which is designated to protect the only large, undisturbed expanse of natural Cascadian subalpine meadows in the Salem BLM District, and the resource management plan identified ACECs as “right-of-way” avoidance areas;
 - b. The wilderness character of the Clackamas Wilderness, which is adjacent to the Corridor;
 - c. The Pacific Crest National Scenic Trail, which runs perpendicular to the corridor and impacts cannot be avoided;
 - d. The Riverside National Recreation Trail, which runs perpendicular to the corridor and impacts cannot be avoided;

Westside Energy Corridors Regional Review
Comments on Warm Springs Corridor 230-248
Cascade Volcanoes Broadband
Great Old Broads for Wilderness
Page 2 of 2

- e. The Clackamas Wild and Scenic River, which runs perpendicular to the corridor and impacts cannot be avoided;
- f. Fish Creek, designated as an Oregon state recreational river, which runs perpendicular to the corridor and impacts cannot be avoided;
- g. Designated Northern Spotted Owl Critical Habitat (listed as Threatened under the Endangered Species Act), which the abstract states may not be compatible with corridor development because utility infrastructure construction would be required since none currently exists within the corridor;
- h. Designated Chinook Salmon and Steelhead Critical Habitat (both species listed as Threatened under the Endangered Species Act), which runs perpendicular to the corridor and impacts cannot be avoided;
- i. The home range of the Gray Wolf pack that is in the area of the corridor within the Mt. Hood National Forest. The Gray Wolf is listed as Threatened under the Endangered Species Act in this portion of its range, and the abstract fails to identify impacts on this species.

Thank you for the opportunity to provide our comments for the Westside Energy Corridors Regional Review. We look forward to continued involvement in this process.

Sincerely,

Jane Heisler, Co-Leader
Cascade Volcanoes Broadband
Great Old Broads for Wilderness

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10243] - Webmaster Receipt
Date: Monday, April 8, 2019 12:30:14 PM
Attachments: [ID_10243_wer11270.01_signedLetter.pdf](#)

Thank you for your input, Angi Bruce.

The tracking number that has been assigned to your input is **10243**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 12:29:36 CDT

First Name: Angi
Last Name: Bruce
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Wyoming Game and Fish Department

Topics
Land Management Responsibilities and Environmental Resource Issues
Ecological resources

Geographic Area
Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

126-218 [blank, blank]

Input

To Whom it May Concern,

Please see the attached comments by the Wyoming Game and Fish Department regarding the proposed West-Wide Energy Corridor - Regions 4, 5, 6 Draft Energy Corridor Abstracts.

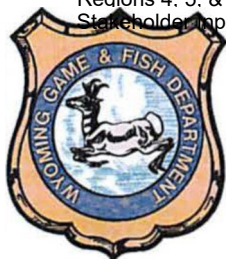
Best Regards,
The Wyoming Game and Fish Department

Attachments

wer11270.01_signed Letter.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

GOVERNOR
MARK GORDON
DIRECTOR
BRIAN R. NESVIK
COMMISSIONERS
DAVID RAEL - President
PETER J. DUBE - Vice President
RALPH BROKAW
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RICHARD LADWIG
MIKE SCHMID



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

April 8 2019

WER 1 I 270.01

Bureau of Land Management U.S. Forest Service and U.S. Department of Energy

West-Wide Energy Corridor

Regions 4, 5, 6

Draft Energy Corridor Abstracts

Laura Fox

Argonne National Laboratory

9700 South Cass Avenue

EM / Building 240

Argonne, IL 60439

Dear Ms. Fox,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the proposed West-Wide Energy Corridor - Regions 4, 5, 6 Draft Energy Corridor Abstracts. We offer the following comments for your consideration.

Corridor Segment 126-218

Please find the Department's justification for the removal of Corridor Segment 126-218 from the West Wide Energy Corridor (WWE) system. We have significant concerns with this corridor location and we have consistently recommended increased protection from development activities in this area.

The Department represents our constituents and their wildlife resources. Sweetwater County anglers, hunters, wildlife enthusiasts, and statewide conservation groups have expressed their desire for more stringent habitat protection measures for the greater Little Mountain area in an effort to prevent industrialized levels of energy related development from occurring and negatively impacting this wildlife-rich landscape. The area between Little Mountain and Flaming Gorge Reservoir is a popular area for recreation, fishing, hunting, and wildlife viewing. It has been described as the 'Yellowstone of Sweetwater County' highlighting its importance among the citizens of not only Sweetwater county but also Wyoming as a whole.

Demand for big game hunting permits in this area are extremely high and drawing odds for both South Rock Springs deer (HA 102) and South Rock Springs elk (HAs 30, 31 and 32) are among the most difficult to draw in Wyoming further highlighting this area's popularity. Some of the Governors and the Wyoming Game and Fish Commissioners' special big game licenses are

Laura Fox
April 8, 2019
Page 2 of 3 - WER 11270.01

used in these hunt areas on an annual basis. The area is known for producing older, "trophy quality" bulls and bucks, and there is intense local, state, and national interest in maintaining conditions that support the integrity of these herds. Large-scale industrial development in this area is inconsistent with the goal of maintaining these conditions and that opportunity.

The area referred to as the Little Mountain Ecosystem represents a unique set of habitat associations that yield a distribution of species unique to the state of Wyoming, more similar to areas associated with desert and pinyon-juniper habitats in the southwest. In fact, this is the only portion of Wyoming with a pinyon pine-juniper habitat type, and its associated species. Only in this area have we documented striped whipsnakes, ringtails, and a host of pinyon-juniper obligates, small mammals and songbirds. Terrestrial Species of Greatest Conservation Need that have been documented in this ecosystem include (but are not limited to) the following: juniper titmouse (Tier 2), ash-throated flycatcher (Tier 2), Western scrub-jay (Tier 2), Scott's oriole (Tier 2), bushtit (Tier 2), sage sparrow (Tier 2), sage thrasher (Tier 2), mountain plover (Tier 1), Greater sage-grouse, water shrew (Tier 2), Western small-footed myotis (Tier 2), long-eared myotis (Tier 3), little brown myotis (Tier 2), long-legged myotis (Tier 3), spotted bat (Tier 2), Townsend's big-eared bat (Tier 2), pallid bat (Tier 2), pygmy rabbit (Tier 2, proposed for federal listing), cliff chipmunk (Tier 2), canyon mouse (Tier 2), pinyon mouse (Tier 2), silky pocket mouse (Tier 3), great-basin pocket mouse (Tier 3), sagebrush vole (Tier 2), northern flying squirrel (Tier 2), white-tailed prairie dog (Tier 2), least weasel (Tier 3), river otter (Tier 2), ringtail (Tier 3), midget faded rattlesnakes (Tier 1), Great Basin gophersnake (Tier 2), and ornate tree lizard (Tier 2).

Increasing demands for energy development and other land uses along the east side of Flaming Gorge Reservoir cumulatively may threaten water quality and physical characteristics in this crucial habitat. Land disturbances can yield heavier sediment and phosphorus loading to Flaming Gorge Reservoir encouraging eutrophic aquatic conditions and/or accelerated sediment deposition that deteriorate habitat quality for aquatic wildlife. Moreover, threats of large-scale industrial chemical or petroleum spills from pipelines constructed in this corridor could negatively affect water quality and fisheries due to its proximity to Flaming Gorge.

In conclusion, the existing north-south utility transportation corridor (126-218) located on the east side of, and parallel to, Flaming Gorge Reservoir has the potential to negatively impact a myriad wildlife species and their habitats. Due to these issues and concerns, we respectfully request that energy utility corridor 126-218 be removed from the WWEC system.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Rick Huber, Habitat Protection Biologist, at 307-777-4558.

Laura Fox
April 8, 2019
Page 3 of 3 - WER 11270.01

Sincerely,

A handwritten signature in blue ink that reads "Augi Bruce". The signature is written in a cursive style with a large initial "A".

Augi Bruce
Habitat Protection Supervisor

AB/rh/ml

cc: U.S. Fish and Wildlife Service
Mark Zornes, Wyoming Game and Fish Department
Patrick Burke, Wyoming Game and Fish Department
Robb Keith Wyoming Game and Fish Department
Kevin Pence Wyoming Game and Fish Department
Chris Wichmann Wyoming Department of Agriculture Cheyenne

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10244] - Webmaster Receipt
Date: Monday, April 8, 2019 1:27:52 PM
Attachments: [ID_10244_2019.4.8CommentaboutWestwideEnergyCorridor.pdf](#)

Thank you for your input, Daniel Serres.

The tracking number that has been assigned to your input is **10244**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 13:27:01 CDT

First Name: Daniel
Last Name: Serres
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Columbia Riverkeeper

Topics

Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues
Air quality
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Public access and recreation
Soils/erosion
Specially designated areas
Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

230-248 [blank, blank]

Input

Please see the attached comment of Columbia Riverkeeper, Oregon Physicians for Social Responsibility, Center for Sustainable Economy, Sustainable Energy and Economy Network, and Sierra Club.

Contact:
Dan Serres
Conservation Director
Columbia Riverkeeper
dan@columbiariverkeeper.org
1125 SE Madison Suite 103A Portland OR 97214

Attachments

2019.4.8 Comment about Westwide Energy Corridor.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



CENTER
FOR SUSTAINABLE
ECONOMY
Building the DNA of the New Economy



April 8, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

Via: corridors@anl.gov and the web form at <http://corridoreis.anl.gov/involve/stakeholder-input/>

Dear Mr. Leverette, Mr. Woodruff and Dr. Smith,

Please accept these comments which address the Corridor Abstract for Corridor 230-248 in Region 6 of the West-wide Energy Corridors (WWEC) Regional Review, on behalf of Columbia Riverkeeper, Sierra Club, Center for Sustainable Economy, Sustainable Energy and Economy Network, and Oregon Physicians for Social Responsibility.

Corridor 230-248 is not located in a favorable landscape for energy infrastructure. Since its identification as a corridor of concern, new conflicts have arisen that should disqualify Corridor 230-248 from further consideration. The following comments highlight conflicts not adequately discussed in the Abstract. Because of the breadth and depth of these conflicts, and the fact that many of them are not easily resolved, we believe that these conflicts would be best remedied by deleting this corridor.

1. The Abstract provides inaccurate information about the purpose and rationale for the corridor.

The Abstract inaccurately portrays both the purpose and rationale for Corridor 230-248 and fails to recognize the potential for pipeline development in the near future. This corridor is not intended to facilitate the movement of energy from west to east across Mt. Hood National Forest, as the Abstract states. It was included in the WWEC as a corridor to facilitate the shipment of fracked gas to and from liquefied natural gas (LNG) facilities proposed on the Lower Columbia River via the Palomar Pipeline proposal. NW Natural and Transcanada eventually withdrew their FERC application for Palomar after the proposed Bradwood LNG terminal was denied by the State of Oregon under Section 401 of the Clean Water Act. At the time, Palomar's backers stated their intention to continue pursuing a cross-Cascades pipeline despite withdrawing the Palomar proposal. In recent years, NW Natural and Transcanada have worked together to develop the Trail West Pipeline, a project which would move gas in the east-to-west direction from the Transcanada Gas Transmission Northwest (GTN) pipeline in Central Oregon to the I-5 corridor near Molalla, Oregon.

The Trail West pipeline would likely provide fracked gas for proposed methanol refineries in Kalama, Washington and Port Westward, Oregon. These proposed methanol refineries are dedicated to the export of methanol to China. Indeed, the Chinese Academy of Sciences is backing both projects via its subsidiary, Northwest Innovation Works. Each refinery has the potential to use approximately 300 million cubic feet of gas per day, a staggering quantity of fracked gas. In July 2015, the Northwest Gas Association stated, "a large enough project (roughly over 150,000 Dth/d of demand) would likely *need new infrastructure* regardless of their preferred gas transportation type simply due to high utilization of the existing pipeline systems."¹ The Gas Association affirmed its perspective again in its 2016 Gas Outlook, stating that new methanol-related gas demand could push the regional pipeline system to an "inflection point," prompting new gas pipeline development.²

This new pipeline could be proposed for Corridor 230-248. NW Natural and Transcanada have discussed this route, now called the Trail West Pipeline, as an option to supply gas to the proposed Kalama and/or Port Westward refinery or to free up capacity in other pipelines to supply those methanol refineries. Indeed, the NW Gas Association recently estimated that the Trail West Pipeline may seek to begin operating in the 4th Quarter of 2023, although Trail West has not yet filed an application with the Federal Energy Regulatory Commission (FERC).³

¹ Power and Natural Gas Planning Taskforce. "The Northwest Gas Landscape – Looking Forward." NW Gas Association and Pacific Northwest Utilities Conference Committee (PNUCC). July 2015. P. 14.

² NW Gas Association. 2016 Gas Outlook. P. 3.

³ NW Gas Association. 2018 Gas Outlook. Appendix D.

Please correct the Abstract to reflect that this corridor is mostly likely intended to move fracked gas across the Cascades for the purpose of exporting methanol to China. Further, please correct the Abstract to acknowledge that neither the past proposal for use, nor the potential future proposal, facilitate transportation of renewable energy.

2. The corridor poses irreconcilable conflicts with Northern Spotted Owl Critical Habitat.

Much of the proposed pipeline route is located within federally designated critical habitat for the threatened northern spotted owl. The rule designating this forest as spotted owl Critical Habitat determined that all unoccupied and likely occupied areas in these subunits are **essential** for the conservation of the species to meet the recovery criterion. Given the spotted owl's continued decline, the Revised Recovery Plan for the Spotted Owl emphasizes conserving older, moist forest stands **wherever they occur**, regardless of the Northwest Forest Plan's system of reserved or non-reserved lands. We concur with the Abstract's conclusion that "Northern Spotted Owl critical habitat . . . may not be compatible with future development in an area without existing infrastructure." This incompatibility points to the need to delete this corridor.

3. The corridor intersects the unstable, flashy Fish Creek watershed.

Fish Creek provides important habitat for several fish species including Endangered Species Act-listed winter steelhead, coho salmon, and spring Chinook, as well as Pacific lamprey and cutthroat trout. While the Abstract acknowledges that Fish Creek is a Wild and Scenic River, it fails to discuss the extremely unstable nature of the watershed, its history of major flooding and landslide events, and the dangers that poses to energy development in the corridor. The Fish Creek Watershed has the greatest potential for landslides of all the watersheds in the Mt. Hood National Forest. The Fish Creek Watershed experienced a 100-year flood event in February of 1996. In the wake of this event, the USFS engaged in extensive restoration efforts in the Fish Creek area. The significant scale and comprehensive nature of this watershed restoration effort after the flood was unprecedented at its time in the Pacific Northwest. Because of landslide and flooding concerns and the history of watershed management in Fish Creek, we request the corridor not intersect with Fish Creek. Further, because the corridor cannot easily be re-routed to avoid the Fish Creek watershed, it should be deleted.

4. The corridor overlaps the home range of the new White River wolf pack.

For the first time in almost 70 years, there is an ESA-listed wolf pack in Mt. Hood National Forest, dubbed the "White River Pack." The Oregon Department of Fish & Wildlife confirmed evidence of the wolves using areas near White River and the Mount Hood National Forest and has designated the region an "area of known wolf activity." An announcement from the

Confederated Tribes of Warm Springs' wildlife department notes that wolf pups born in August 2018 represent the first verified wild wolf pups born on the tribe's land since the 1940s.⁴ Corridor 230-248 runs along the entire boundary area between the White River on Mt. Hood National Forest and the Warm Springs Reservation. As the wolves are a new presence in the area, the potential conflict between their home range and future development of the energy corridor has not been examined in any detail. We request that the next phase of the corridor analysis probe into the potential that developing the corridor would increase human/wolf conflict.

5. The corridor intersects the Pacific Crest National Scenic Trail and other important recreation areas, violating protective Visual Quality Objectives.

If developed, this corridor would cross the Pacific Crest Trail, a federally designated National Scenic Trail. It would also disrupt the experience of users at the popular Timothy Lake recreation area and its extensive system of trails. And the corridor would cross federally designated Wild and Scenic Rivers. These crossings would significantly diminish these distinctive recreational resources. Developing this corridor is inconsistent with the Visual Quality Objectives (VQOs) for sensitivity level 1 trails and designated viewsheds in the Forest Plan, and would require amending the standards and guidelines in that Plan.

6. The corridor's many river crossings conflict with the Wild & Scenic Rivers Act and Northwest Forest Plan.

The Wild and Scenic Clackamas River is classified as "scenic" at its intersection with the energy corridor. The river has five categories determined "outstandingly remarkable": recreation, fish, wildlife, historic, and vegetation. Section 7 of the Wild and Scenic Rivers Act specifically prohibits the FERC from permitting projects that would interfere with outstanding scenic, recreational, fish or wildlife values. The appropriate standard under Section 7(a) is whether the project would invade the designated river or unreasonably diminish the scenic, recreational, fish or wildlife values present at the date of designation. The two most controversial river crossings in the Mt. Hood National Forest, Clackamas River and Fish Creek, are both virtually unavoidable if the corridor remains in the south side of Mt. Hood National Forest. Accordingly, the corridor should be deleted altogether.

7. Clearcutting Late-Successional Reserves conflicts with the Northwest Forest Plan.

⁴ https://www.dfw.state.or.us/Wolves/wolf_program_updates.asp

The Northwest Forest Plan is clear about logging in Late-successional Reserves (LSRs): "There is no harvest allowed in stands over 80 years old."⁵ Corridor 230-248 passes through an LSR adjacent to the Clackamas River with forest stands that are clearly more than 80 years old. The loss of these forests would have lasting impacts to the ecosystem and undeniably degrade habitat in this watershed. Any corridor development would require a total loss of forest characteristics, including removal of all snags, downed woody debris and other integral decadent components to terrestrial habitat. This degradation is yet another way that developing this corridor would be out of compliance with the Northwest Forest Plan.

8. Developing this corridor conflicts with the Mt. Hood Land & Resource Management Plan.

When Corridor 230-248 was being evaluated for the development of the Palmar Pipeline, the Forest Service prepared comments for FERC that included a detailed list of the specific forest-wide guidelines with which a pipeline on this route would conflict. On this issue, we support and incorporate by reference the detailed comments submitted by BARK. BARK's comments identify significant conflicts with numerous elements of the Mt. Hood National Forest Land and Resource Management Plan.

9. The abstract does not address the danger of pipeline leaks to natural resources.

Introducing new fossil fuel infrastructure in the rugged, erosive, sometimes roadless terrain of the Mt. Hood National Forest poses major risks to public safety and natural resources. Fossil fuel pipelines leak, rupture, spill, and sometimes burn. Hundreds of pipeline accidents, releasing millions of gallons of gas and oil into the waterways of the United States, have occurred over the past 20 years.⁶ A new pipeline in the proposed energy corridor would introduce significant new fire and public safety risks. A liquid fuels pipeline in the same area would introduce unacceptable risks to drinking water. Along with being Wild & Scenic, the Clackamas River provides the municipal drinking water supply for nine municipalities and hundreds of thousands of people. If the corridor were ever developed to transport oil, a pipeline leak would pose a significant threat to the drinking water supply. If the corridor carried gas, any leaks would increase the chance of igniting a wildland fire and complicate wildfire response. The Abstract should examine the very real and predictable conflicts that arise from pipeline leaks along this route.

⁵ Northwest Forest Plan Standards & Guidelines, C-12.

⁶ https://en.wikipedia.org/wiki/List_of_pipeline_accidents_in_the_United_States_in_the_21st_century, *see also* <https://www.nrdc.org/onearth/spill-tracker>

Conclusion

For the above reasons, as well as all the conflicts identified in the WWEC Settlement agreement and the Corridor Abstract, we strongly urge that Corridor 230-248 be deleted from consideration as part of the WWEC. Any future energy development that requires transport in northern Oregon should use pre-existing corridors or identify routes that do not have such extensive conflicts with federal laws and regulations, as well as the potential for so many adverse ecological impacts.

Thanks for considering this comment. We look forward to further participation in the corridor review process.

Sincerely,

Dan Serres, Conservation Director, Columbia Riverkeeper

Nicholas Caleb, J.D., LL.M. Staff Attorney, Climate Justice Program, Center for Sustainable Economy

Daphne Wysham, Director, Sustainable Energy and Economy Network

Kelly Campbell, Executive Director, Oregon Physicians for Social Responsibility

Rhett Lawrence, Conservation Director, Oregon Chapter Sierra Club

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10245] - Webmaster Receipt
Date: Monday, April 8, 2019 2:02:56 PM

Thank you for your input, Mary Huff.

The tracking number that has been assigned to your input is **10245**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 14:02:22 CDT

First Name: Mary
Last Name: Huff
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Owyhee County

Topics

Energy Planning Opportunities
Jurisdiction
Land Management Responsibilities and Environmental Resource Issues
Ecological resources
Hydrological resources
Lands and realty

Geographic Area

[Area selected via Corridor Mapping Tool](#)

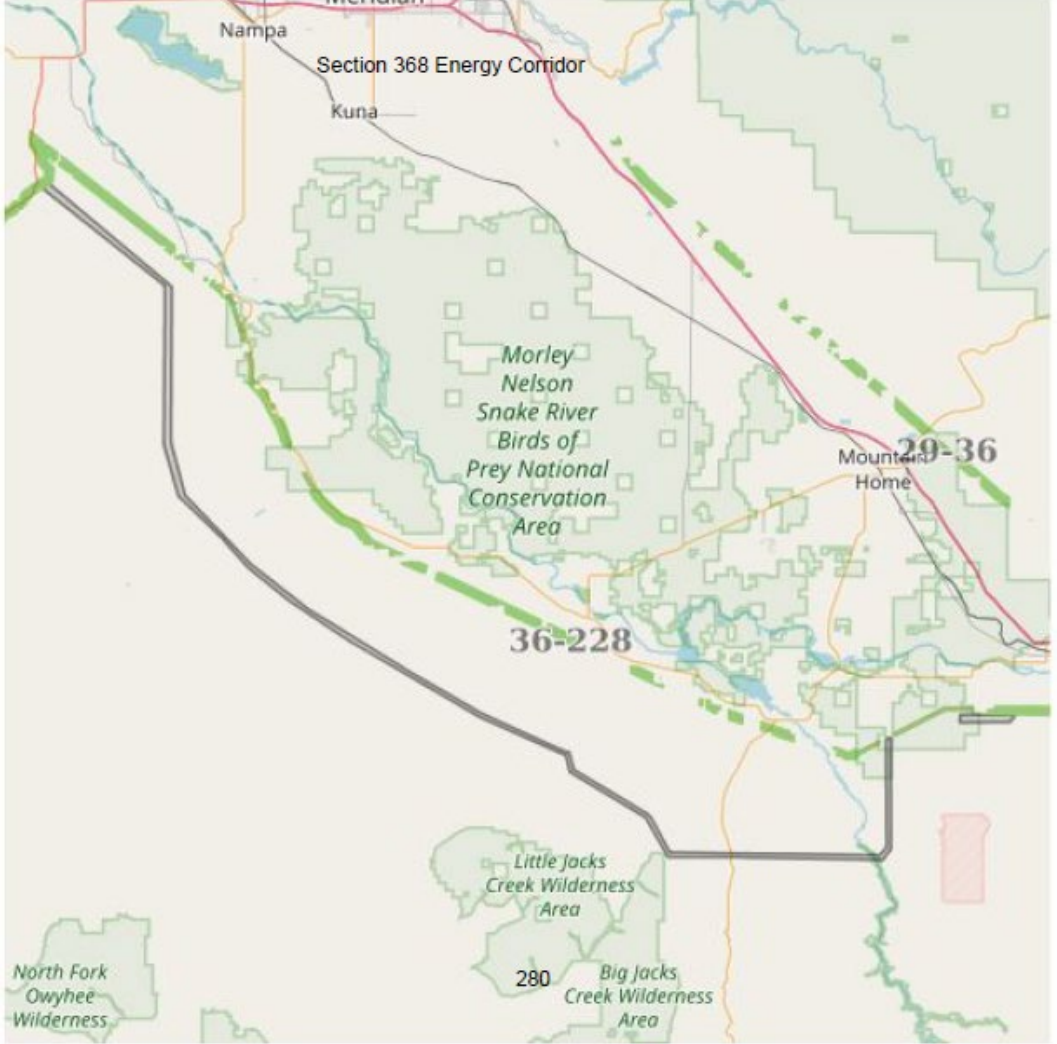
Input

This is an example southern route off private property through Owyhee County, this map is to accompany comments submitted via email by the Board of Owyhee County Commissioners dated April 8, 2019.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



Nampa

Section 368 Energy Corridor

Kuna

Morley
Nelson
Snake River
Birds of
Prey National
Conservation
Area

Mountain
Home

29-36

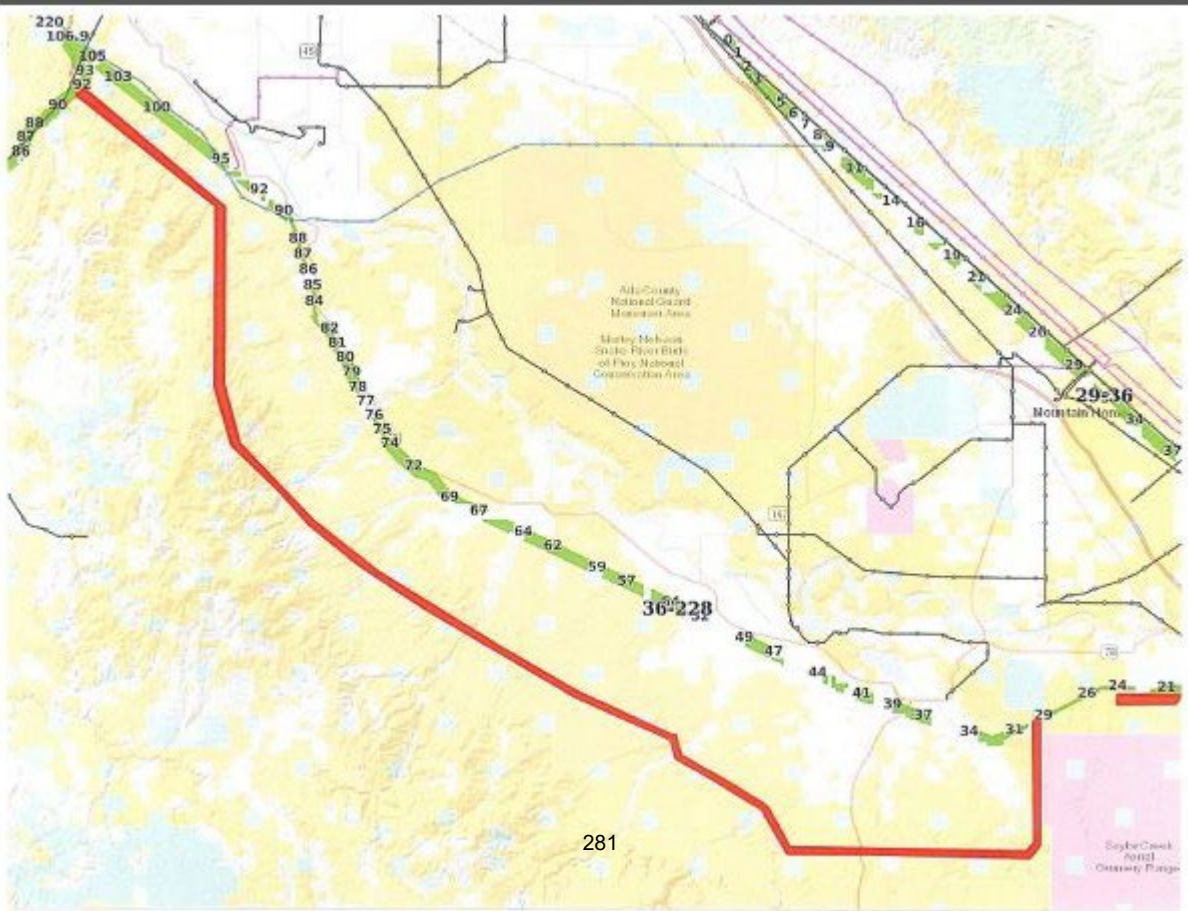
36-228

Little Jacks
Creek Wilderness
Area

280

Big Jacks
Creek Wilderness
Area

North Fork
Owyhee
Wilderness



281

Saylor Creek
Hotel
Gateway Plaza

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10246] - Webmaster Receipt
Date: Monday, April 8, 2019 2:38:03 PM
Attachments: [ID_10246_TUCommentsSec368WWEnergyCorrStudyRegs45604082019.pdf](#)

Thank you for your input, Cathy Purves.

The tracking number that has been assigned to your input is **10246**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 14:36:43 CDT

First Name: Cathy

Last Name: Purves

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Trout Unlimited

Topics

Energy Planning Opportunities

Energy Planning Issues

Jurisdiction

Existing infrastructure/available space

Land Management Responsibilities and Environmental Resource Issues

Air quality

Ecological resources

Hydrological resources

Lands with wilderness characteristics

Public access and recreation

Soils/erosion

Specially designated areas

Interagency Operating Procedures

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

Hello,

Please find attached comments from Trout Unlimited on the review of Energy Corridor summaries and abstracts for Regions 4, 5 and 6.

We appreciate this opportunity to comment.

Thanks,

Cathy Purves

cpurves@tu.org

Attachments

TUComments-Sec368WWEnergyCorrStudy-Regs4,5,6-04082019.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

April 5, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

RE: Comments on BLM Draft West-Wide Section 368 Energy Corridor Regional Reviews and Abstracts for Regions 4, 5, and 6

Dear Mr. Leverette, Mr. Woodruff and Dr. Smith,

Please accept the following comments from Trout Unlimited (TU) on the Bureau of Land Management (BLM), U.S. Forest Service (USFS) and Department of Energy (DOE)'s Draft Energy Corridor Regional Reviews and Abstracts for Regions 4, 5, and 6. Trout Unlimited has been a participant in the Section 368 Energy Corridor planning process since the original publication of the Programmatic Environmental Impact Statement (PEIS) and appreciates the continued opportunity to review the revisions and updates to the Section 368 energy corridors document.

The 2013 Settlement Agreement provided significant improvements to siting considerations and TU considers many of the improvements beneficial. However, we have some continuing concerns regarding the designation of corridors that continue to have the potential to impact important environmental landscapes and fish and wildlife species. Our comments will review general overall concerns and then specific state corridors in Regions 4, 5 and 6.

Interested Party Background

Trout Unlimited is the nation's largest coldwater conservation organization. We recognize the value of public lands and their unparalleled importance in providing habitat to coldwater fisheries, drinking water and wildlife habitat. Nationally, TU has more than 300,000 members and supporters, including numerous active state councils and local chapters in the three regions the proposed energy corridor routes occur. Our members and staff actively participate in on-the-ground fisheries habitat improvement projects, backcountry protection efforts for wilderness and special management areas, and the public planning actions underway by the USFS and BLM.

General Comments

As a non-profit coldwater conservation organization interested in clean energy development and solutions, TU is working for diverse and responsible energy development alternatives on public lands. Our intent with these comments is to offer suggestions for issues with updated resource analysis, mitigation adequacy and improved route considerations as the Section 368 Energy Corridor review and planning process moves forward.

