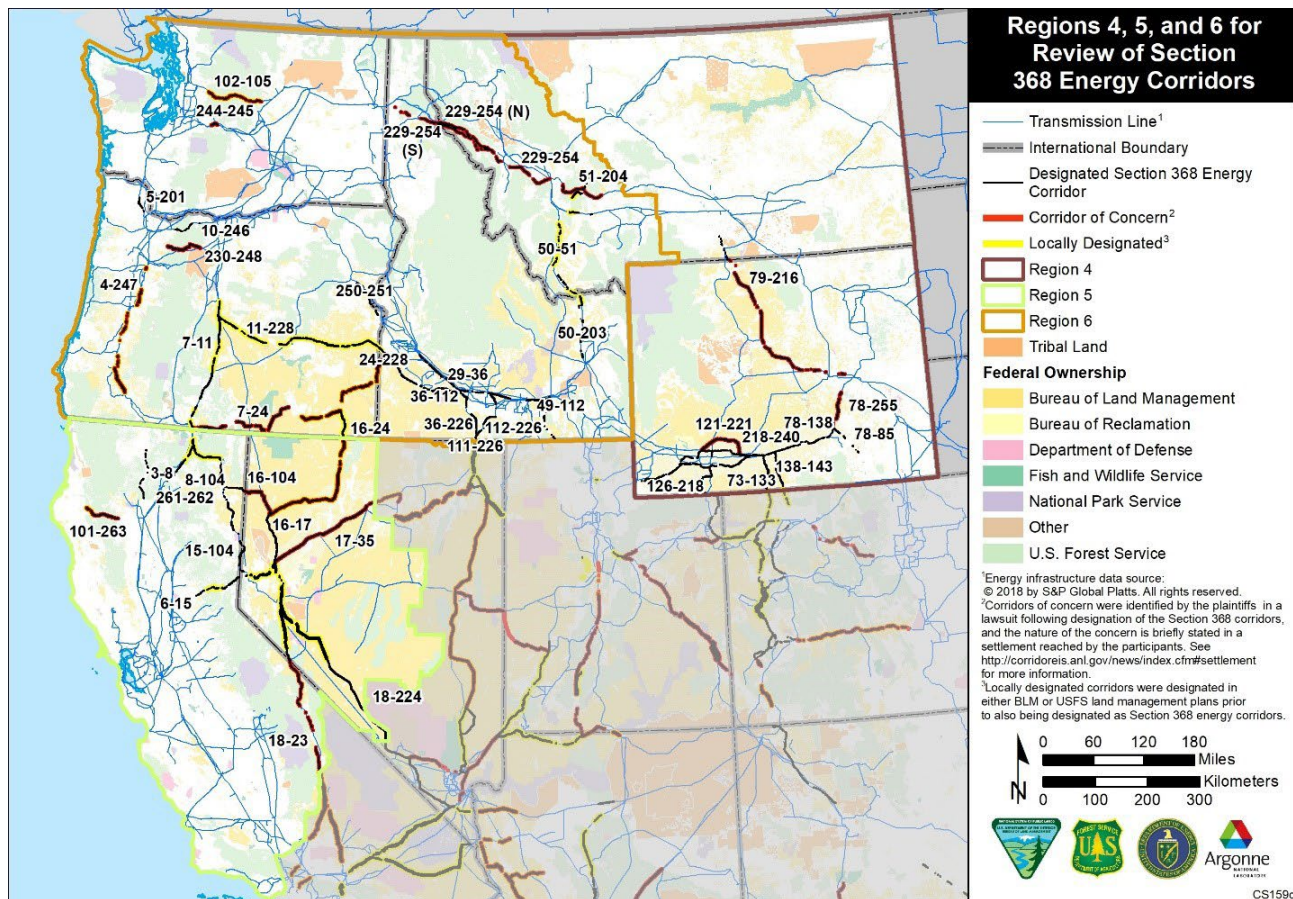




REGIONS 4, 5, & 6: STAKEHOLDER INPUT - REPORT

Section 368 Energy Corridor Regional Review



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Region 4, 5 & 6 Stakeholder Input on Regions 4, 5, & 6 Report

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

The Region 4, 5, & 6 Report was released to the public on November 2, 2020. Stakeholders were given 90 days to provide input; the public input period closed January 31, 2021. All written stakeholder input received within that timeframe is provided in this document. This input was used to develop the final 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 there were 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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Contents

10045 Jean Publieee	1
10046 Jean Publieee.....	2
10047 Montana Department of Transportation	3
10048 Bureau of Land Management... ..	4
10049 Inyo County	5
10050 Concerned Citizens of Montana	8
10051 Walker Basin Conservancy	12
10052 Rich Fairbanks	15
10053 EarthGrid PBC.....	16
10054 Kim Anderson.....	17
10055 Joan Stephens	18
10056 Susan Crampton	19
10057 Elizabeth Eszterhas.....	20
10058 350 Eugene.....	21
10059 James Neu... ..	22
10060 Karen Perkins	23
10061 Selena Blick.....	24
10062 Robert Fisetete.....	25
10063 Mason Kennedy	27
10064 Karen Steenhof... ..	28
10065 James Neu.....	80
10066 Owyhee County.....	81
10067 Thomas & Michelle Meyers	86
10068 Southern California Edison	87
10069 Bark and Columbia Riverkeeper.	116
10070 Pacific Crest Trail Association	123
10071 James Ogsbury	127
10072 The Wilderness Society.....	130
10073 Gensis Alkali, LLC	134
10074 State of Idaho	136
10075 Wyoming Department of Environmental Quality.....	138
10076 Oregon Natural Desert Association.....	145
10077 Defenders of Wildlife	154
10078 SER Conservation District... ..	187
10079 Friends of the Inyo.....	190
10080 Oregon Department of Fish and Wildlife	200
10081 Laura M Ohanian.....	209
10082 American Clean Power Association.....	210
10083 Cascadia Wildlands.....	218

10084 Connie Holloway	222
10085 Basin and Range Watch.....	224
10086 Mono County.....	231
10088 Robyn Thompson	246
10089 Robyn Thompson	289
10090 Audubon California, Audubon Rockies, Bark, California Wilderness Coalition, Center for Biological Diversity, Defenders of Wildlife, Friends of Nevada Wilderness, Friends of the Inyo, Idaho Conservation League, KS Wild, National Audubon Society, Natural Resources Defense Council, Oregon Natural Desert Association, Soda Mountain Wilderness Council, The Wilderness Society, The Wildlands Conservancy, Wyoming Wilderness Association... ..	369
Cascadia Wildlands.....	408

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>

Sent: Monday, November 2, 2020 3:03 PM

To: mail_corridoreiswebmaster@anl.gov; mail_corridoreisarchives@anl.gov; Corridoreisarchives@anl.gov

Subject: Regions 4, 5, and 6 Report Input [10045] - Webmaster Receipt

Thank you for your input, jean publicee.

The tracking number that has been assigned to your input is **10045**. Please refer to the tracking number in all correspondence relating to your input.

Date: November 02, 2020 15:02:20 CST

First Name: jean

Last Name: publicee

Email: jeanpublic1@gmail.com

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

Input

i do not support any part of this policy of this us agency. i fidn that this agency works to the detriment of american people. it makes laws tha throw wild horses off the national land and brings in cattle that are environmentally destructive and bring sin endles mines on our national land. the profiteers love to work with the govt bnecause the govt gives them cheap cheap rates that they cant get anywhere else in america. so they get a bargain to destroy our national lands. this agency is the worst of ht worst. they have no compassion for saving earth and its environmenta at all. they are filled with money as their only objercvtivre. you will destroy earth with this sole focus on money. our national lands are being destroyed by blm.this projecft is an indicator of that same focus on money and destruction for money. stop it now.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Monday, November 2, 2020 3:03 PM
To: mail_corridoreiswebmaster@anl.gov; mail_corridoreisarchives@anl.gov
<Corridoreisarchives@anl.gov>
Subject: Regions 4, 5, and 6 Report Input [10046] - Webmaster Receipt

Thank you for your input, jean publicee.

The tracking number that has been assigned to your input is **10046**. Please refer to the tracking number in all correspondence relating to your input.

Date: November 02, 2020 15:02:20 CST

First Name: jean

Last Name: publicee

Email: jeanpublic1@gmail.com

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

Input

i do not support any part of this policy of this us agency. i fidn that this agency works to the detriment of american people. it makes laws tha throw wild horses off the national land and brings in cattle that are environmentally destructive and bring sin endles mines on our national land. the profiteers love to work with the govt bnecause the govt gives them cheap cheap rates that they cant get anywhere else in america. so they get a bargain to destroy our national lands. this agency is the worst of ht worst. they have no compassion for saving earth and its environmenta at all. they are filled with money as their only objercvtivre. you will destroy earth with this sole focus on money. our national lands are being destroyed by blm.this projecft is an indicator of that same focus on money and destruction for money. stop it now.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Monday, November 9, 2020 9:42 AM
To: [mail_corridoreiswebmaster](mailto:mail_corridoreiswebmaster@anl.gov) <corridoreiswebmaster@anl.gov>; [mail_corridoreisarchives](mailto:mail_corridoreisarchives@anl.gov) <Corridoreisarchives@anl.gov>
Subject: Regions 4, 5, and 6 Report Input [10047] - Webmaster Receipt

Thank you for your input, Jean Riley.

The tracking number that has been assigned to your input is **10047**. Please refer to the tracking number in all correspondence relating to your input.

Date: November 09, 2020 09:42:01 CST

First Name: Jean
Last Name: Riley
Email: jriley@mt.gov

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

Input

The Montana Department of Transportation (MDT) has reviewed the Section 368 Energy Corridors Review: Regions 4, 5, & 6 Report. We have the following comments:
No installation of permanent structures will be allowed within MDT right-of-way.

No permanent or temporary access from Interstates (I-15 or I-90) right-of-way.

Any crossings of MDT roadway must be permitted by MDT. There will be height requirements.

Thank you for the opportunity to comment on the Section 368 Energy Corridors Review: Regions 4, 5, & 6 Report and project.

If you have any questions, please contact by email.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: [Region4Corridors](#)
To: [White, Ellen M.](#)
Subject: FW: Regions 4, 5, and 6 Report Input [10048] - Webmaster Receipt
Date: Wednesday, December 9, 2020 12:33:31 PM

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Wednesday, December 2, 2020 11:23 AM
To: mail_corridoreiswebmaster@anl.gov; mail_corridoreisarchives@anl.gov
Subject: Regions 4, 5, and 6 Report Input [10048] - Webmaster Receipt

Thank you for your input, Jim Regan-Vienop.

The tracking number that has been assigned to your input is **10048**. Please refer to the tracking number in all correspondence relating to your input.

Date: December 02, 2020 11:22:35 CST

First Name: Jim
Last Name: Regan-Vienop
Email: jreganvienop@blm.gov

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

Input

Report section 2.2.1 starting on report page 23, GRSG-Approved Resource Management Plan Amendments (ARMPAs), is out of date. The report notes that the BLM March 2019 RODs amended the 2015 ARMPAs. Those RODs were challenged in court, see Bullock ID case, and a Preliminary Injunction issued that requires BLM to continue implementing the 2015 ARMPAs, not the 2019 amendments, until the court changes things. A note should be added that for the foreseeable future the 2015 ARMPAs guide are the land use plans in effect for the BLM.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: [Region4Corridors](#)
To: [White, Ellen M.](#)
Subject: FW: Regions 4, 5, and 6 Report Input [10049] - Webmaster Receipt
Date: Thursday, January 21, 2021 4:05:39 PM
Attachments: [ID_10049_InyoCountycomments1823Corridor12152020.pdf](#)

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Thursday, January 7, 2021 11:42 AM
To: mail_corridoreiswebmaster@anl.gov; mail_corridoreisarchives@anl.gov
Subject: Regions 4, 5, and 6 Report Input [10049] - Webmaster Receipt

Thank you for your input, Cathreen Richards.

The tracking number that has been assigned to your input is **10049**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 07, 2021 11:41:31 CST

First Name: Cathreen
Last Name: Richards
Email: crichards@inyocounty.us

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

Input

The Inyo County Board of Supervisors respectfully submits the attached comments.

Thank you

Attachments

Inyo County comments 18 23 Corridor 12 15 2020.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



January 5, 2021

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

Re: West-wide Energy Corridor Region 4, 5 and 6 Draft Report

On behalf of the Inyo County Board of Supervisors, I would like to thank the Agencies for the opportunity to comment on the Draft Report for Regions 4, 5 and 6 (specifically Region 5) of the Section 368 Energy Corridors. We believe that coordination is of the utmost importance in this planning process and appreciate the recent coordination between the Bureau of Land Management and the County. We hope that this continues as this project is completed and with any future projects related to it.

In response to the Report, with respect to Region 5, we are happy to see Inyo County's Renewable Energy General Plan Amendment's (REGPA) restriction on additional transmission, beyond what is outlined within it, included in the Local Initiatives and Potential Future Development Section. We are also pleased to find references to corridor locations at or near Solar Energy Development Areas (SEDA) as identified in the REGPA, particularly Rose Valley and Owens Lake. We are hopeful that the REGPA policies addressing additional transmission are adhered to as the development of those policies went through an extensive public input process and reflect Inyo County citizens' preferences. Any plans to convey electricity from the east (e.g. 18-224 corridor) to tie into the 18-23 corridor should not be pursued as this would likely require more capacity than the REGPA sets forth.

We are relieved to see on the Summary of Potential Revisions, Deletions and Additions Table, the consideration of shifting the 18-23 Corridor to the east from mileposts 86-216. As we commented previously, a section of this, between mileposts 184-192, runs through the newly designated Alabama Hills National Scenic Area (NSA). A tremendous amount of hard work, that took years by a local grassroots effort, was put in to get this designation. Transmission lines running through the Alabama Hills NSA would not be compatible with the stated purpose of the NSA and would be an affront to the efforts in getting the designation. We support the use of the existing infrastructure located to the east to keep transmission lines off the west side of Highway 395. Visual resources are extremely important to the people who live in Inyo County and to the millions of annual visitors to the County. Impacts to these resources could have significant, negative, results on the County's tourist based economy.

Sincerely,

A handwritten signature in blue ink that reads "Jeff Griffiths". The signature is fluid and cursive, with the first name "Jeff" being larger and more prominent than the last name "Griffiths".

Jeff Griffiths, Chairperson
Inyo County Board of Supervisors

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

From: [Region4Corridors](#)
To: [White, Ellen M.](#)
Subject: FW: Regions 4, 5, and 6 Report Input [10050] - Webmaster Receipt
Date: Thursday, January 21, 2021 4:05:48 PM
Attachments: [ID_10050_368EnergyCorridorsComments12_16_20201.docx](#)

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Wednesday, January 13, 2021 2:22 PM
To: mail_corridoreiswebmaster@anl.gov <mail_corridoreiswebmaster@anl.gov>; mail_corridoreisarchives@anl.gov <mail_corridoreisarchives@anl.gov>
Subject: Regions 4, 5, and 6 Report Input [10050] - Webmaster Receipt

Thank you for your input, Marie Garrison.

The tracking number that has been assigned to your input is **10050**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 13, 2021 14:21:38 CST

First Name: Marie
Last Name: Garrison
Email: feelyranch@aol.com

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

Input

[Blank]

Attachments

368 Energy Corridors Comments 12_16_2020 (1).docx

Questions? Contact us at: corridoreiswebmaster@anl.gov



Concerned Citizens Montana

Voices for honest energy.

December 16, 2020

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 many acres 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
 - 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. In our area of southwestern Montana, there are substantial acres of continuous public land on 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: [Region4Corridors](#)
To: [White, Ellen M.](#)
Subject: FW: Regions 4, 5, and 6 Report Input [10051] - Webmaster Receipt
Date: Thursday, January 21, 2021 4:05:57 PM
Attachments: [ID_10051_WBC_Regions456_input.docx](#)

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Friday, January 15, 2021 8:33 PM
To: mail_corridoreiswebmaster@anl.gov; mail_corridoreisarchives@anl.gov
Subject: Regions 4, 5, and 6 Report Input [10051] - Webmaster Receipt

Thank you for your input, Jessica Abbott.

The tracking number that has been assigned to your input is **10051**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 15, 2021 20:32:35 CST

First Name: Jessica
Last Name: Abbott
Email: jessica.abbott@walkerbasin.org

Are you submitting input on the behalf of an organization? Yes
Organization: Walker Basin Conservancy

Input

[Blank]

Attachments

WBC_Regions456_input.docx

Questions? Contact us at: corridoreiswebmaster@anl.gov

Regions 4, 5, and 6 Report Input

Thank you for the opportunity to provide input on the West-Wide Energy Corridors Renewal Review. The Walker Basin Conservancy is a non-profit whose mission is to restore Walker Lake, while also playing a major role in conservation and restoration efforts throughout the Walker Basin. The Walker Basin Conservancy would like to raise several concerns and provide recommendations for potential resolutions regarding plans for corridors 17-18, 18-23, & 18-224 within the Walker Basin.

Comments on corridor 17-18

1. The designated corridor 17-18 crosses the Walker River at milepost (MP) 49 which may adversely impact yellow-billed cuckoos. Yellow-billed cuckoos, a federally listed threatened species, have been detected in riparian areas along the Walker River up and downstream from the designated corridor (NDOW Wildlife Biologist M. Enders pers. Comm.). We recommend consulting with NDOW and USFWS to ensure that any development within the riparian corridor will not adversely impact yellow-billed cuckoos or their habitat.

Comments on corridor 18-23

1. The designated path of the 18-23 corridor goes directly through critical habitat for the Bi-State Sage Grouse (BSSG), including known breeding locations. The corridor overlaps with BSSG critical habitat between MPs 38-49, 55-78, 80-88, and 94-103. Transmission lines adversely impact BSSG populations by reducing nesting and brooding success in areas within 2.8 km of the transmission line¹. The Walker Basin Conservancy recommends ensuring the corridor be located at least 2.8 km away from any active BSSG leks to mitigate impacts on breeding success. We also suggest consulting with USFWS and NDOW to avoid adversely impacting BSSG populations in the area.
2. The designed corridor 18-23 runs adjacent to the Walker River State Recreation Area (WRSRA) between MPs 12-50, specifically near MPs 23-30. Overhead transmission lines in MPs 23-30 will create a visual impact that could impact recreation at WRSRA.
3. The Walker River State Recreation Area (WRSRA) is not shown on the Section 368 Energy Corridor Mapping Tool for corridor 18-23. WRSRA should appear as state land under the Surface Management Agency layer. We recommend working with WRSRA to analyze potential impacts of the proposed corridor on park operations. We also request that the Mapping Tool be updated to include a layer showing WRSRA.
4. It is unclear why the width of the designed corridor 18-23 varies considerably (1,320 to 10,560 ft) across agency jurisdictions. We advocate keeping the width minimal, no greater than 1,320 ft, throughout the length of the corridor to reduce negative impacts on wildlife and recreation. We also recommend shifting the corridor in some places to better align with existing infrastructure/rights-of-way (e.g. MPs 38-42 and 54-57).

Comments on corridor 18-224

1. Walker Basin Conservancy is working to restore Walker Lake by increasing water inflows to the lake by acquiring water rights from willing sellers in the Walker Basin. These efforts will increase the surface area and elevation of Walker Lake. We recommend that the designed corridor 18-224 placement accounts for anticipated changes in water depth/lake surface area coverage and analyzes impacts from this corridor on the lake in the scenario where the lake is significantly higher in elevation and surface area. Potential areas of concern include MPs 21-36.
2. Designed corridor 18-224 and undesignated corridor segment MP 20 to MP 27 run adjacent to and in the Walker River Reservation. We recommend consulting with the tribe regarding impacts of the proposed route.

From: [Region4Corridors](#)
To: [White, Ellen M.](#)
Subject: FW: Regions 4, 5, and 6 Report Input [10052] - Webmaster Receipt
Date: Thursday, January 21, 2021 4:06:12 PM

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Tuesday, January 19, 2021 1:29 PM
To: mail_corridoreiswebmaster@anl.gov; mail_corridoreisarchives@anl.gov
<Corridoreisarchives@anl.gov>
Subject: Regions 4, 5, and 6 Report Input [10052] - Webmaster Receipt

Thank you for your input, Rich Fairbanks.

The tracking number that has been assigned to your input is **10052**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 19, 2021 13:28:50 CST

First Name: Rich
Last Name: Fairbanks
Email: richfairbanks3@gmail.com

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

Input

The west is too hot, too dry and has too few fire crews to allow more of these pipelines. We ought to be prosecuting petroleum executives, not enriching them.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: [Region4Corridors](#)
To: [White, Ellen M.](#)
Subject: FW: Regions 4, 5, and 6 Report Input [10053] - Webmaster Receipt
Date: Thursday, January 21, 2021 4:06:19 PM

From: corridoreiswebmaster@anl.gov <corridoreiswebmaster@anl.gov>
Sent: Tuesday, January 19, 2021 1:54 PM
To: mail_corridoreiswebmaster@anl.gov; mail_corridoreisarchives@anl.gov
Subject: Regions 4, 5, and 6 Report Input [10053] - Webmaster Receipt

Thank you for your input, Troy Helming.

The tracking number that has been assigned to your input is **10053**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 19, 2021 13:53:37 CST

First Name: Troy
Last Name: Helming
Email: troy@earthgrid.io

Are you submitting input on the behalf of an organization? Yes
Organization: EarthGrid PBC

Input

We like the initial designations "as is" as shown in the report. How do we submit an application to put an underground transmission line along one or more of the corridors, in CA, UT, ID, CO and WY?

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10054] - Webmaster Receipt
Date: Friday, January 22, 2021 5:32:31 PM

Thank you for your input, Kim Anderson.

The tracking number that has been assigned to your input is **10054**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 22, 2021 17:32:18 CST

First Name: Kim
Last Name: Anderson
Email: kinnoreen@gmail.com

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

Input

It is imperative for us to address the climate crisis that we should've responded to 70 years ago. in 1979 President Carter put solar panels on the WH - immediately after the oil and gas industry put Reagan into office and they have been receiving subsidies of over 20 billion a year of taxpayers money. I want our tax money used for renewable energy that creates good jobs and NOT at the expense of our planet and our grandchildren's futures.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10055] - Webmaster Receipt
Date: Friday, January 22, 2021 8:54:48 PM

Thank you for your input, Joan Stephens.

The tracking number that has been assigned to your input is **10055**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 22, 2021 20:54:30 CST

First Name: Joan
Last Name: Stephens
Email: joantaves@gmail.com

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

Input

I urge you to deny permits for the Warm Springs Corridor 230-248 portion of the Trail West Pipeline. We need to move away from fossil fuels and protect our water supplies from toxic fracking chemicals. This is the wrong direction for the preservation of our health and the health of the planet.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10056] - Webmaster Receipt
Date: Friday, January 22, 2021 10:04:02 PM

Thank you for your input, Susan Crampton.

The tracking number that has been assigned to your input is **10056**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 22, 2021 22:03:44 CST

First Name: Susan
Last Name: Crampton
Email: scrampton@methownet.com

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

Input

This public comment is submitted to decision-makers for the Proposed Trail West pipeline. Wrong project in the wrong place in the wrong time. Don't do it. Susan Crampton, born and raised in Oregon 1947.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10057] - Webmaster Receipt
Date: Saturday, January 23, 2021 9:08:53 AM

Thank you for your input, Elizabeth Eszterhas.

The tracking number that has been assigned to your input is **10057**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 23, 2021 09:08:34 CST

First Name: Elizabeth
Last Name: Eszterhas
Email: myjavelina@hotmail.com

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

Input

As a parent, a resident of the pacific northwest, and just a human being, I deeply oppose this pipeline through western forest lands. The time is past to build projects such as this, which would lock us into using polluting, climate warming fracked gas. Destruction of even one more inch of our precious remaining wild lands for this project is intolererable. The racist citing of this pipeline near already disadvantaged tribal homelands is also disgraceful. My god, do these companies have no shame? The people of the northwest have rejected several different portions of this project. Please consider the irreversible effect this project would have on our children and their childern and their children, and reject this abomination!

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10058] - Webmaster Receipt
Date: Saturday, January 23, 2021 9:13:23 AM

Thank you for your input, Debra McGee.

The tracking number that has been assigned to your input is **10058**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 23, 2021 09:13:13 CST

First Name: Debra
Last Name: McGee
Email: zap_oregon@msn.com

Are you submitting input on the behalf of an organization? Yes
Organization: 350Eugene

Input

I am commenting on behalf of the 2,000+ supporters of 350 Eugene.

We are working and organizing to provide a livable planet for the future of all living beings. The continued extraction, distribution and burning of fossil fuels for energy is a direct threat to our health and safety.

Science tells us we have seven years to change our course as a specie before we lock in unchangeable climate collapsing consequences.

I have lived in Oregon for 40 years and am an avid backpacker. Three times I have hiked around Mt Hood. I also hike in the area being proposed for this pipeline. This project is destructive to soils, air and water. It will negatively affect species already close to extinction.

350ppms is the upper atmospheric level of co2 that is safe for humans -we are currently at 415ppms and growing.

Please for the sake of all humanity do not allow this project to continue! Our very survival is at stake!

Respectfully, Debra E. McGee

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10059] - Webmaster Receipt
Date: Saturday, January 23, 2021 11:27:40 AM

Thank you for your input, James Neu.

The tracking number that has been assigned to your input is **10059**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 23, 2021 11:27:23 CST

First Name: James
Last Name: Neu
Email: jjneusies2@gmail.com

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

Input

BLM and USFS Representatives,

Thank you for the opportunity to comment on this project. I am opposed to this proposed fossil fuel expansion project as it does not align with the State of Oregon GHG reduction goals set forth by the governor in her Executive Order 20-04 and under the new federal administration's carbon reduction goals for the nation.

Fossil fuel infrastructure projects of this magnitude have lifecycles that last for more than 50 years. The IPCC recommends anthropogenic contributions to global warming through the combustion of fossil fuels needs to be reduced in the next 8 years. This proposed project goes against those recommendations. Renewable energy sources have proven a better solution environmentally, economically and socially.

This proposed project will disrupt wildlife ecosystems and fisheries, travers many rivers and streams, and create a wildfire hazard. Several times a year, I recreate in this area of the proposed project and this would be environmentally devastating for current and future generations of outdoor activities. This project does not benefit the citizens of Oregon and must not be permitted.

I urge you to deny this proposed fossil fuel expansion project for the benefit of Oregonians and to all of those that recreate here. Thank you for the opportunity to comment.

James Neu

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10060] - Webmaster Receipt
Date: Saturday, January 23, 2021 1:12:25 PM

Thank you for your input, Karen Perkins.

The tracking number that has been assigned to your input is **10060**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 23, 2021 13:12:18 CST

First Name: Karen
Last Name: Perkins
Email: karenperkins@mindspring.com

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

Input

The Jordan Cove project was turned down for good reason. The same must be done for the TRail West Fracked gas pipeline. This pipeline is designed to run through fragile forest land which has recently shown to be prone to fire due to extreme dry climate. Fire in this region coupled with a gas line would be catastrophic. We should be moving off of fossil fuel use, not building the infrastructure for more.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10061] - Webmaster Receipt
Date: Saturday, January 23, 2021 2:10:56 PM

Thank you for your input, Selena Blick.

The tracking number that has been assigned to your input is **10061**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 23, 2021 14:10:49 CST

First Name: Selena

Last Name: Blick

Email: selena@350eugene.org

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

Input

We need to switch off of fracked gas NOW if we have any hope of combatting climate change! Oregon does NOT need another pipeline, especially considering the damage of the wildfires in 2020. Building another pipeline will only lead to more fires, explosions, degrade our forests, and kill people and animals.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10062] - Webmaster Receipt
Date: Saturday, January 23, 2021 6:07:57 PM

Thank you for your input, Robert Fisette.

The tracking number that has been assigned to your input is **10062**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 23, 2021 18:07:46 CST

First Name: Robert
Last Name: Fisette
Email: rob.fisette@gmail.com

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

Input

Hello,

I am writing concerning the Trail West Pipeline. I am a resident of Eugene, OR. I urge BLM and USFS to not approve this pipeline project.

As you know, Oregon had the worst fire season in its history in 2020. Burning fossil fuels accelerates climate change--there is no longer legitimate debate about this fact. Accelerating climate change accelerates the fire danger in Oregon. We must abandon our reliance on fossil fuels, starting with building NO NEW FOSSIL FUEL INFRASTRUCTURE.

Beyond increasing reliance on fossil fuels, the presence of the pipeline is itself a hazard. Pipelines leak. Gas starts and accelerates fires. Clear-cutting forest for installation releases sequestered carbon.

I'm sure the companies who would build the pipeline and trade in the gas it would transport stand to lose money if the pipeline is not approved. They have invested in their companies. Investment comes with risk. When your company is invested in activity which is threatening the future of life on this planet, a fact which has long been known and acknowledged by these companies, then I have no sympathy for such an investment going south.

No new fossil fuel infrastructure in Oregon. No Trail West Pipeline.

Thank you,

Robert Fisette
Eugene, OR

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10063] - Webmaster Receipt
Date: Saturday, January 23, 2021 9:27:57 PM

Thank you for your input, Mason Kennedy.

The tracking number that has been assigned to your input is **10063**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 23, 2021 21:27:46 CST

First Name: Mason
Last Name: Kennedy
Email: mason.f.kennedy@gmail.com

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

Input

I am a student at the University of Oregon, I have lived in this state for my entire life and worked on Mt. Hood. This Pipeline would hurt the state that has raised me and I hope it is never constructed.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10064] - Webmaster Receipt
Date: Sunday, January 24, 2021 1:38:48 PM
Attachments: [ID_10064_GatewayWestBLMRACSubcommitteeMEPFinalReport20140530.pdf](#)

Thank you for your input, Karen Steenhof.

The tracking number that has been assigned to your input is **10064**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 24, 2021 13:38:15 CST

First Name: Karen
Last Name: Steenhof
Email: karensteenhof@gmail.com

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

Input

Thank you for the opportunity to comment on the Regions 4, 5, and 6 report for the West-wide Energy Corridor, dated November 2020. My concerns focus on Corridor 36-228. I have read the portions of the report that address 36-228 in both Volume I and II, and have found that the report lacks key information.

I was surprised and disappointed that the latest West-wide Energy Corridor review contained no reference to the Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options in or near the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), which was produced in 2014 (see Attachment). And I was surprised and disappointed that the West-wide review was still considering routes that, after a detailed analysis, the RAC had determined to have serious impacts on communities, resources, and private landowners.

In 2013 and 2014, the RAC subcommittee evaluated 26 different route options for the Gateway West transmission line (12 for the northern route and 14 for the southern route). The analysis included a matrix to quantify resource constraints and features associated with each route. After 11 meetings, one work session, two field tours, and input from dozens of citizens, utility staff, and other experts, the subcommittee identified two route options that minimized all conflicts.

I was pleased to see that the West-wide review is considering revising the existing corridor to “avoid private lands in Owyhee County, where there is no existing infrastructure and where there is strong local opposition to future development within the corridor.”

However, I was disappointed to see that Gateway Alternative 9E is still being considered as an alternative corridor. Route 9E was one of the least viable routes reviewed by the RAC subcommittee, primarily because of the threats it posed to Greater Sage-grouse populations and their habitat. Therefore, I was surprised to that the review recommends that “The Agencies could also consider re-routing the corridor to the south to avoid private lands, following alternative 9E for Gateway West for a portion of the corridor,” without references to known conflicts. In fact, Route 9E does not avoid private lands, and page 76 of Volume 2 does

not even mention the sage grouse that would be impacted along that “potential revision.”

The statement in Volume 2, page 76 that “potential revision through the NCA would be dependent on the whether or not it is compatible with the purposes of the NCA” seems to ignore the fact that the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act removed land along the Gateway West transmission line right-of-way from NCA status.

I suggest that this portion of the report be re-written to include important relevant information and a re-evaluation based upon the information that has been omitted.

Attachments

Gateway West BLM RAC Subcommittee MEP Final Report 20140530.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

**Boise District Resource Advisory Council Subcommittee Review and Comments
on the
Gateway West Transmission Line Project Mitigation and Enhancement Portfolio
for the
Morley Nelson Snake River Birds of Prey
National Conservation Area**

May 30, 2014

4494RPT.DOC

RAC Subcommittee Review and Comments on the Gateway West Mitigation and Enhancement Portfolio

TABLE OF CONTENTS

Introduction.....	1
History of Information Submitted.....	3
Summary of the Components and the Proposed Funding in the Draft Portfolio	5
RAC Subcommittee and Public Comments and recommendations on the Draft Portfolio	12
General Comments.....	12
Specific Comments and Recommendations.....	14
Habitat Restoration	14
Enhancement of Raptor Populations.....	15
Research and Monitoring.....	16
Visitor Management.....	17
Land Purchase	18
Fund Management	18
Implementation and Oversight Committee.....	18
Duration of the Enhancement Components	19
Allocation Prioritization.....	19
References.....	19

LIST OF TABLES

- Table 1. Estimated Cost of Compensatory Mitigation.
- Table 2. Estimated Cost of the Enhancement Components of the Draft Portfolio.
- Table 3. The Estimated Total Cost of Proposed Compensatory Mitigation and Enhancement Components.
- Table 4. Subcommittee Route Options Estimated Enhancement Funding.

ATTACHMENTS

- Attachment A. Comments on the Gateway West Enhancement and Mitigation package from Michael N. Kochert.
- Attachment B. Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014.
- Attachment C. Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA.

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INTRODUCTION

The Boise District Resource Advisory Council (RAC) advises and makes recommendations to the Bureau of Land Management (BLM) on resource and land management issues in southwestern Idaho. The RAC formed a subcommittee in November 2013 to work on issues surrounding siting the Gateway West Transmission Line Project (GWW) in portions of the Boise District in and around the Morley Nelson Snake River Birds of Prey National Conservation Area (BOPNCA), as well as on private lands. The subcommittee began evaluating the issues related to the GWW, as described in the *Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments In or Near the Morley Nelson Snake River Birds of Prey National Conservation Area* which accompanies this report. The accompanying report summarizes our route option review and recommendations relative to the GWW within and near the BOPNCA.

One task that the subcommittee has undertaken is an evaluation of the Draft Mitigation and Enhancement Portfolio Proposal (Draft Portfolio) prepared by Rocky Mountain Power and Idaho Power Company (hereafter the Companies). The Companies originally submitted the Draft Portfolio to BLM during the comment period for the GWW final environmental impact statement (FEIS) and then revised the document and submitted it to the RAC subcommittee for further evaluation in January 2014. This report presents a summary of the Draft Portfolio and the subcommittee's comments and recommendations for consideration by the RAC, BLM and the Companies in finalizing this important component of GWW.

The Draft Portfolio submitted by the Companies is designed to go above and beyond the standard mitigation requirements (which includes avoidance and minimization through implementation of design features and environmental protection measures/best management practices), which are addressed separately in the permitting process. The Draft Portfolio includes both compensatory mitigation and enhancement components. The compensatory mitigation program addresses the "residual effects" which persist after standard mitigation has been implemented. This additional mitigation is required to return an impacted area to baseline conditions¹. The enhancement program is designed to go beyond the compensatory mitigation and create a net benefit to the BOPNCA relative to current conditions. The enhancement program has been tailored to the special features of the BOPNCA and the desired future conditions, as determined by the BLM.

The mitigation and enhancement program in the Draft Portfolio should be designed to last the duration of the project permit and monitored throughout:

¹ For the purposes of this report, baseline conditions are based on the ecological site potential for a specific area.