Regions 4, 5, and 6 cover seven states containing important fish and wildlife habitat including sensitive species, threatened, endangered and state species of special concern or greatest conservation need. In past reviews of energy corridor transmission proposals by BLM, including the Gateway West, Gateway South, and TransWest Express Transmission Projects, and the Chokecherry – Sierra Madre Wind Project, TU stressed the importance of coordination among agencies in identifying the challenges and opportunities to improve siting any type of ROW projects across public lands and important landscapes. In addition, in an effort to better identify areas that remain of high concern to the public and areas that have already experienced a significant impact from energy development, TU created a human footprint analysis. In light of the increased demand for renewable energy development across our nation's public lands, TU completed this internal assessment of renewable energy development and associated potential habitat impacts. We referenced our review of the proposed energy corridor alignments based on results from the TU white paper *Broadscale Assessment of Renewable Energy Potential and the Human Footprint* (A. Haak, 2010) report. The Renewable Report includes an assessment of development suitability across the western United States. The suitability assessment is based primarily on a human footprint analysis which uses the intensity and extent of anthropogenic impacts on the landscape as a surrogate for loss of biodiversity and altered ecological processes. Lands with a greater human footprint are assumed to be more degraded and therefore potentially more suitable for development than less altered landscapes. Since the footprint document was created, there has been considerable development across the landscapes, and thus, as with the Corridor Study completed by the BLM and USFS, review of the report should take into account this exponential expansion of the footprint acreage.

Our general comments include the following considerations.

1. Concentrate ROW access and future development in the most degraded/altered landscapes.
2. Avoid areas with known important fish and wildlife values.
3. Avoid fragmenting high quality habitat patches or clusters of patches. These are landscapes that have a relatively low intensity human footprint. This may include single large patches or clusters of smaller patches where roads or other linear features have already fragmented the landscape. Any additional large-scale disturbances will increase fragmentation of these smaller patches, reducing their resilience and habitat value.
4. Minimize the footprint of the corridor ROWs. Regardless of where the final corridors are ultimately sited, there will be significant temporary and permanent disturbances to the landscape and the alternative that ultimately disturbs the smallest land area is preferable. Linear distance is obviously an important component of this. However, terrain is also a factor with the more rugged corridors requiring wider ROWs for roads as well as more miles of roads to allow for switch-backs. A longer pathway across flat land may ultimately have a smaller overall footprint than a shorter distance over mountainous and more rugged terrain.
5. Cumulative impacts from proposed and potential parallel transmission projects must be included in any analysis. The potential for cumulative impacts that expand a landscape for more than six miles across is significant, especially when individual proposed projects seek non-

collocation access amounting to two to three mile ROWs and potentially expanding the BLM's recommended six mile cap.

6. With increasing warming trends and changing climates affecting landscapes and watersheds across the country, the energy corridor review must include climate change analyses that looks at the larger regional landscape, intra-agency and inter-agency coordination, and field level reviews.
7. Consideration of outdated, updated and relevant additional findings of federal planning documents and guidance (such as the BLM's Instruction Memorandum No 2014-080 and the USFS Interim Directive No. 2720-2014-2, as examples) in identifying energy corridors into the next twenty years.
8. The use of the best available science must be included in the data analyses. This includes updated research on impacts from energy development activities that affect fish, wildlife, recreation, water, and air, and the public.
9. Strong coordination between federal and state agencies with respect to understanding and implementing future changes to corridors (according to the Settlement Agreement) and ensuring that compliance with the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), and Section 368 of the Energy Policy Act of 2005 (EPAct), and state regulations are met.
10. Reviews must include USFS and BLM staff at local levels and state wildlife management agency staff and, along with the public, strong coordination between the energy corridor planning effort and the numerous federal land use plan revision efforts underway or completed since the initial 2009 energy corridor siting routes on USFS and BLM landscapes.

State Corridor of Concern Reviews

1. **Wyoming: Region 4.** In reviewing the Energy Corridor Abstracts (Abstracts) for Corridors of Concerns sited through the state, TU identified several areas that should be considered in the corridor revision process. As a general statement about these Abstracts and consequential data supplied in them, we noticed that in both the map Figures provided and in the tables presented, watershed information and analysis was generally omitted from the corridor Abstract review. Though several energy corridors involve proposed stream, river, wetland, and riparian crossings, the Abstracts failed to include this information. We understand the level of assessment is not meant to be extremely detailed; however, this omission affects the Ecology discussion section and the evaluated level of impact assessment presented in the Abstracts. This results in lack of obvious ecological impacts which need to be accounted for when the proposed corridor crosses through important and relevant landscapes.
 - Corridors 79-216 and 78-255: Wind River- Bighorn Basin BLM District and Casper to Rawlins Districts. These Districts include considerable river recreation, hunting and fishing activities, streams and rivers that are important for coldwater fisheries, and Wyoming Game and Fish Department (WGFD) special management areas for both aquatic and terrestrial habitat conditions. In addition to a review of big game corridors and wildlife habitat displacement issues, soil landscape ecology should be a consideration due to the high level of erosion, sedimentation issues, and sparse vegetation in many areas along this route. Currently the Ecology Section of the Abstract is poorly defined and omits considerable information.
 - Corridors 121-221 and 218-240: Rock Springs High Desert District & Ashley National Forest. The Rock Springs BLM planning area is undergoing a Resource Management Plan (RMP) revision that is not mentioned in the Abstract. In addition, the Ashley National Forest is also involved in their plan revision process which was not included in the Abstract. Both plans

are important and at the stage where the old plans should not be the reference document; rather the siting of these corridors should include new plan components. The corridor route crosses through several stream and rivers, including the Green River (segment 218-240). The Green River is a major blue ribbon trout fishing destination, a significant tourism draw and source of river recreation, and contains both wild and native trout habitat. The Abstract states that No Concerns exist for this route of the corridor. We disagree and urge the agencies to include a more thorough analysis that mentions the watershed crossings, the level of ecological impacts likely to occur and to consider the ongoing draft management plans that are to be released in the near future for both the BLM and the USFS.

Trout Unlimited has a particular vested interest in this corridor section for what is known as the Greater Little Mountain Area (GLMA), a unique high desert landscape home to numerous big game species, native Colorado River cutthroat trout (CRCT), wild recreational trout, and numerous federal and state sensitive and threatened and endangered species, and species of greatest conservation need. With the ongoing plan revision for the Rock Springs RMP, the GLMA has been singled out as an area in need of special management considerations.

Colorado River cutthroat trout is a sensitive species recognized by the 2006 Conservation Agreement and updated 2013 Conservation Assessment for Colorado River cutthroat¹ signed by the Wyoming BLM, WGFD, USFS, US Fish and Wildlife Colorado, and Wyoming Trout Unlimited. The goal of the Agreement is “To assure the long-term viability of Colorado River cutthroat trout throughout their history range.” With six stream crossings containing CRCT species along this route and numerous habitat restoration projects for both CRCT and big game, TU requests the corridor route for this segment be reconsidered and updated to reflect the latest research, findings, management plan updates, and mitigation measures to ensure the best possible protection for fish and wildlife species in this fragile ecosystem.

In addition to our concerns with fish and wildlife impacts, the location of the corridor route along the east flank of Flaming Gorge Recreation Area, part of the Upper Colorado River system, must be re-evaluated. This segment is identified as a “high impact” area for a reason. An extremely popular recreational designation for anglers, hunters, boaters, and recreationists of all kinds, the Abstract is incorrect in stating that no issues of concern occur other than sage grouse. In addition to its major recreational attributes, it is an area that receives high sediment loads and experiences high salinity levels displaced into the reservoir from natural and manmade activities, including significant oil and gas activities. The presence of multiple springs and groundwater recharge areas associated with this area suggest that deeper regions of shallow groundwater may be encountered with increased disturbance and development. These issues place Flaming Gorge into a high profile level of concern by multiple agencies.

- 2. Montana: Region 6.** After a review of the corridor routes through Montana, TU has similar concerns to those noted in our Wyoming comments with respect to identification of watersheds on map figures and in general discussion in the Abstract tables and compatibility discussions.

¹ Hirsch, C.L., M.R. Dare, and S.E. Albeke. 2013. Range-wide status of Colorado River cutthroat trout (*Oncorhynchus clarkii pleuriticus*): 2010. Colorado River Cutthroat Trout Conservation Team Report. Colorado Parks and Wildlife, Fort Collins.

Though several energy corridors involve proposed stream, river, wetland, and riparian crossings, the Abstracts rarely define this information. Furthermore, corridor segments in Montana cross identified Bull Trout habitat, an ESA-listed species. Since no management prescriptions for utility corridors were included in the Bull Trout Recovery Plan for the Conterminous United States Population of Bull Trout (2015), mitigation measures must be developed that prescribe avoidance parameters for this imperiled species. This should be a standard requirement for all corridors accessing Bull Trout habitat.

- Corridor 50-51. Dillon and Butte BLM Field Offices and Beaverhead Deerlodge National Forest. This segment of the corridor includes a crossing of the Big Hole River. This river is a popular recreational fishery in Montana and requires a more thorough analysis and route consideration. Updates and amendments to BLM RMPs should also be reviewed. Trout Unlimited appreciates the Ecology update section to include CHAT and Imperiled Species concerns in addition to the presence of wildlife migration corridors and displacement issues.
- Corridor 51-204. Butte BLM Field Office and Beaverhead-Deerlodge National Forest. Rather than follow the highway (Interstate 15) ROW through the Beaverhead-Deerlodge National Forest, this section instead proposes to cross through a section of the forest. An option should be considered that includes routing the corridor along Interstate 15. We recommend a more thorough and field level evaluation of this route for potential fish and wildlife concerns.
- Corridor 229-254 (regular and N routes). Beaverhead-Deerlodge National Forest, Lolo National Forest, Kootenai National Forest, and Dillon and Butte BLM Field Offices. This corridor, with numerous segments that access high value national forest landscapes, contains sensitive and ESA-listed fish and wildlife species, inventoried roadless areas, wild and scenic river segments and popular recreational access areas, and must be more thoroughly reviewed. Currently, the Abstract states no other routes exist for the corridor location than to go through Bull Trout habitat in the Lolo National Forest. Although identified as restricted to electric transmission corridors only, we recommend a secondary look at alternative routes segments for this section. The Lolo National Forest Plan is outdated (1986) and allows for access based on issues and lack of data not considered in today's energy development environment. This includes no guidelines in the plan for Bull Trout guidance or objectives. With updated technologies and mitigation options, the agencies need to reduce high impacts and reconsider portions of this corridor to avoid Bull Trout habitat and to minimize disturbance to other sensitive wildlife species.

In addition to Bull Trout habitat in the Beaverhead-Deerlodge National Forest which will be accessed by this corridor route, the Silver King Roadless Area and the Continental Divide National Scenic Trail are also being accessed. We support shifting the corridor to avoid the roadless area landscape, as recommended, but also to avoid the Trail and Bull Trout habitat.

The Abstract table identifies no resource concerns within the corridor segment that accesses the Missoula BLM Field Office planning area and therefore, no information or analysis is presented. However, the Missoula RMP has started their plan revision in 2018, which is not mentioned in the Abstract and should be. In addition, we recommend a more thorough review, including Field Office staff involvement, in the corridor segment that accesses the planning area.

Overall, TU believes the entire corridor for this section needs additional reviews based on the significant levels of fish, wildlife, wild and scenic river, inventoried roadless areas,

recreational interests and the presence of extremely rough terrain not suitable for transmission line access.

- 3. Idaho: Region 6.** A section of corridor proposed through northern Idaho is a continuation of corridor sections accessed through Montana. Southern Idaho corridor sections cover an east-west access route and the general map incorrectly identifies these southern routes as not included in any Corridors of Concern. Northern Idaho presents several areas of concern for TU including access through Bull Trout habitat in the Lolo National Forest.
- Corridor 229-254 (S): Idaho Panhandle NF and Lolo NF. The Idaho Panhandle NF updated its forest plan in 2015 but the Lolo NF plan remains outdated and updated resource management considerations are lacking. We support the recommendation for the corridor to be relocated to prevent roadless area access and critical habitat for Bull Trout. Since no management prescriptions for utility corridors were included in the Bull Trout Recovery Plan for the Conterminous United States Population of Bull Trout (2015), mitigation measures must be developed that prescribe avoidance parameters for this species habitat. This should be a standard requirement for all corridors accessing Bull Trout habitat.
 - Corridor 50-203: Dillon BLM Field Office, Upper Snake BLM Field Office, Targhee National Forest. Location of corridor segments in this section extend from the Montana boundary and are located in rough terrain, cross rivers that are segments of a Wild and Scenic River study and access two national historic trail viewsheds. Though the assessment states that no river segments within the Dillon Field Office, including portions of the Beaverhead River, are eligible for inclusion in the Wild and Scenic River system, nevertheless, this river section should be evaluated more thoroughly to consider any impacts to this coldwater fishery likely to be imposed from a possible corridor crossing.

For the Targhee National Forest, the outdated land use plan (1997) does not have objectives or measures for management of electric and other transmission activities. In addition to providing additional mitigation measures beyond those in the outdated plan, we urge both agencies to make sure all ROWs stay in designated ROW corridors and to encourage the use of collocation of multiple projects within the same corridor to minimize environmental impacts.

Ecology discussion must include watershed analysis and review. We support avoidance of the Market Lake Wildlife Refuge but encourage the consideration of other equally high value fish and wildlife avoidance areas.

- Corridor 29-36: Four Rivers BLM Field office, Jarbidge BLM Field Office. Segments of the proposed corridor access several significant environmentally sensitive areas. They include the Morley Nelson Snake River Birds of Prey NCA, the Snake River Wild and Scenic Study River section, the Oregon National Historic Trail, and critical fish, wildlife and plant species. Because the Four Rivers BLM is undergoing an RMP revision, we request a more thorough review and alternative resolutions than what are identified for portions of this crossing.
- Corridor 36-112: Jarbidge BLM Field Office. The Snake River Wild and Scenic Study area is in a corridor gap and we support the recommendation to shift the corridor south to align with existing ROW lines, avoiding the Study area of the Snake River.
- Corridor 36-226: Burley BLM Field Office. This section of the corridor falls within an RMP that is dated 1982 and lacks strong environmental considerations for corridor placement in environmentally sensitive areas. We recommend the agencies seek additional route segments that will shift the corridor outside of the Salmon Falls Reservoir SRMA.

4. **Oregon: Region 6.** The corridor routes through the Owyhee River Canyon Addition is of concern to TU in addition to other routes in Oregon.
- Corridor 24-228: Vale BLM District Office, Owyhee BLM Field Office. The portion of this corridor segment that routes from Idaho to Oregon requires additional review. To all extent possible, we support BLM's desire to avoid potential lands with wilderness characteristics. All possible considerations should be given to the Owyhee River crossing, a watershed not mentioned in the review of areas of interest in the Abstract.
 - Corridor 7-24 Lakeview Klamath Falls BLM Field Office, Winema National Forest, Fremont National Forest, Lakeview Field Office, Burns District Office. The corridor sections within these agency land planning areas contain significant environmental issues. While the BLM states there are no resource issues associated with the Lakeview Klamath Falls Field Office planning area (RMP 2016), TU remains concerned about the dated Winema National Forest plan (1990) and the Fremont National Forest Plan (1989). Considerable sage grouse issues exist within this segment of corridor placement and both national forests have no management prescriptions to deal with energy corridors and future development. We support the Abstract's assessment that significant portions of this corridor route should be re-routed. The Ruby Pipeline corridor, which TU contributed significant comments on regarding river crossings, should be the obvious ROW choice. We urge the BLM to approach corridor assignment in Lands with Wilderness Characteristics with the best and most updated environmental reviews.
 - Corridor 11-228: Prineville, Deschutes, Three Rivers, Vale Malheur, and Owyhee BLM Field Offices. Trout Unlimited has concerns about several segments of this corridor which cross important trout streams/rivers. These include the South Fork John Day River, the Lower Crooked River and Jump Creek in addition to other coldwater fisheries that have the potential to be impacted. Because several of the BLM Field Offices are currently managed under outdated RMPs, we urge the BLM to provide the best available science and management criteria for mitigating the impact associated with river crossings. Collocating ROWs within current corridors will help reduce extended and new ROW establishments that impact river and riparian habitat. The Abstracts must include watershed impacts as part of the corridor high impact assessment.
 - Corridor 10-246: Cascades BLM Field Office and Mt. Hood National Forest. Portions of this corridor are identified as high potential conflict within Mt. Hood National Forest and we urge the USFS to expand their analysis of this segment. This is particularly relevant since the land management plan for this forest is dated 1990 and includes Bull Trout critical habitat, Chinook Salmon critical habitat, Steelhead Salmon critical habitat, Coho Salmon critical habitat, the Bull Run Watershed Management Unit OCD, the Sandy, Oregon Wild and Scenic River, old growth forests, and Northern Spotted Owl habitat, none of which have recommendations, objectives or guidance for handling utility corridors. We support shifting all corridor segments to avoid all of the above mentioned critical habitat areas. Highly recommended by TU is the need to update all corridor planning efforts with recently passed protective legislation encompassing Oregon federal lands.
 - Corridor 230-248: Cascades BLM Field Office and Mt. Hood National Forest. Similar to the corridor mentioned above, this section contains significant concerns for critical fish habitat, Wild and Scenic River segments, and conflicts with the Northwest Forest Plan revision. The updated Northwestern and Coastal Oregon RMP (2016) provides clear direction and we urge the BLM to modify the corridor boundaries to avoid Steelhead Salmon critical habitat, Coho Salmon critical habitat, Chinook Salmon critical habitat, Fish Creek Oregon and Clackamas

- River National Wild and Scenic River designations, Riverside National Recreation Trail, Pacific Crest NHT, ACEC contacts and contact with a Wilderness Area. Since many of the management plans for handling these sensitive areas do not include references on implementing objectives for utility corridors, we urge both agencies to implement stronger analysis and mitigation measures for minimizing impacts from this corridor. We also encourage route alignments that either avoid or minimize at all possible extents any contact with these high impact areas.
- Corridor 7-11: Deschutes, Lakeview, Klamath Falls and Prineville BLM Field Offices ad Fremont-Winema and Deschutes National Forests. The corridor segment within these agencies planning areas are located in ESA-listed Bull Trout critical habitat, the Sycan River Wild and Scenic River corridor, and BLM landscapes identified as Lands with Wilderness Characteristics. Avoidance of any impacts to critical native trout habitat must be addressed better than that which is provided in the Abstract. Updated science and research regarding impacts from energy development activities must be included in any analysis. We recommend reroutes as much as possible but support the considerations provided in the Abstract.
 - Corridor 4-247: Butte Falls, Cascades, Grants Pass, Siuslaw, South River, Swiftwater, and Upper Willamette BLM Field Offices (Western Oregon BLM District Office). The RMP for this District has recently been updated and BLM states it retains broad discretion regarding the siting of corridors in multiple use areas, including lands with proposed wilderness characteristics. We urge the BLM to include strong balanced mitigation measures to limit any impacts from ROW crossings on critical areas. This would include Coho Salmon (ESA-listed threatened), old growth forests, and Northern Spotted Owl critical habitat. We also would like to mention that due to the high impact levels of this corridor route, it should be identified as a corridor of concern. Currently it is not identified as such in the Abstract.
5. **Washington: Region 6.** Corridor sections in Washington include critical habitat for Coho Salmon, Chinook Salmon, Steelhead Salmon, Bull Trout, Northern Spotted Owl habitat, and significant areas of wilderness and inventoried roadless areas. As indicated in previous comments above, many of the management recovery plans for ESA species do not include how to manage for utility corridors. For this, TU recommends reassessing opportunities for further mitigation and best management practices in establishing utility corridors in highly sensitive areas.
- Corridor 5-201: Salem Tillamook BLM Field Office. Coho salmon (an ESA-listed threatened species) habitat intersects with the corridor and we support the resolution to site the corridor along existing transmission corridors. In addition, we recommend strong mitigation measures to improve any impact results from corridor crossings in salmon habitat.
 - Corridor 102-105: Wenatchee BLM Field Office, Okanogan-Wenatchee and Mt. Baker-Snoqualmie National Forests. Trout Unlimited's concerns in this corridor segment include the presence of Chinook Salmon (ESA-listed endangered and threatened) and the lack of any reference of utility corridors mitigation measurements in the Final Critical Habitat Rule for Chinook Salmon in 2000 or the ensuing Recovery Plan for Lower Columbia River Chinook Salmon in 2013.
 - Corridor 244-245: Mt. Baker-Snoqualmie and Okanogan- Wenatchee National Forests. Forest plans for these forests are outdated and are also part of the Northwest Forest Plan revision process. Chinook salmon critical habitat, Northern Spotted Owl critical habitat, the Pacific Crest NT, and several state management areas are of concern to TU. Again, since these plans did not contain management measures or objectives for handling utility

corridors, we urge the BLM to initiate and implement the strongest possible mitigation measurements that best protect critical habitat values.

- 6. Nevada: Region 5.** Energy Corridor routes in Nevada interest TU based on the presence of Lahontan cutthroat trout and backcountry wilderness and roadless areas, all of which are few and far between in this state. Because Forest Plans and BLM RMPs are outdated in most of the planning areas, our concerns remain high that the BLM and USFS provide strong mitigation and management measures that protect vital watersheds and backcountry habitat and recreational experiences.
- Corridor 18-23: Carson BLM Field Office and Humboldt-Toiyabe and Inyo National Forests. Several areas of concern exist with TU on the Humboldt-Toiyabe National Forest. This forest's plan is 1986 vintage and does not have adequate management objectives or mitigation measures for implementing utility corridor siting and environmental analysis. While the Abstract states the corridor is not located within roadless or wilderness areas, we encourage the BLM and USFS to provide stronger management direction and mitigation measures that limit or minimize extended impacts that could affect these areas.

Conclusion

We appreciate this opportunity to participate in the corridor review for this important federal planning process. Significant time has elapsed since the original PEIS Energy Corridor document and 2013 Settlement Agreement. Trout Unlimited strongly recommends that the agencies further improve their methods for considering and addressing environmental concerns in the corridor abstracts and through the Regional Reviews, including by acknowledging and addressing intersections with all native and wild trout and salmon habitat, wilderness-quality lands, and public recreation areas.

In addition, TU participated in the February webinar on using the mapping tools and believes the agencies need to continue to improve on the application for ease of public use of these tools. It remains cumbersome, extremely detailed, and difficult for a lay person to comprehend the various levels of layer data needed to provide adequate comments. From our cursory review, many corridors have not made significant improvements over the 2009 recommendations. We urge the agencies to consider improving the mapping tools to include watershed drainages that are important at any level of corridor siting, additional updates from BLM and USFS planning actions to their RMPs and LMPs, and making sure data is available for coordinating and sharing across inter and intra agency offices and field level staff.

We look forward to continued participation in this effort.

Sincerely,

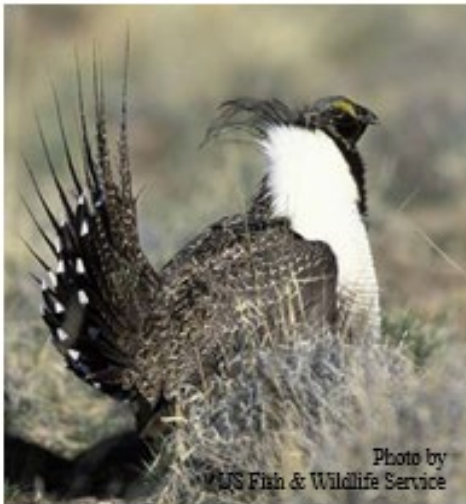


Cathy Purves
NEPA and Foundation Coordinator
Trout Unlimited
220 North 8th Street
Lander, WY 82520

307-332-6700 ext. 10



Broadscale Assessment of Renewable Energy Potential and the Human Footprint



Amy Haak
Trout Unlimited
Boise, Idaho



February 2011

Contact Information

For more information on Trout Unlimited's energy program or development of this assessment, please contact:

Brad Powell – Energy Director; bpowell@tu.org

Corey Fisher – Assistant Energy Director; cfisher@tu.org

Kendall Van Dyk – Renewable Energy Coordinator; kvandyk@tu.org

Amy Haak – Resource Information Director; ahaak@tu.org

Or visit our website at www.tu.org

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10247] - Webmaster Receipt
Date: Monday, April 8, 2019 3:56:53 PM
Attachments: [ID_10247_PCTAResponseNorthernSierra368EnergyCorridorReviewRegions456.docx](#)

Thank you for your input, Connor Swift.

The tracking number that has been assigned to your input is **10247**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 15:56:30 CDT

First Name: Connor

Last Name: Swift

Email:

Are you submitting input on the behalf of an organization? Yes

Organization: Pacific Crest Trail Association

Topics

Land Management Responsibilities and Environmental Resource Issues

Specially designated areas

Geographic Area

[Area selected via Corridor Mapping Tool](#)

Input

Comment letter attached, attachment 1.

Attachments

PCTA Response Northern Sierra--368 Energy Corridor Review--Regions 4, 5, 6--.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

March 25, 2019

RE: Pacific Crest Trail Association Response to the Section 368 West-wide Energy Review Corridor—
Regions 4, 5 and 6

To Project Review Team,

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's and Bureau of Land Management's (BLM) primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails dates back to the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states in Sec. 11 (a), "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." Sec. 11 (b) continues, "Each Secretary or the head of any Federal land managing agency, may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails." Based on this direction, it is PCTA's role to work with the Forest Service and BLM to ensure the best possible management of the PCT and the experience it affords trail users, year-round. Additionally, PCTA has had a strong partnership with these agencies for over a decade with the maintenance and management of the PCT.

The PCT user's experience can be significantly impaired if, along the Trail in between protected areas, they encounter harshly clashing land uses. This was acknowledged early on by a federal interagency task force who interpreted the NTSA by developing these guidelines, which also appear in the PCT Comprehensive Plan,

"The routes of national scenic trails should be so located as to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass. They should avoid, insofar as practicable, established highways, motor roads, mining areas, power transmission lines, existing commercial and industrial developments, range fences and improvements, private operations, and any other activities that would be incompatible with the protection of the trail in its natural condition and its use for outdoor recreation."

Protection of the unique resource the PCT represents is particularly challenging because, along its 2,650 miles, hundreds of developments are proposed each year by an array of different land management agencies, private owners, and industries. However, the original vision was reaffirmed in Executive Order Number 13195, Trails For the 21st Century which states, "Corridors associated with national scenic trails . . . [should be] protected to the degree necessary to ensure that the values for which each trail was established remain intact."

Within Region 5 in the Northern Sierra, PCTA has analyzed all of the energy corridors that cross, are adjacent to, and have potential to impact the PCT and the experience the trail provides to hikers, horseback riders and non-motorized winter trail users. Protection of the trail experience must consider not only developments adjacent to or intersecting the trail corridor, but also developments that would degrade the vista for trail users. While some of the energy corridors appear to have minimal impact on the PCT, others appear to have the potential to substantially interfere with the nature and purposes for which the PCT was designated a National Scenic Trail. The following corridors are addressed with

PCTA's questions, input and there are associated maps for the areas of interest using the "drawing tool" provided on the West-wide Energy Corridor website.

Corridor 6 – 15, Colfax to Reno Corridor

1. The corridor will cross the PCT in the vicinity of Donner Summit where the PCT crosses Donner Pass Road and Interstate 80 near the town of Truckee, California. Currently, there are minimal transmission lines in the area and PCTA requests that any additional infrastructure be aligned with the existing adjacent corridors to reduce the potential conflict in the area. The PCT crosses a major highway in the area, Interstate 80, and the cumulative visual impacts would significantly increase with the development of additional infrastructure outside of the existing transmission corridors.
2. The analysis does not thoroughly address the potential impacts to the viewshed and nature and purposes of the Pacific Crest National Scenic Trail as it crosses the Trail from East to West.
3. We ask that the corridor width at the PCT crossing be at the absolute minimum width, not the proposed width of 3,500 feet. The Tahoe Forest Land Management Plan (LMP) identifies this PCT intersection as having a visual quality objective (VQO) of retention. The retention objective is stated in the Tahoe LMP and the corridor abstract as "Areas in which management practices should not be evident to the casual observer." Reducing the size of the corridor will minimize the impacts and conflicts of the area and PCT intersection, as well as help meet the VQO of retention.
4. PCTA asks that the crossings of the PCT be kept perpendicular at 90 degrees, with the inclusion of a change in approach angle to reduce the impacts and meet the siting principles in the project. This will also assist in maintaining the VQO of retention, as stated in the Tahoe LMP for the PCT intersection.

The above design features are necessary in order to comply with the National Trails System Act. Failure to include such design features will inevitably allow for substantial interference with the nature and purposes of the PCT.

The following language, or language with slight variations, is contained in several corridor abstracts that contain the PCT, "Agencies could consider a new IOP for NSTs and NHTs to enhance BMPs for proposed development within the energy corridor." With this, PCTA suggests the following Interagency Operating Procedures (IOPs) be considered for addressing nationally designated trails:

- Corridors prior to crossing any National Scenic or Historic Trail perpendicularly will incorporate a change in the angle of approach within the immediate foreground to foreground viewshed prior to the trail and corridor intersection
 - This will minimize the length of the clearing viewed and experienced by trail users as they cross energy corridors
- Narrowing of the corridor to the absolute minimum width within the trail's foreground
- Utilize vegetation management approaches such as visual screening by leaving tall shrubs where the trail intersects energy corridors
- Where a corridor is viewed within the middleground viewshed from the trail, vary the shape and width of the corridor, and feather edges of the clearing, to blend with the forms and lines of the landscape

We look forward to working with our agency partners on this planning effort to ensure that impacts to the Pacific Crest National Scenic Trail are minimized to ensure the trail provides the best experience possible for trail users. Please do not hesitate to contact me with any questions.

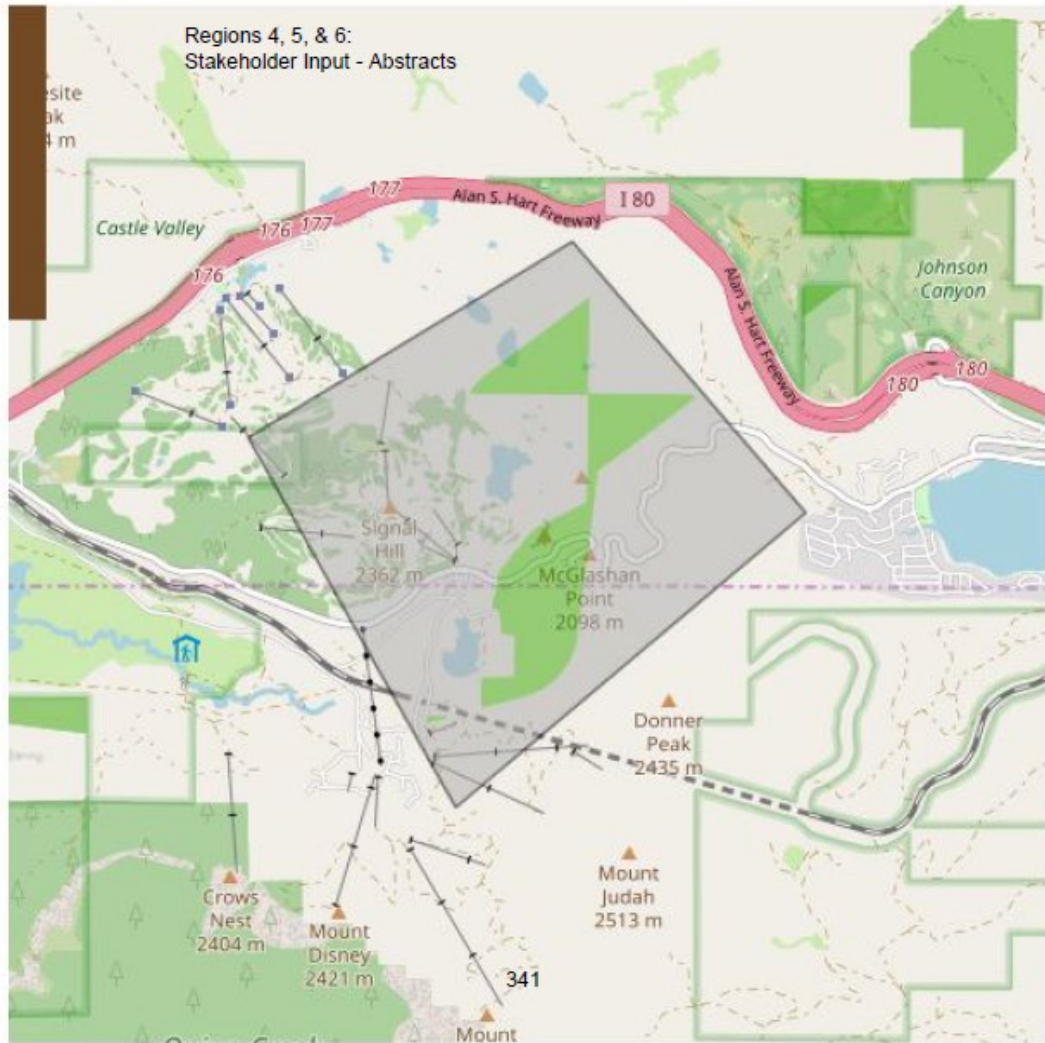
Sincerely,

A handwritten signature in black ink, appearing to read "Connor Swift", is written over a light gray rectangular background.