The BLM should ensure adequate management, protection, and monitoring of the mitigation during the expected lifetime of the development project and its associated impacts.-Draft MS-1794 – Regional Mitigation Manual Section (P)

http://www.blm.gov/pgdata/etc/medialib/blm/wo/Information_Resources_Management/policy/im_attachments/2013.Par.57631.File.dat/IM2013-142_att1.pdf

A mitigation and enhancement plan should be consistent with the enabling legislation for BOPNCA, Public Law 103-64, which established the BOPNCA in 1993 for the following purposes:

The purposes for which the conservation area is established, and shall be managed, are to provide for the conservation, protection, and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values of the public lands in the conservation area.

Section 2(4) of the Act defines the term “raptor habitat” to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area.

Section 1((5)(D) states, “Protection of the conservation area as a home for raptors can best and should be accomplished by the Secretary of the Interior, acting through the Bureau of Land Management, under a management plan that: (...) (D) allows for diverse appropriate uses of lands in the area to the extent consistent with the maintenance and enhancement of raptor populations and habitats and protection and sound management of other resources and values of the area.”

Section 2002 of Public Law 111–11—Mar. 30, 2009, established the National Landscape Conservation System (NLCS) within the BLM and automatically made Snake River Birds of Prey National Conservation Area, among other National Conservation Areas and other special areas, part of the NLCS. Public Law 111-11 specifically mandated the NLCS to uphold the enabling legislation for each of the components of the NLCS. Section 2301 added “Morley Nelson” to the NCA’s title to recognize the contribution of that individual.

Morley Nelson was the first to recognize the significance of what is now the BOPNCA, and his life work was dedicated to demonstrating that raptor protection could be compatible with electrical power transmission and distribution.

The BOPNCA is included in the National Landscape Conservation System, which was created in 2000 with a mission to "conserve, protect, and restore these nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations." This system was formally established by Congress through the Omnibus Public Land Management Act of 2009 and includes 878 federally recognized areas and approximately 27 million acres of National Conservation Areas, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers, National Monuments, National Scenic and Historic Trails, and other special areas. The BLM's National Conservation Lands include 16 NCAs and five similar units in ten states.

To authorize a right-of-way under the Federal Land Policy and Management Act (FLPMA) through any portion of the BOPNCA, the BLM is charged with demonstrating that: 1) the use is compatible with the enabling legislation of the BOPNCA (PL 103-64, BLM 2012a); 2) the agency has avoided impacting the BOPNCA to the greatest extent possible (MS 6220); 3) impacts to Greater sage-grouse (BLM 2012b), private property, and local communities, among others, are considered; and 4) an enhancement program will result in a net benefit to the NCA for the duration of the permit (PL 103-64). This report focuses on item 4.

HISTORY OF INFORMATION SUBMITTED

The following is a chronology of information submitted or presented to the subcommittee related to the requirement for a mitigation and enhancement plan for the BOPNCA:

- On December 17, 2013, the Companies gave a presentation on the proposed Draft Portfolio at the RAC subcommittee meeting. The subcommittee held a discussion following the presentation. Comments were later developed by subcommittee members and one member of the public, Michael N. Kochert. The document submitted by Mr. Kochert was titled "Comments on the Gateway West Enhancement and Mitigation package". This document is dated January 5, 2014 and is included as Attachment A.
- On January 13, 2014, the Morley Nelson Snake River Birds of Prey National Conservation Area Gateway West DRAFT Mitigation and Enhancement Portfolio Proposal was transmitted via email to the subcommittee with applicable Environmental Protection Plans (Appendix A) and Cost Estimator tables for BOPNCA Enhancement (Appendix B). The document was prepared by the Companies and dated January 2014.
- On January 16, 2014, the Companies provided an update on the Draft Portfolio to the subcommittee focusing on proposed route Segments 8 and 9 and the components of the plan including habitat restoration, law enforcement, visitor enhancement, land purchase, and existing facility removal. The Draft Portfolio also proposed an oversight committee made up of members with an intimate knowledge of the area. A discussion followed the

update, and comments were provided to the Companies by the subcommittee and the public. These comments are included later in this document.

- On January 28, 2014, the subcommittee provided a brief overview of the Draft Portfolio during the RAC meeting.
- On February 26, 2014, a representative of the Idaho Army National Guard (IDARNG) presented an overview of the Mitigation and Enhancement Program for the Orchard Combat Training Center (OCTC) which is also within the BOPNCA.
- On March 3, 2014, the BLM circulated a list of questions submitted by subcommittee members regarding the Draft Portfolio in preparation for the March 10, 2014 subcommittee meeting.
- On March 10, 2014, the Companies presented an update of the Draft Portfolio and responded to the questions posed by the subcommittee. In addition, a panel discussion was held that included representatives from the BLM, U.S. Geological Survey (USGS), the Audubon Society, and Intermountain Rangeland Consultants regarding the challenges and opportunities in restoring habitat in the BOPNCA. The panel discussion was followed by a presentation by a retired USGS raptor expert on raptor monitoring issues. The Companies also responded to the questions previously circulated by the BLM (see previous item).
- On March 11, 2014, the subcommittee received draft comments from the Golden Eagle Audubon Society in a document titled “Gateway West Mitigation and Enhancement Portfolio – DRAFT Greater Eagle Audubon Society (GEAS) Comments – February 27, 2014”. These comments are included as Attachment B.
- On April 2, 2014, the Companies gave a presentation of a summary of the Draft Portfolio. One objective of the presentation was to provide a distinction between mitigation and enhancement portions of the Draft Portfolio and separately discuss the components of each. The Companies also showed how the funding in the Draft Portfolio could be scaled depending on the routes selected and provided a handout showing how to use the Gateway West Snake River Birds of Prey Enhancement and Mitigation Calculator.
- On April 23, 2014, the Companies provided an estimate of the enhancement funding for the routes recommended by the subcommittee, as well as for all other route options that have been considered by the subcommittee for reference.

SUMMARY OF THE COMPONENTS AND THE PROPOSED FUNDING IN THE DRAFT PORTFOLIO

The Companies first submitted the Draft Portfolio in June 2013 during the FEIS comment period. The Portfolio described “a proposed approach to determine the level of mitigation and enhancement needed to allow for the approval of both Segments 8 and 9.” Proposed funding levels in the Draft Portfolio were based on modified versions of the Companies’ proposed routes in the FEIS. Proposed Segment 8 was modified by Alternatives 8D and 8E, and Proposed Segment 9 was modified by Alternative 9G. These routes are identified in the subcommittee’s report on route options as “Draft Portfolio Proposed Routes.” The anticipated level of disturbance and line mileage within the BOPNCA for the Draft Portfolio Proposed Routes can be considered “a metric that can be applied regardless of the alternative route considered”. In other words, the proposed compensatory mitigation and enhancement for the Draft Portfolio Proposed Routes can be considered a baseline proposal. In the event that different route options are selected by BLM, portions of the compensatory mitigation and enhancement for the BLM selected routes would be determined by a ratio or scaling factor applied to the Draft Portfolio Proposed Routes. In describing the impact of the project on the BOPNCA, the Companies used results of the FEIS analysis, which addressed impacts to cultural resources, plant and wildlife resources (general vegetation, invasive plant species, wetlands, and special status plant species), and raptors and their habitat.

The Draft Portfolio consists of 1) measures and plans for avoidance, minimization, restoration, and compensatory mitigation to offset residual impacts; and 2) elements to enhance the objects and values of the BOPNCA. This review is limited to a review of the components of compensatory mitigation and enhancement. Compensatory mitigation in the Draft Portfolio includes:

- **Habitat Restoration.** Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to reclamation of temporary disturbances. The acreage used in the calculation is scaled by impact and is based on the operational footprint of the project such as a tower footprint and any new permanent access roads. Habitat restoration efforts will be directed towards a return to native vegetation.
- **Law Enforcement.** Funding for part-time law enforcement is proposed to focus on and minimize/eliminate illegal behavior, particularly in response to new permanent access roads.

The Companies indicate that impacts to cultural resources will be mitigated by implementation of the Segment Historic Properties Treatment Plans and a Historic Trails Mitigation Plan. Also, in the event that there would be any impacts to wetlands or riparian areas, those impacts would be offset and mitigated by the implementation of the wetland mitigation plan titled

“Compensatory Mitigation for and Monitoring of Unavoidable Impacts to Waters of the United States”. Table 1 provides the estimated cost of the compensatory mitigation components in the Draft Portfolio.

Table 1. Estimated Cost of Compensatory Mitigation.

Element	Habitat Restoration	Law Enforcement ¼ FTE for 10 years	Total
Compensatory Mitigation	\$266,400	\$350,000	\$616,400

Enhancement in the Draft Portfolio includes:

- Habitat Restoration.** Funding for habitat restoration is proposed by the Companies within the BOPNCA in addition to compensatory mitigation and the reclamation of temporary disturbances. The acreage used in the calculation is based on the construction footprint of the project, which is larger than the operational footprint. The funding is scalable depending on the number of acres and the quality of land affected by the project. High quality lands, such as undisturbed habitat, would be mitigated with a higher number of acres, while lower quality land, such as land occupied by invasive species, would be mitigated with a lower number of acres. Habitat restoration would be aggressive and concentrated with the intent of a high success rate for each acre restored. Habitat restoration efforts will be directed towards a return to perennial vegetation.
- Land Purchase.** Funding for land purchase is proposed by the Companies to protect cultural resources and habitat. The Companies would provide funding to be used for the purchase of property(ies) with unique cultural, visual, and/or ecological values to further protect those resources from future damage. Properties would be purchased from willing sellers within the BOPNCA boundaries, and the amount of money offered for property purchase would be scaled using the miles of the BOPNCA crossed by the proposed route.
- Law Enforcement.** Funding for law enforcement is proposed by the Companies to reduce inappropriate behavior within the BOPNCA. The Draft Portfolio provides for a BLM ranger to offset potential unlawful activity that may be associated with the increased access created by new rights-of-way and maintenance roads. The funding is scaled by line miles of the routes within the BOPNCA and would last for an initial 10-year period followed by an additional 10 years but with funding for fewer hours per week.

- Visitor Enhancement.** Funding for visitor enhancement is proposed by the Companies to educate visitors of the values of BOPNCA and in the appropriate behavior within and use of the BOPNCA. This funding is also scaled by line miles of the routes within the BOPNCA.
- Management Fund.** A management fund is proposed by the Companies to cover the costs of the oversight committee, administration, and monitoring. The management fund, regardless of routes ultimately approved by the BLM, is a fixed amount equal to the amount currently proposed. The oversight committee would be made up of people with knowledge of the BOPNCA and surrounding area.
- Idaho Power Existing Facility Removal.** The Companies propose to remove portions of two existing lower-voltage power lines and one substation owned by Idaho Power from areas within the BOPNCA to further enhance the BOPNCA. The BLM could elect to leave some of the power poles from the removed lines as perching and nesting opportunities for birds of prey. The Companies still have customers to serve in these areas and have included in the removal of the lower-voltage power lines the additional infrastructure required (which is outside the BOPNCA) to continue service to these customers.

Table 2 provides the estimated cost of the enhancement components based on the Draft Portfolio Proposed Routes. The total cost of compensatory mitigation and enhancement is shown on Table 3.

Table 2. Estimated Cost of the Enhancement Components of the Draft Portfolio.

Element	Habitat Restoration	Law Enforcement <small>¾ FTE for 10 years, ½ FTE for an additional 10 years</small>	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
Enhancement	\$3,297,600	\$1,750,000	\$320,000	\$500,000	\$1,922,000 (cost to Companies)	\$1,000,000	\$6,867,600 (excluding line removal costs)

Table 3. The Estimated Total Cost of Proposed Compensatory Mitigation and Enhancement Components.

Element	Habitat Restoration	Law Enforcement ¼ FTE for 10 years, ½ FTE for an additional 10 years	Land Purchase	Visitor Enhancement	IPC Line Removal	Management Funding	Total
Mitigation	\$266,400	\$350,000	--	--	--	--	\$616,400
Enhancement	\$3,297,600	\$1,750,000	\$320,000	\$500,000	\$1,922,000 (cost to Companies)	\$1,000,000	\$6,867,600 (excluding line removal costs)
TOTALS	\$3,564,000	\$2,100,000	\$320,000	\$500,000	\$1,922,000 (cost to Companies)	\$1,000,000	\$7,484,000 (excluding line removal costs)

The total cost of the Draft Portfolio based on the Companies proposed routes, including costs incurred by the Companies to remove Idaho Power facilities is \$9,406,000.

During the April 18, 2014 meeting, the subcommittee completed the identification and categorization of alternative routes for Segments 8 and 9 in and around the BOPNCA. The subcommittee classified route options as either recommended or not recommended. The subcommittee then requested that the Companies provide an estimated enhancement funding value for the recommended routes. The Companies provided the estimated enhancement funding for all subcommittee route options (routes ranked recommended and not recommended), and the values and other information are provided in Table 4.

In addition to Table 4, the Companies also provided the following summary information and example calculation of the estimated enhancement funding values using the subcommittee recommended routes:

- Companies’ Draft Portfolio Proposed routes
 - Segment 8 with 8D and 8E – *36.6 miles*
 - Segment 9 with 9G – *52.3 miles*
- Subcommittee recommended alternative routes – miles on BLM within the BOPNCA
 - Segment 8, Summer Lake Option 1 revised – *15.4 miles*
 - Segment 9, Baja Road-Murphy Flat South revised – *46.1 miles*
- Percentage of subcommittee recommended alternative line miles to Companies’ Proposed routes
 - Segment 8, Summer Lake Option 1 revised – $15.4/36.6 = 42.08\%$
 - Segment 9, Baja Road-Murphy Flat South revised – $46.1/52.3 = 88.15\%$

- Estimated enhancement funding value of subcommittee recommended route options based on Companies' proposed enhancement funding amount for habitat restoration, land purchase, law enforcement, and visitor enhancement for each segment
 - Segment 8, Summer Lake Option 1 revised – $\$2,527,765 * 42.08\% = \$1,063,684$
 - Segment 9, Baja Road-Murphy Flat South revised – $\$3,339,835 * 88.15\% = \$2,944,065$
- Total estimated enhancement funding value for subcommittee recommended route options
 - $\$1,063,593 + \$2,943,908 + \$1,000,000$ (management fund) = **$\$5,007,501$**
- Total value of estimated enhancement for subcommittee recommended route options
 - $\$5,007,503 + \$1,922,000$ (Idaho Power facility removal) = **$\$6,929,503$**

Table 4. Subcommittee Route Options Estimated Enhancement Funding.

Route	Bureau of Land Management	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
Segment 8				
Draft Portfolio Proposed Route 8	36.6	Not recommended	100%	\$2,527,765
Applicant Proposed (FEIS)	25.4	Not recommended	69.40%	\$1,754,241
Bowmont North	4.8	Not recommended	13.11%	\$331,510
Bowmont South	12.1	Not recommended	33.06%	\$835,682
Bowmont South - 500kV Rebuild	0.7	Not recommended	1.91%	\$48,345
King Hill-Mayfield	1.7	Not recommended	4.64%	\$117,410
Melmont Option 1	9.3	Not recommended	25.41%	\$642,301
Melmont Option 2	9.4	Not recommended	25.68%	\$649,207
OCTC Alpha Sector By-pass Variation (FEIS Alt 8D)	2.9	Not recommended	7.92%	\$200,287
Sinker Butte (FEIS Alt 8E)	38.6	Not recommended	105.46%	\$2,665,894
Summer Lake (Option 2)	18.8	Not recommended	51.37%	\$1,298,415
Summer Lake Option 1	15.4	Recommended	42.08%	\$1,063,595
Segment 9				
Draft Portfolio Proposed Route 9	52.3	Not recommended	100%	\$3,339,835
Applicant Proposed (WVEC Alternative - FEIS)	4.8	Not recommended	9.18%	\$306,524
Baja Road-Murphy Flat North Option 1	48.7	Not recommended	93.12%	\$3,109,942
Baja Road-Murphy Flat North Option 2	47.1	Not recommended	90.06%	\$3,007,767
Baja Road-Murphy Flat North Option 3	48.7	Not recommended	93.12%	\$3,109,942

Table 4. Subcommittee Route Options Estimated Enhancement Funding.

Route	Bureau of Land Management	Subcommittee Route Options Category	Subcommittee Route Options - % of Companies' Proposed Routes	Subcommittee Route Options - Estimated Enhancement Funding**
Baja Road-Murphy Flat S.	46.1	Recommended	88.15%	\$2,943,908
Baja Road-Sinker Creek	43.7	Not recommended	83.56%	\$2,790,646
Baja Road-Summer Lake	46.7	Not recommended	89.29%	\$2,982,223
Bruneau South Variation (FEIS Alt 9H)	1.4	Not recommended	2.68%	\$89,403
Cove Variation (FEIS Alt 9D)	5.8	Not recommended	11.09%	\$370,383
Glenn's Ferry-Mayfield	2	Not recommended	3.82%	\$127,718
Owyhee Uplands (DEIS Alt 9E)	2.7	Not recommended	5.16%	\$172,420
Owyhee Uplands (FEIS Alt 9E)	5	Not recommended	9.56%	\$319,296
Sinker Creek Variation	0.2	Not recommended	0.38%	\$12,772

** Includes funding for habitat restoration, land purchase, law enforcement, and visitor enhancement. Does not include management funding (\$1M) and does not include cost to Companies for facility removal (\$1.922M).

RAC SUBCOMMITTEE AND PUBLIC COMMENTS AND RECOMMENDATIONS ON THE DRAFT PORTFOLIO

General Comments

The subcommittee commends the Companies for including several components that address important BOPNCA values in their Draft Portfolio. We agree with the apparent long-term commitment implied by the financial support designated for law enforcement, the management oversight group, and cultural resources protection. Although we may disagree with the dollar amounts proposed in both real and relative terms, we agree that a long-term commitment is necessary to mitigate the direct impacts of the GWW project through the BOPNCA and to enhance the area for future generations.

The subcommittee also commends the Companies for their continued involvement and cooperative interaction during the course of the 6-month process of the subcommittee meetings and deliberations. We have learned from the Companies and sincerely appreciate their cooperation and adaptability during the process.