Connor Swift
Northern Sierra Regional Representative

CC:
Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator
Justin Kooyman, PCTA, Associate Director of Trail Operations

Regions 4, 5, & 6:
Stakeholder Input - Abstracts



From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10248] - Webmaster Receipt
Date: Monday, April 8, 2019 4:21:03 PM

Thank you for your input, Zach Funkhouser.

The tracking number that has been assigned to your input is **10248**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 16:20:44 CDT

First Name: Zach
Last Name: Funkhouser
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Idaho Power Company

Topics

Physical barrier
Jurisdiction
Existing infrastructure/available space
Specially designated areas
Visual resources

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

Idaho Power appreciates the opportunity to comment on the energy corridor abstracts proposed for the West-wide Energy Corridor. The corridors being proposed within and adjacent to Idaho Power's service territory closely align with Idaho Power's anticipated regional transmission needs. We would also like to recognize the cooperating agencies, whose participation is critical to the success of this endeavor. Thank you for the opportunity to comment and address the corridor needs in the West and, more specifically, those immediate to Idaho Power's service territory.

- A 3,500 ft corridor width may be adequate for some corridors, however it will significantly constrain corridors with multiple high-voltage transmission lines that serve a similar operational function (e.g., regional v. local energy delivery.) The corridor widths should provide adequate separation of lines such that energy transport efficiency and business investment is optimized.
- Lines are sometimes constructed to deliver remote power to load centers, however, the most beneficial line routes connect major load centers together. A line route that terminates at a remote location, although potentially useful, would be much more useful if it continued on and connected with another line corridor (these corridors then generally connect to the load centers). This would facilitate resource development along the entire line route, while also connecting two major corridors, which allows utilities with ownership in those corridors to economically transact.

- An energy corridor between southern Idaho and northern Idaho (or eastern Washington), similar to the corridor between eastern Idaho and Montana, would be potentially valuable. A western Idaho north-south corridor is not currently identified.
- The non-continuous nature of the proposed energy corridors makes them difficult to use and is perceived as pre-determining the location of infrastructure across private lands which occur between corridor boundaries.
- Corridor locations that occur on BLM land should have a previously complete Visual Resource Inventory or project proponents will incur schedule delay trying to use them.
- Corridor locations that occur on BLM land should not have VRM I or II designations within them. RMP amendments should be complete prior to any recommendation to site within them or the corridor should completely avoid VRM I and II designations.
- Visual comments above should also pertain to Forest Service managed lands and with respect to Visual Resource Management objectives and associated siting constraints.
- Corridor locations that occur on BLM land should not have ACECs in them.
- Corridors should not have any type of federal land use designation of “no surface disturbance” identified within them.
- If a project proponent is required to adhere to specific siting requirements when using a corridor, such as co-locating to a certain distance from other infrastructure, those criteria should be clearly established and documented.

Idaho Power would like to reiterate our appreciation for the opportunity to submit comments and suggestions. We would like to take this opportunity to thank the Agencies for their efforts in this endeavor. Should you have specific questions, you may contact Jared Ellsworth, at 208.388.6499 or Zach Funkhouser at 208.388.5375.

Sincerely,

Idaho Power Company

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10249] - Webmaster Receipt
Date: Monday, April 8, 2019 5:23:34 PM

Thank you for your input, Dustin Weaver.

The tracking number that has been assigned to your input is **10249**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 17:23:03 CDT

First Name: Dustin
Last Name: Weaver
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Williams Companies - Natural Gas Transmission, Gathering & Processing

Topics

Physical barrier
Existing infrastructure/available space

Geographic Area

General (not corridor-specific)

Input

Williams Companies Comments – Section 368 Corridor Study

Williams Companies Service and Design Considerations in the Study Area

Williams and its predecessor companies have operated in Region 4, 5 and 6 for over 60 years. Our companies have gathered and processed natural gas in Wyoming and delivered gas to communities in Wyoming, Idaho, Oregon and Washington, as well as other states, through a 4,000 mile transmission system that has been in place for decades. With in-place pipelines, compressors, meter stations and other appurtenant structures, expansion or reinforcement facilities have been constructed adjacent to what is already there. Having rights-of-way, access and delivery points already established, our companies have historically not looked to other routes or corridors when expanding capacity to growing communities and industry. We do not expect that to change in the future.

Corridor Compatibility Issues

High Voltage AC Interference/Faults: With the presence of any AC in the immediate vicinity of the pipelines, the risk of faults or induced corrosion are higher. HVAC can affect existing required cathodic protection systems and Williams would be required to first assess cathodic protection levels, including soil types, HVAC load currents and pipe characteristics, before construction of new power lines and, if needed, Williams would require the placement of additional facilities that would ensure the proper cathodic protection levels, without

interference, after the HVAC lines were built.

Other Pipelines: Limited right-of-way availability for pipelines in a corridor could increase the chance of DC interference between different pipelines. If the pipeline space is constrained, it could become overcrowded with different pipelines and their associated Cathodic Protection (CP) systems. From the different CP systems, DC stray current can cause DC interference corrosion and that can only be fixed by testing and installing mitigation measures. With natural gas facilities, there are above ground appurtenances and the presence of HVAC or other DC the number of above ground fixtures would likely increase.

Overall, compatibility issues make corridors less desirable, especially if another facility is running parallel. We are currently working with two power companies on transmission line crossings in separate states in an effort to minimize the effect of high-voltage power. The issues created by HVAC crossings are significant. From the Williams perspective, our natural gas facilities should be as far from High Voltage AC (HVAC) powerlines as practical.

We hope this information is useful and we appreciate the opportunity for Williams Companies to comment. We would be happy to provide more specific information concerning location and compatibility. Please feel free to contact Dustin Weaver at (210) 479-4524 or by email at Dustin.Weaver@williams.com.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10250] - Webmaster Receipt
Date: Monday, April 8, 2019 6:23:17 PM
Attachments: [ID_10250_DeschutesNFRegionalReview04082019.pdf](#)

Thank you for your input, Cristina Peterson.

The tracking number that has been assigned to your input is **10250**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 18:22:43 CDT

First Name: Cristina
Last Name: Peterson
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Deschutes National Forest Bend - Fort Rock Ranger District

Topics

Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Lands and realty
Livestock grazing
Public access and recreation
Soils/erosion
Specially designated areas
Tribal concerns
Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

7-11 [blank, blank]

Input

Thank you for the opportunity to provide feedback. Please see the attached PDF.

Attachments

DeschutesNF-RegionalReview-04-08-2019.pdf

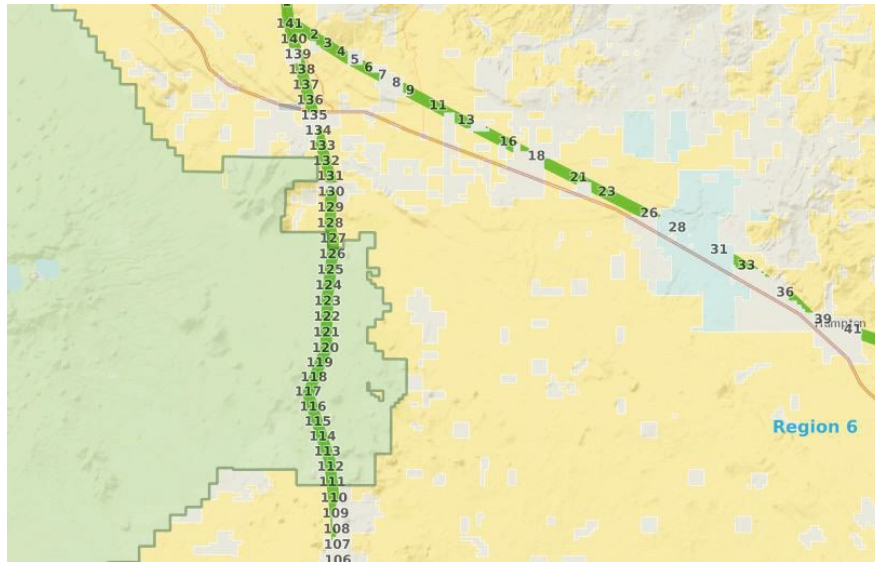
Questions? Contact us at: corridoreiswebmaster@anl.gov

For each corridor, review previously collected information (2014) and answer the questionnaire sheets.

Corridor: 7-11

Regional Review Feedback

April 8, 2019



General Feedback: It would be very helpful to have a shapefile with mile posts on it so specialists can identify exactly where along the corridor their resource concerns exist. The mapping tool was not very helpful because many specialists have GIS layers with data about the location of their resource concerns which could not be integrated. Being able to overlay shapefiles in GIS is more useful. If a shapefile with mile posts is available, specialists on the Deschutes NF would be able to provide more location specific information or concerns. At this time, resource concerns described below are for the entire length of the corridor that is sited on the Deschutes NF.

Question 1: Does the corridor location facilitate energy transport? Things to consider:

- Is there interest in developing within the corridor (planned projects, applications)?
- Is there energy generation development on the horizon in the area (renewable energy or growing demand)?
- Does the corridor provide a viable link between energy supply and areas of high demand (crucial path for energy transport)?

Response:

- There is no interest at this time that the Deschutes NF is aware of, in developing within the corridor.
- There is no energy generation development plan that the Deschutes NF is aware of.
- This corridor does provide a crucial path for energy transport and based on the data we have available, it services rural communities.

Question 2: Does the corridor have capacity for additional development?

Things to consider:

- If the corridor has existing infrastructure, does it appear that the corridor could accommodate additional development?
- Are there pinch points within the corridor (i.e., terrain or special designations on either side of the corridor) that would make future development challenging?

Response:

- It appears that the corridor could accommodate additional development. However, it does pass through 2 active cattle allotments that have multiple range improvements.
- Potential pinch points could result from shallow lava flows that would be more difficult to develop. Another potential pinch point is the Old Growth Management Area at the northern end of the corridor on the Deschutes NF.

Question 3: List top 3 environmental concerns within the corridor that could make future development challenging?

Response:

1) The corridor goes right through sage grouse habitat, big game winter range (deer, elk, antelope), golden eagle nesting areas, and a deer migration corridor. The corridor is adjacent to an Old Growth Management Area; wildlife retention of old growth ponderosa pine (live and dead) is a concern. Caves located along the corridor pose a concern as well.

2) The northern half of the corridor runs through sensitive soil types including SRI 7 (barren pumice/cinder flats), SRI's 7C and 9V (very rough lava flows with varying thickness of coarse Newberry pumice mantle). The southern half of the corridor runs through soil types where hard and competent bedrock may be very near the surface (18-24", though deeper in some places). Areas that are shallow to bedrock or young lavas may pose significant challenges to installing buried lines, poles, or other facilities. Barren flats and Newberry pumice-mantled areas are likely habitat for Pumice Moonwort (*Botrychium pumicola*). They could also present challenges for vegetative recovery or have limitations regarding other resource needs/mitigations. Disturbance to sensitive soils where vegetation and surface organics are disrupted and recover slowly can result in transference of effects to adjacent off-site soils in the form of concentrated flow, erosion, and sediment deposition. It is crucial to incorporate appropriate design features and transportation system maintenance requirements into agreements to limit this transference.

3) There are populations of the Region 6 Sensitive plant Pumice Moonwort (*Botrychium pumicola*) in the powerline corridor where it passes through our ranger district. The corridor may also contain habitat for green-tinged paintbrush (*Castilleja chlorotica*).

Question 4: What changes to land use plans (amendments or revisions for example, Sage-grouse RMPA, project specific amendments, etc.) have been made since 2009? How do they affect the corridor? Please consult with your agency land use planning staff.

- If there have been changes to land use plans, please indicate how the corridor is affected (was corridor narrowed, was the designation removed, was the corridor's mode changed to underground-only, etc.)

Response:

- Sage grouse guidelines place some limits on new development and time of year operations. Eastside screens would apply to the whole extent of the line.

Question 5: Is there a better location to re-route the corridor that better facilitates major energy transmission development AND resource protection? Things to consider:

- Can you re-route along existing infrastructure (including newly authorized transmission lines/pipelines, roads and highways).
- Would widening corridor alleviate the concern(s) by allowing more flexibility to avoid resource concerns?
- Could the corridor be designated underground-only or above ground-only to alleviate concerns?

Response:

- It would be less impactful to use the existing corridor rather than creating a new one.
- Widening the corridor would further reduce deer hiding and thermal cover, and would likely impact sage-grouse and green-tinged paintbrush habitat. It would not alleviate cultural resource concerns. Widening the corridor would result in a greater footprint of disturbance. Widening the corridor would actually create more habitat for the Pumice Moonwort to colonize and would therefore require the same careful powerline maintenance that occurs today on the existing line where the species occurs.
- Both would require ground disturbance and have some impacts. The underground line might alleviate concerns within the Scenic Views Management Area, though that is a small section. See soils comments above regarding rough lava flows and shallow soils, which could be prohibit an underground line. Cave resources in the area would also affect the decision to put the line underground. Above-ground only would have the least concerns for botany because it would minimize soil disruption (and disruption to Pumice Moonwort populations and habitat). There could be conflicts with meeting objectives in the Old Growth Management area and Eastside Screens if old growth trees were proposed to be removed.

If there is a better location to re-route the corridor, please provide a map.

Response:

- Bonneville Power Administration currently has a powerline through this corridor. There are roads through this corridor as well. It would be less impactful to use the existing corridor rather than creating a new one.

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10251] - Webmaster Receipt
Date: Monday, April 8, 2019 6:41:00 PM
Attachments: [ID_10251_FOI_BHCP_SC_WWECcomments_final.pdf](#)

Thank you for your input, Jora Fogg.

The tracking number that has been assigned to your input is **10251**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 18:40:41 CDT

First Name: Jora
Last Name: Fogg
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Friends of the Inyo

Topics

Land Management Responsibilities and Environmental Resource Issues
Cultural resources
Ecological resources
Lands with wilderness characteristics
Public access and recreation
Specially designated areas
Tribal concerns
Visual resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

18-23 [66, 237]

Input

[Blank]

Attachments

FOI_BHCP_SC_WWEC_comments_final.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



April 8, 2019

Mitchell Leverette
Acting Assistant Director
Energy Minerals Land Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

Submitted via email: corridors@anl.gov and online:
<http://corridoreis.anl.gov/involve/stakeholder-input/>

Re: Comments on Corridor Abstracts for Section 368 West-wide Energy Corridors
Regions 4, 5 and 6 Regional Review

Thank you for the opportunity to provide comments in the WWEC region 4,5,6 review for abstract 18-23. Friends of the Inyo is a 30 year old grassroots nonprofit conservation organization based in Bishop, California, dedicated to the stewardship, exploration and preservation of the Eastern Sierra's public lands and wildlife. With over 900 members, FOI is an active partner with federal land management agencies including the USFS and BLM. In Inyo and Mono Counties, the Sierra Club Range of Light Group is a member of the Toiyabe Chapter of the Sierra Club and offers outings and advocates for public lands and environmental protection on a wide range of issues with 450 members. The Bodie Hills Conservation Partnership is a coalition of organizations working toward permanent protection of the Bodie Hills, an American treasure with exceptional scenic, historic, recreational and ecological values. We work to create a healthy sustainable future for the Bodie Hills that combines conservation and public access, preserves current uses and promotes the region's scenic beauty for the economic benefit of local residents.

Corridor 18-23 traverses a national and international tourist destination that provides abundant wildland and non-wildland based recreational opportunities to millions of visitors annually. The region's lifeblood is its tourism-based industry. There is substantial concern about the impact not only of new powerlines and transmission infrastructure being developed within this scenic wonderland, but also that prioritizing this corridor via the Section 368 process would facilitate development of inappropriately-sited renewable energy facilities and related infrastructure in the greater Eastern Sierra region. See, e.g., letters from Mono County (May 27, 2014) and Inyo County (October 8, 2016).

While portions of this corridor already exist (and it currently hosts the Pacific DC intertie in Mono County and several additional transmission lines in Inyo County), *it is the possibility of new powerlines, pipelines and other transmission infrastructure, including appurtenant energy and facilities development, that is of concern.* The iconic scenic landscapes, world class tourism, and fragile biological, cultural and recreational resources between mile posts 66 and 240 of abstract 18-23 makes this corridor particularly problematic for future transmission infrastructure. It is our general recommendation this corridor be removed all together in light of the numerous issues raised by previous stakeholders and below in our MP specific comments.

Within California, the agencies should adjust or delete the following corridors to address unacceptable environmental impacts.

MP 66-70: This corridor crosses extensive habitat for the Bi-State Distinct Population Segment (DPS) of Greater Sage-grouse (aka Bi-state sage grouse, BSSG) and intersects critical habitat within the Bodie Hills Population Management Unit (PMU). Due to an August 24, 2018 court ruling vacating the Service's 2015 withdrawal of 2013 proposal to list and designate critical habitat for the BSSG under the ESA (*Desert Survivors v. U.S. Dept of Interior*, 321 F. Supp. 3d 1011 (N.D. Cal. 2018)), the Service is initiating a new status review of the BSSG which will entail updating its assessment of the status of and threats to the BSSG, as well as ongoing and anticipated future conservation actions. The court's ruling reinstated the October 28, 2013 proposed rules to list the BSSG with a 4(d) rule and designate critical habitat (78 Fed. Reg. 64,328). The ruling also directs the Service to provide a new opportunity for public comment on these proposed rules, and then subsequently develop a new and final listing determination on the proposed rules. This final listing determination must be published in the Federal Register by October 1, 2019 with an anticipated comment period in the Federal Register this summer. We are deeply concerned about the potential impacts of development of new transmission lines, gas pipelines, and associated infrastructure on the Bi-State sage grouse given the proposed corridor is within or very near proposed critical habitat for these sensitive birds.

The BSSG population as a whole has been declining since 2011. Scientific data shows the Bodie Hills PMU as stable or slightly increasing, and is a major source

population for other PMUs that are in consistent decline. If population demographics were to decrease within the Bodie Hills it could have dire consequences for the population as a whole. Detailed information can be found at <https://pubs.usgs.gov/of/2018/1177/ofr20181177.pdf>.

Infrastructure is a moderate priority threat in the Bodie Hills PMU. Predation (from raptors, ravens, coyotes and other mammals) is an increasing problem currently being studied. The development of increased infrastructure in any of these areas could further exacerbate risks to the survival of the BSSG. In addition to providing perches for predators, linear structures, like transmission lines, fragment habitat and increase potential for direct mortality from infrastructure strikes. Increased human and vehicle traffic associated with development and maintenance of infrastructure also increase the potential for direct mortality through vehicle strikes.

MP 66-80: This corridor is adjacent to the USFS Excelsior Roadless Area and intersects the BLM Excelsior WSA and the Excelsior citizens-proposed wilderness area. This area provides habitat connectivity between the northern White Mountains and the eastern wild lands of the Bodie Hills. It represents a wild, untouched chunk of the western Great Basin, containing extensive intermountain basin big sagebrush shrubland and great basin pinyon juniper woodland with isolated ephemeral lakes, unique geologic dune systems, and locally limited but ecologically critical springs and associated riparian systems. This area has wetlands and dry alkali lakes unique to the Inyo National Forest (INF). The INF recently identified the area between MP 66-80 as having high ecological integrity in its wilderness evaluation narratives for Land Management Plan (LMP) revisions. Rare plant species include globe spring parsley, and dune horse brush; USFS sensitive species include William's combleaf and Long Valley milkvetch. The corridor footprint is within and adjacent to priority Bi-State Sage Grouse habitat. Desert bighorn sheep occasionally use the area traveling from the White Mountains. Although largely un-inventoried, the area is extremely rich in archeological resources. The INF LMP revision is underway with an expected Final Record of Decision by the end of 2019. The agency should incorporate the new LMP in their assessment of the feasibility of this alignment. The LMP identifies Inventoried Roadless Areas as Designated Areas pursuant to the Roadless Area Conservation Rule.

MP 71-77, 81-88, 94-102: The corridor is directly within BSSG critical habitat in the South Mono PMU. Please see above MP 66-70 comments regarding BSSG impacts.

MP 96: Existing transmission lines run outside of the Benton Paiute Reservation, however the proposed corridor is routed directly through the reservation. MP 96 is under the jurisdiction of BIA and the agency must receive approval from both BIA and the Tribe on the alignment through their property.

MP 102-104: The corridor is very near to BSSG critical habitat. Please see above MP 66-70 comments regarding BSSG impacts.

MP 110-111, 114-116: The alignment is within the Casa Diablo WSA and it intersects the Chidago Canyon WSA. Infrastructure development is prohibited by law in WSAs. The abstract also contains inappropriate and presumptive language indicating that transmission lines will need to be shared (within the existing corridor) “until one or all of the WSAs are released to non-wilderness uses by Congress.” (See discussion of “potential compatibility issues” for the Chidago Canyon, Casa Diablo, Fish Slough and Volcanic Tablelands WSAs in the Abstract, pp. 8-9.) This biased language that presumes specific action by Congress should be eliminated from the corridor abstract and from all future analyses.

MP 112-113. This alignment is within the Fish Slough Area of Critical Environmental Concern (ACEC). The Abstract for corridor 18-23 indicates that the corridor intersects the Fish Slough Area of Critical Environmental Concern (ACEC) (see Abstract, p.10). Fish Slough is not only highly important habitat for resident and migratory birds, it contains habitat for rare and endemic fish species and other critical habitat and resource values. The area hosts three of only five small remaining populations of the Owens pupfish (*Cyprinodon radiosus*), an Owens Valley endemic that is not only a California Fully Protected species but is also listed as endangered at the state and federal levels.

The Fish Slough ACEC is an extensive system of springs and marshes cooperatively managed by the Department, BLM, Los Angeles Department of Water and Power (LADWP), University of California Natural Reserve System, and USFWS. Two sites within Fish Slough, 'BLM Spring' and the Owens Valley Native Fishes Sanctuary, have lost pupfish populations following illegal introductions of largemouth bass. BLM Spring was restored in cooperation with BLM in 2002, and reintroduction of native-dwelling pupfish occurred in 2003. This project included dam reconstruction, fabrication and installation of a new type of fish migration barrier, vegetation control, and exotic fish removal. Two additional populations tenuously persist in marshy areas of Fish Slough. At present, the federally threatened Fish Slough milkvetch (*Astragalus lentiginosus* var. *piscinensis*) is restricted to the same range as it was at the time of listing, a 10 kilometer (km) (6 mile (mi)) stretch of alkaline flats paralleling Fish Slough. The slough supports the species on fewer than 540 acres (ac) (219 hectares (ha)). For more information see <https://www.wildlife.ca.gov/Regions/6/Desert-Fishes/Owens-pupfish> and https://inyo-monowater.org/wp-content/uploads/2011/09/Fish-Slough_Milkvetch_5yrReview_2009.pdf. Allowing transmission development within these locations could adversely impact the values for which these areas were designated.

MP 156-157: This area is designated a state scenic highway that may conflict with future transmission infrastructure.

MP 183-192: This corridor section is within the newly designated Alabama Hills National Scenic Area, signed into law on March 12, 2019. John D. Dingell, Jr. Conservation, Management, and Recreation Act, Pub. Law 116-9 (2019). The law creating the Alabama Hills National Scenic Area, requires the agency to minimize harm to the purposes and values of the Scenic Area from any new utility facility rights-of-way which include “nationally significant scenic, cultural, geological, educational, biological, historical, recreational, cinematographic, and scientific resources.” *Id.* at 1402. The law also requires a determination that any new rightsof-way be the “only technical or feasible location, following consideration of alternatives within existing rights-of-way or outside of the Scenic Area.” *Id.* In addition, the law also mandates that the right-of-way be in accordance with NEPA and other applicable laws, which includes the National Landscape Conservation System Act, established to “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” 16 U.S.C. § 7202(a).

The area has significant national history implications from: a) Paiute – Shoshone inhabitation of the area for thousands of years and the culturally sensitive and significant Native American sites, artifacts, and history there; b) the historic gold mines of the Alabama Hills. It was miners in the 1860s that named the area after the CSS Alabama, a Confederate warship; c) The spectacular rock outcroppings - back dropped by the Sierra Nevada mountain crest - became the birthplace of the **‘American Western’** film genre, with over 400 Hollywood films made here from “*The Lone Ranger*” and “*Hopalong Cassidy*” serials to “*How the West was Won*” and more recently “*Ironman*” feature length movies. The area has nationally significant scenic features: a) The incredible jaw-dropping view-scape that is formed by the wind and water erosion of unique 90 million year old granitic boulders and hundreds of natural arches that dominate the area. Hundreds of thousands of visitors annually are drawn to this very unique and visually stunning landscape; b) the scenic beauty has attracted legendary landscape photographers - like Edward Weston, Ansel Adams and David Muench - to the Alabama Hills; and led to hundreds of films, print ads and commercials, that capture this magical landscape for the viewer; c) spectacular spring wildflower blooms, which serve as a colorful contrast to the stark background of the desert and rocks. The abstract must be corrected to include the new designation and future management direction.

MP 194-210. We object to the characterization of Owens Lake as “medium conflict” as depicted in the Conflict Map Analysis. See Abstract, Figure 3, p. 3. It is known that the shoreline and body of Owens Lake is very important to local Tribes, both historically and present day. See, e.g., <http://nahc.ca.gov/wpcontent/uploads/2018/01/Owens-Valley-Investiagtion-Memo.pdf>. Owens Lake and the surrounding shoreline should be characterized on the Conflict Map as “high conflict.” Owens Lake has been nominated by the Native American Heritage Commission to the National Register of Historic Places as an Archaeological District, Cultural Landscape and/or Traditional Cultural Property. This designation was proposed in 2017. Our understanding is that people are presently working to

complete the paperwork necessary to allow the nomination to proceed. See <http://nahc.ca.gov/wp-content/uploads/2017/07/Resolution-%E2%80%93-Support-for-Placing-Owens-Lake-on-the-National-Register-of-Historic-Resources.pdf>. Additionally, Los Angeles Department of Water and Power has spent more than a billion dollars on restoration and mitigation at Owen Lake.

MP 207: This section of corridor is within Sierra Nevada Bighorn Sheep Critical Habitat, and this particular area is a source population for reintroduction efforts to aid in the recovery of the species. The CA Department of Fish and Wildlife and the U.S. Fish and Wildlife Service should be consulted and a Biological Opinion prepared, regarding impacts to the species.

MP 212-224, 230-235, 238-240: These corridor locations are within the Mohave Ground Squirrel (MGS) ACEC and California Desert National Conservation Lands identified in the DRECP (2016). The ACEC was established to protect the long-term survival of this species and ensure connectivity for MGS between this ACEC and the large, mostly undeveloped and protected MGS habitat found within the China Lake Naval Air Weapons Station to the east. The goal in establishing this ACEC/NCL is to allow for unimpeded movement of wildlife in this bottleneck area for the species. The corridor is within one of 11 core population centers for the MGS. The corridor is inconsistent with the goals of the ACEC to protect MGS habitat; maintain wildlife habitat connectivity and characteristics of climate refugia and prevent fragmentation; and to retain healthy desert habitat for this and other sensitive species. (See DRECP App. L, west desert and eastern slopes subregion p. 1293.) The corridor is the site of ongoing studies of MGS core populations. We identify other issues below within these MPs.

MP 222-240: This area has been identified by USFWS as a “Desert Tortoise Connectivity Area”. Furthermore, there have been recent sightings of tortoise in this area by BLM Ridgecrest Field Office staff as animals are moving northward and up in elevation with warmer and drier temperatures across the species’ habitat.

MP 223-225: This alignment is within the Rose Spring ACEC and NCLs, which were designated for significant prehistoric cultural resource values. At the Rose Spring archaeological site complex, excavations revealed a well stratified subsurface archaeological deposit which was successfully used to date the introduction of bow and arrow technology to Eastern California. The bow-and-arrow event, about 1,500 to 1,000 years ago, changed the patterns of prehistory not only in this region but throughout the Great Basin and neighboring southwest (DRECP App A, pg 19-20). The alignment runs along the Pacific migratory bird flyway. Songbirds, shorebirds, and waterfowl pass through Rose Valley on their way to breeding grounds. The flyway has stopover riparian and wetland habitat in the Sierra Nevada canyons and at Little Lake, Owens Lake and Haiwee Reservoir. This area also includes Mohave ground squirrel (MGS) core habitat within the MGS Conservation Area. This is one of only 11 core population centers.

MP 224-226, 229-240: This alignment is within the Sierra Canyons ACEC and overlapping NCLs, which have important cultural significance and history as well as recreational resources. These canyons provided a critical water source, access points to the hunting grounds of the Sierra Nevada, and routes for trade with people on the other side of the mountains. Multiple sites within this corridor include many large, prehistoric National Register of Historic Places eligible properties in relatively undisturbed contexts and have high densities of obsidian and other types of lithic material. The sites in these canyons have the potential to answer some of the most pressing questions in California archaeology, particularly about trade, human adaptation to changing environments, and culture contact and interaction (DRECP appendix A p. 20). The area provides habitat for numerous special status plant species including Charlotte's phacelia and Latimer's woodland gilia. The area also contains excellent habitat for the federally and state-listed threatened desert tortoise and the East Monache mule deer herd. This is the largest of the three winter ranges and runs for approximately 30 miles along the base of the Sierra Nevada range between Olancho Creek and Five Mile Canyon. About 600-700 deer spend their winters here. Healthy creosote habitat supports a high variety and density of resident bird species such as the Le Conte's thrasher and loggerhead shrikes (DRECP appendix L, west desert and east slope subregion).

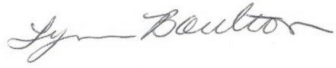
MP 234-237: This alignment is within the Fossil Falls ACEC. This ACEC was designated for wildlife values, significant prehistoric and historic cultural values, unique geological formations east of the Sierra Nevada Mountains and west of the Coso Range Volcanic Field. It contains sites associated with the earliest prehistoric Native American occupation in California and is listed on the National Register of Historic Places as the Fossil Falls Archaeological District. In this district cultural research attributes the rock art as a distinctive style termed Coso Representation, associated with local Numic-speaking groups such as the Northern Paiute, Panamint Shoshone, Coso Shoshone, and Kawaiisu. Studies including excavations at the Stahl Site, south of Fossil Falls, have identified cultural components from more than 10,000 years before present. Such significant history draws thousands of visitors each year to Fossil Falls (DRECP App L, Basin and Range subregion). There is also a popular BLM campground located in the vicinity of the proposed corridor.

Conclusion

We strongly recommend the Agencies to reanalyze the corridor 18-23, focus on prioritizing efforts on key corridors, and complete additional necessary steps in the process for the Regional Reviews to correct corridor alignments and address conflicts. We support the ongoing commitment shown by the BLM, Forest Service, and the Department of Energy to improve the siting and functionality of the WWEC. A strong public engagement process is crucial for improving the WWEC and appropriate siting of new infrastructure on public lands. We look forward to attending the June 2019 public meeting in Nevada to follow up and share our comments in person with agency staff.



Jora Fogg
Policy Director



Lynn Boulton
Chair
Sierra Club Range of Light Group



April Sall
Director
Bodie Hills Conservation Partnership

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10252] - Webmaster Receipt
Date: Monday, April 8, 2019 7:01:04 PM
Attachments: [ID_10252_Commentson1823_MonoCounty.pdf](#)

Thank you for your input, Michael Draper.

The tracking number that has been assigned to your input is **10252**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 19:00:39 CDT

First Name: Michael
Last Name: Draper
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Mono County

Topics

Cultural resources
Ecological resources
Hydrological resources
Lands and realty
Lands with wilderness characteristics
Paleontology
Tribal concerns
Visual resources

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

[Blank]

Attachments

Comments on 18-23_Mono County.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Mono County Community Development

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April 8, 2019

TO: Stephen Fusilier, Bureau of Land Management

Re: Response Region 5, Corridor 18-23, corridor abstract

The Mono County Community Development Department appreciates the opportunity to respond to the published draft energy corridor abstracts for Regions 4, 5, and 6 of the West-Wide Energy Corridor (WWEC). We also appreciate the public outreach effort and hope for an open and transparent review process that engages local governments and interested parties. We hope that our comments will be useful as the BLM moves forward with the intent to:

- Confirm the existing corridor best meets the siting principles (e.g., the corridor is located in the best place given the siting principles - maximum utility, minimum environmental impact);
- Identify opportunities to improve corridor placement or interagency operating procedures (IOPs) (e.g., shift a corridor segment, widen or narrow the corridor, remove a corridor, or add a new corridor elsewhere) or to add new or revise existing IOPs.; and
- Identify opportunities to resolve potential conflicts through future changes to land use plans.

As the utility corridors are assessed, additional opportunities are requested to promote local public participation, coordination and collaboration with applicable federal and state agencies. Mono County offers its Collaborative Planning Team (CPT), which consists of many affected local, state and federal agencies, as a potential outreach/participation/collaboration tool. With meetings quarterly, we would be happy to schedule a WWEC agenda item; the next CPT meeting is scheduled for April 23, 2019 followed by July 25 in Mammoth Lakes, CA.

Corridor 18-23

In a letter dated May 27, 2014 (attached), the County previously identified issues of concern including the Corridor passing through sensitive environmental areas including proposed critical habitat for the Bi-State Distinct Population Segment of the Greater Sage Grouse and habitat for the Townsend Long Eared Bat; the Corridor passes through visually sensitive terrain and is visible from several designated scenic highways; the feasibility of additional infrastructure development within the Corridor is questionable due to distant populations, sensitive terrain, and surrounding Wilderness Study Areas.

The County would like to raise the following additional concerns:

- The Corridor passes through areas with a high potential for cultural resources, archaeological resources, and paleontological resources, including but not limited to Fish Slough, the Volcanic Tableland, Casa Diablo, Chidago Canyon, and Adobe Valley.

- The Benton Paiute Tribe should be consulted regarding the portion of the project that crosses tribal land.
- Mono County policies require new transmission lines to be installed underground unless certain conditions apply. If overhead is required the project must meet one of four findings, and impacts must be avoided, minimized, or mitigated to the extent possible. Conditions include not disrupting visual character of the area, above ground placement is environmentally preferable and does not create public health and safety impacts, undergrounding utilities would create an unreasonable financial hardship, or the exclusive purpose is to serve an agricultural operation.
- Increased potential for wildfires: one recent local fire and other fires across the state that have resulted in catastrophic loss of property and loss of life may have been started by above-ground electrical line infrastructure in high wind conditions.
- The specific route sections 119-116 and 105-86 are located far away from the existing infrastructure corridor and should be reviewed as an entirely new corridor.

Mono County Policy

Existing Mono County policy regarding energy corridors is contained within the Mono County General Plan and includes:

Land Use Element

Policy 1.A.6. Regulate future development in a manner that minimizes visual impacts to the natural environment, to community areas, and to cultural resources and recreational areas.

Action 1.A.6.a. Implement the Visual Resource policies in the Conservation/Open Space Element.

Chapter 11- Utilities

B. Uses Permitted. Underground facilities for the distribution of gas, water, sewer, telephone, television, communications and electricity shall be allowed in all designations.

Conservation/Open Space Element

II. Issues/Opportunities/Constraints

Visual Resources

4. The visual impacts of utility corridors and overhead utility lines have become an issue both in community areas and undeveloped areas. The Public Utilities Commission (PUC) regulates transmission lines; the County has authority over some distribution lines. The Mono County General Plan currently requires underground utility lines unless certain findings can be made and a use permit is approved for overhead lines (see Chapter 11 of the Land Use Element).

Energy Resources & Resource Efficiency

7. Electrical transmission lines and fluid conveyance pipelines (including gas pipelines) can be highly visible elements in the landscape if they are not routed and constructed carefully. Because of their linear nature and the need for access, not only for construction but for routine maintenance, the placement of transmission lines and pipelines often is not only conspicuous, but can contribute to erosion, water quality degradation, and loss of wildlife habitat.

III. Policies

GOAL 14. Minimize the visual, environmental, and public health and safety impacts of electrical transmission lines and fluid conveyance pipelines.

Objective 14.A. Electrical transmission and distribution lines and fluid conveyance pipelines shall meet the utility needs of the public and be designed to minimize disruption of aesthetic quality. See also Chapter 11 of the Land Use Element.

Policy 14.A.1. New major steel-tower electrical transmission facilities shall be consolidated with existing steel-tower transmission facilities except where there are technical or overload constraints or where there are social, aesthetic, significant economic, or other overriding concerns.

Policy 14.A.3. New transmission or distribution lines or fluid pipelines shall be buried when such burial does not create unacceptable environmental impacts or the potential to contaminate shallow groundwater resources.

Policy 14.A.4. Where burial is not possible, transmission facilities and fluid pipelines shall be located in relation to existing slopes such that topography and/or natural cover provide a background where possible.

Policy 14.A.5. Transmission line rights of way shall avoid crossing hills or other high points at the crests. To avoid placing a transmission tower at the crest of a ridge or hill, space towers below the crest or in a saddle to carry the line over the ridge or hill. The profiles of facilities should not be silhouetted against the sky.

Policy 14.A.6. Where transmission line rights of way cross major highways or rivers, the transmission line towers shall be carefully placed for minimum visibility.

Policy 14.A.7. Avoid diagonal alignments of transmission lines through agricultural fields to minimize their visibility.

Policy 14.A.8. Require location of access and construction roads so that natural features are preserved and erosion is minimized. Use existing roads to the extent possible.

Policy 14.A.9. Require that materials used to construct transmission towers harmonize with the natural surroundings. Self-protecting bare steel and other types of non-reflective surfaces are appropriate in many areas. Towers constructed of material other than steel, such as concrete, aluminum, or wood should be considered. Coloring of transmission line towers to blend with the landscape should be considered.

Policy 14.A.10. Above-ground transmission lines shall be non-specular wire construction.

Objective 15.B. Transmission and distribution lines shall not adversely impact wildlife, fisheries, or public health and safety.

Policy 15.B.1. New transmission or distribution lines shall avoid open expanses of water, wetland, and sagebrush steppe, particularly those heavily used by birds. They shall also avoid nesting and rearing areas.

Policy 15.B.2. Avoid the placement of transmission or distribution lines through crucial wildlife habitats such as deer fawning and migration areas, and sage grouse lekking and brood-rearing habitat.

Policy 15.B.3. Design transmission lines to minimize hazards to raptors and other large birds, and require the installation of anti-perching devices when overhead placement in sensitive habitat is unavoidable.

Policy 15.B.4. Where burial is not possible, overhead transmission lines shall provide a maintenance and fire safety plan.

In the County's 2014 letter, an alternative corridor through southwestern Nevada was suggested. The County would appreciate understanding the alternative corridors that were or are being considered and analyzed in addition to the preferred corridor.

Thank you for consideration of these comments. Mono County looks forward to future coordination and collaboration in the development of the corridor.

Sincerely,

Wendy Sugimura
Director

cc: Mono County Board of Supervisors

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10253] - Webmaster Receipt
Date: Monday, April 8, 2019 7:07:59 PM
Attachments: [ID_10253_Comments4.8.19.pdf](#)

Thank you for your input, Michael Draper.

The tracking number that has been assigned to your input is **10253**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 19:07:42 CDT

First Name: Michael
Last Name: Draper
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Mono County

Topics

Cultural resources
Ecological resources
Hydrological resources
Lands with wilderness characteristics
Paleontology
Tribal concerns

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

18-23 [blank, blank]

Input

[Blank]

Attachments

Comments 4.8.19.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Mono County Community Development

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
www.monocounty.ca.gov

April 8, 2019

TO: Stephen Fusilier, Bureau of Land Management

Re: Response Region 5, Corridor 18-23, corridor abstract

The Mono County Community Development Department appreciates the opportunity to respond to the published draft energy corridor abstracts for Regions 4, 5, and 6 of the West-Wide Energy Corridor (WWEC). We also appreciate the public outreach effort and hope for an open and transparent review process that engages local governments and interested parties. We hope that our comments will be useful as the BLM moves forward with the intent to:

- Confirm the existing corridor best meets the siting principles (e.g., the corridor is located in the best place given the siting principles - maximum utility, minimum environmental impact);
- Identify opportunities to improve corridor placement or interagency operating procedures (IOPs) (e.g., shift a corridor segment, widen or narrow the corridor, remove a corridor, or add a new corridor elsewhere) or to add new or revise existing IOPs.; and
- Identify opportunities to resolve potential conflicts through future changes to land use plans.

As the utility corridors are assessed, additional opportunities are requested to promote local public participation, coordination and collaboration with applicable federal and state agencies. Mono County offers its Collaborative Planning Team (CPT), which consists of many affected local, state and federal agencies, as a potential outreach/participation/collaboration tool. With meetings quarterly, we would be happy to schedule a WWEC agenda item; the next CPT meeting is scheduled for April 23, 2019 followed by July 25 in Mammoth Lakes, CA.

Corridor 18-23

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4. The visual impacts of utility corridors and overhead utility lines have become an issue both in community areas and undeveloped areas. The Public Utilities Commission (PUC) regulates transmission lines; the County has authority over some distribution lines. The Mono County General Plan currently requires underground utility lines unless certain findings can be made and a use permit is approved for overhead lines (see Chapter 11 of the Land Use Element).

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7. Electrical transmission lines and fluid conveyance pipelines (including gas pipelines) can be highly visible elements in the landscape if they are not routed and constructed carefully. Because of their linear nature and the need for access, not only for construction but for routine maintenance, the placement of transmission lines and pipelines often is not only conspicuous, but can contribute to erosion, water quality degradation, and loss of wildlife habitat.

III. Policies

GOAL 14. Minimize the visual, environmental, and public health and safety impacts of electrical transmission lines and fluid conveyance pipelines.

Objective 14.A. Electrical transmission and distribution lines and fluid conveyance pipelines shall meet the utility needs of the public and be designed to minimize disruption of aesthetic quality. See also Chapter 11 of the Land Use Element.

Policy 14.A.1. New major steel-tower electrical transmission facilities shall be consolidated with existing steel-tower transmission facilities except where there are technical or overload constraints or where there are social, aesthetic, significant economic, or other overriding concerns.

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Policy 14.A.8. Require location of access and construction roads so that natural features are preserved and erosion is minimized. Use existing roads to the extent possible.

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Objective 15.B. Transmission and distribution lines shall not adversely impact wildlife, fisheries, or public health and safety.

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Thank you for consideration of these comments. Mono County looks forward to future coordination and collaboration in the development of the corridor.

Sincerely,

Wendy Sugimura
Director

cc: Mono County Board of Supervisors



Sugimura

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10254] - Webmaster Receipt
Date: Monday, April 8, 2019 8:08:31 PM

Thank you for your input, Brock Applegate.

The tracking number that has been assigned to your input is **10254**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 08, 2019 20:08:13 CDT

First Name: Brock
Last Name: Applegate
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Washington State Department of Fish and Wildlife

Topics

Energy Planning Opportunities
Energy Planning Issues
Physical barrier
Existing infrastructure/available space
Ecological resources
Hydrological resources
Soils/erosion

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

244-245 [0, 3]

Input

From Mileposts 0-3, Sunday Creek serves as habitat for fall Chinook and coho salmon and winter steelhead. Although we would like to move the energy corridor out of the Sunday Creek drainage, WDFW noticed Northern Spotted Owl habitat immediately surrounding the current corridor and a northern goshawk nest site very nearby. WDFW recommends that the Federal Agencies keep the energy corridor within and as close to the current Right-of-Way disturbance, as possible. We also recommend that any crossing of stream body acquires a Hydraulic Project Approval (HPA) from the State of Washington to address all of our concerns for specific fish and wildlife impacts.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10255] - Webmaster Receipt
Date: Tuesday, April 9, 2019 1:35:30 AM

Thank you for your input, Brock Applegate.

The tracking number that has been assigned to your input is **10255**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 09, 2019 01:35:23 CDT

First Name: Brock
Last Name: Applegate
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Washington State Department of Fish and Wildlife

Topics

Energy Planning Opportunities
Energy Planning Issues
Physical barrier
Ecological resources
Hydrological resources

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

102-105 [blank, blank]

244-245 [blank, blank]

Input

Washington State Department of Fish and Wildlife (WDFW) has some general recommendations for the energy corridors in the State of Washington.

- 1) WDFW recommends that the Federal Agencies obtain a Hydraulic Project Approval (HPA) from WDFW for all water crossings and structures over waterbodies. WDFW can make our specific recommendations for each project when proposed for the energy corridor.
- 2) WDFW recommends directional drilling when crossing waterbodies, when environmentally feasible, to allow for safer migration corridors for avian and fish species.
- 3) During planning of additional infrastructure, please incorporate wildlife corridors into the plans to connect large species such as ungulates and large carnivores, such as bear, wolf, cougar, bobcat and smaller carnivores, such as weasels and foxes, and even the smallest mammals, amphibians, and reptiles.
- 4) We also recommend managers limit water crossings by closing Right-of-Way roads near or crossing waterbodies to unauthorized vehicles through the use of gates and obstacles. The exclusion of vehicles from streams helps preserve fish passage, habitat, and a functional riparian area.
- 5) WDFW recommends that energy corridor managers allow as much vegetation as possible to grow, particularly near water bodies, for as long of a mowing interval as possible. Please leave

riparian habitat intact to promote stream functions, increase wildlife connectivity, and create hiding habitat.

6) ROW roads near water bodies have created problems for fish through the use of undersized culverts and improperly placed fords and have created numerous fish passage barriers along the energy corridors in some areas. WDFW would like these type of areas addressed when project managers apply for an HPA.

7) WDFW has included links to the databases for Priority Habitat and Species: apps.wdfw.wa.gov/phsontheweb/ and our Salmonscape: <http://apps.wdfw.wa.gov/salmonscape/>

WDFW encourages energy corridor managers to use these databases and consult with us at anytime. We appreciate the opportunity to comment and make recommendations.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10256] - Webmaster Receipt
Date: Tuesday, April 9, 2019 11:30:35 AM
Attachments: [ID_10256_4_08_19CEC368Region456CorridorComments.pdf](#)

Thank you for your input, Jim Bartridge.

The tracking number that has been assigned to your input is **10256**. Please refer to the tracking number in all correspondence relating to your input.

Date: April 09, 2019 11:29:55 CDT

First Name: Jim
Last Name: Bartridge
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: California Energy Commission

Topics

Energy Planning Opportunities
Existing infrastructure/available space
Cultural resources
Ecological resources
Tribal concerns

Geographic Area

Regions 4, 5, & 6 > General Regions 4, 5, & 6 corridors

Input

Re:Comments on Regions 4, 5, and 6 Review of Section 368 Energy Corridors

The California Energy Commission (Energy Commission) is the State's primary energy policy and planning agency and respectfully submits the following staff comments in response to the Regions 4, 5, and 6 review of Section 368 energy corridors.

California has a long history of energy planning and appreciates the value collaboration, best available science-based data, and transparency bring to planning activities. The Section 368 energy corridors are important to the State and will assist in helping the state meet future energy goals.

Energy Commission staff reviewed the Regions 4, 5, and 6 Corridor Abstracts and find the mapping tool developed by Argonne National Laboratory to be useful. Energy Commission staff recommends that existing and potential future renewable energy resource areas, existing transmission infrastructure, tribal and cultural resources, and California's energy goals be considered as potential corridor amendments are evaluated. Staff also recommends utilizing the extensive science-based datasets gathered from past state-federal collaborations in the California Statewide Energy Gateway (see <https://caenergy.databasin.org/>) to better understand resource and potential environmental issues.

If you have any questions concerning these comments, please contact Jim Bartridge at (916) 654-4169 or via email at jim.bartridge@energy.ca.gov

Sincerely,
SHAWN PITTARD
Deputy Director
Siting, Transmission &
Environmental Protection Division

Attachments

4_08_19 CEC 368 Region 4,5,6 Corridor Comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



VIA ELECTRONIC SUBMISSION

April 8, 2019

Jeremy Bluma
Bureau of Land Management
1387 S. Vinnell Way
Boise, ID 83709

Re: Comments on Regions 4, 5, and 6 Review of Section 368 Energy Corridors

The California Energy Commission (Energy Commission) is the State's primary energy policy and planning agency and respectfully submits the following staff comments in response to the Regions 4, 5, and 6 review of Section 368 energy corridors.

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If you have any questions concerning these comments, please contact Jim Bartridge at (916) 654-4169 or via email at jim.bartridge@energy.ca.gov

Sincerely,

A handwritten signature in blue ink that reads "Shawn Pittard".

SHAWN PITTARD
Deputy Director
Siting, Transmission &
Environmental Protection Division

Cc: corridors@anl.gov

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10257] - Webmaster Receipt
Date: Friday, May 17, 2019 3:55:38 PM
Attachments: [ID_10257_368EnergyCorridorsComments5.17.19_dh.docx](#)

Thank you for your input, Marie Garrison.

The tracking number that has been assigned to your input is **10257**. Please refer to the tracking number in all correspondence relating to your input.

Date: May 17, 2019 15:54:50 CDT

First Name: Marie
Last Name: Garrison
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Concerned Citizens Montana, NPO

Topics

Energy Planning Issues
Land Management Responsibilities and Environmental Resource Issues

Geographic Area

Regions 4, 5, & 6 > Specific Regions 4, 5 & 6 corridors

50-51 [blank, blank]
50-203 [blank, blank]
51-204 [blank, blank]
51-205 [blank, blank]

Input

Our comments are in Attachment 1. Thank you!

Attachments

368 Energy Corridors Comments 5.17.19_dh.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov



Concerned Citizens Montana

Voices for honest energy.

May 17, 2019

RE: 368 Energy Corridor Region 6 Abstracts:

50-51
50-203
51-204
51-205

Concerned Citizens Montana (CCM) supports citizen involvement in promoting responsible and innovative energy solutions that include protection of private property rights and the human environment. Through these efforts we seek to maintain Montana's unique and important lifestyle. CCM is the umbrella group formed to represent citizens' groups in Montana located in the following Montana counties: Beaverhead, Broadwater, Jefferson, Madison, and Silver Bow. We are a non-profit 501(c)3 organization and can be contacted at ConcernedCitizensMontana@gmail.com or PO Box 86, Divide, MT 59727. The organization's website is <http://www.ConcernedCitizensMontana.net/>.

Concerned Citizens Montana takes this opportunity to comment on the process of establishing 368 Energy Corridors in Region 6 in Southwest Montana. Our group was extensively involved in Northwestern Energy's Mountain States Intertie project (MSTI) throughout the process of siting this 500 kV transmission line. This letter attempts to outline the concerns that our group still consider germane to routing energy projects. We believe that our comments listed below are critical to consider in any attempt to site 368 Energy Corridors in Region 6. Although our comments can be applied to all transmission sitings, we are herein specifically referring to designated corridors 50-51, 50-203, 51-204, 51-205.

Our primary concern with the aforementioned corridors is that they are non-continuous because of intervening private lands. While CCM realizes that the United States Bureau of Land Management and the United States Forest Service cannot site 368 Corridors on private lands, we conclude that private lands in our region will be heavily impacted by designated corridors 50-51, 50-203, 51-204, 51-205 because to be continuous corridors, private lands must be utilized.

The following list includes a litany of other concerns that most landowners, citizens, and local governments in Montana and Idaho expressed regarding Northwestern Energy's MSTI project. We still consider the concerns listed below as significant in siting 368 Energy Corridors, and as such, are including them as part of our comments on siting 368 Energy Corridors:

- negative electromagnetic affects to people, livestock, and wildlife,
- loss of Property Enjoyment & Value
 - The economic value of the private lands along the route is associated with agricultural productivity and
 - Rural development value: This is closely tied to quiet enjoyment, scenic vistas, wildlife issues and recreational opportunities,
- increase in fire hazards and fire-fighting hazards,
- negative impacts to citizen's livelihoods and local businesses: ranching, fishing, guiding, tourism, farming, geology camps, recreation, hunting, etc.,

- interference with Emergency service communications, radio, TV, cell phones, cell towers,
- miles of private property affected: residential, subdivisions, hay, farm and grazing ground,
- further spread of noxious weeds at landowner's expense,
- direct or indirect impacts on existing residences could result from the incompatibility with or removal of occupied dwellings and related structures,
- permanently convert agricultural land to non-agricultural use,
- permanent loss of agricultural lands such as grazing land, hay ground, farm land, irrigation systems and irrigated crop lands,
- disrupting, altering or nullifying aerial spraying practices,
- interference with precision farming equipment,
- interference with apiaries – would need to be relocated (bees leave their hives if not at least 1,000 feet away from electric fields),
- dividing or fragmenting agricultural fields, obstructing access, impeding the delivery and use of water for livestock and irrigation, reducing the efficacy of windbreaks, and disrupting the operation of farm equipment,
- aerial spraying for noxious weeds, insects and crop diseases becomes hazardous,
- maneuvering harvest and farm equipment becomes difficult and hazardous,
- damage to farm equipment as a result of collisions with structures,
- restrictions on nighttime operations (due to potential for accidents),
- restrictions on normal crop rotations because of operational considerations,
- increased difficulty in leasing fields with transmission lines,
- loss of farming efficiency (increased time and materials needed to farm around transmission line structures),
- land taken out of production,
- equipment operator safety,
- loss of Montana Value: the negative effects to tourism, agribusiness, timber and mineral industries will be long-term,
- local realtors have told us that if the line is built across your property, your land will be un-saleable. If you can see the line from your property, your property will also be de-valued.
- new housing developments, urban and rural business opportunities will be negatively impacted.
- Degradation of the aesthetic value of these areas. The physical presence of the line prevents the visitor from experiencing a completely natural environment,
- possibility of more high voltage transmission lines through our area,
- FHA Rules prohibit the issuance of insured loans for homes located adjacent to transmission power lines. (12 - 60 kV or greater, as they are considered hazardous) FHA Rules 1912 4150.2-2J, and
- socio-Cultural impacts include environmental racism. Account for cultural features including historic districts, cemeteries, battlegrounds, churches, etc.

In summary, because 80% of the land in the western United States is public land, we are perplexed that proposed energy projects are constantly being sited on private land. The consequence of this policy action will result in a major loss of agricultural land throughout the west and will ultimately depopulate rural America. Montanans should make every effort to maintain large private landscapes and protect habitat, wildlife, economic and community sustainability. Thus, we advocate for public projects being built on public lands. Federal agencies need to route corridors on continuous public lands and not use fragmented public lands that

require private lands to complete the corridor. This is not acceptable to the citizens in the five counties that we represent. The four abstracts/corridors that we are commenting on have substantial amount of continuous public land in which to locate non-fragmented 368 energy corridors. Additionally, in regards to fragmented 368 Energy Corridors and their necessary use of private lands for any hope of corridor continuity, the following three Montana laws are in place to protect its citizens – private landowners – from federal agencies that in an effort to establish corridors on fragmented public lands target our private properties:

Montana Law: MCA 75-1-103

The legislature recognizes that each person is entitled to a healthful environment, that each person is entitled to use and enjoy that person's private property free of undue government regulation, that each person has the right to pursue life's basic necessities, and that each person has a responsibility to contribute to the preservation and enhancement of the environment. The implementation of these rights requires the balancing of the competing interests associated with the rights by the legislature in order to protect the public health, safety, and welfare.

Montana Law: MCA 70-30-110

*Survey and location of property to be taken – greatest public good – **LEAST PRIVATE INJURY***

Montana Law: MCA 90-4-1001

“to promote energy efficiency, conservation, production, and consumption of a reliable and efficient mix of energy sources that represent the least social, environmental, and economic cost and the greatest long-term benefits to MONTANA CITIZENS”.

Thank you for your consideration of our comments and concerns.

Marie Garrison
President, Concerned Citizens Montana

From: corridoreiswebmaster@anl.gov
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Section 368 Stakeholder Input [10258] - Webmaster Receipt
Date: Wednesday, June 12, 2019 5:05:37 PM

Thank you for your input, cath richards.

The tracking number that has been assigned to your input is **10258**. Please refer to the tracking number in all correspondence relating to your input.

Date: June 12, 2019 17:05:27 CDT

First Name: cath
Last Name: richards
Email:

Are you submitting input on the behalf of an organization? Yes
Organization: Inyo County Board of Supervisors

Topics

Public access and recreation
Specially designated areas
Visual resources

Geographic Area

General (not corridor-specific)

Input

We strongly recommend that you remove the section of corridor 18-23 beginning at milepost 195 on the south to milepost 178 at the north, to the east, to co-locate with the existing transmission infrastructure whether it is on Federally managed lands or not. No new transmission lines or corridors should be necessary or even considered when there is already existing infrastructure and/or right-of-ways in place. In addition, we also submit that any potential co-location should only be evaluated within the capacity parameters set forth in the County's Renewable Energy General Plan Amendment. This is an extremely sensitive issue to the people of Inyo County and the millions of annual visitors to the County who place a very high value on visual resources and where any impacts to these resources could have significant, negative, results on the County's tourist based economy.

The reviewing agencies should also be made aware of the newly designated Alabama Hills National Scenic Area (NSA). This designation was signed into law as part of S. 47 the Conservation, Management and Recreation Act, on March 12, 2019. The Alabama Hills NSA legislation has been consistently proposed in the many iterations of the California Desert Conservation Act and the California Minerals, Off-Road Recreation, and Conservation Act and has been strongly advocated for years. It is somewhat surprising it was not included in the Corridor 18-23 review, especially since it is located on land managed by the BLM. Based on this new NSA designation, milepost evaluations for 184-192 should be updated to include the NSA.

The agencies should work directly with local jurisdictions when mapping huge infrastructure planning such as this.

Economic impacts needs to be added to the list of land use and resource issues.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov



Big Pine Paiute Tribe of the Owens Valley

Big Pine Paiute Indian Reservation

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April 8, 2019

To: ("The agencies"): Department of the Interior, Department of Agriculture, Department of Energy
Submitted at: <http://www.corridoreis.anl.gov/>

From: Big Pine Paiute Tribe of the Owens Valley

Subject: Tribal comments on Corridor Abstract 18-23, Yerington to Ridgecrest Corridor

The Big Pine Paiute Tribe of the Owens Valley ("Tribe") respectfully submits these comments on the agencies' Corridor Abstract 18-23, Yerington to Ridgecrest Corridor.

The Tribe continues to be challenged by the agencies' approach to Tribal Consultation regarding the Westwide Energy Corridor project. The Tribe learned of the April 8, 2019, comment deadline on the 18-23 abstract through a non Tribal acquaintance. The Tribe understands the project, identifying suitable large-scale energy corridors throughout the western United States, has been in the works for over a decade, and this is one reason contributing to the difficulty in providing for timely and meaningful Tribal consultation. A contact person from an agency office in Owens Valley should have been designated to inform and assist with consultation with tribes in the area. It is hoped the agencies are aware that the Tribe submitted written comments dated February 6, 2008, and June 16, 2008, on the Programmatic Environmental Impact Statement (PEIS). The Tribe's 2008 comments called for better Tribal notification and alerted the agencies to specific resources of cultural significance in the path of corridor 18-23 (a copy of the Tribe's June 2008 letter is attached). The Tribe understands the PEIS was challenged in court, and a settlement eventually resulted. The Tribe has not been apprised of the agencies' response to previous Tribal concerns. It is not clear to the Tribe who will ultimately make the decision(s) with regard to energy corridors, but those individuals should be making the effort to consult with Tribal leaders.

The Tribe recommends corridor 18-23 be removed from further consideration. There are a vast number of conflicts with the 18-23 corridor. Several conflicts are listed in the abstract, and most of these appear to be conflicts with federal land use designations and endangered species concerns. The corridor traverses or comes in close proximity, Areas of Critical Environmental Concern, roadless areas, areas with wilderness potential, and habitat for rare and endangered species. All are good reasons to abandon corridor 18-23, and the Tribe has concerns in addition to conflicts listed in the abstract, such as disruption of archaeological and cultural resources.

Corridor 18-23 runs through an area known for its magnificent scenery. The visual components of the Owens Valley landscape are culturally important as well: Traditional stories are associated with landscape features such as particular rocks, mountain peaks, and springs, and unsightly power lines dishonor these traditions.

It is noted that corridor 18-23 runs generally parallel to corridor 18-224 in Nevada, suggesting redundancy. However, the Tribe recommends comments from others be consulted for concerns on the 18-224 corridor.

The Tribe is aware that transmission lines already exist in sections of the proposed 18-23 corridor. The Tribe was not consulted about the existing lines, which were constructed many decades ago. Transmission lines are unsightly reminders of how resources such as water and hydropower from the Owens Valley are developed and exported to a distant large city. Despite its incredible beauty and persistent population of Indigenous people, Owens Valley has suffered greatly over the past century-and-a-half from heavy-handed human and resource exploitation. If the agencies designate 18-23 as a corridor, the likelihood of placing more infrastructure in the corridor is high. The Tribe would prefer a discussion of *reducing* the use of this corridor, not expanding it to allow even more activity.

Corridor 18-23 covers many miles along the Sierran alluvial fan, and therefore runs through many Tribal cultural areas, including ancient Paiute irrigation ditches. Corridor 18-23 runs very close to the west side of the Big Pine Paiute Reservation. Just south of the Reservation, its path consumes the Woodman Cemetery, which is frequently used by the Tribe. Corridor 18-23 runs through innumerable Tribal cultural resources in the vicinity of Crater Mountain, an Area of Critical Environmental Concern (ACEC) as well as a BLM Wilderness Study Area.

To the north of Big Pine, the corridor traversed the Volcanic Tablelands which contain innumerable cultural resources, including petroglyph sites. A part of the corridor intersects the Fish Slough ACEC, which is a unique area for many reasons. We do not understand the routing through the Utu Utu Gwaitu (Benton Paiute) Reservation.

South of the Crater Mountain area, corridor 18-23 descends to the floor of Owens Valley, beginning north of Charlie's Butte, passing near the LA Aqueduct Intake, and passing due east of Manzanar National Historic Site. From there, it heads due south and through the Alabama Hills Scenic Area, for about ten miles. For about 18 miles, the corridor passes just west of Owens Lake, traditionally called "Patsiata." The Tribe is working with others to call for designating Owens Lake and the lands surrounding the lake an Archaeological District potentially eligible for the National Register of Historic Places. Through Rose Valley, there are numerous resource conflicts, with many important cultural areas located through that narrow valley.