The BOPNCA was established to protect raptor populations and habitats and the natural, environmental, scientific, cultural and educational resources found within the conservation area. The enhancement package applies to these resources. In addition, the enhancement package must take into account the current resources available to protect the NCA. Native vegetation in the NCA has suffered greatly due to fires, off-road vehicle use and a lack of restoration resources. On the other hand, there are dozens of groups in the Boise area conducting outings and tours to educate the public about the NCA. The enhancement package should focus on the resources within the NCA that are most in need of enhancement- raptor populations, habitats and the natural environment. This includes restoring native habitat, closing and monitoring roads that fragment the landscape, and decreasing the destructive impacts of fires.

Lastly, while the subcommittee thanks the Companies for their expertise during this process, we cannot endorse the enhancement package as presented. The Companies' enhancement package proposes a myriad of various projects without demonstrating how standards of enhancement will be met during the life of the project. We encourage the BLM to take a hard look at the true cost of enhancement. The enhancement package should not be punitive, but must meet the high standards outlined in the NCA legislation.

The Subcommittee did not reach a conclusion on the funding levels contained in the Draft Portfolio. However, the general consensus of the subcommittee is that the proposed funding levels are too low. As BLM moves forward with any additional NEPA reviews the Subcommittee recommends that BLM explore how successful mitigation and enhancement packages have been developed in other areas of the country. Settling upon a dollar amount for mitigation and enhancement will entail numerous negotiation sessions between the Companies

and BLM. Hopefully, it will include some background assessments of the environmental, social and economic benefits and costs of lines crossing the BOPNCA. We encourage the BLM and the Companies to derive a valid economic assessment of the benefits and costs of the actions specific to the BOPNCA for the NEPA process.

The subcommittee found that the Draft Portfolio did not adequately address enhancement of raptor populations and scientific resources and values, and we recommend that it be expanded to include components to enhance these two important values recognized by the enabling legislation. In addition, we recommend that Law Enforcement and Visitor Enhancement be combined into one category, called Visitor Management which would also include Education. There should be separate categories for Enhancement of Raptor Populations and Research and Monitoring. The subcommittee recommends that the BLM and the Companies re-evaluate priorities and revise the proposed allocations among these components.

To be consistent with the enabling legislation, the RAC subcommittee recommends that the Draft Portfolio should seek to conserve, protect, and enhance these specific resource issues:

- Raptor populations;
- Raptor habitats (raptor habitat includes the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the BOPNCA);
- Natural and environmental resources and values associated with the BOPNCA;
- Scientific resources and values of the public lands in the BOPNCA;
- Cultural resources and values of the public lands in the BOPNCA; and
- Educational resources and values of the public lands in the BOPNCA.

We believe that the Draft Portfolio should be designed and implemented with the following considerations:

- Be consistent with the BOPNCA Enabling Legislation and highlight the relevant features, particularly raptors, their prey and the supporting habitat;
- Be diverse: contain a diverse portfolio of enhancement options, some of which the Draft Portfolio contains;
- Be durable: the functional time span of each component of the Draft Portfolio needs to be discussed, and the benefits need to last for as long as the impacts of the transmission line are expected to be present;
- Accurately assess the probability of restoration success: the measure of success should not be the number of attempts at restoration, but achieved restoration to a set of pre-agreed upon criteria;
- Protect high-quality habitat and restoration areas: successful restoration efforts need to be protected; and

- Be reasonable (both locally and nationally): the enhancement opportunities provided by the Draft Portfolio should not relieve the BLM of their responsibility to provide funding to manage the BOPNCA. That said, the enhancement components of the Draft Portfolio should be substantive.

SPECIFIC COMMENTS AND RECOMMENDATIONS

Habitat Restoration

The subcommittee believes that the Draft Portfolio should contain an integrated and adaptive approach with a long-term focus for habitat restoration in the BOPNCA using current scientific research and information as presented to the subcommittee on March 10, 2014 by representatives from the BLM, USGS, the Audubon Society, and Intermountain Rangeland Consultants. We believe that innovative methods for rangeland restoration should be evaluated and pursued within the BOPNCA that could eventually be used broadly to help manage lands outside the BOPNCA.

As we have discussed during the deliberations of the subcommittee, the concept of “baseline” conditions needs careful consideration and a clearer definition. Efforts at restoration and rehabilitation should be undertaken with the awareness that the BOPNCA includes some of the harshest environments in the Great Basin. The BOPNCA is in an environment that experiences extremely low precipitation, high summer temperatures, and invasion of habitat-altering annual grasses, all of which increases fire frequency. It will be extremely difficult to accomplish the restoration goals of the BLM and Companies without strategic planning and implementation that may include repeated efforts to establish vegetation in this harsh environment. We recommend that areas proposed for habitat restoration and enhancement be defined in detail via maps. However, we have concerns that small-scale, intensive and very expensive rehabilitation efforts will ultimately fail due to repeated fires, lack of maintenance, and other factors. We would prefer seeing larger, strategic areas treated than the small microcosms described in the Draft Portfolio.

We recommend that the portfolio’s emphasis on small microcosms be reduced and combined with a landscape-scale strategy for habitat protection, restoration, and enhancement. Key remnant native sagebrush (*Artemisia*) patches within the BOPNCA that exhibit ecological integrity and are still “intact” should be identified, and preserving their integrity should be a priority. The subcommittee recommends that remnant stands of sagebrush and other perennial vegetation such as winterfat (*Krascheninnikovia lanata*) be protected using strategically placed firebreaks and other tools. Firebreaks may later be modified to protect newly restored and connected patches to help ensure protection from future fires. Successful protection of remaining habitat and restoration investments will require decreasing the response time of fire suppression efforts and increasing the response capability. These goals could be accomplished through a variety of partnerships and cooperative programs, including, but not limited to, the following:

- Providing additional fire-fighting resources (equipment, training, staff and funding, etc.);
- Updating cooperative agreements and coordinated response programs with rural fire departments, municipal Fire Departments, and Rangeland Fire Protection Associations to reduce the response time; and
- Updating the Idaho Fire Prevention Plan² to better protect native vegetation within the BOPNCA by preventing human-caused wildfires.

Enhancement of Raptor Populations

The first step in maintaining and enhancing raptor populations is to ensure that the new transmission lines have no adverse effects on raptors. Ultimately, enhancement measures should improve or at least maintain current raptor population levels. The permitting process should disallow line construction within the BOPNCA during the nesting season (February-August) to avoid direct disturbance to nesting raptors. Biologists and engineers should work together to design towers that are friendly to raptors but not to ravens. For example, the density of steel latticework on the bridge above the conductors should be as low as possible to discourage raven nesting. Towers with tubular metal poles may not benefit raptors because of vibrations and the lack of suitable perching and nesting sites.

The Draft Portfolio should include funding for construction of artificial platforms on transmission towers within the BOPNCA that will provide nesting sites at a safe location below the conductors. New towers in areas that replace or parallel existing lines should be designed in a way to encourage continued nesting by raptors, particularly ferruginous hawks (*Buteo regalis*), which are currently nesting on existing transmission towers. Where existing lines are planned for removal, structures that are suitable for raptor nests and perches should be left intact. Artificial nesting platforms can provide new and alternative nesting substrate for raptors, particularly ferruginous hawks and golden eagles (*Aquila chrysaetos*), in areas without cliffs or existing transmission lines (e.g., Murphy Flat). Providing opportunities for nesting on taller structures might benefit eagles on the Owyhee Front by reducing their exposure to disturbance from off highway vehicles.

Enhancing raptor populations requires enhancing prey populations, and prey populations are best enhanced by managing their habitat. The two principal prey species within the BOPNCA are the Piute ground squirrel (*Urocitellus mollis*) and the black-tailed jack rabbit (*Lepus californicus*). Ground squirrels are the primary prey of prairie falcons (*Falco mexicanus*), the raptor species for which the BOPNCA was first recognized and created. Jack rabbits are the primary prey of golden eagles. Jackrabbits require shrubs for food and cover; ground squirrels thrive best in vegetation communities dominated by native perennial shrubs and grasses.

²http://www.blm.gov/pgdata/etc/medialib/blm/id/fire/fire_restriction_maps.Par.70675.File.dat/2013_IdahoFireRestrictionsPlan_508.pdf

Restoring habitat and increasing prey populations will benefit raptors, but additional measures to enhance raptor populations directly should be included in population enhancement strategies. We recommend that a proactive and accelerated program for retrofitting distribution lines within the BOPNCA be undertaken to reduce the potential for electrocution of raptors. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following guidelines described in the Avian Power Line Interaction Committee's publication "Suggested Practices for Avian Protection On Power Lines: The State of the Art in 2006" (APLIC 2006). More frequent patrols should be conducted to determine if poles being used by raptors are raptor-safe.

Research and Monitoring

The subcommittee recommends that the Companies provide funding for research and monitoring in the BOPNCA. We recommend that effective monitoring be proposed at all trophic levels. Habitat restoration should be monitored in conjunction with trends in prey and raptor populations. Monitoring should focus on the effects of the new transmission lines and associated mitigation and enhancement efforts, but to be effective, it must consider resources throughout the BOPNCA.

We believe that the Draft Portfolio should specify a vegetation monitoring plan for native shrubs, grasses, and forbs that will allow an evaluation of the effectiveness of habitat restoration and an understanding of success rates. The monitoring information will be the basis for adapting the restoration approach to challenges and failures so that long-term success can be achieved. The results and findings should be considered as a model for other sites across the West where sagebrush recovery and restoration are needed.

We recommend that monitoring protocols be put in place to understand the effects of transmission lines and raptor response to nest and perch enhancement and identify any negative impacts of power line construction. Use of the new transmission lines by raptors and ravens should be monitored as it was along the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993).

Monitoring trends in raptors nesting on transmission lines must be carried out in conjunction with monitoring population trends throughout the BOPNCA. The Ferruginous Hawk should be a priority for monitoring because it is the species most likely to respond to transmission lines within the BOPNCA. Priorities and approaches for monitoring raptors throughout the BOPNCA should follow recommendations from the Raptor Monitoring Workshop held in June 2008 (Attachment C). Golden Eagles and Prairie Falcons should be a high priority for monitoring because these species were cornerstones in establishing the BOPNCA and because a large set of background data has been collected on them. The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and the jackrabbit's status is associated with shrub habitat. The Prairie Falcon is a ground squirrel specialist and is sensitive to changes in ground

squirrel abundance as a result of climate change and habitat alteration. Prairie Falcon nesting populations in the canyon have not been assessed since 2003. Future studies should be designed to assess whether these three important species are or are not adapting to habitat changes that have occurred. Species that respond favorably to shrub loss (e.g., northern harriers [*Circus cyaneus*], short-eared owls [*Asio flammeus*] or agricultural development (e.g., Swainson's hawks [*Buteo swainsoni*], red-tailed hawks [*Buteo jamaicensis*], American kestrels [*Falco sparverius*]) should be a lower priority for research and monitoring.

We recommend that the Draft Portfolio also provide for monitoring trends in small mammal populations that are key prey species (ground squirrels and jack rabbits) on a landscape level throughout the BOPNCA. The monitoring of small mammals should be coordinated with raptor monitoring.

New and improved access roads associated with transmission line construction and operation could increase recreational shooting near the lines. There is a concern that elevated soil concentrations of lead from shooting and trash and litter accumulation could have long term impacts on prey and raptor populations. The Companies should propose studies that evaluate the extent of lead in the environment in the BOPNCA and examine potential solutions. There also may be a need to examine the effects of recreational shooting on raptor and prey populations.

Proposed research and monitoring should recognize and take advantage of previous work undertaken within the BOPNCA. This component should include the resources necessary to perform an integrated and adaptive approach. We view the oversight committee as being critical in helping to define both integrated research objectives and monitoring needs of the area. Biologists from several agencies and universities are currently conducting research projects within the BOPNCA. We recommend that the oversight committee be proactive in focusing, prioritizing, and integrating these and future research efforts to ensure that they address BLM's long-term and short-term needs in a coordinated way. The Companies should consider funding a repository for archiving and disseminating data collected in the BOPNCA to be used by both researchers and managers. The NCA Research Group recently identified a need to compile available data from previous studies and monitoring efforts, and to make these data available and accessible. We recommend formalizing and expanding the research and monitoring program to maximize the benefits and leverage additional funding opportunities. One possibility would be to create an endowment (see below) to fund research and monitoring into the future.

Visitor Management

We are pleased that the Draft Portfolio includes funding for enhanced BLM law enforcement patrols. This funding should continue for the duration of the permit. An expanded on-site presence will reduce degradation caused by irresponsible public recreational use. Partnering with local communities and civic groups could expand opportunities for visitor contact within the

BOPNCA. Again, the oversight committee can provide guidance about this important component of the Draft Portfolio.

The BLM already has an excellent public education program for the BOPNCA. It employs a full time Environmental Education Specialist, dedicated to the BOPNCA. This specialist gives more than 100 presentations at schools and special events each year and contacts more than 8,000 individuals. The BLM has a sign management plan for the BOPNCA, maintains a website about the BOPNCA, and has developed a visitor's guide that contains general maps of the BOPNCA, raptor viewing information, and recreational opportunities. Public education about NCA raptors and their habitat also occurs at the Peregrine Fund's World Center for Birds of Prey, the Idaho Fish and Game's MK Nature Center, Canyon County's Celebration Park visitor center, and the Kuna Chamber of Commerce visitor facility. The Snake River Raptor Volunteer group is also involved in public education. The subcommittee finds that public education is currently closer to meeting objectives than other programs.

Land Purchase

The Companies' recommendation for property purchase was based on enhancing the preservation of cultural resources. We recommend re-evaluating whether land purchase should be a priority or whether it would be best to invest funds in an endowment (see below) to enhance all resources and values over a longer time frame. If land purchase is a component of the enhancement package, some degree of funding should be included to help manage these lands.

Fund Management

The Subcommittee believes that BLM should explore establishing a fund located with a third party, such as an Idaho state agency, to receive and manage enhancement funds on behalf of the BLM. The state agency would distribute funds at the direction of BLM with the advice of the Implementation and Oversight Committee.

Implementation and Oversight Committee

The Companies have suggested creating and funding an oversight committee to make recommendations to the BLM on the implementation of the enhancement program. We recommend that the oversight committee include interested and involved people with local expertise on each of the trophic levels (plants, prey, and raptors). The structure, responsibilities and management of the oversight committee have yet to be determined. One option is for the oversight committee to be a subcommittee of the Boise District RAC. However, we view the oversight committee as being critical to the long-term sustainability of the BOPNCA and the Companies' success with implementation of the Draft Portfolio. We recommend that the BLM establish the oversight committee as soon as feasible and seek their involvement in the immediate and long-term decisions needed to sustain the integrity of the BOPNCA.

Duration of the Enhancement Components

The BLM should ensure that adequate funding is provided for enhancement components during the period for which the right-of-way permit is granted. Contingencies for responding to fires that may impact restoration areas should be included in the permit. The relevant issues should be revisited to determine if the goals of enhancement have been met when the permit is renewed.

Allocation Prioritization

We respectfully attempt to categorize and prioritize the efforts and funding implied in the Draft Portfolio. We recommend that the BLM consider the enhancement components in the following order of priority:

- Enhancement of Raptor Populations
- Habitat Restoration
- Research and Monitoring
- Implementation and Oversight Committee
- Visitor Management
- Land Purchase

We believe it is important that the BLM ensure adequate funding for all enhancement components. It is especially important for the first four categories listed above.

REFERENCES

Avian Power Line Interaction Committee (APLIC). 2006. *Suggested practices for raptor protection on power lines; the state of the art in 2006*. Edison Electric Institute; Raptor Research Foundation, Washington, D.C. USA.

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Bureau of Land Management (BLM). (2012b). *BLM Manual 6220- National Monuments, National Conservation Areas, and Similar Designations*. Release Number 6-132. July 13, 2012.

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Steenhof, K., M.N. Kochert, L.B. Carpenter, and J.A. Roppe. 1993. *Nesting by raptors and common ravens on electrical transmission line towers*. J. Wildl. Manage. 57(2):271-281.

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ATTACHMENT A
**Comments on the Gateway West Enhancement and
Mitigation package from Michael N. Kochert**

01/05/2014

To: Gateway West Subcommittee co-chairs

Fr: Michael N. Kochert

Re: **Comments on the Gateway West Enhancement and Mitigation package.**

Thank you for the opportunity to attend your 17 December 2013 meeting on the Gateway West transmission line and to hear the presentation describing the Enhancement and Mitigation plan for the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA). This message is a follow-up to my oral comments at the meeting.

As a matter of introduction, I have conducted and directed research and monitoring of raptors, prey, and vegetation in the NCA for nearly 45 years. I also studied colonization and use of the 500 kV PP&L (PacifiCorp) transmission line by raptors and ravens with agency and industry colleagues for 10 of those years.

My comments are as follows:

1. I commend Idaho Power and Rocky Mountain Power for the comprehensive package, and I commend the BLM Boise District and NCA staffs for their input to the effort.
2. The NCA was established by the U.S. Congress because the area contains an internationally unique aggregation of nesting raptors, and the legislation calls for protection and enhancement of the unique raptor nesting populations. Given that, most of my comments are predicated on the premise that major actions in the NCA need to consider the ultimate effect on the unique raptor resource.
3. Although the Enhancement and Mitigation package is quite comprehensive, a major deficiency of the package is that it lacks a monitoring component. Given that the package identifies a fairly substantial investment for many enhancement and mitigation actions, it is very important to evaluate the effectiveness of those actions. For example, I sensed at the meeting that there was not complete agreement on the predicted success rate of the habitat restoration efforts. As I stated at the meeting, I commend the parties involved for proposing to undertake such a challenging effort. However, given the extremely dry climate in the NCA in the recent past and predicted for the future, success of restoration efforts in the low precipitation zone in the Grand View and Bruneau areas could be extremely low. Even in decent precipitation years vegetation restoration in these areas could be a challenge. Given the uncertainty, I believe that restoration efforts should be monitored for effectiveness.