Should the agencies continue considering corridor 18-23, the Tribe respectfully requests the agencies charge a local agency official with timely communication, and the Tribe would be interested in a Tribal-agency meeting among decision-makers.

April 8, 2019

Mitchell Leverette, Acting Assistant Director
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Submitted electronically via blm_wo_368corridors@blm.gov

**Re: Comments on Corridor Abstracts for Regions 4, 5 and 6 under West-wide Energy
Corridor Regional Review**

Dear Mr. Leverette, Mr. Smith and Dr. Smith:

Please accept the following comments from Defenders of Wildlife, National Audubon Society, Wildlands Network, Western Watersheds Project, BARK, and Center for Biological Diversity on the Regions 4, 5 and 6 corridor abstracts for the regional reviews of the Section 368 West-wide Energy Corridors (WWEC).

Defenders of Wildlife (“Defenders”) is dedicated to protecting native animals and plants in their natural communities. Founded in 1947, Defenders is a national conservation organization with approximately 1.8 million members and supporters dedicated to wildlife and habitat conservation and protecting biodiversity across the nation.

The National Audubon Society (“Audubon”) protects birds and the places they need, today and tomorrow, throughout the Americas using science, advocacy, education, and on-the-ground conservation. Audubon’s reach spans over one million members, nearly 500 local chapters, and 23 affiliated state offices across the country. Since 1905, Audubon has worked to shape effective conservation plans in diverse ecosystems, educate the public through nature centers and citizen science projects, and manage designated Important Bird Areas (IBAs) for species throughout the Western Hemisphere.

Wildlands Network envisions a world where nature is unbroken, and where humans co-exist in harmony with the land and its wild inhabitants. Our mission is to reconnect, restore, and rewild North America so life in all its diversity can thrive.

Western Watersheds Project is a non-profit organization with more than 5,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives and legal advocacy. Western Watersheds Project and its staff and members use and enjoy the public lands and their wildlife, cultural and natural resources for health, recreational, scientific, spiritual, educational, aesthetic, and other purposes.

Since 1999, Bark has been actively working to protect and restore the ecosystems of Mt. Hood National Forest. Our mission is to bring about a transformation of Mt. Hood National Forest into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. As of writing these comments, we represent over 30,000 people who support our mission.

The Center for Biological Diversity (“Center”) is a non-profit public interest organization with offices located across the country including offices in Oakland and Los Angeles, California, representing more than 1.4 million members and online activists nationwide dedicated to the conservation and recovery of species at-risk of extinction and their habitats. The Center has long-standing interest in siting of corridors on public lands and has actively participated in the siting process for specific corridors and in these regional reviews.

A. Introduction

Many of our organizations have a long history of engagement in the Section 368 West-wide Energy Corridors planning process. In 2012, Defenders, BARK, Center for Biological Diversity, and Western Watersheds Project were part of the settlement agreement¹ in which the Bureau of Land Management (BLM), the U.S. Forest Service (USFS) and the Department of Energy (DOE) (collectively, “the Agencies”) and other stakeholders agreed to, among other things, reevaluate energy corridor designations and undertake periodic reviews of such corridors. Since then, our groups have provided extensive comments in 2014, 2016 and 2018 as part of these reviews.

We believe that the WWECs provide the Agencies a significant opportunity to apply a directed development, “smart from the start” approach to transmission planning in furtherance of both clean energy and wildlife objectives for public lands. The planning process also provides the BLM a great opportunity to ensure the long-term success of its Solar Energy Program and the Wind and Solar Leasing Rule by identifying recommended changes and additions to the existing corridors to incentivize transmission to low-conflict zones. Without transmission, many of the zones that BLM identified and designated in the Solar Energy Program Programmatic Environmental Impact Statement (PEIS) will fail to attract development interest.

At the same time, the review process also provides an opportunity to properly site new infrastructure to avoid high quality habitat for endangered or threatened species, and to conserve wildlife migration corridors and habitat as envisioned by Secretarial Order 3362.² In the order, the

¹ Wilderness Soc’y et al. v. U.S. Dep’t of Interior, No. 3:09-cv-03048 JW (N.D. Cal.) (July 3, 2012).

² Secretarial Order 3362. (2018) Available at https://www.doi.gov/sites/doi.gov/files/uploads/so_3362_migration.pdf

Secretary of the Interior emphasized conservation of migration corridors in sagebrush ecosystems in the western states. Given that 43 of the 59 corridors in Regions 4, 5 and 6 intersect some part of Greater Sage-grouse habitat, including habitat for the Bi-State population currently proposed for listing under the ESA, it is important that the corridors be planned and routed to avoid essential sagebrush habitats used by Sage-grouse and focal species in the Secretarial Order—or to minimize or mitigate for the impacts where avoidance is not possible. Recent amendments to federal Sage-grouse plan amendments in seven western states, including many that are within Regions 4, 5 and 6, require that certain areas be excluded or avoided from development, including placement of transmission and pipelines. The WWEC planning process in Regions 4, 5, and 6 must be certain to align proposed routes in accordance with these plan prescriptions and other plans such as the national forest plans, that were adopted or are pending adoption to protect Sage-grouse.

While we are supportive of the planning process for energy corridors, specifically transmission corridors that would support renewable energy development, we have some concerns and recommendations on both BLM's WWEC regional review process as well as specific designated corridors within Regions 4, 5 and 6. We offer our comments below.

B. Section 368 Review General Comments and Recommendations

I. Online mapping tool and updates to spatial data

We appreciate the investment the Agencies have made in creating the Section 368 Energy Corridor Mapping Tool³ that provides mapping data for energy corridors in 11 western states as contemplated in Section 368 of the Energy Policy Act of 2005.⁴ The current version of the mapping tool is helpful in understanding the location of the corridors in relation to various land use types, land ownership, existing infrastructure, and areas of ecological importance. We appreciate that the Agencies added data layers on existing transmission lines, pipelines, and substations as well as natural resources such as eligible wild and scenic rivers that we had identified as important but missing from the tool in 2016⁵ and 2018.⁶ We also appreciate the Agencies incorporating the Western Association of Fish and Wildlife Agencies' Crucial Habitat Assessment Tool (CHAT) in the system.

While we appreciate the tool improvements, there are a few places where additional or complete information would be helpful. For example, the identifier for the data layer "Areas of Critical Environmental Concern (ACEC)" provides valuable electronic "fields" about a given ACEC, including the name of the ACEC, related land use plan, the record of decision date and the purpose for designation.⁷ However, quite often many of these fields are without any information.⁸ We recommend that the BLM provide complete metadata for each ACEC, especially information on

³ Available at <https://bogi.evs.anl.gov/section368/portal/>

⁴ Energy Policy Act of 2005, 42 U.S.C. § 15926 (a)(1).

⁵ Defenders of Wildlife. October 20, 2016. Comments on Section 368 Energy Corridors within Priority Region 1. Pg. 2.

⁶ Defenders of Wildlife, Center for Biological Diversity and the National Audubon Society. February 23, 2018.

Comments on Corridor Abstracts for Regions 2 and 3 under West-wide Energy Corridor Regional Review. Pg. 2-3.

⁷ See Little Mountain ACEC, Greater Sand Dunes ACEC, and Greater Red Creek ACEC in Wyoming as examples.

⁸ See Donkey Hills ACEC in Montana, Timbered Crater ACEC or Mount Dome ACEC in California, and Buffalo Creeks Canyon in Nevada as examples.

why each ACEC was designated. Quick access as to the purpose of a designation would be helpful in understanding the potential resource issues related to Section 368 corridors that would route through or close to an ACEC.

The Agencies, in the Conflict Assessment Criteria Table,⁹ state that no data are currently available for the following GIS data layers: National Recreation Trails. We wish to inform the Agencies that American Trails, in partnership with the National Park Service, maintains a database and a map of National Recreation Trails called the NRT database which is publicly available at <http://www.nrtdatabase.org/>. We recommend that the Agencies incorporate these data layers into the Section 368 Corridor Mapping Tool.

Recommendation: Provide complete information for ACECs in the Section 368 Corridor Mapping Tool.

Recommendation: Add data layers for National Recreation Trails to the Section 368 Corridor Mapping Tool.

II. Improved stakeholder engagement

We appreciate various methods the Agencies have used to allow opportunity for and to maximize public engagement in the planning process, including conducting webinars and holding public workshops. We understand that the Agencies are committed to offering workshops in several states in Regions 4, 5 and 6. We agree that in-person meetings and workshops can be very effective in allowing for meaningful public participation. We appreciate the continued effort by the Agencies to solicit public input through numerous channels and for being available to answer questions at any time.

As we mentioned in our previous comments, we continue to believe it would be in the public interest for the Agencies to make electronically available all public comments provided during the regional review process. This would be helpful for all stakeholders to know what other input was provided by others, mostly for informational purposes, but also to find additional opportunities to coordinate with stakeholders and the Agencies to make for the most efficient and effective planning process possible.

Recommendation: Publish all public comments electronically in the “Documents” section in the West-wide Energy Corridor Information Center at <http://corridoreis.anl.gov/>.

III. Affirmation with the siting principles stipulated in the settlement agreement

As we have also previously expressed, we are concerned with the Agencies’ approach to the periodic review process that individually reviews potential impacts of corridors sections but fails to consider the total or cumulative impacts of all the sections along a given route or the potential effects of multiple corridors on wildlife and natural resources within the same region. For example, in south-western Wyoming within the Region 4, more than a dozen corridors¹⁰ cut through large

⁹Table 2-5 Conflict Assessment Criteria Table for Section 368 Energy Corridor Reviews. Available at http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf.

¹⁰Corridors 55-240, 121-240, 218-240, 121-220, 219-220, 121-221, 220-221, 129-218, 129-221, 73-129, 73-138, 73-133, and 138-143.

areas of general and priority habitat management areas for Greater Sage-grouse, a focal species with declining populations in Wyoming and across the western United States. In fact, some corridors in Region 3 not currently under review also run through the same areas of Sage-grouse habitat. This planning process fails to consider these cumulative effects.

Similarly, seven corridors¹¹ run through Sage-grouse habitat in southwestern Idaho in Region 6. While the corridor abstracts for the corridors provide some analysis on how impacts to the grouse would be addressed, they fail to assess the collective impacts of potential development in those corridors on the species. It is important to review and assess if the cumulative impacts of development in those corridors would be significant enough to warrant avoidance of the sensitive habitat due the possibility of habitat loss and fragmentation from development. Absent such review and assessment, the Agencies fail to meet the siting principle to ensure that the corridor locations “promote efficient use of the landscape.” Currently the Agencies lack the information to decide whether it would be a more efficient use of the landscape to direct transmission development elsewhere.

Recommendation: Perform a cumulative impacts analysis of corridors intersecting large areas of habitat for key landscape species and federally protected species.

IV. Greater Sage-grouse Resource Management Plan Revisions and Amendments

On March 15, 2019, the BLM announced it had finalized new Sage-grouse management prescriptions for Greater Sage-grouse on BLM lands in five states that fall within WVEC Regions 4, 5, and 6—Idaho,¹² Nevada and Northeastern California,¹³ Oregon,¹⁴ and Wyoming.¹⁵

These plan amendments effectively change the outcomes of the National Greater Sage-grouse Planning Strategy, which was an unprecedented effort by the federal government in 2015 to improve management of more than 60 million acres of the Sagebrush Sea, a landscape that is vital to fish and wildlife, recreation, western communities and sustainable economic development. That original planning process advanced landscape-level planning within the BLM and other federal agencies, designating tens of millions of acres of priority habitat on public lands to conserve Greater Sage-grouse and more than 350 other species of conservation concern. Since, Regions 4, 5 and 6 currently undergoing the review process encompass a majority of Greater Sage-grouse habitat, it is critical that the review process provide careful consideration for protection of the species habitat. In fact, 43 of the 59 corridors currently being reviewed in these regions would route through some form of designated Sage-grouse habitat.

¹¹ Corridors 49-202, 49-112, 112-226, 36-112, 29-36, 36-228, 24-228.

¹² Idaho Greater Sage-grouse Record of Decision and Approved Resource Management Plan. Available at <https://eplanning.blm.gov/epl-front-office/projects/lup/103344/168711/205330/IdahoRODandARMPAMarch2019.pdf>

¹³ Nevada and Northeastern California Greater Sage-grouse Record of Decision and Approved Resource Management Plan Amendment. Available at https://eplanning.blm.gov/epl-front-office/projects/lup/103343/168753/205395/NVCA_2019_ROD_ARMPA_FINAL_03_13_2019.pdf

¹⁴ Oregon Greater Sage-grouse Record of Decision and Approved Resource Management Plan. Available at https://eplanning.blm.gov/epl-front-office/projects/lup/103348/168708/205327/2019_Oregon_GRSR_ROD_ARMPA.pdf

¹⁵ Wyoming Greater Sage-grouse Approved Resource Management Plan Amendment and Record of Decision. Available at https://eplanning.blm.gov/epl-front-office/projects/lup/103347/168776/205593/WY_ROD_03142019_signed.pdf

Unfortunately, the new plan amendments for Idaho, Nevada, northeastern California, and Wyoming eliminate protections provided for 11 million acres of primarily BLM land designated as Sagebrush Focal Areas (SFA) to protect the most essential Sage-grouse habitat in the Sagebrush Sea. They also diminish key protections for Sage-grouse in eight western states, including those reviewed in the current set of abstracts for the WWEC planning purpose.

While we understand that the newly revised plans may have different management prescriptions for protecting Sage-grouse from utility corridors, we believe the Agencies need to adopt a consistent and a protective approach to analyzing the impacts from corridors to Sage-grouse and to conserve the species and its habitat. To the extent possible, all Sage-grouse habitat within Priority Habitat Management Areas (PHMA) and Important Habitat Management Areas (IHMA) should be avoided. If avoidance is not possible, the Agencies should specify in all the abstracts that minimization and compensatory mitigation measures would be adopted during project development. We appreciate that in some instances, the Agencies note that there are opportunities to move corridors to avoid Sage-grouse habitat areas. We urge the Agencies to continue to explore such opportunities and to shift corridors whenever there is an opportunity to do so.

At the request of the BLM, in 2014, the U.S. Geological Survey (USGS) analyzed the best available science and reported values for buffer distances for protecting Sage-grouse leks from potentially harmful development. The USGS report¹⁶ identified 3.1 miles and 5 miles as the lower and upper ranges for a conservation buffer for linear structures such as transmission lines. The BLM should adopt a minimum of 3.1-mile development buffer around Sage-grouse leks for reviewed corridors, regardless of the habitat designation.

Recommendation: Adopt a consistent approach to analyzing corridor abstracts for impacts on Greater Sage-grouse with the goal of resolving inconsistent or lesser protections provided in the new Sage-grouse plan amendments.

Recommendation: Avoid all Greater Sage-grouse designated habitat areas wherever possible, especially PHMA and IHMA.

Recommendation: Specify in the corridor abstracts that where avoidance is not possible, project developers will be required to minimize and implement compensatory mitigation during project development.

Recommendation: Allow a buffer of at least 3.1 miles for all corridors from Sage-grouse leks.

V. Bi-State Sage-grouse Population

The Bi-State sage-grouse which is found in and near the Mono Basin in Eastern California and Western Nevada is currently proposed for listing under the Endangered Species Act (ESA) along with proposed critical habitat.¹⁷ The U.S. Fish and Wildlife Service is currently undertaking a status review and a final listing determination. Designation of corridors in this habitat is of great concern given the significant impacts that the development new transmission lines and other projects in such corridors this region would have on the Bi-State sage-grouse. Transmission lines are of particular concern because the poles, towers, and lines provide perching and nesting opportunities for raptors

¹⁶ Conservation Buffer Distance Estimates for Greater Sage-grouse- A Review (2014). Available at <https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf>

¹⁷ The proposed listing, 78 Fed. Reg. 64,328 (October 28, 2013), was re-instated pursuant to a court order in *Desert Survivors v. U.S. Dept of Interior*, 321 F. Supp. 3d 1011 (N.D. Cal. 2018))

and other predators that threaten the survival of sage grouse populations. Bi-state sage-grouse populations are grouped into population management units (PMU) and 9 sub-populations. The figure below shows Bi-State Distinct Population Segment (DPS) of greater sage-grouse identified by population management units (PMUs) across Nevada and California.

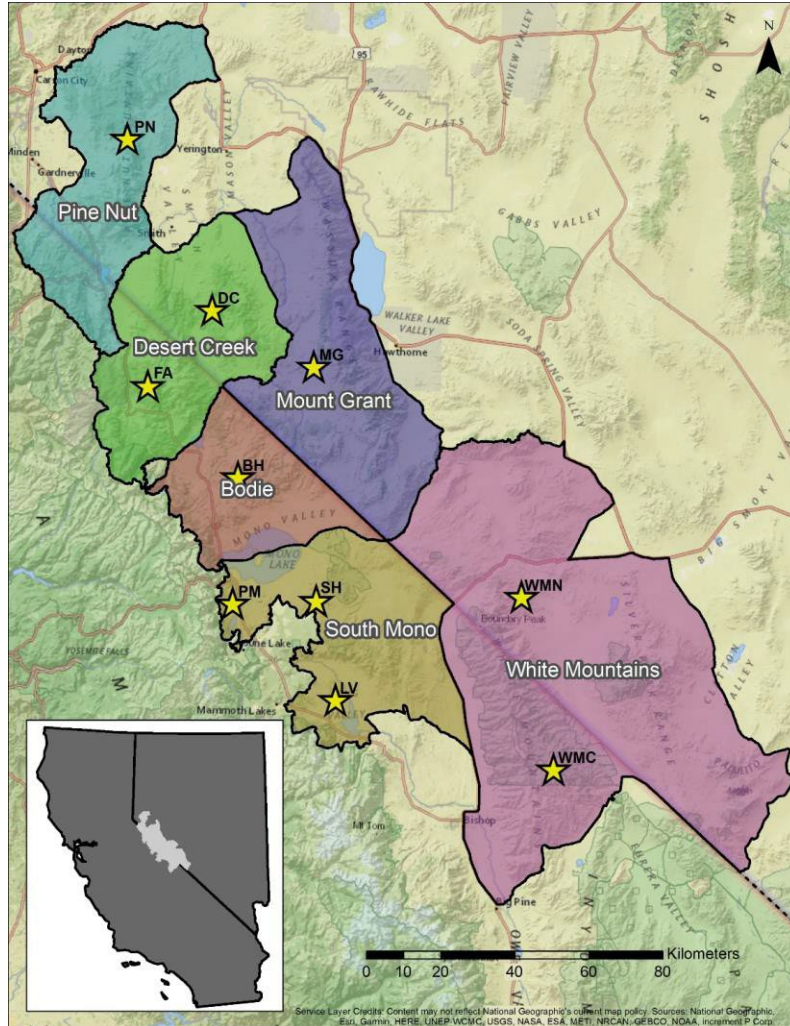


Figure 1:¹⁸ The Bi-State Distinct Population Segment (DPS) of greater sage-grouse (*Centrocercus urophasianus*) identified by population management units (PMUs) across Nevada and California. Stars indicate approximate center-points of subpopulations monitored: PN (Pine Nut Mountains), Desert Creek (DC), Fales (FA), Mount Grant (MG), Bodie Hills (BH), Parker Meadows (PM), Sagehen (SH), Long Valley (LV), White Mountains Nevada (WMN), White Mountains California (WHC).

¹⁸ Figure 1 from Mathews, S.R., Coates, P.S., Prochazka, B.G., Ricca, M.A., Meyerpeter, M.B., Espinosa, S.P., Lisius, S., Gardner, S.C., and Delehanty, D.J., 2018, An integrated population model for greater sage-grouse (*Centrocercus urophasianus*) in the Bi-State Distinct Population Segment, California and Nevada, 2003–17: U.S. Geological Survey Open-File Report 2018-1177, 89 p., <https://doi.org/10.3133/ofr20181177> <https://pubs.usgs.gov/of/2018/1177/ofr20181177.pdf>

The proposed critical habitat as shown below includes a large portion of the PMUs.

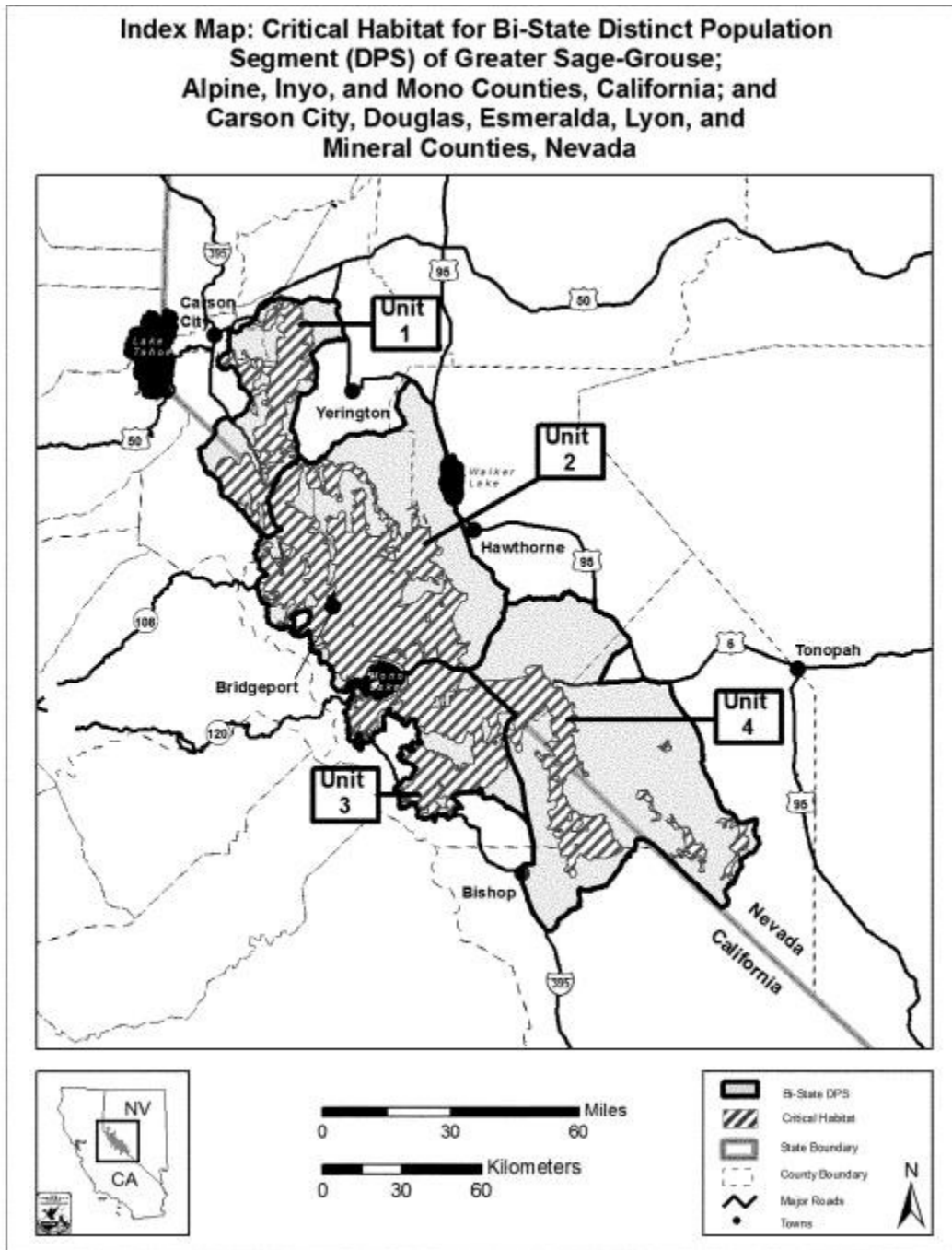


Figure 2: Critical Habitat for Bi-State Distinct Population Segment (DPS) for Greater Sage-grouse.¹⁹

¹⁹ 78 FR at 64351.

The USFWS estimates that 40 to 50 percent of annually occupied leks in the Bi-State area are within approximately 5 km (3.1 mi) or less of existing transmission lines (Service 2013, unpublished data), thus providing situations where sage-grouse can be negatively impacted by these facilities both now and in the future.²⁰ Furthermore, USFWS expects that “sage-grouse may be negatively affected beyond the impacts the species currently faces within its range” if more power lines are built in or adjacent to these habitats.²¹

As part of the efforts to protect the Bi-State population, both BLM and the Forest Service have developed plans that limit activities in Bi-State sage grouse habitat.²² In addition, state agencies and local communities have committed to various conservation measures in the Bi-State Action Plan.²³ Nonetheless, this imperiled species continues to decline. Recent population data shows that most of the sub-populations of the Bi-State sage grouse continue to decline with only one population increasing at Bodie Hills and a few that appear stable at very low population levels.²⁴ The Bi-state sage-grouse population is at risk of extinction with several of the sub-populations at imminent risk of extirpation in the face of stochastic events. Therefore, no corridors should be designated within Bi-state sage-grouse proposed critical habitat.

Recommendation: Do not designate corridors within Bi-state Sage-grouse proposed critical habitat.

C. Information on Important Bird Areas

I. Important Bird Areas (IBA)

The IBA program identifies the most important places for bird conservation nationwide. IBAs provide essential breeding, wintering, or migration habitat for one or more bird species that are threatened or endangered, restricted to a particular biome or region, restricted to one habitat type, or that occur at particularly high density during some portion of the year. Species of concern have also been identified through the U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern 2008 (BCC) report, which identifies species that are likely to become candidates for protection under the ESA without further conservation action. IBAs are large enough to safeguard a viable population of a species, group of species, or avian community during at least part of its life-cycle, but small enough to be conserved in their entirety, and are located on a mixture of public and private land.

Coordinated by BirdLife International and administrated by Audubon in the United States, the program uses science-based assessment to identify habitats of particular importance. In order to qualify, each proposed site undergoes a rigorous review process by a committee of ornithological and conservation experts that consider data-driven evaluations of bird populations and habitat. The

²⁰ USFWS. Species Status Assessment. Bi-State Distinct Population Segment of Greater Sage-grouse. July 2013. Pg. 46. Available at https://www.fws.gov/nevada/nv_species/documents/sage_grouse/species-report-service2013a.pdf

²¹ *Id.*

²² See, Greater Sage Grouse Bi-State Distinct Population Segment Forest Plan Amendment https://www.fs.usda.gov/nfs/11558/www/nepa/92468_FSPLT3_3080151.pdf

²³ 2012 Bi-State Action Plan. Available at <https://www.bistatesagegrouse.com/general/page/2012-bi-state-action-plan>

²⁴ Mathews et al., pp. 47.

IBAs are assigned a priority value after considering the large geographical context, with the rankings ranging from State (lowest threshold), to Continental, to Global (highest threshold).

In a previous version of the Conflict Assessment Criteria Table²⁵ for Section 368 Energy Corridor Reviews, IBAs were classified as “Medium Potential Conflict Areas,” under the criterion “Sensitive habitat areas, including species use areas, riparian areas, or areas of importance for Federal or State sensitive species.” However, we noticed that the current version does not list IBAs as a category under the above or any criterion. Transmission and pipeline construction have impacts on birds and the habitat birds need to persist.²⁶ IBAs are sites of highest conservation value for birds selected using criteria to ensure that identified IBAs are truly significant for the international conservation of bird populations. For descriptions of Global IBAs, see <http://datazone.birdlife.org/site/ibacritglob>. Audubon state programs also use state criteria and data for designating IBAs of state importance.

Recommendation: Incorporate IBAs as a sensitive resource category under “Medium Potential Conflict Areas.”

II. Section 368 corridors overlap with IBAs

We compared where WWEC corridors in Regions 4, 5, and 6 overlap with boundaries for existing IBAs. These overlays reveal that a total of nine corridors intersect with current IBAs as presented below. We recommend that the corridors avoid these IBAs.

²⁵ Available at http://corridoreis.anl.gov/documents/docs/conflict_assessment_table.pdf

²⁶ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4081594/>

1. Corridor 112-226

This corridor intersects the South Hills IBA. Species of interest in the South Hills IBA include Greater Sage-grouse, Northern Goshawk, Ferruginous Hawk, and Sharp-tailed Grouse.²⁷

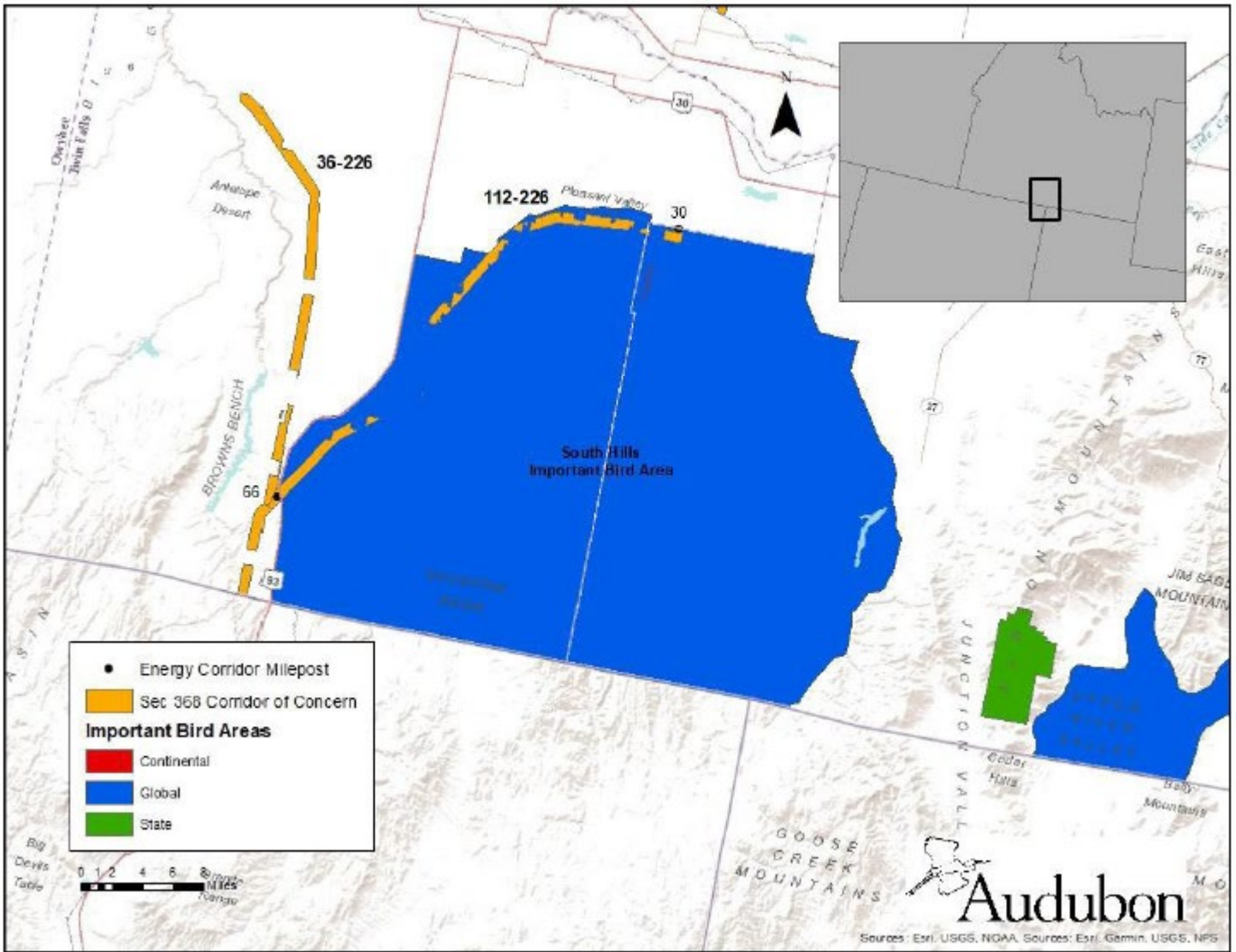


Figure 3: South Hills Globally Significant (highest priority) IBA, Idaho – Corridor 112-226.

²⁷ <https://www.audubon.org/important-bird-areas/south-hills>

2. Corridor 121-221

This corridor intersects the globally significant Red Desert IBA from MP 15 to MP 24. This large expanse of relatively intact sagebrush habitat provides important breeding, foraging, nesting, wintering, or migratory stop-over habitat for sagebrush obligate avian species such as Greater Sage-grouse.²⁸ Surveys in 2012 found over 13,000 individuals in a population estimated at between 200,000 and 400,000 birds in the United States.²⁹

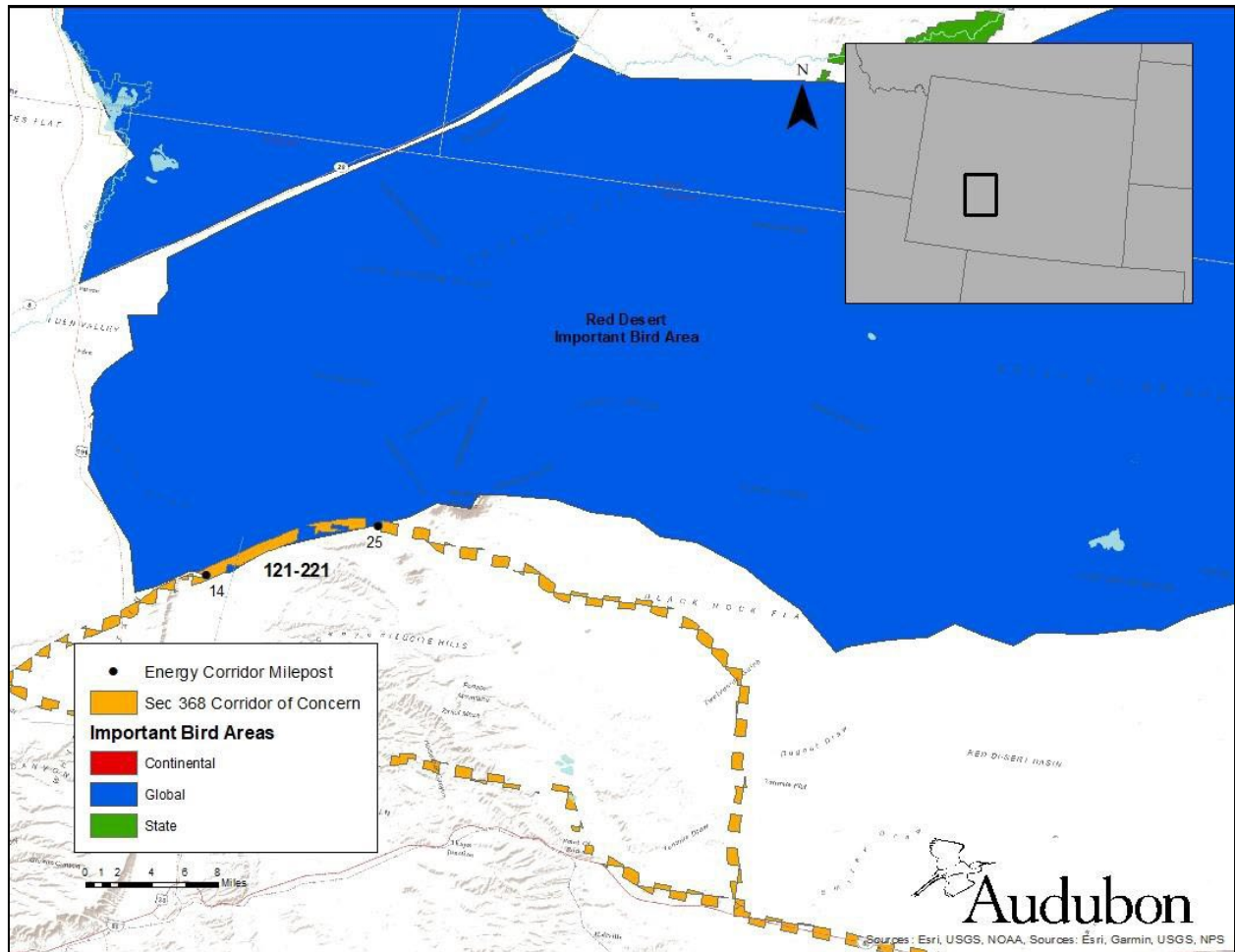


Figure 4: Red Desert Globally Significant IBA, Wyoming – Corridor 121-221.

²⁸ <https://www.audubon.org/important-bird-areas/red-desert>

²⁹ <https://defenders.org/Sage-grouse/basic-facts>

3. Corridor 16-24

This corridor traces along Eastern edge of the Bill Creek - Montana Mountains Global IBA from MP 141 to MP 160. This site supports the largest Greater Sage-grouse population in Nevada, and one of the highest densities of Sage-grouse in the country.³⁰

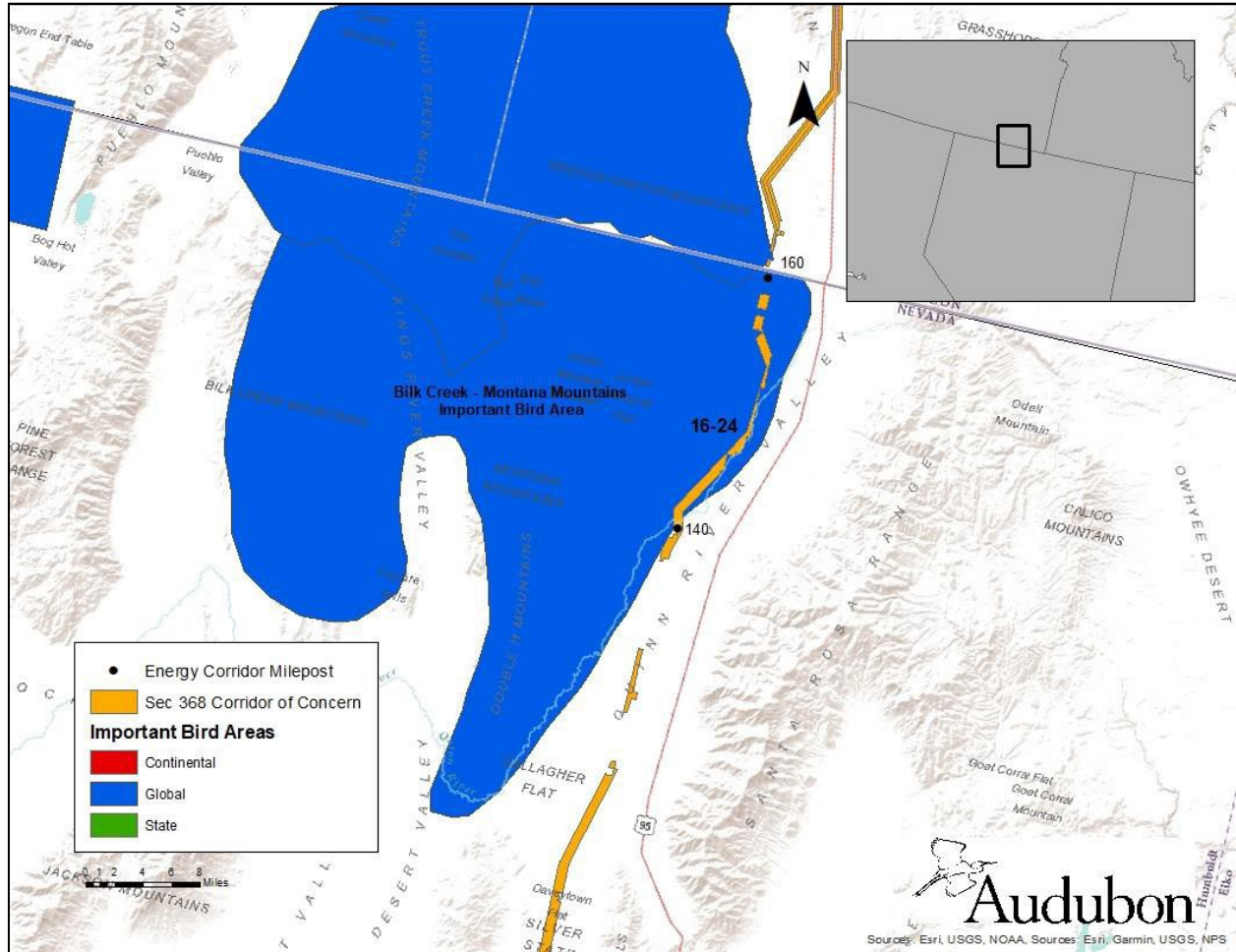


Figure 5: Bill Creek – Montana Mountains Globally Significant IBA, Nevada – Corridor 16-24.

³⁰ <https://www.audubon.org/important-bird-areas/bilk-creek-montana-mountains>

4. Corridor 18-23

Corridor 18-23 intersects the Mono Highlands IBA from MP 100 to MP 108. The IBA is notable for its large population of Greater Sage-grouse, including a part of the Mono County metapopulations that USFWS has determined to be a distinct population segment of Greater Sage-grouse in the Great Basin known as the Bi-State Sage Grouse.³¹ The corridor also intersects the Adobe Valley IBA (from MP 81 to MP 82 and again from MP 85 to MP 89) which includes an isolated sub-population of Greater Sage-grouse in the Adobe Valley, with its only strutting ground located on private land.³² In addition, this corridor intersects the Owens River IBA from MP 18 to MP 23. The riparian habitats associated with the Owens River are already among the most extensive in the state, and with continued commitment by the Los Angeles Department of Water and Power to improve their habitat value for birds, this IBA is poised to be one of the most important in the southwestern U.S. in the coming decades. Swainson's Hawk breed throughout the IBA in massive Fremont Cottonwoods on the valley floor, in what is probably the stronghold of their population in Central and southern California.³³

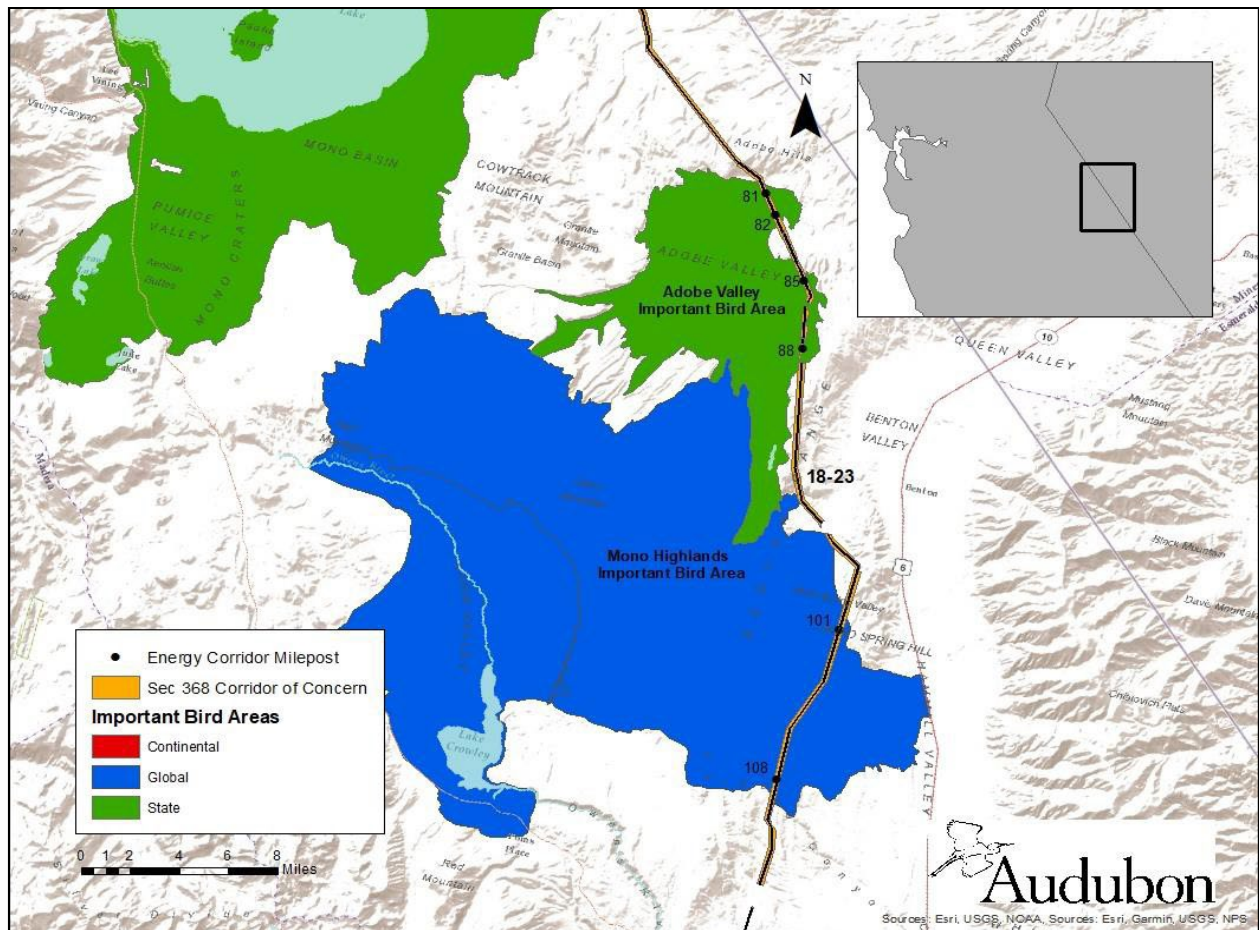


Figure 6: Mono Highlands Globally Significant IBA and Adobe Valley IBA of State Importance, California – Corridor 18-23.

³¹ <https://www.audubon.org/important-bird-areas/mono-highlands>

³² <https://www.audubon.org/important-bird-areas/adobe-valley>

³³ <https://www.audubon.org/important-bird-areas/owens-river>

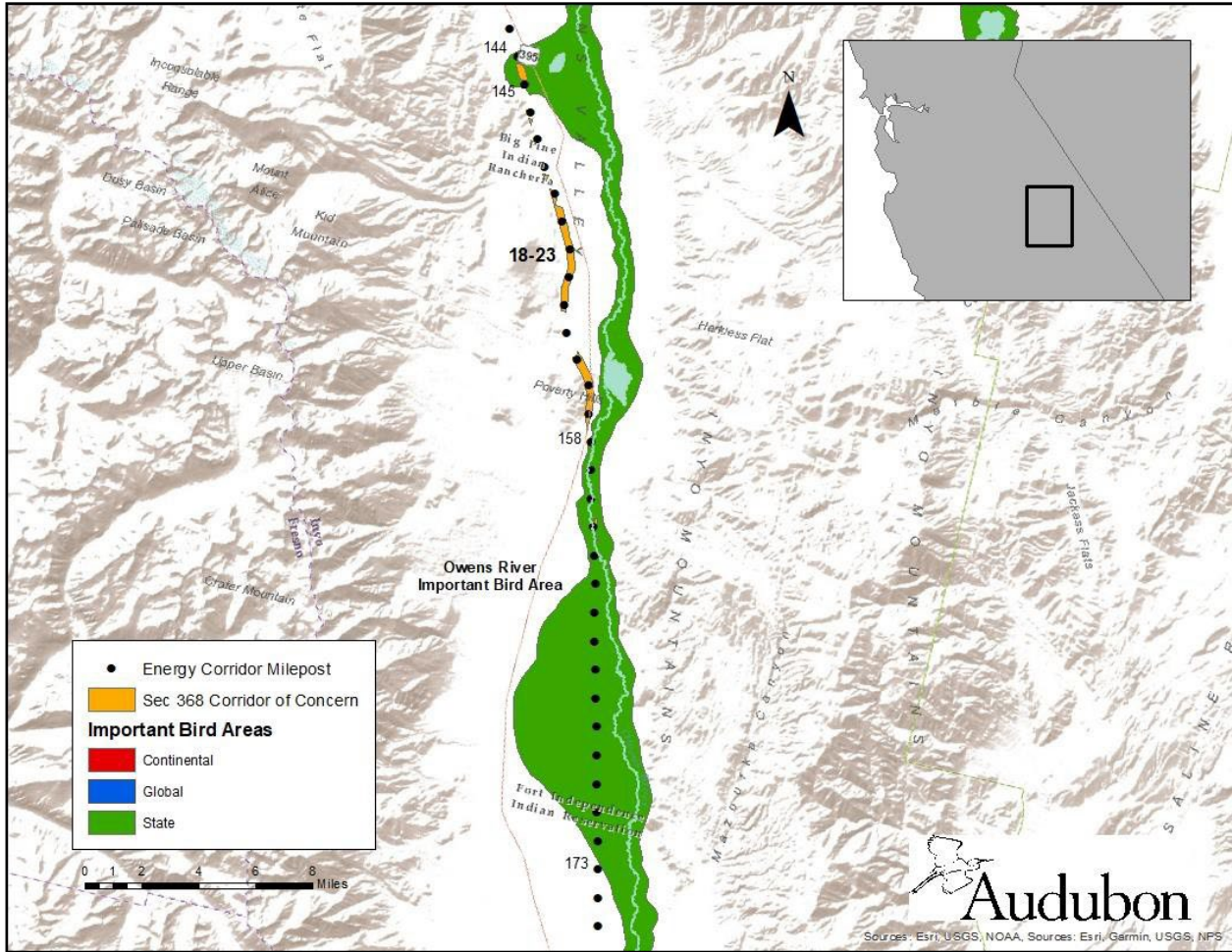


Figure 7: Owens River IBA of State Importance, California – Corridor 18-23.

5. Corridor 29-36 and 36-228

Corridor 29-36 intersects the Snake River Birds of Prey NCA/CJ Strike Reservoir IBA³⁴ of State Importance from MP 23 to MP 32 in the southeast corner of the IBA and once again in the northern edge of the IBA from MP 75 to MP 78 and MP 83 to MP 89. Corridor 29-86 also intersects the IBA from MP 31 to MP 33.

This site supports one of the densest populations of nesting raptors in North America. Up to 800 pairs of raptors of 12 different species nest here: Prairie Falcon, Golden Eagle, Ferruginous Hawk, Northern Harrier, Great-horned Owl, Long-eared Owl, Red-tailed Hawk, Swainson’s Hawk, American Kestrel, Burrowing Owl, Short-eared Owl, and Western Screech-owl. More than 200 Prairie Falcons nest here, representing up to 5% of the world’s population of this species. Bald Eagles winter here, and Long-billed Curlews are common breeders. Furthermore, 240 species of birds are known to use the C. J. Strike area annually of which 98 breed in the area and 105 species commonly in the winter. Large numbers of passerines pass through this area during the spring migration.

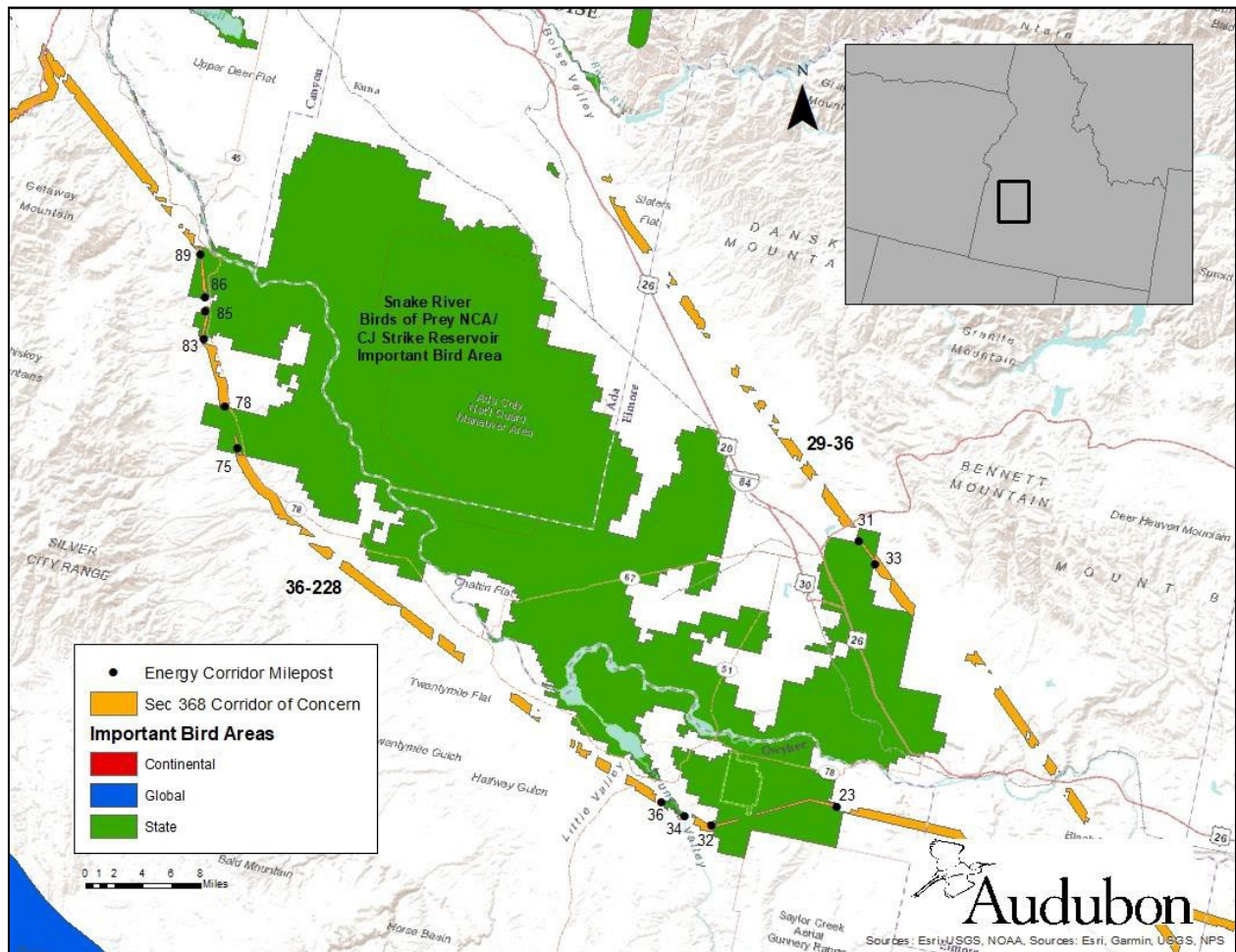


Figure 8: Snake River Birds of Prey NCA/CJ Strike Reservoir IBA of State Importance, Idaho – Corridors 29-36 and 36-228.

³⁴ <https://www.audubon.org/important-bird-areas/cj-strike-wma-and-reservoir>

6. Corridor 49-202

This corridor cuts through southwestern portion of Raft River/Curlew Valley Global IBA from MP 39 to MP 52. This area has long been recognized as a regionally, perhaps nationally, significant area for nesting Ferruginous Hawks. Various studies of this species have been conducted in the area during the 1970's, 80's, and 90's, along with monitoring by Burley and Malad BLM personnel. As of 1996, there were 46 active nests. Swainson's Hawks, Greater Sage-grouse, and Columbian Sharp-tailed grouse also nest in the area.³⁵

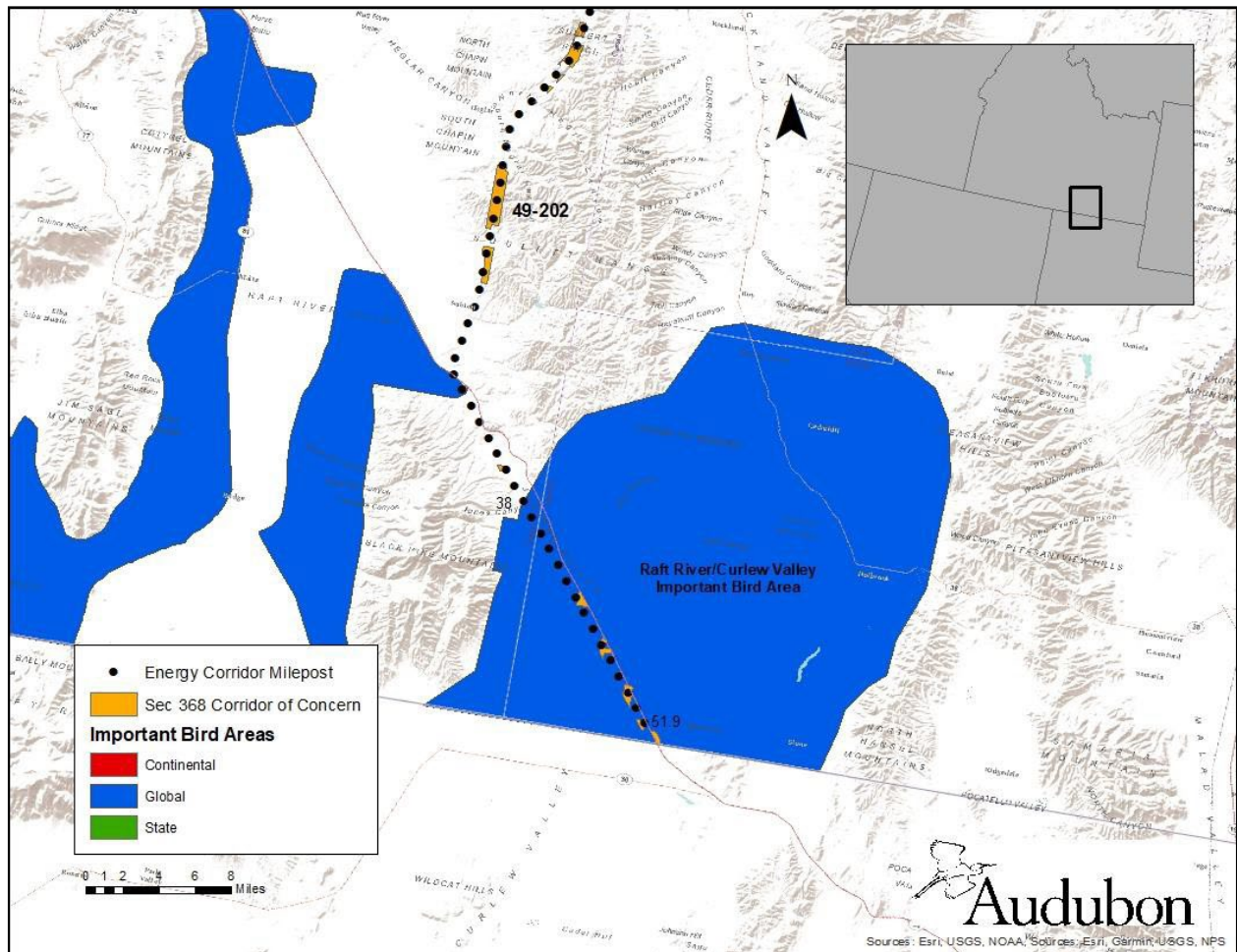


Figure 9: Raft River/Curlew Valley Globally Significant IBA, Idaho – Corridor 49-202.

³⁵ <https://www.audubon.org/important-bird-areas/raft-river-curlew-valley>

7. Corridor 50-203

This corridor traces along southeastern edge of northern section of the Beaverhead Sage-steppe Global IBA from MP 17 to MP 19 and again along the southwestern edge of southern section of the IBA from MP 31 to MP 49. The IBA represents the largest intact sagebrush habitats that remain in southwestern Montana, in extent and continuity and supports significant numbers of Greater Sage-grouse—at least 3% of the state population. The IBA encompasses at least 29 known lek sites (3% of the leks in the state) and supports at least 730 male grouse in the breeding season (>3% of the state population of surveyed male grouse).³⁶

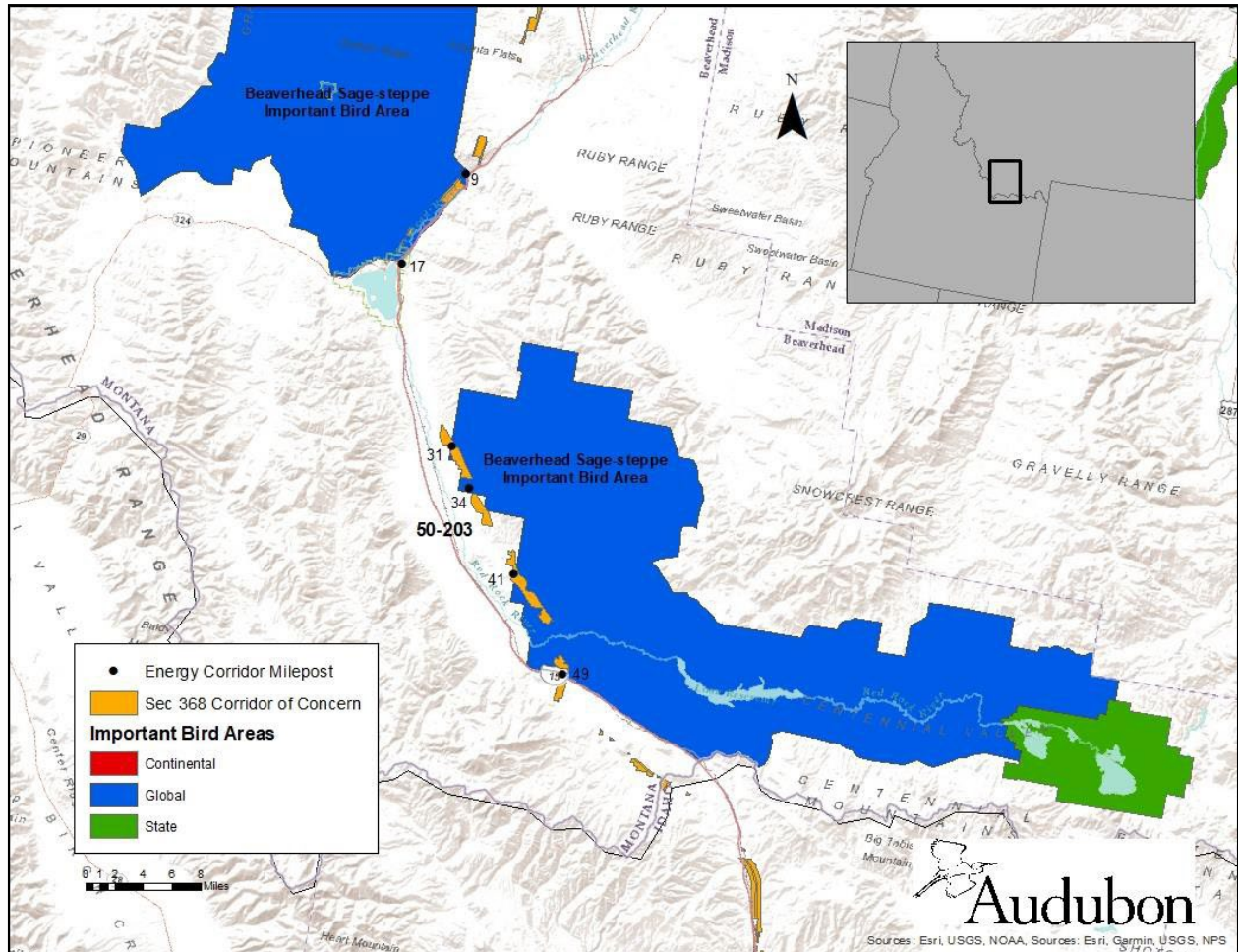


Figure 10: Beaverhead Sage Steppe Globally Significant IBA, Montana – Corridor 50-203.