I suggest that the Enhancement and Mitigation package provide for development of a comprehensive, peer reviewed monitoring plan. The monitoring efforts, if designed

properly, would provide the opportunity to for adaptive management experiments. The plan should identify the metrics for success. For example, will restoration success be a measure of vegetation in the restored areas or will it be prey composition and density, or reproductive performance of the nesting raptors?

4. Because construction of the transmission lines and the major proposed enhancement actions has the potential to ultimately affect the raptor populations, I believe it is incumbent to monitor the status of the major raptors in the area. I believe that colonization of the transmission line should be monitored much like it was done with establishment of the PP&L 500-kV transmission line in the 1980s (Steenhof et al. 1993). The monitoring of the PP&L line provided valuable information to the utility, and it also identified the effect of the line on the raptor and raven population.

It seems to me that the goal of the large-scale restoration efforts is to enhance the habitat and ultimately enhance or maintain the raptors. In my opinion, evaluating the effectiveness of large-scale restoration efforts without assessing raptor populations is falling short of completely evaluating the effectiveness of restoration efforts. A well-designed monitoring effort at the three main trophic levels would serve as a good adaptive management experiment for the restoration efforts.

5. I noticed that the Enhancement and Mitigation package did not mention or address raptors. I believe that that installation of nesting platforms can be an important enhancement and management effort. We found from our long-term research on the PP&L transmission line that the nesting platforms enhanced raptor nesting success (Steenhof et al. 1993). We also found that, when placed properly, nesting platforms can attract raptors to nest below the conductors. For example, in all cases where Golden Eagles nested in towers with nesting platforms below the conductors, eagles nested in the platforms and in no other position of the tower. When planning for the 500-kV transmission line in the late 1970s, the PP&L (PacifiCorp) sought Morley Nelson's advice about placement of nesting platforms to enhance raptor nesting opportunities on the transmission line. During my work on the PP&L transmission line project I observed that PP&L personnel readily climbed to the nesting platforms located just above the waist below the conductors and performed work in the nest without the need to shut down the transmission line.
6. I have no problems with the proposal to removal of 8 miles of existing 46-kV transmission line between Bowmont and Gage substations. However, I suggest that IPC leave the existing poles and cross arms to reduce the cost of removal and to provide nesting and perching opportunities for raptors.

7. Several miles of 3-phase, cross arm distribution and transmission lines exist in the NCA, and electrocution of raptors has been reported on these power lines (Lehman and Barrett 2002). In my opinion, a positive enhancement effort would be to patrol untreated distribution and transmission lines for dead raptors and to retrofit any pole where an electrocution has occurred. Poles should be retrofitted using designs developed by Morley Nelson for Idaho Power and following procedures described in APLIC (2006).

Literature Cited

- Avian Power Line Interaction Committee (APLIC). 2006. Suggested practices for raptor protection on power lines; The state of the art in 2006. Edison Electric Institute; Raptor Research Foundation, Washington, D.C. USA.
- Lehman, R. N., and J. S. Barrett. 2002. Raptor electrocutions and associated fire hazards in the Snake River Birds of Prey National Conservation Area. Idaho Bureau of Land Management Technical.

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ATTACHMENT B

Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014

Gateway West Mitigation and Enhancement Portfolio – DRAFT GEAS Comments – February 27, 2014

To: Bureau of Land Management Resource Advisory Committee Gateway West
Subcommittee Co-Chairs

From: Golden Eagle Audubon Society

Re: Comments on the Gateway West Enhancement and Mitigation Portfolio, 1/10/2014

Thank you for this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We, the Board of Directors, write these comments on behalf of members of Golden Eagle Audubon Society (GEAS). GEAS constitutes some 1,500 members primarily residing in southwest Idaho. Our strategic focus is the conservation of birds, wildlife, and their habitats and promotion of wildlife appreciation by SW Idaho residents. Regarding the Gateway West Enhancement and Mitigation Portfolio, our primary concerns include the potentially highly inaccurate success estimate for restoration of native plant communities; the potential missed opportunities to enhance raptor nesting, perching and foraging opportunities; and the lack of a reliable monitoring strategy to track the value of proposed (and needed) enhancement and mitigation actions. GEAS would like to see the outcomes of this Enhancement and Mitigation Portfolio positively affect plants and wildlife, more specifically birds and bird habitat. The majority of our members live and bird watch in southwest Idaho and the Morley Nelson Snake River Birds of Prey National Conservation Area (SRBOP) is very dear to our membership. We propose actions that can lead directly to an overall enhancement of SRBOP for the betterment of raptors, other birds, other wildlife and their habitats, and to better enjoyment for the wildlife-loving public.

General Comments:

GEAS applauds Rocky Mountain Power and Idaho Power's (hereafter, 'the Companies') effort to work "in spirit of cooperation" to "meet enhancement requirements" (page 6) and the thoughtfulness the Companies have put forth for the need for remediation (i.e., habitat restoration component is scaled to the number of acres impacted during construction, page 35).

The Portfolio indicates that the Enabling Legislation for SRBOP, Public Law 103-64, established the SRBOP in 1993 for the "...conservation, protection and enhancement of raptor populations and habitats and the natural and environmental resources and values associated therewith, and of the scientific, cultural, and educational resources and values...." Section 2(4) of the Act defines the term "raptor habitat" to include the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area. Furthermore, it references the 2008 SRBOP Resource Management Plan (RMP) indicating: "the SRBOP is managed by BLM under the concept of dominant use rather than multiple use. This means that prior to authorizing uses,

BLM determines the compatibility of those uses with the purposes for which the NCA was established.”

Based on the Public Law and the RMP, the Portfolio states (Page 33, Sect. 8.2) that, “locating utilities within these (designated) corridors is consistent with the RMP and with the enabling legislation for the SRBOP and therefore should require no additional enhancement to be consistent with the enabling legislation.” GEAS does not agree with this position. Degradation to raptor habitat as a result of powerline construction is not consistent with enabling legislation. Enhancement therefore is a required act to mitigate for reduction and damage to raptor habitat, not simply an in-kind act “in the spirit of cooperation”. Further, it is the Companies responsibility as a direct economic beneficiary of the line installation to ensure – for the long-term – that raptor habitat is not degraded as a result of the powerline. The Portfolio correctly cites the SRBOP RMP stating, “to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded (page 36)”. Thus, to meet RMP objectives as well as operate in the spirit of cooperation, the Companies should be seeking to expand and inter-connect native vegetation in order to achieve objectives stated in the RMP.

GEAS contends that the Companies are in a positive economic situation right now as they have saved significant expenses by routing Sections 8 and 9 through SRBOP – a decision GEAS vocally supported with comments submitted during the Final Environment Impact Statement comment period. The Companies saved substantial dollars by using SRBOP because the route covers fewer miles, there is less need to compensate private landowners, and there are minimal new road construction costs. Funding the restoration approach we propose is not out of the realm for the Companies and is in the Companies best interests to demonstrate their social responsibility and sustainability highlighted in their business plans and reports.

Specific Comments and Recommendations

The most critical component to long-term stability of the world-renowned raptor populations of SRBOP is maintenance and enhancement of native vegetation communities that support diverse, abundant prey bases for the raptors. Therefore, GEAS provides comments that can lead to the direct actions necessary to achieve habitat restoration and enhancement goals.

GEAS proposes the use of an integrated and adaptive approach where restoration is applied. We contend that the habitat treatment success rates estimated in the Portfolio (80%) counters what restoration ecologists working in the SRBOP have found. The success of treatments in the precipitation and temperature zone occupied by SRBOP has very low restoration success for reseeded and other habitat enhancements using traditional approaches (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.) due to SRBOP susceptibility to invasion by cheatgrass and accelerated fire cycle. Some habitat projects for the sole purpose of vegetation enhancement have actually increased the spread of cheatgrass. Work by Brooks and Chambers

(2011) on resistance and resilience highlights the difficulties that must be confronted by restoration efforts in these dry, low elevation areas and represents the kind of science that should be understood before implementing a restoration plan in the SRBOP.

Cheatgrass presence complicates these efforts. The invasion of cheatgrass has changed the fire frequency in sagebrush systems such as the SRBOP where, prior to cheatgrass invasions, fire occurred on average every 70 years. Cheatgrass presence has accelerated fire return intervals to 5 to 7 years, a drastic change that has completely altered habitat in the SRBOP and makes remnant stands of native vegetation a vital element of the long-term health of SRBOP and its ability to support raptors. Thus it is critical to first protect remnant sagebrush patches using firebreaks (i.e., forage kochia) as proposed by the BLM fuels experts (L Okeson, pers. comm.). As restoration activities progress, firebreaks may be modified (i.e., replaced with native vegetation to connect restored areas and planted around the newly restored and connected patches) to help ensure protection from future fire.

Likewise, much effort has been expended on habitat enhancement in SRBOP, yet we know very little about what factors influence success and failure. GEAS proposes a restoration approach that is informed by ongoing research, designed to test and improve our knowledge as restoration is implemented, spatially explicit, and timed to appropriately capitalize on optimal weather conditions.

Ongoing restoration research carried out by the NCA Restoration Working Group is well suited to inform the Companies restoration efforts as they develop new techniques and understand the importance of seasonal and annual timing of implementation as a key factors influencing success (M. Germino, D. Shinneman, and D. Pilliod, pers. comm.). The Work Group should be a key element of project planning and their published information and monitoring data should be employed as specific strategies are developed.

Restoration initiated through the Enhancement and Mitigation Portfolio should start with these data in hand. Initial restoration plots should be placed and planted so they build upon and improve the research data, and bridge to application at larger spatial extents. That is, plots should be placed in areas that will eventually connect remnant native vegetation patches and seeded/planted in a range of treatments the Work Group research shows have higher success probabilities. This approach is critical to prepare for the second, larger application: because the actual restoration implementation must be timed with optimal weather, this “learn-do” approach will increase the likelihood of success when full implementation occurs.

GEAS recommends that this restoration approach begin with the identification of the key remnant native sagebrush patches within the SRBOP that exhibit ecological integrity and are still “intact”. These areas are the “base” for this type of approach. The second step would focus

restoration efforts in areas between these key remnant patches in an effort to connect these key areas together. The overall goal of this approach is to eventually create ecologically intact, large, and connected sagebrush areas important for the many species that thrive in these conditions.

The timing of restoration actions as specified above and success for restoration is dependent upon precipitation (large rain events) in the spring before restoration actions (planting, etc.) occur. It is imperative that restoration funds be flexible. Funds must be banked and allocated when the conditions are right for restoration actions. The restoration fund can be accessed when the conditions are prime for restoration actions. GEAS recommends the funding committed by the Companies be established as a Trust Fund which is managed by a Board or Oversight Committee. The Committee should have discretion to apply or reserve funding in a time-sensitive context (i.e., commit restoration funds in positive weather years). The Trust would serve a second function as a pot of ‘matchable’ dollars that could attract additional funds to augment restoration of SRBOPA.

As restoration actions occur, monitoring must be implemented to quantify and understand where and why success rates are high, address challenges and failures, and allow for adapting the restoration approach over the years so that the dollars spent on restoration will be successful over the long-term. The Portfolio fails to specify a monitoring effort. This is an important aspect that must be addressed and is crucial to the success of this approach. If vegetation reestablishment is the goal, then appropriate vegetation monitoring protocols must be put in place with data collected both before and after construction on the line, within the key remnant sagebrush patches, and at sites designated for restoration and mitigation.

Monitoring needs to be carefully considered and matched to expected outcomes temporally and ecologically. For example, restoration actions over a relatively small proportion of SRBOP are not likely to have measurable effects on, for example, prairie falcon populations across the entire SRBOP. It may, however, have some influence on nest success or breeding density of proximal nesting territories. Likewise, demographic response by prairie falcons may lag habitat recovery by several years. These examples illustrate the need for a thoughtful monitoring approach that begins with fine-resolution, vegetation monitoring and eventually scales to measuring the response by raptors that are most likely to be influenced by the restoration. The monitoring strategy should be implemented using an experimental design, where “control areas” and “experimental areas” are monitored so that comparisons can be made to determine successes, address failures, and inform late stage and future restoration actions accordingly. Again, this monitoring effort is critical to the adaptive restoration process and is required by BLM regulations.

GEAS proposes action on an overall approach that meets the enabling legislation and RMP guidance, employs the best science while engaging the fuels expertise at BLM, and sets the stage

for a more programmatic approach to habitat recovery in the SRBOP. Coordination between BLM land managers and ecologists, the Companies' natural resource and administrative specialists, and the NCA Restoration Working Group is critical to implement this approach. GEAS is committed to this collaborative, adaptive approach and pledges continued participation where appropriate.

Additional Comments on Enhancement and Mitigation

Recreational Shooting

Although not directly addressed in the Portfolio, GEAS members are strongly in favor of a shooting closure within 200 yards of new and existing powerlines as well as access roads. A shooting closure is consistent with and supports a range of recommendations and offerings in the Portfolio. For example, the Portfolio indicates that, "access roads ... may increase the risk of vandalism ... (page 32)." A shooting ban of 200 yards from roads and powerlines would be enforceable (consistent with Law Enforcement provisions, page 37) and discourage both firearm-caused vandalism and additive mortality to raptors and prey. Furthermore, we contend that one of the greatest threats shooting brings to the SRBOP is the potential for fire ignition. There are numerous incidents of target-shooting-related fire ignitions in southwest Idaho, some of which sparked immense, destructive blazes. Wildfire is a recognized threat to native vegetation (and consequently small mammals and raptors) in the SRBOP and an economic threat to the powerlines. A shooting ban would reduce all of these threats and, when paired with increased law enforcement, is completely enforceable.

Vegetation Restoration (reclamation)

Regarding plant/seed mixtures: Page 36 states "mixes should include shrubs that are suitable for small mammals." *While we don't argue with this intent, we expect that shrubs and forbs planted and seeded need to be a close match to the local soil and climate conditions... i.e., native plants. It's important this is clearly stated.*

Regarding the need for better (more accurate and precise) maps of proposed restoration: I.e., "... developing a geodatabase layer using the proposed facility locations and then overlaying that "footprint" database, whether for construction or operation footprint, with the relevant vegetation or land ownership geodatabase layer." GEAS recommends the restoration effort be fully informed with highly accurate spatial data and planning. SRBOP is one of the best-mapped areas in Idaho with a long history of spatial data. In preparation for spatial planning, the best available data on historic restoration activity and restoration research should be overlaid with topography, soils, fire perimeter and other GIS layers to ensure proper construction siting, mitigation siting and restoration actions.

Page 36: “in accordance with the RMP, habitat restoration projects should be located in areas where it is most beneficial to raptor prey populations” therefore a spatial component to the restoration exercise is essential.

Need ‘security’ fund for fire response on top of management; page 32 cites a concern that “access roads ... may increase risk of vandalism, weed infestation, litter, etc.” We feel that the increased risk of fire ignition is the most critical threat posed by increased access. Some 80% of fire ignitions in the NCA are human-caused (L. Okeson, pers. comm.). We agree, that access also means quicker response to fire ignition but we also know that fires expand rapidly. Therefore we suggest a dedicated effort to sign the areas regarding risks and costs of wildfire and a proactive effort to deter ignitions (including a firearm ban).

Raptor nest/perch augmentation

Proactive retrofitting is an important element especially to honor the intent of the NCA as a world-renown site for Birds of Prey (NCA not an end unto itself ... they are identified and situated for specific resource functions; SRBOP specifically designated for raptors, use for other purposes must be compatible with enhancements for BOP). GEAS recommends retrofitting existing structures where appropriate to enhance nest and perch sites for raptors.

Leave structures on removed lines

Page 39 and 40, referring to removal of Swan Falls to Bowmont line and Mountain Home to Bennet line: GEAS recommend the Companies do not remove structures that are suitable for raptor and raven nest and perches. We recognize there may be safety considerations but recommend that all structures that are not deemed unsafe be left. In addition to opportunities for raptors and ravens, many cavity nesting (excavators and secondary) will benefit from the nest site opportunities. Furthermore, a wide variety of birds would benefit for the elevated perch opportunities.

We recommend that cost savings of structure removal be redirected to (1) decommissioning and restoration of the service roads for these lines (thus improving and protecting slickspot peppergrass habitat), and (2) enhancements on the primary lines.

GEAS recommends the Enhancement Portfolio reference using ‘state of the art’ guidelines to add desirable nest opportunities.

Monitoring

As stated above, monitoring needs to be a specific element of the Portfolio. GEAS recommends that the Portfolio references the BLM Assessment Inventory and Monitoring program and any local (i.e., NCA specific) monitoring protocols and specifically describes the need for targeted monitoring of vegetation response to restoration, small mammal population trend, and raptor response to nest and perch enhancement. Monitoring is best conducted under an experimental design so trials inform subsequent efforts and expenditures.

Vegetation

Page 36: ... “to stabilize and increase the small mammal prey base, remnant upland native shrub must be preserved, interconnected and expanded.” Monitoring of upland native shrub is critical to measure success of restoration actions.

Prey base

Page 36: Citing the SRBOP RMP: the greatest benefit to raptors is in the stabilization of the prey base” thus no amount of restoration nor reclamation will meet RMP standards unless the prey base responds and the only way to accurately test this is through monitoring of the prey populations themselves.

Raptors

Monitoring protocols should be put in place to understand the effects of the line and help target measures to address any negative impacts through further management action. Ultimately enhancement measures should improve or at least maintain current population numbers in the area.

Again, Golden Eagle Audubon Society Board of Directors appreciates this opportunity to comment on the Gateway West Enhancement and Mitigation Portfolio. We look forward to further engagement in successful siting of the Gateway West line in SRBOP and in successfully enhancing native vegetation, small mammal, and raptor communities in southwest Idaho.