³⁶ <https://www.audubon.org/important-bird-areas/beaverhead-sage-steppe>

8. Corridor 79-216

Corridor 79-216 traces along eastern edge of Bridger Sage-steppe IBA and traverses the northeast section of the IBA from MP 249 to MP 255. This IBA supports the largest concentration of Greater Sage-grouse in the south-central portion of the state and roughly 3% of the male grouse surveyed in the state. The IBA encompasses 21 lek sites (2.3% of the known leks in Montana), and at least 632 male Sage-grouse, based on lek surveys. Although somewhat isolated to the east and west by the Prior and Beartooth mountain ranges, the area's Sage-grouse population is contiguous with, and part of, the grouse population in northern Wyoming.³⁷

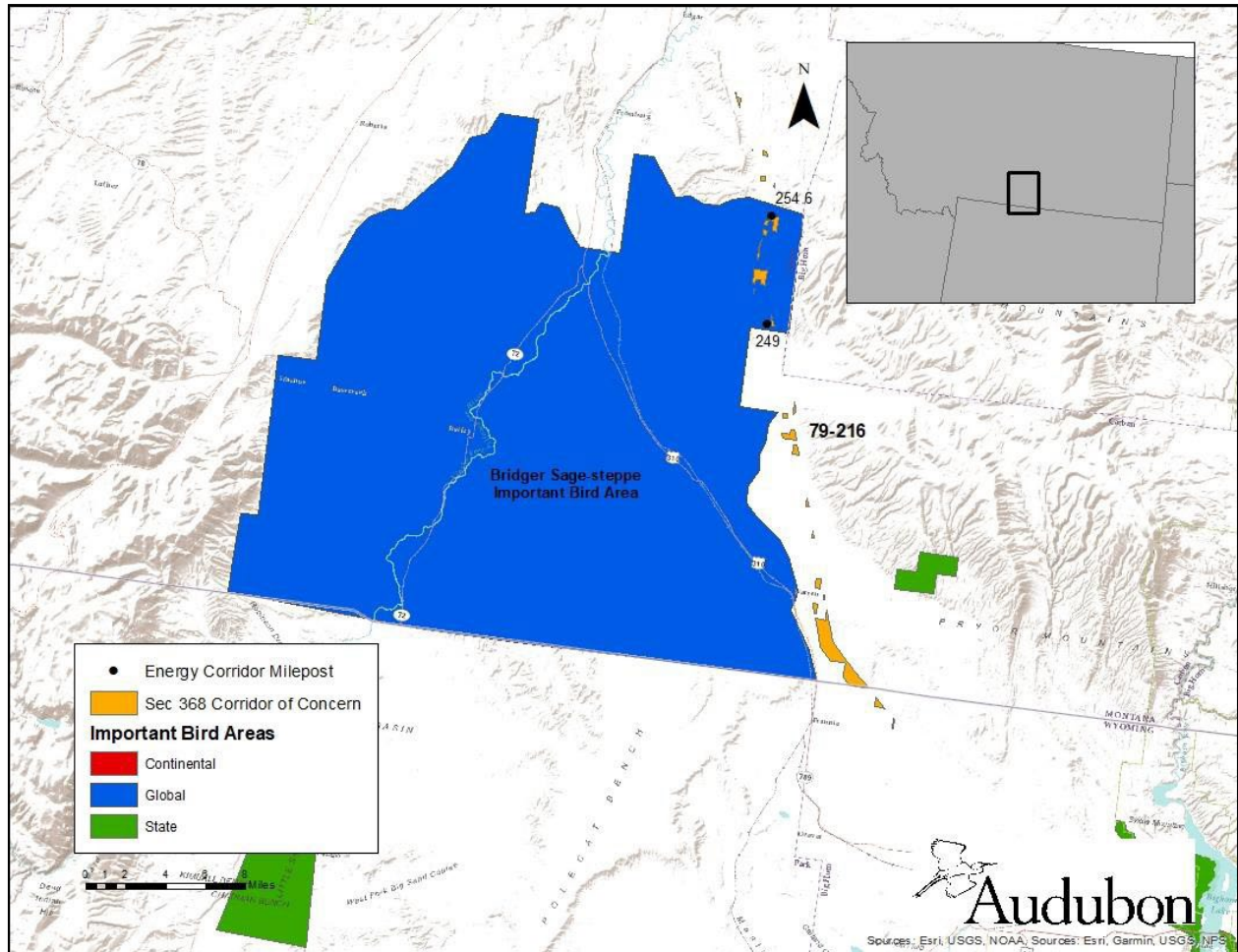


Figure 11: Bridger Sage-steppe Globally Significant IBA, Montana – Corridor 79-216.

³⁷ <https://www.audubon.org/important-bird-areas/bridger-sage-steppe>

D. Comments on Regions 4, 5 and 6 Corridor Abstracts

In addition to the concerns and recommendations stated above, we offer the following comments on specific corridors in Regions 4, 5 and 6 and hereby incorporate by reference the comments Defenders submitted on May 27, 2014.

I. Corridors in Region 4

Corridor	Comments and Recommendations
73-133	Recommendation: Consider one alternate route instead of two parallel corridors- Corridor 73-133 and Corridor 138-143.
78-85	Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.
78-255	<p>The corridor falls in Greater Sage-grouse core area in Wyoming. Although the corridor is collocated with existing transmission line, the draft abstract notes that the General Habitat Management Area (GHMA) and the PHMA in which the corridor is located cannot be avoided. In addition, the corridor is a Corridor of Concern and could conflict with lands with wilderness characteristics. Furthermore, the draft abstract notes that there are steep and rough terrain within the corridor.</p> <p>Recommendation: Delete this corridor given the physical challenges and resource conflicts associated with the corridor.</p>
79-216	<p>The entire corridor goes through Greater Sage-grouse core area in Wyoming and in PHMA or GHMA in Idaho. The corridor was identified as a Corridor of Concern because of conflicts with Sage-grouse core area and habitat, National Register of Historic Places properties, National Historic Trail and potentially with LWC. In addition, Corridor 79-216 traces along eastern edge of Bridger Sage-steppe IBA and traverses the Northeast section of the IBA from MP 249 to MP 255. The IBA supports the largest concentration of Sage-grouse in the south-central portion of the state and roughly 3% of the male grouse surveyed in the state. The IBA encompasses 21 lek sites (2.3% of the known leks in Montana), and at least 632 male Sage-grouse, based on lek surveys. A segment of the corridor also overlaps the Cedar Ridge- a large traditional cultural property important for tribes.</p> <p>Recommendation: Delete the corridor due to these numerous conflicts.</p>
121-221	<p>The Corridor falls entirely within Sage-grouse PHMA and GHMA and conflicts with other resources such as historic trails, scenic places (such as the Boar's Tusk, North and South Table Mountain etc.), and Greater Sand Dunes ACEC which supports the Steamboat desert elk herd. In addition, the corridor traces along Southern border of Red Desert Global IBA from MP 15 to MP 24. This large expanse of relatively intact sagebrush habitat provides important breeding, foraging, nesting, wintering, or migratory stop-over habitat for sagebrush obligate avian species such as Greater Sage-grouse.</p> <p>Recommendation: Delete the corridor due to the resource conflicts and the fact that other corridors run parallel to it.</p>

121-240	<p>Recommendation: Shift the corridor from MP 0 to MP 11 as noted in the draft abstract to allow for collocation and to lessen the impacts to the Four Trails Feasibility Study area and the California National Historic Trail.</p>
126-218	<p>Recommendation: Reroute to avoid Sage-grouse GHMA and PHMA wherever possible, the Greater Red Creek ACEC and the adjacent roadless area at MP 82, MP 87, and MP 89.</p>
129-218	<p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p>
129-221	<p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p>
138-143	<p>Upper Muddy Creek/Grizzly Wildlife Habitat Management Area contains important wildlife values. Enhanced riparian habitat and restored watershed functions on the Grizzly WHMA. The upper Muddy Creek watershed provides habitat where the native fish assemblage of Colorado River cutthroat trout, mountain suckers, and speckled dace have been successfully restored to promote a meta-population assemblage of cold-water species.</p> <p>The warm water reach of Muddy Creek within this crucial habitat area supports the only viable assemblage of bluehead suckers, round tail chubs, and flannel mouth suckers known to still exist in Wyoming.</p> <p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p> <p>Recommendation: Consider one alternate route instead of two parallel corridors- Corridor 73-133 and Corridor 138-143.</p>
218-240	<p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p>
219-220	<p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p>
220-221	<p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p>

II. Corridors in Region 5

Corridor	Comments and Recommendations
3-8	Recommendation: Reduce corridor width between MP 25 and MP 59 to 1000 ft. for consistency with segment through Lassen National Forest.
6-15	<p>Recommendation: Reduce corridor width between MP 0 and MP 73 to correspond with footprint of existing facilities.</p> <p>Recommendation: Consult with USFWS to avoid adverse impacts to Sierra Nevada Yellow-legged Frog. Use full mitigation hierarchy to avoid, minimize, and compensate for impacts to Sierra Nevada Yellow-legged Frog.</p>
8-104	Recommendation: Reduce corridor width between MP 0 and MP 50 to 500 ft. for consistency with segment through Lassen National Forest.
15-104	<p>Recommendation: Reduce corridor width between MP 0 and MP 100 to 500 ft. for consistency with segments through BLM Applegate Field Office area.</p> <p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p>
16-17	Recommendation: Reduce corridor width between MP 0 and MP 51 to correspond with footprint of existing facilities.
16-24	<p>Corridor traces along Eastern edge of the Bill Creek - Montana Mountains Global IBA from MP 141 to MP 160. This site supports the largest Sage-grouse population in NV, and one of the highest densities of Sage-grouse in the country.</p> <p>Recommendation: Re-route the corridor to avoid the IBA.</p>
16-104	<p>Recommendation: Reduce corridor width between MP 0 and MP 15 and MP 20 and MP 66 to 500 ft. for consistency with narrowest existing segment.</p> <p>Recommendation: Use full mitigation hierarchy to avoid, minimize, and compensate for impacts within two miles of important Sage-grouse breeding areas.</p>
18-23	<p>This is a Corridor of Concern and has conflicts with multiple resources including wildlife.</p> <p>It intersects with critical habitat of several listed species including Yellow-billed Cuckoo and Sierra Nevada Bighorn Sheep. The corridor could also impact other wildlife including Mojave Ground Squirrel, Desert Tortoise and Sage-grouse. In fact, the corridor intersects the Bi-state Sage-grouse on several occasions. Specific to Greater Sage-grouse, several miles of the corridor go through proposed critical habitat for bi-state distinct population segment in California and Nevada.</p>

	<p>The corridor has a high potential to impact several bird species because it goes through three Important Bird Areas- the Mono Highlands Global IBA, the Adobe Valley State IBA, and the Owens River State IBA. The Mono Highlands IBA supports large population of Greater Sage-grouse including part of the Mono County metapopulations that appear to be genetically distinct from other groups in the Great Basin. The riparian habitats associated with the Owens River IBA are already among the most extensive in the state, and with continued commitment by the Los Angeles Department of Water and Power to improve their habitat value for birds.</p> <p>In addition, the corridor is adjacent to the Sacatar Trail wilderness areas and intersects several other wilderness study areas including the Excelsior Wilderness Study Area (WSA), Chidago Canyon WSA, Casa Diablo WSA, Fish Slough WSA, and Volcanic Tablelands WSA. It also intersects the Fish Slough, Olancha Greasewood, Sierra Canyons, Fossil Falls and Rose Spring ACEC.</p> <p>Finally, various segments of this corridor conflict with visual and cultural resources.</p> <p>Recommendation: Delete the corridor due to the multiple conflicts associated with the placement of this corridor.</p>
18-224	<p>Recommendation: Shift corridor west between MP 209 and MP 217 to collocate with Hwy 95.</p>
101-263	<p>Recommendation: Reduce corridor width between MP 0 and MP 40 to correspond with footprint of existing facilities.</p> <p>Recommendation: Consult with USFWS and use full mitigation hierarchy to avoid, minimize, and compensate for impacts to Northern Spotted Owl in the Six Rivers NF and Shasta-Trinity NF.</p>
261-262	<p>Recommendation: Reduce corridor width between MP 40 and MP 66 to 2000 ft. for consistency with segments through Klamath National Forest and BLM Redding Field Office area.</p>

III. Corridors in Region 6

Corridor	Comments and Recommendations
4-247	<p>A new Area of Known Wolf Activity (AKWA) has been designated by Oregon Department of Fish and Wildlife (ODFW) in the southern portion of the Indigo Unit (Douglas and Lane Counties). Biologists found tracks of multiple wolves in late 2018. Trail camera images of three wolves were captured by a US Fish and Wildlife Service remote camera on Feb. 20, 2019 in the Umpqua National Forest. At this time, wildlife managers have little data regarding the specifics of this new group (i.e., sex, breeding status, and specific use area) and additional surveys are needed to find out more information. See https://dfw.state.or.us/Wolves/Packs/Indigo.asp</p>

	<p>Recommendation: Consider this new information and consult with ODFW.</p> <p>Recommendation: Avoid designated northern spotted owl critical habitat.</p>
7-11	<p>The corridor could impact the Silver Lake AKWA and is a known dispersal corridor for the species. The area also overlaps with deer and elk migration corridor.</p> <p>Recommendation: Consult with ODFW re impacts to wolves and big game migration linkages.</p> <p>Recommendation: Shift corridor to the west from MP 123-125 to avoid Greater Sage-grouse PHMA.</p>
7-24	<p>The corridor is already a Corridor of Concern due to its location through Sage-grouse habitat, including Sagebrush Focal Area, pygmy rabbit habitat, and citizen-proposed wilderness area. It goes in between the Sheldon Hart Mountain Antelope Refuge and the Sheldon National Wildlife Refuge thereby possibly affecting wildlife migration. In addition, the corridor intersects Visual Resource Management (VRM) Class II area, is adjacent to VRM Class I area and could affect Alvord Desert Wilderness Study Area.</p> <p>Recommendation: Delete the corridor.</p>
10-246	<p>The corridor intersects the Sandy River ACEC from MP 25 to MP 34. The Sandy River goes through the ACEC and provides habitat for Lower Columbia River Chinook, winter steelhead, Coho and cutthroat trout. In addition, peregrine falcons, bald eagles, and harlequin ducks have been known to use the Sandy River Gorge.</p> <p>Recommendation: Recognize the presence of these species and consider full mitigation hierarchy to avoid, minimize, and compensate for impacts to these species.</p>
11-228	<p>Recommendation: Conduct additional analysis to avoid, minimize, and mitigate impacts to lands with wilderness characteristics, including in citizen proposed wilderness areas (Dry Creek, Freezout Ridge, Grassy Mountain, Keeney Ridge, and Middle River).</p>
24-228	<p>The corridor goes through GHMA, IHMA or PHMA for its entire length except between MP 20 and MP 23. It has the potential to affect pygmy rabbit habitat as well as LWC. It has been noted before that Corridor 24-228 may not be viable due to significant resource conflicts along Corridors 7-24 and 16-24 to which 24-228 would connect.</p> <p>Recommendation: Delete the corridor.</p>

29-36	<p>Corridor 29-36 intersects the Snake River Birds of Prey NCA/CJ Strike Reservoir IBA of State Importance IBA from MP 23 to MP 32 in the southeast corner of the IBA and once again in the northern edge of the IBA from MP 75 to MP 78 and MP 83 to MP 89. Corridor 29-86 also intersects the IBA from MP 31 to MP 33.</p> <p>This site supports one of the densest populations of nesting raptors in North America. Up to 800 pairs of raptors of 12 different species nest here: Prairie Falcon, Golden Eagle, Ferruginous Hawk, Northern Harrier, Great-horned Owl, Long-eared Owl, Red-tailed Hawk, Swainson’s Hawk, American Kestrel, Burrowing Owl, Short-eared Owl, and Western Screech-owl. More than 200 Prairie Falcons nest here, representing up to 5% of the world’s population of this species. Bald Eagles winter here, and Long-billed Curlews are common breeders. Furthermore, 240 species of birds are known to use the C. J. Strike area annually of which 98 breed in the area and 105 species commonly in the winter. Large numbers of passerines pass through this area during the spring migration.</p> <p>Recommendation: Minimize impacts to nesting raptors in the Snake River Birds of Prey NCA.</p> <p>Recommendation: Reroute to avoid Sage-grouse PHMA and Snake River Birds of Prey NCA/CJ Strike Reservoir IBA. If rerouting around the NCA is not feasible, reroute to collocate with existing and proposed transmission lines.</p>
36-226	<p>Recommendation: Shift corridor to collocate with existing infrastructure between MP 56 and MP 65 to collocate with existing transmission line.</p>
36-228	<p>Corridor 29-86 intersects the Snake River Birds of Prey NCA/CJ Strike Reservoir IBA of State Importance from MP 31 to MP 33. This site supports one of the densest populations of nesting raptors in North America. Up to 800 pairs of raptors of 12 different species nest here: Prairie Falcon, Golden Eagle, Ferruginous Hawk, Northern Harrier, Great-horned Owl, Long-eared Owl, Red-tailed Hawk, Swainson’s Hawk, American Kestrel, Burrowing Owl, Short-eared Owl, and Western Screech-owl. More than 200 Prairie Falcons nest here, representing up to 5% of the world’s population of this species. Bald Eagles winter here, and Long-billed Curlews are common breeders. Furthermore, 240 species of birds are known to use the C. J. Strike area annually of which 98 breed in the area and 105 species commonly in the winter. Large numbers of passerines pass through this area during the spring migration.</p> <p>Recommendation: Reroute to Snake River Birds of Prey NCA/CJ Strike Reservoir IBA. If rerouting around the NCA is not feasible, reroute to collocate with existing and proposed transmission lines.</p>
49-202	<p>Corridor cuts through Southwestern portion of Raft River/Curlew Valley Global IBA from MP 39 to MP 52. This area has long been recognized as a regionally, perhaps nationally, significant area for nesting Ferruginous Hawks. Various studies of this species have been conducted in the area during the 1970s, 80s, and 90s, along</p>

	<p>with monitoring by Burley and Malad BLM personnel. As of 1996, there were 46 active nests. Swainson’s Hawks, Greater Sage-grouse, and Columbian Sharp-tailed Grouse also nest in the area.</p> <p>Recommendation: Re-route the corridor to avoid the IBA.</p>
50-51	<p>The Divide to Dillon area is a documented important linkage area for bighorn sheep, elk, grizzly bear and wolverine. The linkage area also provides elk and mule deer winter range.</p> <p>Recommendation: Shift the corridor to avoid the WSR Study River segments given the watershed and aquatic values associated with the Big Hole river.</p>
50-203	<p>Corridor traces along Southeastern edge of Northern section of the Beaverhead Sage-steppe Global IBA from MP 17 to MP 19 and again along the Southwestern edge of Southern section of the IBA from MP 31 to MP 49. The IBA represents the largest intact sagebrush habitats that remain in southwestern Montana, in extent and continuity and supports significant numbers of Greater Sage-grouse- at least 3% of the state population. The IBA encompasses at least 29 known lek sites (3% of the leks in the state) and supports at least 730 male grouse in the breeding season (>3% of the state population of surveyed male grouse).</p> <p>Recommendation: Re-route the corridor to avoid the IBA.</p> <p>Recommendation: Shift corridor to avoid intersection with the Wild and Scenic Study River segment of the Beaverhead River.</p>
51-204	<p>The Elkhorn Mountains provide crucial habitat for elk and serve as a connectivity corridor for grizzly bear and Canada lynx. The Elkhorn Mountains ACEC supports these values. In addition, the ACEC contains over 11 miles of fish bearing streams, including five miles supporting at-risk fish; as such, maintenance of riparian and instream habitat is a management priority within the ACEC.</p> <p>Recommendation: Avoid the ACEC as it would be consistent with the BLM’s emphasis on managing the area as an ecological unit for the purpose of sustaining biological diversity and ecosystem processes.</p>
102-105	<p>Recommendation: Consult with USFWS to avoid adverse modification to designated Northern spotted owl, marbled murrelet, bull trout, and chinook salmon critical habitat. Apply reasonable and prudent measures identified by the USFWS during consultation for the above species.</p>
112-226	<p>Corridor traces along NW edge of South Hills IBA and intersects the IBA from MP 31 to MP 65. Species of interest in the South Hills IBA include Greater Sage-grouse, Northern Goshawk, Ferruginous Hawk, Sharp-tailed Grouse and occur at MP 31, MP 34-41, MP 43-49, and MP 58-65.</p> <p>Recommendation: Re-route the corridor to avoid the IBA.</p>

229-254	<p>The potential impacts of on ecological values of the Elkhorn Mountains ACEC should be fully mitigated.</p> <p>The Silver King Inventoried Roadless Area within the Beaverhead Deerlodge National Forest should be avoided. The area is contiguous to other roadless areas on the Lolo National Forest. According to the Beaverhead Deerlodge LRMP (2009) FEIS the “IRA provides secure habitat for wildlife enhancing linkages and connectivity across the landscape in between the (Greater Yellowstone Area) and forests to the west and north. Canada lynx habitat is mapped. Westslope cutthroat and bull trout inhabit some stream segments.” The area also supports stands of at-risk whitebark pine and contributes to undisturbed habitat for wolves.</p> <p>Recommendation: Consult with USFWS to avoid adverse modification to bull trout designated critical habitat.</p>
230-248	<p>Corridor 230-248 is already a corridor of concern for several reasons including potential impacts on critical habitat for Northern Spotted Owl, Steelhead, Chinook, and Coho salmon, impacts to wild and scenic rivers, conflicts with Northwest Forest Plan, and intersection with Pacific Crest National Scenic Trail and the Riverside National Recreation Trail. Furthermore, the corridor intersects with Soosap Meadows ACEC. In addition, there are reports³⁸ that the Mt. Hood National Forest now has the first wolf pack in Mt. Hood National Forest in almost 70 years, the “White River Pack”³⁹ living right in the corridor’s path.</p> <p>Recommendation: Delete the corridor due to the numerous conflicts associated with this corridor.</p>
244-245	<p>Recommendation: Reroute to avoid Greater Sage-grouse GHMA and PHMA.</p> <p>Recommendation: Collocate with existing infrastructure where possible.</p>

E. Conclusion

Thank you for this opportunity to provide comments on the corridor abstracts for Regions 4, 5 and 6. We believe that the Agencies are heading in the right direction in planning for energy corridors at a landscape level and with consideration to renewable energy development and wildlife conservation. We look forward to continuing to work with the Agencies and other stakeholders to plan for energy corridors. Please direct any questions regarding our comments and recommendations to Rupak Thapaliya at 202.772.3217.

³⁸ Hamway Stephen. “Wolf pups spotted in north Central Oregon.” The Bulletin. Bend, OR. August 29, 2018. Available at <https://www.bendbulletin.com/localstate/6483216-151/wolf-pups-spotted-in-north-central-oregon>

³⁹ Oregon Department of Fish and Wildlife. White River Wolves- Area of Known Wolf Activity. Available at https://dfw.state.or.us/Wolves/Packs/White_River.asp

Sincerely,

Rupak Thapaliya
Renewable Energy and Wildlife Policy Analyst
Defenders of Wildlife

Garry George
Renewable Energy Director
National Audubon Society

Katie Davis
Western Program Director
Wildlands Network

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THE **OUTSIDE** IS IN US ALL.

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April 8, 2019

Jeremy Bluma
Project Manager
Bureau of Land Management
blm_wo_368corridors@blm.gov

Re: Section 368 Energy Corridor Review – Regions 4, 5, and 6

Dear Mr. Bluma:

Thank you for the opportunity to provide input on the regional review of the Section 368 Energy Corridors. Montana Fish, Wildlife and Parks (FWP) supports the concept of co-locating energy infrastructure to minimize disturbance of fish, wildlife, parks, and recreation resources across the landscape. Through these regular reviews, we can identify resource changes that may necessitate modifying the Section 368 Energy Corridors.

Several FWP biologists identified important streams and big game winter range that could be impacted by increased energy development (see attached comments). However, there are fish, wildlife, and recreation resources throughout the Section 368 Energy Corridors that cross Montana, so it was challenging to pinpoint locations of resources at a broad scale without the context of specific proposals. We can provide site-specific information and suggest appropriate mitigation measures when projects, such as transmission lines or pipelines, are proposed. To be most effective, resource information and mitigation recommendations should be considered early in project siting and development.

FWP will continue to track this review and look forward to future opportunities to provide input. If you have questions, please contact Linnaea Schroeer, FWP Responsive Management Unit, at (406) 994-3034, lschroeer@mt.gov.

Sincerely,

Martha Williams
Director

C: Linnaea Schroeer

Enclosure

Section 368 Energy Corridor Regional Review
Section 368 Energy Corridors Regions 4, 5, and 6 FWP Comments

Corridor Name	Mile Markers	Comments
79-216	230 to 249	There are no significant fisheries concerns. Piney Creek upstream of marker 236 holds an aboriginal population of Yellowstone Cutthroat. The population is approximately 1 mile above the power right of way. Sage Creek has a native Yellowstone Cutthroat trout population and marker 245 intersects at the lower end of that fishery. Avoidance of stream bank and bed disturbances should be included in the best management practices around Sage and Piney Creek.
79-216	250	Sediment control Best Management Practices should be incorporated to decrease potential for sediment from entering the tributaries and eventually entering the Clarks Fork Drainage. Also recommend following all required set backs where applicable.
229-254 (S)	273-299.8	Corridor section (273-299.8) in the Elkhorn Mountains area runs through elk and mule deer winter range (area is also yearlong range for both species) - as noted there already is a 500-KV transmission line present in the corridor. The section from MP 277-281 crosses the USFS's Elkhorns Wildlife Management Unit which is the USFS's only designated Wildlife Management Unit in the nation.



Oregon

Kate Brown., Governor

Department of Fish and Wildlife

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Jeremy Bluma, Project Manager
Bureau of Land Management
West-wide Energy Corridor Section 368 Corridor Regional Review
jbluma@blm.gov



April 17, 2019

Dear Mr. Bluma,

Thank you for the opportunity to provide input on the Bureau of Land Management (BLM) West-Wide Energy Corridors Regional Review for Regions 4, 5, and 6. It is the Oregon Department of Fish and Wildlife's (ODFW) understanding that the corridors identified in the West-Wide Energy Corridor Programmatic Environmental Impact Statement (PEIS) were adopted into the respective land management plans for the BLM and US Forest Service (USFS) in 2009, and that recommendations received as part of the Regional Review could lead to potential revisions, deletions, or additions to the corridors and identify possible changes to the interagency operating procedures (IOPs).

It is the policy of the State of Oregon that wildlife shall be managed to prevent serious depletion of any indigenous species and to provide optimum recreational and aesthetic benefits for present and future generations of this state (ORS 496.012). To that end, ODFW evaluated the Section 368 energy corridors that cross or intersect with the State of Oregon and provides the following review and recommendations in an effort to avoid, minimize, and/or mitigate future impacts to fish and wildlife and their habitats. Should you seek any follow-up discussion on these comments please contact Sarah Reif, Energy Coordinator, at 503-947-6082 and/or sarah.j.reif@state.or.us.

Relevant Management Authorities

ODFW used the following relevant management authorities to guide its review and recommendations provided herein:

Wildlife Policy (ORS 496.012)

Establishes wildlife management policy to prevent serious depletion of any indigenous species and maintain all species of fish and wildlife at optimum levels for future generations.

Food Fish Management Policy (ORS 506.109)

Establishes fish management policy to maintain all species of food fish at optimum levels in all suitable waters of the state and prevent extinction of any indigenous species.

Fish and Wildlife Habitat Mitigation Policy (OAR 635-415-0000 to 0025)

Furtheres the Wildlife Policy (ORS 496.012) and the Food Fish Management Policy (ORS 506.109) through the application of consistent goals and standards to mitigate impacts to fish and wildlife habitat caused by land and water development actions. It is the fish and wildlife habitat mitigation policy of ODFW to require or recommend, depending upon the habitat protection and mitigation opportunities provided by specific statutes, mitigation for losses of fish and wildlife habitat resulting from development actions.

Greater Sage-Grouse Conservation Strategy for Oregon (OAR 635-140-0000 to 0025)

These administrative rules establish the policy of the Commission for the protection and enhancement of Greater Sage-Grouse in Oregon. These rules incorporate and supplement portions of the "Greater Sage-Grouse Conservation Assessment and Strategy for Oregon" (2011) ("the Strategy") which sets population and habitat management objectives, and defines and governs the Department's core area approach to conservation of sage-grouse in Oregon. These rules also advance sage-grouse population and habitat protection through a mitigation hierarchy and the establishment of a mitigation standard for impacts from certain types of development actions in sage-grouse habitat. In the event of a conflict between the "Strategy" and these rules, these rules govern.

State Endangered Species Act (ORS 496.171-182)

Requires conservation and recovery of wildlife species that are classified as endangered or threatened. At ORS 498.026(1), prohibits "taking" of any listed species. Illegal take is a violation of the wildlife laws, subject to criminal prosecution as a Class A misdemeanor or violation pursuant to ORS 496.992.

Wildlife Diversity Plan (OAR 635-100-0001 through 0030)

Establishes a plan to maintain Oregon's wildlife diversity by protecting and enhancing populations and habitats of native wildlife at self-sustaining levels throughout natural geographic ranges. Defines lists for state sensitive, threatened, and endangered species.

ODFW's Fish Passage Law (ORS 509.580 - 509.645)

Requires upstream and downstream passage at all artificial obstructions in those Oregon waters in which migratory native fish are currently or have historically been present.

General Comments

ODFW reviewed the Oregon-specific energy corridors using the Section 368 Corridor Mapping Tool and commends the Argonne National Laboratory, the BLM, and the USFS for creating such a useful interface for public input. ODFW also appreciates the use of the Crucial Habitat Assessment Tool (CHAT; Western Association of Fish and Wildlife Agencies 2016) which incorporates data from the Oregon COMPASS (ODFW 2016; www.compass.dfw.state.or.us) and highlights areas containing important natural resources.

ODFW further appreciates that BLM-designated greater sage-grouse priority habitat management areas (PHMAs) were also used in this review. These PHMAs fully represent State of Oregon

designations for greater sage-grouse “core” and “low-density” habitats as outlined in OAR 635-140-0000 through -0025. The State of Oregon places high priority on conservation of greater sage-grouse habitat, and identification of potential conflicts within the 368 corridors helps raise awareness of the need to address potential impacts early in energy corridor planning.

Given the finalization of the BLM’s 2019 Oregon Greater Sage-grouse Record of Decision and Approved Resource Management Plan Amendment, ODFW recommends these Section 368 Corridors be evaluated in light of those documents and decisions. The State of Oregon has also adopted greater sage-grouse protections, ODFW in 2015 (OAR 635-140-0000 through -0025) and Oregon Department of Land Conservation and Development (DLCD) in 2017 (OAR 660-023-0115). These greater sage-grouse rules were adopted after the Section 368 PEIS Records of Decision (2009) and should be considered when assessing the validity of Section 368 Corridors in Oregon because they would potentially impact development opportunities or have bearing on the IOPs. The ODFW sage-grouse rules require mitigation actions for various types of development including, but not limited to, mining, wind, solar, transmission, and geothermal energy plants. The DLCD sage-grouse rules allow limited development in core and low density (PHMA) habitat following the application of a mitigation hierarchy (avoidance, minimization, and mitigation) which requires developments to follow ODFW’s mitigation rules. These two rules work together to eliminate regulatory uncertainty in protecting sage-grouse habitat in Oregon.