On behalf of the Golden Eagle Audubon Society Board of Directors,

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Conservation Committee Chair
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ATTACHMENT C

Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA

Summary of Findings and Recommendations for Raptor Monitoring Generated from the Workshop on Monitoring Raptor Status and Trends in the NCA

Staff from the BLM Boise District and the US Geological Survey (USGS) Forest and Rangeland Ecosystem Science Center (FRESC) planned and implemented a workshop in June 2008 to form a strategy to monitor raptors in the NCA (USDI 2008). The workshop included 37 scientists, specialists, and managers met to “develop an adaptive management framework for raptor monitoring for the NCA to include regular long-term monitoring to assess raptor status, and monitoring related to specific management or projects.”

Objectives of the workshop were to:

1. prioritize raptor species for long-term monitoring,
2. recommend efficient wildlife monitoring designs to assess the conservation and enhancement of raptor populations and habitats in the NCA, and
3. propose how raptor (and/or other species) monitoring can be used to evaluate vegetation treatment projects implemented in the NCA

This attachment summarizes findings and recommendations of the workshop group that addressed monitoring raptor status and trends in the NCA. A full report of the workshop is presented in USDI (2008). Workshop participants recommended that monitoring should be designed to detect change and prompt a management decision if change exceeds an acceptable standard or pre-determined threshold. In general, upon detecting an unacceptable change or trend, additional investigation(s) should be conducted to gain more detailed understanding of cause-effect relationships, mechanisms, etc.

RESPONSE OF WORKSHOP PARTICIPANTS TO THE QUESTIONS:

Because questions 1 and 2 are interrelated, both questions were addressed simultaneously in discussing the approaches for the different species.

Question 1. Which raptor species warrant intensive long-term monitoring and what monitoring designs are effective for assessing the status of these species, as well as generate information on the other raptor species?

Question 2. How often should various raptors be surveyed and what should be the periodicity of monitoring

The report recommended a 2-tiered approach for monitoring raptors that included intensive monitoring for priority species and a less intensive strategy for multiple species. Workshop participants identified Golden Eagles, Prairie Falcons, Ferruginous Hawks, and Burrowing

Owls as priority species with the eagles and falcons as the top priority. The less intensive strategy would focus on the benchland and wintering raptors. Benchland nesting raptor species, specifically included Burrowing Owl, Ferruginous Hawk, Northern Harrier, and Short-eared Owl. *The term “benchland” refers to the plain surrounding the Snake River Canyon (USDI 1996:9).* Wintering raptor species, specifically Rough-legged Hawk, Northern Harrier, Red-tailed Hawk, Golden Eagle, and Prairie Falcon.

Golden Eagles and Prairie Falcons were considered top priority because:

- These species were cornerstones in establishing the NCA
- A vast background data has been collected on them from which to detect change (40+ years for Golden Eagles and periodically over 30 years for Prairie Falcons).
- They utilize different prey that vary over time, and eagle and falcon populations fluctuate differently based on previous research
- The Golden Eagle is a good indicator raptor species because it relies on black-tailed jackrabbits, and jackrabbit status is associated with shrub habitat condition.
- The Prairie Falcon is a ground squirrel specialist during the breeding season and is sensitive to changes in ground squirrel abundance as a result of climate change and habitat alteration.
- Most Prairie Falcons leave the NCA following ground squirrel estivation, and factors affecting falcons can extend beyond the NCA. Trends in numbers may reflect conditions on and off the NCA, and migratory species, such as Prairie Falcons, may be affected more by climate change than resident species.
- The NCA contains a low number of nesting eagle pairs, and loss of a few nesting pairs should trigger new action by managers.
- Historical counts of falcon pairs have revealed high year-to-year variability
- Analyses of change can be across the NCA or more locally.
- Nesting eagles are relatively inexpensive to monitor compared with data gained.
- Surveyors can effectively gather other data (e.g., covariates).
- The NCA is one of the few places where Prairie Falcons have been studied and monitored in the long-term.
- Prairie Falcons have large home ranges that encompass much of the area within the NCA
- The Golden Eagle is a FWS Bird of Conservation Concern in BCRs 9 (where the NCA lies), 16, 17, 18 & 35, and the FWS is interested in eagle monitoring in the NCA.
- The Prairie Falcon is a FWS Bird of Conservation Concern in BCRs 9, 10, 16, 17, 18 and 32, which comprise the bulk of its range in the U.S.
- The number of Golden Eagles using the NCA approximately doubles in winter with influx from other areas

Ferruginous Hawks and Burrowing Owls were considered priority species because:

- These species nest on the benchlands above the canyon, although Ferruginous Hawks also nest in the canyon.
- They use different vegetation types and prey than Golden Eagles and Prairie Falcons.
- Ferruginous Hawks use shrub and grassland habitats.
- Burrowing Owls use grassland cover types, and owl abundance, distribution, and use of areas is likely to change if shrubland restoration succeeds.
- Preliminary data show no evidence for declines in the Ferruginous Hawk nesting population in the NCA (see Appendix 4). Monitoring would provide for a solid baseline and continued assessment of status
- The Ferruginous Hawk is a FWS Bird of Conservation Concern and BLM Sensitive Species Type 3
- The Burrowing Owl is a FWS Bird of Conservation Concern throughout most of its U.S. range (BCRs 9, 11, 16, 17, 18, 32, 33, 35, 36) and is a BLM Sensitive Species Type 5

Recommended Monitoring for Priority Species

Golden Eagles. Workshop participants recommended that the annual survey of all historical nesting territories in the NCA and in the Comparison Area (the area along the Snake River located upstream and downstream of the NCA) continue as it has for the last 40 years. The annual survey includes assessment of occupancy and productivity.

The quantitative goal of monitoring depends on the location of decline in the NCA and whether it is geographically local or widespread. The goal is to detect change (rate of change or change below an established threshold) in the number of pairs and/or productivity. Participants suggested a loss of 3-4 nesting pairs as a threshold that would trigger action

Management actions: An unacceptable change would trigger a decision to investigate what factors (e.g., fire, OHV and other human disturbance, restored vegetation, etc.) might be associated with the change in nesting pairs or productivity, relative to the location of the change. Investigations and management actions should consider the time frame for recovery. Eagles are long-lived, which could result in a long time for recovery. The BLM should focus vegetation restoration efforts within 3 km of the canyon rim, or within 3 km of nests outside of the canyon.

Threats to Golden Eagles include vegetation type conversion from shrubs to annual grasses, and human activities - recreation (mainly OHV disturbance). [NOTE: *Abandonment equals take if caused by human activity...Diana Whittington (US FWS) stated that human disturbance to nesting Golden eagles (or the permitting of such) that causes loss of any production in a given year is a violation of the Bald/Golden Eagle Act.*]

Prairie Falcons. The group recommended monitoring falcon abundance and nesting success 3 of every 5 years. One year to consist of a full canyon survey as was done in 2002, and the other 2 years to consist of a stratified random sample of sections of canyon with high and low nesting densities as was done in 2003.

Information from assessing annual nesting success could be adequate to monitor Prairie Falcon reproduction in the NCA because nesting success [the proportion of preselected pairs raising at least one young to ≥ 30 days of age (see Steenhof and Newton 2007)] and productivity (mean number of young reaching ≥ 30 days of age per preselected pair) are highly correlated. It cost about \$120,000 to conduct a full canyon survey and collect productivity data in 2002. Using the cost of a full canyon survey with productivity as a base, a full canyon survey with just nesting success would reduce the base cost about 15% and a stratified random sampling effort like that used in 2003 combined with only assessing success would reduce the cost by about 35%. Information on other species (i.e., Red-tailed Hawk and Ferruginous Hawk) also can be collected from the Prairie Falcon point-count surveys.

Participants recommended that the quantitative goals of monitoring be to 1) identify trajectories in the number of nesting pairs and/or nesting success occurring over multiple years in a geographic cluster within the survey area, 2) detect substantial changes in the number of nesting pairs and/or nesting success across larger areas (*substantial change was not defined at the workshop*), and 3) ascertain when the number of pairs falls below the historical minimum of 160 recorded in 1994. Some members of the group cautioned about using absolute thresholds. These levels should serve as triggers for further investigation not as triggers for panic.

Management actions: A decline in the number pairs or nesting success beyond the acceptable level would trigger a management decision to investigate the reasons for the decline. The 1997 survey was a good example of this management process. Results from long-term surveys in selected stretches of the canyon in 1997 indicated a significant decline in the number of falcon pairs. NCA management implemented a full canyon survey in 2002, and results indicated that the number of nesting pairs that year was back at historical high levels.

Recommendations for less intensive monitoring for multiple species

Raptors that nest on the benchlands. Workshop participants recommended that monitoring focus on:

- Burrowing Owls
- Ferruginous Hawks
- Northern Harriers
- Short-eared Owls.

The Burrowing Owl should be a focal species for the ecological communities on the benchlands. Short-eared Owls and Northern Harriers can be nomadic, and numbers vary widely from year to year in the NCA, which is an important consideration for the monitoring design. Year to year changes in local numbers are likely to reflect nomadism as much as they reflect population changes. The Short-eared Owl is a FWS Bird of Conservation Concern and a BLM Sensitive Species (type 5). Swainson's Hawk were not a great concern in the NCA because of low number of pairs.

Recommended monitoring approach: The standardized roadside point-count survey method described in Conway et al. (2008) and Conway and Simon (2003) was recommended for surveying Burrowing Owls and the other species. Routes should be established with some structured sampling frame. Conway and Simon (2003) recommend one route per township. Participants recommended using the existing road network for transects and broadcast surveys for Burrowing Owls and the other species where applicable. When pairs are located, surveyors can search the area of activity to find a nest and assess productivity or nesting success.

Workshop participants recommended that the use of transects for multiple species should be examined further to address the following:

- whether transects should be surveyed year round.
- what information would be collected from the transects—trend over time?
- how nesting success can be assessed from transects.
- what changes can be detected to trigger a management decision?

Wintering raptors. The following species were identified for monitoring on the benchlands:

- Rough-legged Hawk,
- Northern Harrier
- Red-tailed Hawk
- Golden Eagle
- Prairie Falcon

Some participants felt that a measure of raptor use would be a good indicator of restoration success. *[There were differing opinions on this statement. Some Group I participants and Group III (see Statement 1 of Question 2 of Group III) did not agree with the statement, and Group II felt that the approach should be evaluated (see recommendation 4, Question 1)].*

Data from past studies should be evaluated to assess if comparisons can be made with new survey data. John Doremus collected wintering data on certain species. Bill Mattox and James McKinley surveyed road transects from 1998 to 2005 that included all raptor species detected in the Orchard Training Area within the NCA. Also Watson et al. (1996) recorded raptor

species occurrence collected from randomly distributed point counts during the BLM/IDARNG Research Project

Recommended monitoring approach: Participants believed that point-count surveys could be conducted from randomly dispersed points or points along transects. The group recommended use of the roadside point-count survey method. A monitoring plan should consider surveying year-round benchlands road transects during the two years in five when Prairie Falcon monitoring is not being done (see Prairie Falcons 2,a above). [*Note: the recommended periodicity (number of times in a year) of the surveys was not discussed at the workshop and will be addressed in the NCA monitoring plan*]. Workshop participants recommended that surveyors collect other data (e.g., weather, habitat, land use, etc.) as covariates to detect factors influencing birds. The specific covariates will be identified in the planning process. Also the monitoring design should consider stratified random sampling based on management needs.

General Discussion. Some participants suggested the BLM identify and monitor raptor migration corridors in NCA. Also, some asked if we are comfortable with our knowledge of status and our estimates for raptors in NCA (excluding Prairie Falcons and Golden Eagles). Also should the BLM consider a comprehensive assessment / inventory as a basis for monitoring the status of species and their response to management activities?

Question 3. Which raptor species provide the most reliable data to evaluate long-term (i.e., 20 years) habitat restoration success across the NCA?

Golden Eagles and Prairie Falcons were listed because these two species have different primary prey species that are associated with shrubland habitats. Black-tailed jackrabbits (the eagle's main prey) require shrubs. Although Piute ground squirrels (the falcon's main prey) do not require shrubs, their populations are more stable in shrub habitats. Eagles have a relatively small home range compared to the falcon's large home range, which provides managers with a reflection of impacts at different scales and locations. The Golden Eagle population is relatively stable vs. Prairie Falcon's variability in occupancy/productivity.

Raptor use of restored areas vs. untreated areas needs to be assessed, but the challenge is how to do it. Some participants suggested using solar powered GPS satellite-received transmitters on female Prairie Falcons to assess use of treated and untreated areas. *Note: Some participants felt that data from males might be more revealing if transmitters of the appropriate size are available.* Participants recommended that treatment and control experiments should be monitored before, during, and after treatments.

RESEARCH QUESTIONS

The group suggested that protocols be established to assess the array of research questions so that studies can complement each other. Participants identified the following research questions:

- Why are some Golden Eagle territories that have burned more productive than others? (Diet studies may be one way to approach this question.)
- What is the trade-off of using non-natives in vegetation restoration vs. no action?
- Can Loggerhead Shrikes be used as an indicator of restoration success?

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From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10065] - Webmaster Receipt
Date: Sunday, January 24, 2021 9:17:15 PM

Thank you for your input, James Neu.

The tracking number that has been assigned to your input is **10065**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 24, 2021 21:16:55 CST

First Name: James
Last Name: Neu
Email: jjneusies2@gmail.com

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

Input

BLM and USFS Representatives,

Thank you for the opportunity to comment on this project. I am opposed to this proposed fossil fuel expansion project as it does not align with the State of Oregon GHG reduction goals set forth by the governor in her Executive Order 20-04 and under the new federal administration's carbon reduction goals for the nation.

Fossil fuel infrastructure projects of this magnitude have lifecycles that last for more than 50 years. The IPCC recommends anthropogenic contributions to global warming through the combustion of fossil fuels needs to be reduced in the next 8 years. This proposed project goes against those recommendations. Renewable energy sources have proven a better solution environmentally, economically and socially.

This proposed project will disrupt wildlife ecosystems and fisheries, travers many rivers and streams, and create a wildfire hazard. Several times a year, I recreate in this area of the proposed project and this would be environmentally devastating for current and future generations of outdoor activities. This project does not benefit the citizens of Oregon and must not be permitted.

I urge you to deny this proposed fossil fuel expansion project for the benefit of Oregonians and to all of those that recreate here. Thank you for the opportunity to comment.

James Neu

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10066] - Webmaster Receipt
Date: Monday, January 25, 2021 3:46:27 PM
Attachments: [ID_10066_OwyheeCountyCommentonReviewoftheSection368EnergyCorridorsRegions45and6Report1252021.pdf](#)

Thank you for your input, Audra Yoshikane.

The tracking number that has been assigned to your input is **10066**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 25, 2021 15:46:09 CST

First Name: Audra

Last Name: Yoshikane

Email: ayoshikane@co.owyhee.id.us

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

Organization: Owyhee County

Input

[Blank]

Attachments

Owyhee County Comment on Review of the Section 368 Energy Corridors Regions 4, 5, and 6 Report - 1-25-2021.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



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District 3 -Chairman--Joe Merrick- P.O. BOX 128 MURPHY, ID 83650-0128

January 25, 2021

Jeremy Bluma
National Project Manager Section 368 Energy Corridor Reviews
Bureau of Land Management
Washington, D.C.

Re: Owyhee County Comment on Review of the Section 368 Energy Corridors Regions 4, 5, and 6 Report

This document will be delivered electronically via input on the web site [Regions 4, 5, and 6 Report Input \(anl.gov\)](https://www.blm.gov/regions/4-5-6-report-input) and electronically to Jeremy Bluma at jbluma@blm.gov

Dear Mr. Bluma:

On April 9, 2019 Owyhee County provided comment on the proposed routing of corridor 36-228 and any other potential routings of existing or newly proposed corridors. In our comments we addressed various impacts including to impacts to private property owners, wildlife, and loss (either actual or impact loss) of the limited number of private land acres within the county.

In that correspondence we also noted that 80 private land owners potentially affected by the potential routing of the Gateway West Transmission line had provided signed statements that they would not willingly allow the use of their lands for that project and would not, as required by our code, submit applications for Planning and Zoning Approval for such use of their lands.

In reviewing the Regions 4, 5, and 6 Report we are pleased to see that alternatives have been identified that responds to the issues we raised in 2019 and we have referred to them below. We are, however, still concerned about certain elements of the Report and we also address them below.

In the "Potential Corridor Enhancements Summary and Rationale" section of the Report beginning on page 76 we are pleased to see the references to many of the impacts we addressed in our April 2019 letter such as:

-- "Develop a specific Energy Corridor Management Plan and incorporate into Agency land use plans to provide applicable guidance, current policy and technical standards for improved management..."

- "Re-route the corridor to avoid private lands in Owyhee County where there is no existing infrastructure and there is strong local opposition to future development within the corridor..."
- "Re-align the corridor along the recently authorized Gateway West route (beginning at MP 89 connecting to Corridor 29-36 at MP 12) where it crosses the Morley Nelson Snake River Birds of Prey NCA."

We are concerned, however, with several other statements or possible routings as found in that same section on page 76.

The proposal to "Re-align corridor along BLM land south of current corridor location (possibly along Gateway West alternative 9E) from MP 32 to MP 95." does not avoid private property impacts as stated in the report and private property owners potentially affected are among those who have provided statements as noted above.

The statement, "The potential revision through the NCA would be dependent on the whether or not it is compatible with the purposes of the NCA, emphasizing habitat protection with economic development. The NCA Management Plan restricts major utility developments to the two Section 368 energy corridors (Corridors 36-228 and 29-36)." is contrary to the clear language of Section 368 of the 2005 Energy Act upon which lies the direction and authority for the creation of these energy corridors. In addition to the language of Section 368, it is unclear to us why the Report does not mention, or apparently consider, the Congressional Act passed and signed into law in 2017 ([Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act](#)) which removed lands from the NCA and directed the government to issue a right of way for the Gateway West Transmission Line. The Congress achieved this by adding acreage to the NCA so as to ensure there was no net loss of land. The Act also made clear that the removed lands were not to be managed as NCA.