In addition to greater sage-grouse mitigation, ODFW also recommends impacts to other fish and wildlife species’ habitats be addressed according to the Oregon Fish and Wildlife Habitat Mitigation Policy (OAR 635-415-0000 through -0025). The ODFW Mitigation Policy recommends development actions consider all options for avoidance and minimization of development impacts to fish and wildlife habitat, and recommends mitigation for unavoidable impacts with a goal of no net loss. Regarding mitigation, ODFW requests clarification on the PEIS process: would mitigation be addressed by the federal action agencies as part of corridor designation, or is mitigation the responsibility of the individual project proponents in the future? Either way, ODFW recommends further coordination between the federal action agencies and the State of Oregon to discuss ways of better integrating the State’s mitigation goals with the Section 368 process.

Specific Comments

Aside from the specific corridors discussed below, ODFW found that most of the designated energy corridors were co-located with existing infrastructure (transmission lines, highways) which is an appropriate habitat-impact minimization strategy. At this time, ODFW reserves further comment on those designated corridors not specifically referenced below until future projects are proposed within the corridors, at which time ODFW may raise site-specific fish/wildlife habitat concerns and recommendations.

Corridor 7-11: While co-located with existing infrastructure, this corridor does bisect important big game winter range, migration corridors for deer and elk, and dispersal habitat for wolves. The corridor is also in close proximity to greater sage-grouse core and low-density habitat (PHMA) which may trigger ODFW and/or DLCD rules regarding direct and indirect impacts. ODFW recommends potential relocation of the corridor near PHMAs to avoid direct and indirect impacts,

and early consultation be highlighted in the IOPs to address impacts to big game winter range and movement corridors.


Corridor 7-24: ODFW recommends elimination of this designated corridor because of the potential for significant impacts to greater sage-grouse core and low-density habitats (PHMAs) and the close proximity to an existing sage-grouse lek.

Corridor 16-24: ODFW recommends shifting the corridor along mileposts 165-195 to co-locate with existing transmission to the west. This shift would avoid and/or minimize new impacts to greater sage-grouse core and low-density habitats (PHMAs), in favor of co-locating in an area where impacts are already realized.

Corridor 230-248: This corridor does not appear to be co-located with existing infrastructure and is proposed across what appears to be federally-designated critical habitat for northern spotted owls, which is also listed as a State Threatened species. ODFW considers late-successional forested habitat to be limited, essential, and in the case of owl nesting activity areas, irreplaceable habitat meeting the Category 1 definition in the Oregon Fish and Wildlife Habitat Mitigation Policy. In the case of Category 1 habitats, ODFW recommends no development impact. At the time of this review, ODFW has not specifically evaluated this corridor for the presence of Category 1 habitats but flags this corridor for further analysis and conversation between the US Forest Service and ODFW.

Thank you, again, for the opportunity to provide comment to the Regional Review process. ODFW looks forward to engaging with the BLM and USFS in future workshops and planning meetings associated with this process as well as on future, site-specific projects within the designated corridors.

Sincerely,



Sarah Reif
Energy Coordinator, Wildlife Division



Kathleen Yhip
Principal Advisor
Energy & Environmental Policy

April 8, 2019

Jeremy Bluma
Bureau of Land Management, Rights-of-Way
20 M St. SE
Washington, DC 20003

Re: Request for Comments on Review of Section 368 Regions 4, 5, and 6 Energy Corridors
Southern California Edison's Comments

Dear Mr. Bluma,

Southern California Edison Company (SCE) appreciates the opportunity to provide comments in conjunction with the Bureau of Land Management's (BLM's) priority review of the Section 368 West-wide Energy Corridors in Region 4, 5, and 6. SCE is an investor-owned electric utility responsible for the construction, operation, and maintenance of electric transmission, distribution, and generation facilities in central and southern California. SCE's service territory encompasses 50,000 square miles with a population of over 13 million residents. SCE is working diligently to support Federal and State renewable energy goals and to facilitate delivery of safe, reliable, and cost-effective electricity, including renewable energy from third-party generators, to SCE's customers. Continued designation of energy corridors combined with robust coordination between the various Federal and State agencies would assist in improving the efficiency of the permitting process for siting new projects.

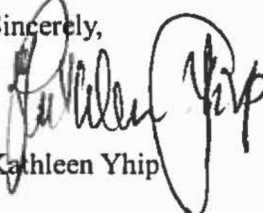
California has some of the most ambitious renewable energy goals in the country, notably Governor Brown's signing of SB100 that established a 60% renewable portfolio standard target for the state to be achieved by 2030 and a target of 100% by 2045. There are multiple planning efforts underway to identify additional renewable resources to reduce the State's greenhouse gas emissions and carbon footprint. SCE encourages the BLM, the United States Forest Service, and the Department of Energy (the Agencies) to remain engaged with the California Energy Commission and California Independent System Operator (CAISO) on the planning efforts and technology changes underway given that they could affect the need for regional planning and may need to be considered during subsequent reviews of the energy corridors.

SCE identified one currently designated corridor (18-23) in Region 5 that our electric infrastructure utilizes. At this time, SCE cannot predict with certainty where new energy development will occur or where additional transmission lines will be needed in the future to deliver the electricity to customers. SCE's comments reflect current projections and requests from developers for interconnection and where existing capacity constraints exist on SCE's infrastructure. SCE encourages the Agencies to pursue resolutions that facilitate a utility's ability to access existing infrastructure to perform required inspections, operations, and maintenance activities (i.e. a coordination IOP related to Roadless Areas or Wilderness Areas). In addition, SCE supports the potential resolution to reclassify the VRM Class II area designated in 2016 where that area intersects with the corridor (MP184 to MP192). A transmission line is a linear development that cannot simply skip over an area, making the proposal to delete the corridor at this location unrealistic and unworkable. SCE also notes that throughout the Desert Renewable Energy Conservation Plan (DRECP) development, the conservation land designations and conservation management actions were intended to apply to new renewable energy development, not existing infrastructure.

Below is a summary of SCE's review of conidor 18-23 in Region 5:

Corridor	Region	SCE Transmission & Interconnection Planning Notes
18-23	39S Corridor for Priority Region I only, or Eastern Sierra	<p>SCE transmission and/or sub-transmission facilities in this corridor Include:</p> <ul style="list-style-type: none"> • three 115 kV lines • two 12 kV lines <p>CAISO queued gen near or which could use the corridor: 0 MW</p> <p>SCE queued gen near or which could use the corridor: --41 MW (Trans/subtrans gen) & 1.48 MW (Distribution gen)</p> <p>Previous!' triggered and/or proposed project5 near this corridor that did not move forward Include:</p> <ul style="list-style-type: none"> • New 115 kV or 220 kV lines • Distribution circuit upgrades <p>.....</p> <p>Likely to be used: Yes, currently queued generation would make use of this corridor.</p> <p>Sited to provide mu utility & min environmental Impact: Yes, multiple SCE I 15 kV & 12 kV facilities exist in this corridor.</p> <p>Effect Of corridor gaps: Since SCE has an existing 11S kV ROW, gaps would have a minor effect.</p> <p>Capacity for new transmission projects Marginal capacity for new generation projects due to the low current capacity of the existing I IS kV & 12 kV SCE facilities.</p> <p>Provides connectivity to renewable generation while ensuring reliability. Yes, multiple SCE I IS kV facilities exist in this corridor.</p> <p>State/local/industry/developer efforts for generation to Intersect with corridor: Yes, currently queued generation would make use or this corridor."</p>

Please feel free to contact me if you have any questions about our comments.

Sincerely,

 Kathleen Yhip



*Toiyabe Chapter, Sierra Club
PO Box 8096
Reno, NV 89507*



April 8, 2019

Mitchell Leverette
Acting Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Reggie Woodruff
Energy Program Manager
Washington Office Lands and Realty Management
U.S. Forest Service

Dr. Julie A. Smith, Ph.D.
Office of Electricity
Department of Energy

via email: corridors@anl.gov

online: <http://corridoreis.anl.gov/involve/stakeholder-input/>

RE: West Wide Energy Corridors Draft Abstracts, Region 5

Dear Mr. Leverette, Mr. Woodruff, Dr. Smith:

Please accept these comments on behalf of the Executive Committee of the Toiyabe Chapter of the Sierra Club and our 5,000 members and the Bodie Hills Conservation Partnership. The Toiyabe Chapter has a deep and longstanding interest in the protection of important wildlands and wildlife in Nevada and the Eastern Sierra. We appreciate the opportunity to provide comments during the planning process. It is important to plan the best routes for transmission lines and pipelines across the west that will have the least impact on environmentally sensitive areas. The Bodie Hills Conservation Partnership is a coalition of organizations working toward permanent protection of the Bodie Hills, an American treasure with exceptional scenic, historic, recreational and ecological values.

The Toiyabe Chapter strongly supports renewable energy as a way to reduce the nation's carbon footprint and to transition away from fossil fuels in order to lower the impacts of climate change. We also recognize that the nation's electrical grid will need upgrades and changes, as the pattern of energy generation becomes more distributed and more varied. We support appropriately sited renewable energy development and appropriately sited energy transmission corridors. At the same time we must not further compromise threatened or endangered species or undermine the purpose of wilderness areas.

We ask that no corridor pass through an area that is under a protected designation such as wilderness, wilderness study areas, roadless areas with wilderness characteristics, citizen proposed wilderness areas, National Conservation Areas, ACEC lands, endangered or threatened species habitat, BLM VRM Class I, USFS National Scenic Areas, research natural areas, and areas identified by state wildlife agencies that are part of their conservation strategies.

We are concerned where transmission lines pass through priority sage grouse habitat and ask that alternatives be considered since this is a species of concern that is slowly declining. The 2017 USGS Hierarchical Population Monitoring of Greater Sage-Grouse in Nevada and California report states that populations in northeastern California and Nevada have declined by an average of 3.86 % annually from 2000-2016. The Greater Sage Grouse has not been listed as a threatened or endangered species to avoid negative impacts to Nevada's economy. However, it is a state-managed species and conservation plans are in place to protect it.

As a general rule and per the Forest Service's Greater Sage-grouse Proposed Land Management Plan Amendments of October 2018, GRSR-LR-SUA-ST-016-Standard and the BLM RDF-LR-LUA-1, it is better to place new transmission lines next to existing ones, even in sage grouse habitat. This minimizes habitat fragmentation, the sprawl of roads, the spread of cheatgrass that grows in disturbed soil to new areas, and leaves other areas free of human footprint. However, it is possible that going outside of an existing corridor is better for the sage grouse. New transmission lines will create new, fresh roads next to old ones inviting cheatgrass to move in. More importantly, it will add more towers for ravens to nest in and on which to perch. Ravens are predators of sage grouse eggs and key contributors to sage grouse population declines. Adding more perches in sage grouse habitat may be worse than creating new roads especially if the new route is in areas that already have a heavy human footprint.

BLM's November 2018 Nevada and Northeastern California Greater Sage-Grouse Proposed RMP and FEIS document states tall transmission towers are to be 2 miles from a lek and any surface disturbance is to be 3.1 miles from a lek. In some places, co-locating along an existing transmission line would violate these regulations. Both the BLM and Forest Service regulations also require perch deterrents on existing and new transmission lines in sage grouse habitat. We ask that you analyze sections of the proposed corridors that pass through sage grouse habitat to determine if it is possible to go around them or underground the transmission lines.

There are eight corridor segments in Region 5 in Nevada. One of those continues on into California. Of those, we recommend against corridors 16-24 and 18-23 because of the many different lands they cut through that have protective statuses. Here are our recommendations for the eight corridors.

Corridor 16-104

This corridor passes through priority Greater Sage Grouse habitat. Looking at the 2017 Nevada Sage Grouse Lek Counts map on slide 7, there are several active leks in this area:

(http://sagebrushco.nv.gov/uploadedFiles/sagebrushconvgov/content/Meetings/2017/2017_GSG_Lek_Counts.pdf) According to the WWEC mapping tool, there is no existing transmission line. This would be the first. Although the initial installation of the transmission lines would be disrupting to the sage grouse, the presence of the towers could create an ongoing raven problem. Undergrounding of transmission lines in this corridor should be considered.

16-104 connects to 15-104 and both 15-104 and 16-104 run through priority Greater Sage Grouse habitat. Please consider an alternative that eliminates the 16-104 Corridor and where 15-104 goes around the Greater Sage Grouse habitat to avoid and minimize impacts.

Corridor 16-24

This corridor crosses and follows the California National Historic Trails where emigrants crossed the Black Rock Desert on the Lassen-Applegate Trail. Visitors often drive to Rabbit Hole Springs on the dirt road next to the railroad tracks. Driving under large transmission towers would negatively detract from the feel of the old west and violate the NCA mission to protect the Emigrant Trails visitor experience. Putting the transmission lines underground would solve the negative visual impact. An alternative would be to move the corridor to the south where there is an existing corridor that is further out of view.

Corridor 16-17

Currently this corridor is well located as long as it isn't extended further north along the existing DC transmission line. If it were extended, it would pass through priority Greater Sage Grouse habitat.

Corridor 15-17 This corridor is well located to minimize impacts.

Corridor 17-35

This corridor follows an existing power line that is poorly sited because it passes through three BLM sage grouse population management units: the Humboldt, East, and Sonoma PMUs.

MPs 64-74 Corridor 17-35 goes through a section of VRM Class II at mileposts 65-75 where it crosses the Humboldt Range. That is not listed in the abstract and should be mentioned.

More importantly, this corridor cuts through a patch of priority Greater Sage Grouse (GRSG) habitat with active leks in the Humboldt Range at mileposts 67-72. Note the lek or breeding sites on the map on slide 7:

http://sagebrushco.nv.gov/uploadedFiles/sagebrushconvgov/content/Meetings/2017/2017_GSG_Lek_Counts.pdf

Using Google Earth, the road scar of the existing transmission line crossing the Humboldt Range is not prominent. It could be because the natural vegetation has already grown over the road or because the road is rarely traveled. Putting in new transmission lines along this corridor will create new, fresh roads. It will also add more towers for ravens to

nest in and perch on in a sage grouse breeding area. Corridor 17-35 at mileposts 64-74 could follow the Lovelock-Unionville road, be moved even further south near the open pit gold mine or go around the southern end of the Humboldt Range.

MPs 87-96, 104-115 This corridor passes through general Greater Sage Grouse habitat and breeding grounds at mileposts 87-96 in the East Range and at mileposts 104-115 where it passes through the Sonoma Range. Although the corridor in the Sonoma Range doesn't pass through priority sage grouse territory, it is passing between two large lek areas and very close to one of them. Adding more transmission lines or upgrading the existing one would negatively impact the sage grouse. Here too, the towers would provide perches and nesting places for ravens that predate on sage grouse nests. Even though there is an existing transmission line, new lines could be routed around the sage grouse habitat and avoid some of these conflicts.

Another alternative that should be considered is to bury the transmission lines along this corridor where it cuts through sage grouse habitat. The disturbed surface could be reseeded with native plant species to prevent cheatgrass taking hold. Sage grouse are ground nesting birds. It is unknown how buried electrical lines will impact them if they are living and nesting on top of them.

Corridors 17-18 and 18-224. We agree these corridors are well placed to minimize impacts.

Corridor 18-23

We oppose the Nevada part of proposed corridor 18-23 that goes through the roadless area between the Bodie Hills and the Wassuk Range. Although this corridor follows an existing DC transmission line, installation of a larger, new line would negatively impact the Bi-state Sage Grouse. The Bi-state Sage Grouse (BSSG) is a distinct population segment of the Greater Sage Grouse and it is a candidate for the threatened species status under the Endangered Species Act. It is managed under the 2012 BSSG Conservation Action Plan. The BSSG inhabit a relatively small territory so it is especially important that the habitat is disturbed as little as possible. Raven predation is the top reason for the decline in the BSSG populations. Transmission towers provide nesting and perch opportunities for ravens. The plan requires anti-perch techniques to reduce raptor and raven perches. It also requires that power lines not be located within two miles of breeding habitat or run through suitable nesting habitat. As part of the Conservation Action Plan, the Humboldt-Toiyabe Forest Service amended their land use plan for the BSSG to establish 4 miles of buffer around existing leks and identification of seasonal habitat restrictions for anthropogenic activities. Infrastructure is ranked as a high threat to the Mount Grant PMU in the plan's risk table.

MP 32-78 This section of the corridor goes through the Bi-state Sage Grouse Mount Grant Population Management Unit (PMU). The Mount Grant PMU has active breeding sites and good sage grouse habitat. It is adjacent to the Bodie Hills PMU, which has the largest sub-population of the species. It is also the "stronghold". The difference between the Bodie Hills PMU and the adjacent Mount Grant PMU is jurisdictional—one is in California and the other is in Nevada. Birds travel from one PMU to the other. Lek sites are mating/breeding sites and are shown here:

http://sagebrushco.nv.gov/uploadedFiles/sagebrushconvgov/content/Meetings/2017/2017_GSG_Lek_Counts.pdf

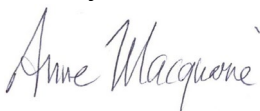
The 2017 BSSG Progress Report states that there was a 19% decrease in the Mount Grant population in 2016 likely due to the drought from 2011-2015 followed by a heavy winter in 2016-17.

MP41 A map in the 2017 BSSG Progress Report shows high utilization by the sage grouse at the southern base of Bald Mountain and very close to the corridor at milepost 41. The BSSG habitat layer of the WWEC mapping tool shows sage grouse habitat in this area as well. However, the CHAT layer of the WWEC mapping tool does not. While the WWEC tools are good, they may not be as accurate as field data. To say a corridor is well sited because it is not in a sensitive area by a few yards, doesn't consider a margin of error in the mapping tool. Any new towers or power lines cutting through the Mount Grant PMU puts the BSSG at risk just by providing perches for the ravens, let alone the disruption during installation. The towers would need to be a significant distance away from the sage grouse to not have an impact.

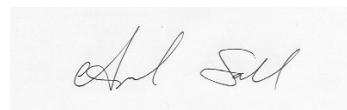
MP52-62 The proposed corridor goes by Cedar Hill at MP62. Cedar Hill has terraces that show the remnant lake levels of the Ice Age Mono Lake. Mono Lake has been a lake for the past 3 million years. The terraces provide information about its history. All construction would need to steer clear of them.

We also recommend the California part of 18-23 be de-designated as it goes through many areas with special designations including the newly designated Alabama Hills National Scenic Area. Parts of it also go through roadless areas that have been identified by the public as candidates for wilderness and the public has asked that the revised Inyo National Forest Management Plan recommend them as wilderness: Excelsior, Pizona, Huntoon, Dexter Canyon, Glass Mountains. The final ROD has not been made. It goes through fragile biological, cultural and recreational resources that make this corridor problematic for future transmission lines.

Thank you,



Anne Macquarie, Chair

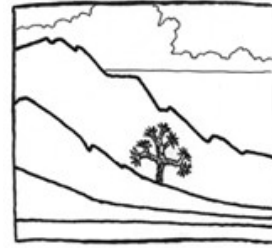


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Bodie Hills Conservation Partnership



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Basin and
Range Watch

April 8, 2019

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Submitted electronically via blm_wo_368corridors@blm.gov

**Re: Comments on Corridor Abstracts for Regions 4, 5 and 6 under West-wide
Energy Corridor Regional Review**

Dear Mr. Leverette, Mr. Smith and Dr. Smith:

Please accept the following comments from Western Watersheds Project and Basin and Range watch on the Regions 4, 5 and 6 corridor abstracts for the regional reviews of the Section 368 West-wide Energy Corridors (WWEC).

Western Watersheds Project (WWP) is a conservation nonprofit with more than 5,000 members and followers, that works to protect and conserve the public lands, wilderness, wildlife, and natural resources of the American West through education, scientific study, public policy initiatives, and litigation. WWP has offices and staff in California, Nevada, and other western states. The management of public lands and wildlife is important to WWP members, supporters, and staff, who appreciate and use these resources for a variety of reasons and will continue to do so into the future.

Basin and Range Watch is a 501(c)(3) non-profit working to conserve the deserts of Nevada and California and to educate the public about the diversity of life, culture, and history of the ecosystems and wild lands of the desert. Federal and many state agencies are seeking to open up millions of acres of unspoiled habitat and public land in our region to energy development. Our goal is to identify the problems of energy sprawl and find solutions that will preserve our natural ecosystems, open spaces, and quality of life for local communities. We support energy efficiency, better rooftop solar policy, and distributed generation/storage alternatives, as well as local, state and national planning for wise energy and land use following the principles of conservation biology. We have visited the sites along the proposed utility corridors in Nevada and California. We have taken photos of the region, hikes on the site and have observed unique flora and fauna on the site.

Our organizations have a long history of engagement in the Section 368 West-wide Energy Corridors planning process. In 2012, WWP was part of the litigation settlement agreement¹ in which the Bureau of Land Management (BLM), the U.S. Forest Service (USFS) and the Department of Energy (DOE) (collectively, “the Agencies”) and other stakeholders agreed to, among other things, reevaluate energy corridor designations and undertake reviews of such corridors.

Basin and Range Watch, although not party to this litigation, has also provided extensive comments on proposed corridors in Nevada especially, with extensive experience visiting these areas on the ground.

Specifically in our comment, we provide detailed information about why the proposed 18-224 corridor through western Nevada should be deleted because of many high quality resource conflicts not addressed elsewhere. Proposed Corridor 18-224 is not an acceptable alternative to other routes, such as 18-23.

Designated Leasing Areas for Renewable Energy

The route is partially made to accommodate the three Solar Energy Zones under the Solar Programmatic Environmental Impact Statement. But solar developers have expressed disinterest in these solar leasing areas due to competitive leasing and high mitigation requirements. This has caused them to prefer Variance Areas. Therefore, 18-224 is not needed.

¹“Wilderness” Society et al. v. U.S. Dep’t of Interior, No. 3:09-cv-03048 JW (N.D. Cal.) (July 3, 2012).

For example, recent solar project proposals have fallen into Variance Areas, such as the proposed Yellow Pine Solar Project in Pahrump Valley, Clark County, Nevada; Gemini Solar Project in Clark County, Nevada; and the Sandstone Solar project in Nye County, Nevada (since withdrawn). All these recent solar projects fall far outside any approved Solar Energy Zones.

The Miller's Designated Leasing Area is a prime example of why the Designated Leasing Areas (DLA) have mostly failed. The now cancelled 22,000-acre Sandstone Solar Project was proposed to be built adjacent to the Miller's DLA. The project would have built 8 additional power towers next to the existing Crescent Dunes Solar Project, in Variance Land outside the DLA, and right along the border of the DLA. The developer, SolarReserve, did not want their project in the DLA due to competitive leasing issues and the high cost of mitigation. They chose Variance Lands instead.

Resource Conflicts of Proposed Corridor 18-224

The Oasis Valley near Beatty, Nye County, Nevada, has a good, healthy desert tortoise population. This can be referenced from the BLM Tonopah Field office from the Environmental Assessment for the Tolicha Peak transmission project in 2012 when 45 tortoises were found in a short survey for this power line in the area. What are the impacts to the Federally Threatened Mojave Desert tortoise (*Gopherus agassizii*) from new transmission lines in a relatively undisturbed habitat? Ravens (*Corvus corax*) commonly nest on transmission lines, allowing them to access relatively flat geography and valleys where tortoise populations thrive. Ravens are one of the largest threats to tortoise, as they prey on both juvenile tortoises and adults, and can reduce recruitment. How will transmission lines through tortoise habitat be avoided or mitigated?

Oasis Valley is a hotspot for biodiversity, with The Nature Conservancy purchasing four large properties to conserve and restore, in order to maintain biological resources in the area. Sensitive species locally include the Amargosa toad (*Anaxyrus nelsoni*), Oasis Valley speckled dace (*Rhinichthys osculus* ssp.), and spring snails (Family Hydrobiidae). One spring snail may be a newly-surveyed spring and pond system may have a spring snail (possibly *Tryonia*) that has been petitioned for listing under the Endangered Species Act (Nevada Department of Wildlife, pers. comm. 2018). The proposed utility corridor would cross the Amargosa River very close to this spring system, which has been purchased by The Nature Conservancy to be protected as a conservation area.

A new breeding Bell's vireos (*Vireo bellii*) has been discovered and encouraged through riparian restoration. Potential breeding habitats for Federally Endangered Southwestern willow flycatcher (*Empidonax traillii extimus*), and Western yellow-billed cuckoo (*Coccyzus americanus* Distinct Population Segment) are also present with ongoing restoration work of riparian and wetland habitat. How will large transmission lines impact these species and current habitat restoration projects?

The Oasis Valley in Nevada lies along the Amargosa River and has numerous springs, marshes, riparian areas, and meadow grasslands with rare plants. It is a birding

hotspot as well, for waterbirds and Neotropical migratory birds, as well as resident and breeding desert species. The area supports a high number of nesting golden eagles (*Aquila chrysaetos*) in the surrounding mountain ranges. A transmission corridor through this area would have large impacts to bird life, as well as potentially increase raven nesting. Ravens are predators on bird nests and desert tortoises.

The corridor goes right over the Montezuma Range. That topography is steep and is forested with pinyon pine and juniper forest. It creates a wildfire risk. Transmission lines caused deadly California wildfires. The Montezuma Range has seen a big drought and this could make the wildfire risk even worse. New roads would have to be built. This would create invasive weeds which will also increase fire risk.

The corridor would go right next to scenic Mt. Jackson and east of Mt. McGruder, which is habitat for the Bi-State Distinct Population Segment of sage-grouse (*Centrocercus urophasianus*), currently undergoing status review for listing under the Endangered Species Act by US Fish and Wildlife Service. What are the impacts of proposed large high-voltage transmission lines to sage-grouse? The corridor would also create a huge visual impact to the region.

The map for the corridor does not even include Walker Lake. The corridor would endanger raptors, water birds and all migrating birds at Walker Lake. Walker Lake has also been recognized as an Important Bird Area. How would a proposed transmission line corridor impact water birds along the eastern and northern edges of Walker Lake? How would a proposed corridor impact Lahontan cutthroat trout (*Oncorhynchus clarkia henshawi*) in the Walker River?

Rural Communities Impacted

The corridor would be in the vicinity of Yerington. Would private property need to be seized? Any potential wildfire caused by a new transmission project would damage property and endanger lives. How would a new transmission line impact property values?

The Nevada Test and Training Range proposes to expand on the corridor route east of Oasis Valley Will the corridor be grandfathered into the expansion or will it be moved west? How would this impact the private properties in the region? Will eminent domain be used?

Groundwater Resources

Construction of a transmission line near Gold Point would require water use for dust mitigation. Gold Point has a very limited aquifer and this could add to potential draw down.

This review should list all the wells and water sources from which construction dust control water would come from.

Alternatives

Some commenters have suggested using this route as an alternative to 18-23 in Owens Valley. This would just move those impacts to Nevada and it would not be technologically practical to move a California corridor eastward. The many resource conflicts listed above make this an unviable alternative.

Cumulative Impacts

Cumulative avian impacts would occur in the Big Smoky Valley due to the close proximity to the Crescent Dunes Solar Project which causes bird mortality for a variety of species. The power tower kills many birds and mortality from a new powerline would add to this impact.

How many new wind, solar and natural gas projects would be planned for this transmission line corridor? A predicted number of projects based on megawatt capacity should be included in this analysis.

Another cumulative impact that should be reviewed is the military expansion proposed over approximately 18,000 acres of BLM land near Beatty containing a proposed Joshua Tree Area of Critical Environmental Concern, historic objects, and recreational trails.

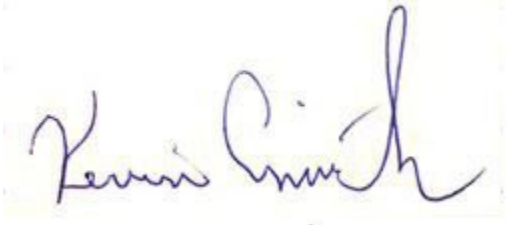
Thank you for your attention to these issues. Please contact us if you have questions or need clarifications about these comments.

Thank you,

Laura Cunningham

A handwritten signature in blue ink, appearing to read 'Laura Cunningham', written over a light blue horizontal line.

California Director
Western Watersheds Project
Cima CA 92323
Mailing: PO Box 70
Beatty NV 89003
775-513-12800

A handwritten signature in blue ink that reads "Kevin Emmerich". The signature is written in a cursive style with a large, looped initial 'K'.

Kevin Emmerich
Co-Founder
Basin and Range watch
PO Box 70
Beatty NV 89003
775-553-2806

From: [Fox, Laura R.](#)
To: [White, Ellen M.](#); [Wescott, Konstance L.](#)
Subject: Corridors Comment
Date: Wednesday, February 20, 2019 8:53:00 PM

From: Kevin Bannon
Sent: Wednesday, February 20, 2019 7:58 PM
To: Fox, Laura R. Corridors@anl.gov
Cc: 'Bluma, Jeremy' <jbluma@blm.gov>; rwoodruff@fs.fed.us;
Subject: RE: Section 368 Energy Corridors Regional Review - Regions 4, 5, and 6 Draft Energy Corridor Abstracts Released

Hi

While understanding what is driving this policy I am writing to criticize the scope. Yes measuring environmental attributes and managing impacts of any project or existing infrastructure is important. Likewise planning for efficiency is too. So while it is Ok to make these things a focus of this project it is wrong to not at all include several other matters.

These pieces of the national electrical grid and petroleum based fuel supply system are national security issues. They also happen to be essential for life. Indeed any failure of these systems will almost by definition result in incredible disruption followed by risk of needless and significant life loss. There is no environmental impact greater than that. These facts need to be front and center in any discussion about existing and future corridors.

On top of that, not only is our energy infrastructure shockingly easy to disrupt, it is not at all resilient, lacking anywhere near the needed redundant backup paths. The need to remedy that needs to be front and center also.

Certainly Congress and the executive branch should be working harder to address the flaws and vulnerabilities. That needs to be discussed candidly also. Need not remind you the dire consequences a large community cut off for energy for long periods of time. Simply look back a couple of years at the example of Puerto Rico. In fact it is sad that someone like me is mentioning this and it is not already being taken care of...makes one wonder...

Please find a way to make sure these points are no longer neglected and properly addressed in this study. Thank you.

From: Fox, Laura R
Sent: Wednesday, February 20, 2019 1:37 PM
To: Corridors@anl.gov
Cc: Bluma, Jeremy <jbluma@blm.gov>; rwoodruff@fs.fed.us;
Subject: Section 368 Energy Corridors Regional Review - Regions 4, 5, and 6 Draft Energy Corridor Abstracts Released

The Bureau of Land Management (BLM), the U.S. Forest Service (USFS), and the U.S. Department of Energy (DOE) have released Regions 4, 5, and 6 draft corridor abstracts, available on the [Regions 4, 5, and 6 Regional Review](#) page of the West-wide Energy Corridor website, and are requesting [input](#) through April 8, 2019. A webinar will be held on February

27, 2019 – Please register as soon as possible via the following URL.

Regions 4, 5 and 6 Webinar on February 27, at 11 am – 12:30 pm MST

Call-in Number: 1-888-850-4523; Passcode: 242705#

Registration URL: https://anl.adobeconnect.com/corridors_feb27/event/registration.html

Webinar Agenda

Introductory remarks

Energy corridor regional review process overview

Mapper overview

Abstract overview

Questions

Closing remarks

For More Information

If you have questions or need more information, visit the West-wide Energy Corridor Information Center at <http://corridoreis.anl.gov> or contact the West-wide Energy Corridor project team at Corridors@anl.gov.

Please forward this message to any party you feel may be interested in Section 368 West-wide Energy Corridors.

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