Section 368 states clearly that within two years of passage of the Act the various Secretaries were to, "incorporate the designated corridors into the relevant agency land use and resource management plans or equivalent plans." That action should have been taken on the NCA at that time and, should be taken now so as to use NCA lands if the the Gateway West Transmission line route is of insufficient dimensions for this corridor.

We concur with the statement, "Gateway West did not route its transmission line through the corridor because of strong local government opposition and the corridor is unlikely to be developed in the future. The potential revision through the NCA creates a preferred route for potential future energy development by connecting multiple Section 368 energy corridors between energy hubs and collocating with the recently authorized Gateway West Transmission Project, a major energy pathway."

The statement which follows that, "The potential corridor revision along the Gateway West Alternative 9E would avoid private lands in Owyhee County", however, is not accurate in respect to impacts to private land impact as we understand that route and the lands it crosses. In regard to this we cite elements of a comment which will be submitted by Ms. Karen Steenhof. Ms. Steenhof is a retired USGS Research Wildlife Biologist and raptor specialist who is also a member of our County Natural Resources Committee. During the years of consideration and conflict over Gateway West, she was also a member of the Boise District RAC and co-chaired the RAC's Gateway West Subcommittee. We incorporate Ms. Steenhof's comments as follows in italicized font and in quotes.

"Thank you for the opportunity to comment on the Regions 4, 5, and 6 report/or the West-wide Energy Corridor, dated November 2020. My concerns focus on Corridor 36-228. I have read the portions of the report that address 36-228 in both Volume I and II, and have found that the review lacks key information.

*I was surprised and disappointed that the latest West-wide Energy Corridor review contained no reference to the **Boise District Resource Advisory Council Subcommittee Report on Gateway West Segments 8 and 9 Route Options in or near the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), which was produced in 2014 (see Attachment found with Ms. Steenhof's Comment).** And I was surprised and disappointed that the West-wide review was still considering routes that, after a detailed analysis, the RAC had determined to have serious impacts on communities, resources, and private landowners.*

In 2013 and 2014, the RAC subcommittee evaluated 26 different route options for the Gateway West transmission line (12 for the northern route and 14 for the southern route). The analysis included a matrix to quantify resource constraints and features associated with each route. After 11 meetings, one work session, two field tours, and input from dozens of citizens, utility staff, and other experts, the subcommittee identified two route options that minimized all conflicts.

I was pleased to see that the West-wide review is considering revising the existing corridor to "avoid private lands in Owyhee County, where there is no existing infrastructure and where there is strong local opposition to future development within the corridor. "

However, I was disappointed to see that Gateway Alternative 9E is still being considered as an alternative corridor. Route 9E was one of the least viable routes reviewed by the RAC subcommittee, primarily because of the threats it posed to Greater Sage-grouse populations and their habitat. Therefore, I was surprised to that the review recommends that "The Agencies could also consider re-routing the corridor to the south to avoid private lands, following alternative 9E for Gateway West for a portion of the corridor," without references to known conflicts. In fact, Route 9E does not avoid private lands, and page 76 of Volume 2 does not even mention the sage grouse that would be impacted along that "potential revision. "

The statement in Volume 2, page 76 that "potential revision through the NCA would be dependent on the whether or not it is compatible with the purposes of the NCA "seems to ignore the fact that the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act removed land along the Gateway West transmission line right-of way from NCA status.

I suggest that this portion of the report be re-written to include important relevant information and a re-evaluation based upon the information that has been omitted. "

In addition to the private property issues in regard to the use of 9E, we provided comment at the Missoula, MT Workshop in 2019 in regard to wildlife issues (including sage grouse) along this route and the adverse impact that would be placed upon intact vegetation systems in the area of the route.

We had attempted to discuss this and other matters with you via teleconference but were not able to get our schedules coordinated. If we have an incorrect understanding of the 9E routing the report cites, we would like to discuss this further with you. Such a teleconference would also be beneficial as an opportunity to ensure that we understand the proposals as stated in the Report and that you have the opportunity to hear any concerns that might arise from a discussion vs simply providing a written comment to the Report.

Again, we appreciate your past efforts to engage us in this process. We believe you are sincerely attempting to gather and consider the impacts to counties such as ours. On that basis, we have provided this comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Merrick", is written over the printed name and title.

Joe Merrick
Chairman

Commissioner

Commissioner

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10067] - Webmaster Receipt
Date: Monday, January 25, 2021 3:51:00 PM

Thank you for your input, Thomas & Michelle Meyers.

The tracking number that has been assigned to your input is **10067**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 25, 2021 15:50:41 CST

First Name: Thomas & Michelle

Last Name: Meyers

Email: meyers7t@gmail.com

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

Input

We are private property owners who ranch and farm in Oreana, Owyhee County, Idaho, in which this Energy Corridor is proposed to be built. We strongly oppose this and are particularly concerned with your Gateway Alternative 9E Route as this will directly affect us, our family, our livestock and all the wildlife habit that are on our property. We know that there have been workgroups assisting to find a better route over the last several year and hope that you seriously take their findings under consideration and abandon the proposed 9E route.

Thank you for allowing us to submit our comments.

Thomas & Michelle Meyers

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10068] - Webmaster Receipt
Date: Tuesday, January 26, 2021 7:02:46 PM
Attachments: [ID_10068_SCESec368CorridorsCommentLetter01262021.docx](#)
[ID_10068_SCESection368CommentTable_Jan2021.xlsx](#)
[ID_10068_201911pathwayto2045whitepaper.pdf](#)

Thank you for your input, Shannon Stewart.

The tracking number that has been assigned to your input is **10068**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 26, 2021 19:02:20 CST

First Name: Shannon
Last Name: Stewart
Email: Shannon.C.Stewart@sce.com

Are you submitting input on the behalf of an organization? Yes
Organization: Southern California Edison

Input

Three attachments provided:
SCE Sec 368 Corridors Comment Letter 01262021.docx
SCE Section368 Comment Table_Jan 2021.xlsx
201911-pathway-to-2045-white-paper.pdf

Attachments

SCE Sec 368 Corridors Comment Letter 01262021.docx,SCE Section368 Comment Table_Jan 2021.xlsx,201911-pathway-to-2045-white-paper.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

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



Section 368 Energy Corridor Regional Review

PATHWAY 2045

Update to the Clean Power and Electrification Pathway

November 2019

EXECUTIVE SUMMARY

By 2045, California will undergo a remarkable evolution. Supported by its residents, the state will achieve carbon neutrality to reduce the threat of climate change. This will require substantial decarbonization of all sectors of the economy and will necessitate rigorous planning to keep energy safe, reliable and affordable.

Pathway 2045 examines the energy implications of California's long-term decarbonization goals on both the economy and the electric sector and maps out a feasible and low-cost path to meeting these goals. Pathway 2045 builds on *The Clean Power and Electrification Pathway*,³ Southern California Edison's 2017 analysis of what will be required to meet 2030 interim goals.

Pathway 2045 concludes that the changes required across California's economy are profound: Decarbonization is achieved through powering 100% of retail sales* with carbon-free electricity, electrifying transportation and buildings and using low-carbon fuels for technologies that are not viable for electrification.

The remaining carbon is sequestered to reach carbon neutrality (Figure 1). Emerging technologies and practices will be required to find the most economical method to remove carbon at this scale.

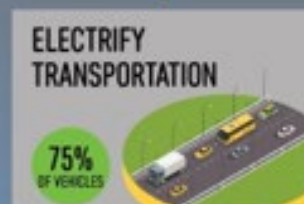
Electric sector: To economically meet both the 2030 and 2045 decarbonization goals, the electric sector needs to decarbonize more quickly than currently required. By 2045, significant electrification of the state's economy combined with population and economic growth will result in a 60% increase in electricity sales from the grid and a 40% increase in peak load.

Eighty gigawatts (GW) of new utility-scale clean generation and 30 GW of utility-scale energy storage will be required in the next 25 years. Energy storage will be essential because the most cost-effective, carbon-free generation sources — wind and solar — are intermittent. Thirty additional GW of generation capacity and 10 GW of storage will come from distributed energy resources (DERs) including up to 50% of single-family homes in California which, driven by improved economics, building codes and supportive but equitable policies, are projected to have customer-sited solar by 2045.

The grid: The grid must have sufficient capacity and continue to modernize to harness the full potential of DERs. Electrification will further increase customers' reliance on the grid, underscoring the need to build in additional resilience to withstand the more frequent and severe weather conditions due to climate change impacts. Grid hardening efforts today along with system designs that accommodate increasing flexibility and more monitoring should reduce these risks. At the same time, California's leadership in deep decarbonization can be a global model that helps mitigate the further threats of climate change.



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CARBON NEUTRALITY BY
2045

Figure 1: Decarbonization is required across the California economy

Natural gas and low-carbon fuels: Services provided by natural gas today, such as supporting electric grid reliability, will still be needed in 2045. Natural gas consumption in 2045 will decline 50% from today, and cost impacts on remaining gas customers will need to be managed. At least 40% of the remaining gas will need to be low-carbon fuels such as biomethane or hydrogen. Other hard-to-electrify sectors such as heavy-duty transportation and some industrial processes will also rely on a combination of natural gas and low-carbon fuels. Research and development is necessary to bring these low-carbon fuels to commercial viability and required scale.

Transportation: Three-quarters of light-duty vehicles, two-thirds of medium-duty vehicles and one-third of heavy-duty vehicles will need to be electric by 2045. Vehicle affordability, product diversity and charging infrastructure availability are needed to accelerate adoption to meet 2030 targets and prepare for 2045.

Buildings: Almost three-quarters of space and water heating needs to be electric by 2045. Given the long life cycles of space and water heating equipment, significant consumer awareness and education need to be supported now to speed adoption. Customers will benefit from the significant efficiency provided by electrification, as well as from energy efficiency and demand response programs that help to lower customer consumption and bills.

The cost and benefits for Californians: The clean energy and grid investments required to meet 2045 goals is a tremendous economic development opportunity for California. Utility-scale generation and storage and the supporting grid represent up to \$250 billion of clean energy and grid investments and include thousands of sustaining craft and skilled jobs.

As California decarbonizes, energy must remain affordable for all of the state’s consumers, including our most vulnerable residents. Electrification produces savings for an average household, but late adopters who continue to rely on natural gas for their homes or gasoline for their cars will be increasingly burdened in the transition.

Robust, coordinated and targeted policies are needed to clean the power supply; build, operate and maintain a reliable and resilient grid; and move customers to adopt new technologies and programs. Advancing and scaling up adoption of new technologies will require incentives, regulations and other market transformation policies.

Most importantly, through this transition, all California residents will benefit from greatly reduced greenhouse gas emissions (Figure 2) and new economic opportunities.

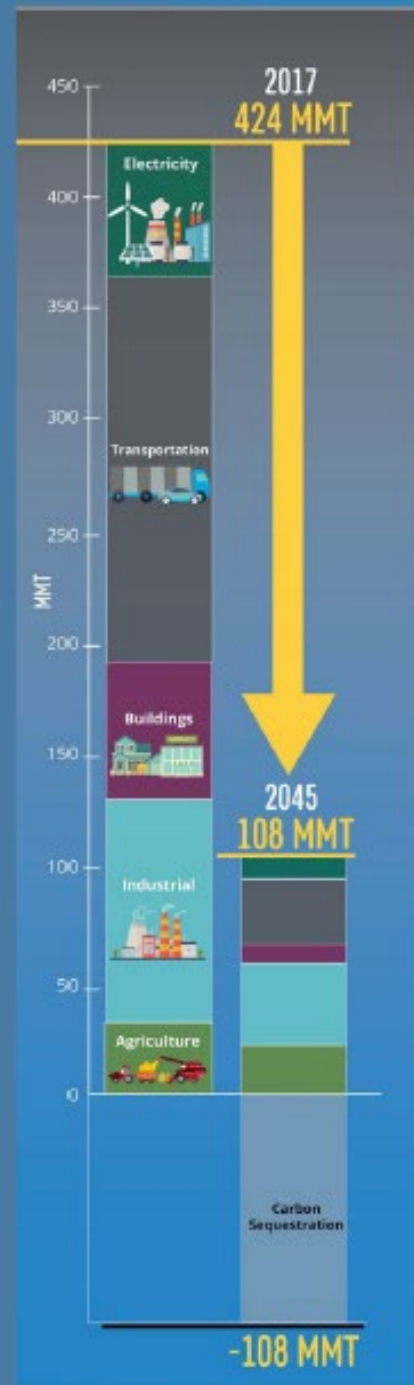


Figure 2: Greenhouse gas emissions reductions to meet California targets (in million metric tons)

“Climate change is the defining issue of our time — and we are at a defining moment.”

Antonio Guterres
United Nations Secretary-General²

INTRODUCTION

California is committed to reducing its greenhouse gas (GHG) emissions and achieving carbon neutrality in 2045 in order to reduce its contributions to climate change. The state’s regulatory and legislative actions are supported by residents, almost two-thirds of whom believe that climate change is already affecting our environment, and more than half of whom think global warming is a very serious threat to California’s future economy and quality of life.³

Pathway 2045 is an in-depth analysis to identify a feasible and economical route to realizing California’s GHG reduction goals (Figure 3) and achieve carbon neutrality in California at the lowest reasonable cost by 2045.

It examines how the economy must transform to meet the state’s goals and the policy, technology and market implications of that transformation. Pathway 2045 updates and extends an earlier SCE analysis, *The Clean Power and Electrification Pathway*,⁴ which focuses on the transition to 2030.

Pathway 2045 concludes that reaching California’s 2045 greenhouse gas goals is possible but will be a significant challenge for the state and requires a near-complete transformation of how the state sources and uses energy across all sectors of the economy. Getting to 2045 goals also requires meeting or exceeding intervening 2030 goals.

In Pathway 2045, economywide GHG emissions decline from 424 million metric tons (MMT) in 2017 to 260 MMT in 2030, and further, to 108 MMT by 2045. This meets the 2030 targeted goal of a 40% reduction from 1990 GHG emissions (Figure 2, page 2) and aligns with the 2050 goal to attain an 80% reduction from 1990 emissions (to 86 MMT).

Economywide decarbonization is achieved through:

- deep decarbonization of the electric sector
- significant electrification of transportation and buildings coupled with advanced energy efficiency
- use of low-carbon fuels for hard-to-electrify applications such as industrial and heavy-duty transportation.

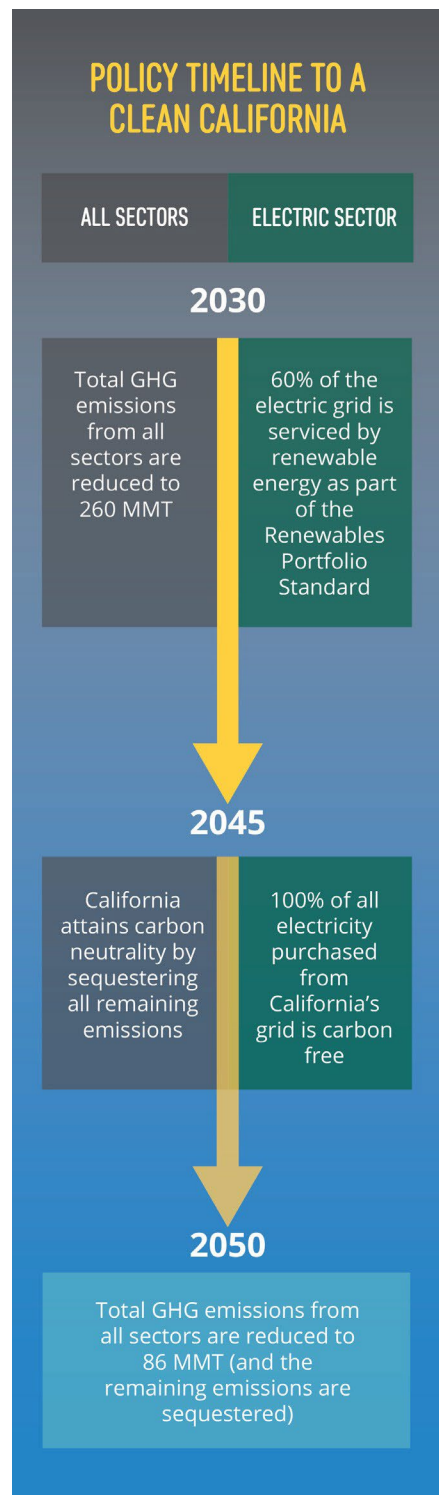


Figure 3: California policy timeline

The remaining carbon is assumed to be sequestered, either biologically or physically, to reach carbon neutrality.

This transition will largely rely on adoption and deployment of currently available technologies. However, commercialization of some emerging technologies will be needed to close the emissions gap.

APPROACH⁵

While a variety of scenarios (including high biomethane and high hydrogen scenarios) could theoretically meet California 2045 decarbonization goals, a high electrification scenario has been found to be among the most feasible and economical.^{6,7} Widespread electrification delivers significant efficiency gains because electric equipment and appliances are more energy efficient than those that rely on fossil fuels.⁸ Improvements in equipment efficiency, energy efficiency (EE) and demand response (DR) programs further lower customer consumption which helps to keep consumer costs affordable (Figure 4).

Pathway 2045 is an electric-led pathway⁹ designed to examine the implications of California’s long-term decarbonization goals on the electric sector and across the economy.

First, a decarbonization analysis identified the most feasible, cost-effective mechanisms to reduce GHGs across sectors of the California economy. Second, a detailed electric sector analysis examined two scenarios to inform the cost estimates and potential trade-offs of resource and grid development: the *Balanced* scenario focuses on both in-state and out-of-state resource development, including out-of-state transmission development, and the *Solar Heavy* in-state scenario, which does not exceed existing California Independent System Operator (CAISO) import limits.¹⁰ The objective of running two scenarios is to provide alternatives, not to conclude at this time that one or the other approach is the preferred path to 2045.

... a near-complete transformation of how the state sources and uses energy across all sectors of the economy

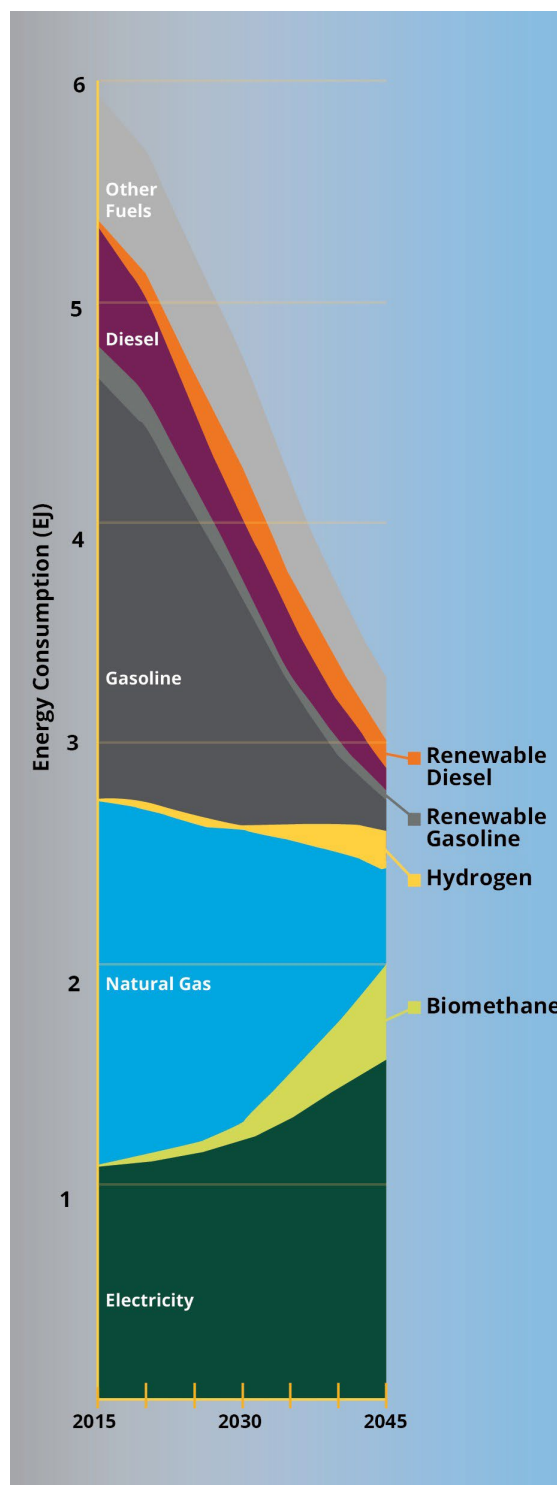


Figure 4: 2045 is powered by energy efficiency, clean energy and fossil fuel reductions

ELECTRIC SECTOR

Deep decarbonization of the electric sector is key for California to reach carbon neutrality, and long-term coordinated electric sector planning is critical.

Shifting energy demand from more carbon-intensive sectors to electricity will significantly increase electricity demand. By 2045, a greater reliance on electricity, combined with population and economic growth, will result in a 60% increase in grid-served electricity consumption (Figure 5) and a 40% increase in peak load. This load growth is a considerable departure from the past two decades of relatively flat demand.

California’s SB 100 requires 60% renewable energy by 2030, as defined by the Renewables Portfolio Standard (RPS). RPS does not include all types of carbon-free electricity (it excludes large hydro and nuclear) and the state’s energy providers are on track to meet this target. However, given both the 40% GHG reduction goal and the steep resource procurement ramp post-2030 to reach 100% carbon-free retail electric sales by 2045, the electric sector should provide 80% carbon-free electricity by 2030.¹¹

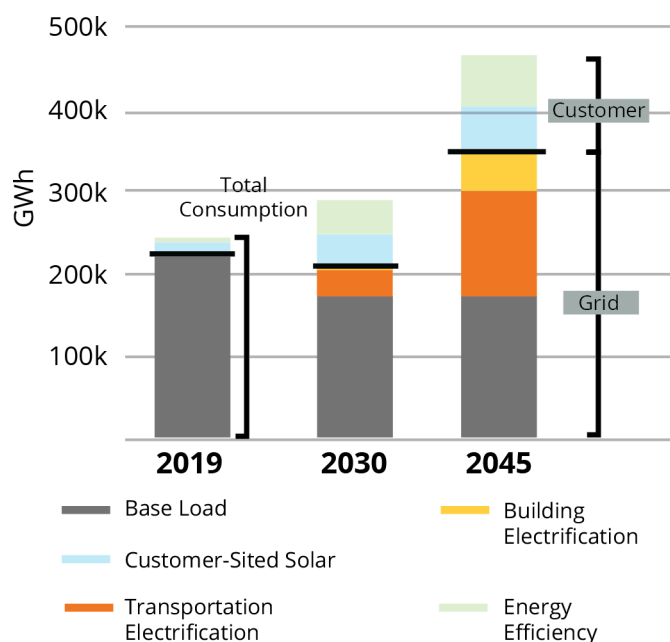
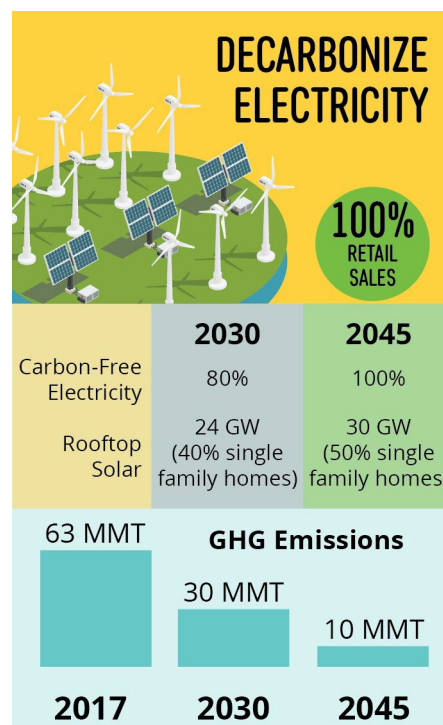


Figure 5: Increased demand is met through grid and customer-sited (distributed) resources



RESOURCE INVESTMENT

By 2045, more than 80 GW of additional utility-scale clean generation and 30 GW of utility-scale energy storage will be needed in CAISO’s footprint.

This is an annual development rate two to three times higher than historical levels¹² and represents approximately \$170 billion of clean energy investment. It will require significant procurement and resource management coordination.* Integrated planning across jurisdictions becomes paramount as procurement and planning responsibilities continue to fragment. This level of clean energy investment will be an economic engine for California in the upcoming decades, creating thousands of sustaining craft and skilled jobs in resource development, grid construction and energy management.

* Land use, siting issues and battery supply chain/recycling issues are not addressed in the Pathway 2045 analysis.

As the economy becomes more dependent on electricity as its primary fuel, up to 50% of single-family homes in California are projected to have customer-sited solar, driven by improved economics, building codes and supportive but equitable policies. This will provide approximately 30 GW of generation capacity. Additionally, 10 GW of customer-sited storage is projected by 2045. Grid modernization will need to keep pace to ensure interconnection and interoperability of DERs with the grid.

COMPARATIVE RESOURCE SCENARIOS

In both the *Balanced* and *Solar Heavy* scenarios, Pathway 2045 demonstrates that the projected need can be met with clean generation technologies that exist today (Figure 6).

The 2045 *Balanced* scenario relies heavily on in-state solar, wind and energy storage resources. California’s abundant resource potential and anticipated technological improvements allow three-quarters of the generation to be developed in state. However, the *Balanced* scenario also sources clean energy, primarily wind, from neighboring states (two-thirds of wind resources added are from out of state by 2045). Out-of-state resources and enhanced integration across state boundaries in the western grid provide greater resource diversity and flexibility but bringing these resources to the CAISO border requires additional transmission investments.

The *Solar Heavy* scenario relies more on new, in-state solar and energy storage and less on out-of-state wind (only half of wind resources added are from out of state by 2045). This scenario requires more resource capacity, but by using more in-state resources, requires less transmission relative to the *Balanced* scenario. Land use constraints that were not modeled in this scenario could limit the amount of in-state development that is feasible.

Both scenarios use longer-duration storage in 2045 compared to the typical four-hour duration used through 2030. Sixty percent of the storage used in the *Balanced* scenario and 70% of the storage used in the *Solar Heavy* scenario have durations of seven hours or greater. This longer storage duration is needed to replace the function of today’s dispatchable generation.

Alternative solutions beyond solar, wind and storage, including offshore wind and advanced geothermal, were included as resource options in both scenarios. However, the costs of these technologies were too high to be selected and will need to be significantly reduced to

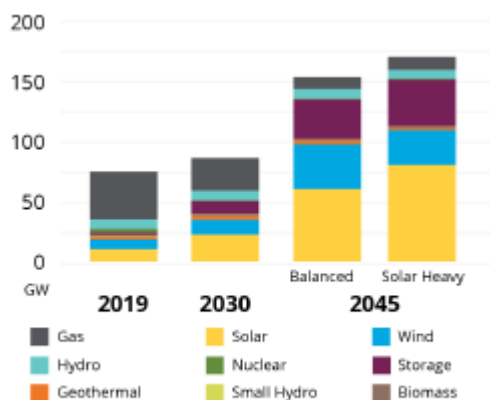


Figure 6: Comparative capacity mixes (in GWs)

While the current cost differential between scenarios in 2045 is within 5%, both scenarios have uncertain future costs given the type, location and quantity of resources needed. Decision-making should be based on a holistic approach that considers the complexity and interdependencies among factors such as in-state, land-use constraints, length and difficulty of siting processes, and other states’ policies that may restrict California’s access to their resources.

Figure 6: Comparative capacity mixes (in GWs)

RESOURCE ATTRIBUTES

Resource attributes are the most important elements to consider when planning across decades. For the purposes of this modeling, specific resources were selected that today are predicted to most cost-effectively meet demand in 2045. Pathway 2045 intends to be resource agnostic, however, if a specific technology reveals itself to be more effectual and cost-competitive than what has been modeled, then that technology should be selected in future planning and procurement activities.

GRID INVESTMENT

From 2030 to 2045, grid investments of up to \$75 billion will be required to integrate bulk renewable generation and storage and serve the load growth associated with transportation and building electrification.

Transmission upgrades will be required for generation interconnections within the state and the doubling of CAISO’s import capability to source out-of-state renewables. Investments are also required to address the local capacity area issues that occur with the projected retirement of many natural gas plants.

Utility-scale storage is used to balance load and resources and to minimize transmission and distribution upgrades. However, energy storage cannot fully offset traditional grid upgrades given both the significant load growth and the limited charging window offered by bulk solar (Figure 7).

Distribution grid upgrades will be required to meet increased demand and peak loads. Some of these may be offset by DER solutions that can include managed charging and shifting

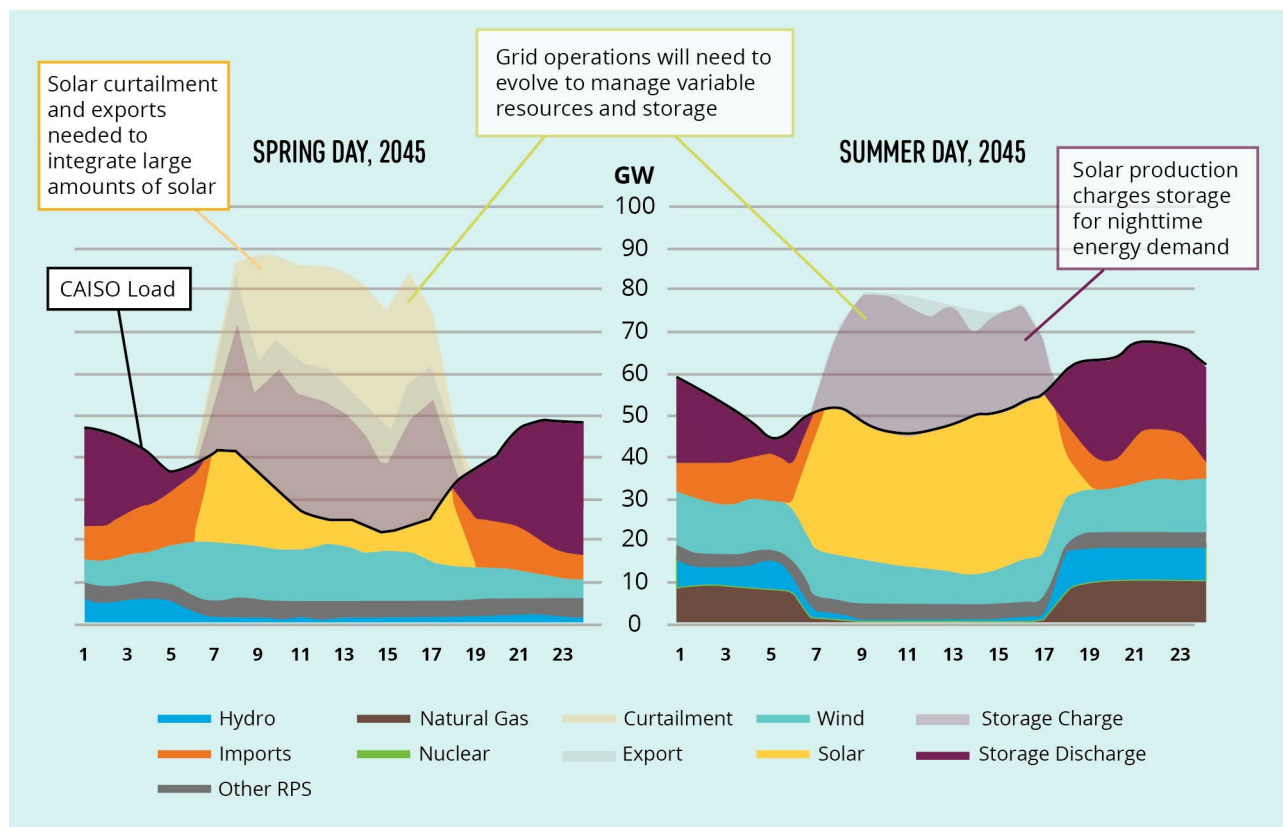


Figure 7: Resource mix of the decarbonized grid

the timing of customer usage through smart homes and other technology advances. Additionally, homes with solar and storage will provide increased load flexibility and resilience, including increased protection from power disruptions.

Customers should always be able to rely on the electric system. This is why new electric system designs and standards must be developed to create a grid that is resilient to more frequent extreme weather events brought on by climate impacts. Building on the grid hardening technologies that are being deployed today (such as the accelerated installation of insulated wire and advances in protection and control technologies) the new grid must include real-time diagnostics that can identify and isolate anomalies and weaknesses, while also facilitating deeper integration of DERs.

GRID OPERATIONS

In 2045, solar and wind will contribute the bulk of the energy supply across most hours of the day and 68% of the annual energy needed to serve grid demand. Natural gas generation, by contrast, will contribute 6% of the annual energy needed to serve grid load and will be used primarily to fill the gaps during high-load or low-renewable-generation periods. Curtailment of solar generation will be required during low-load, high-renewable-generation periods, creating a significant opportunity for storage or load management technologies that can use this excess energy.

With the dominance of intermittent solar and wind and the projected retirement of natural gas plants that provide significant amounts of steady, controllable energy, grid operators will need to evolve their operations to manage storage resources and

flexible customer loads (such as electric vehicles and building systems) to maintain grid stability.* More planning studies are needed to address how to reliably operate a decarbonized grid and to better understand worst-case weather scenarios. California's resource adequacy program, planning standards and energy markets may need to undergo comprehensive reform to manage this new fleet of variable, shiftable resources (Figure 7, page 7).

NATURAL GAS AND LOW-CARBON FUELS

Today, natural gas provides 46% of in-state (CAISO) generation, supplies 90% of the energy used in space and water heating and offers grid services. It provides thermal energy for industrial heating processes and supports combined heat and power services for customers with large energy needs, such as manufacturers, high-rise office buildings and hospitals.

Pathway 2045 shows significant reductions in natural gas use across the economy. However, some natural gas continues to be deployed because removing it completely from the 2045 electricity landscape would significantly increase resource costs. Compared to the *Balanced* scenario, if the remaining 10 GW of natural gas capacity was eliminated from the electric system, average annual resource costs would rise nearly 40% post-2030 to account for increased out-of-state wind, pumped storage and geothermal capacity. Until alternative cost-effective technologies are available to provide grid services and energy during infrequent but expected weather patterns, natural gas generation capacity provides a crucial role in keeping the grid reliable and affordable.

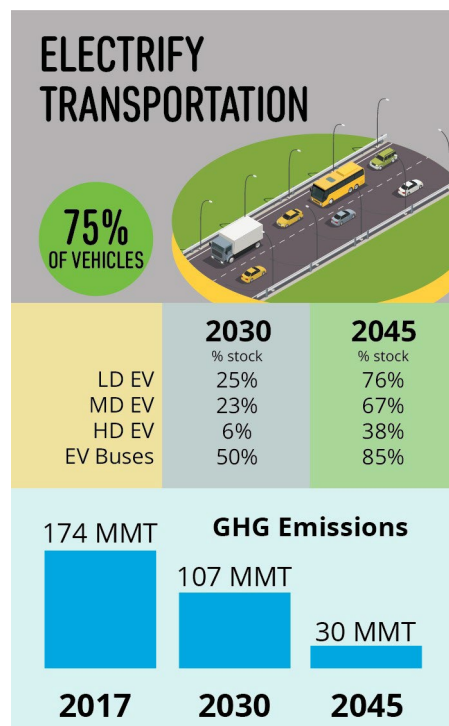
* Key aspects of grid stability include inertia, active and reactive power control, fault ride-through and black start power.

Transitioning away from natural gas use in electric generation and buildings will have the largest impact on reducing overall pipeline gas consumption (50% reduction from today's levels, equivalent to approximately 1,000 billion cubic feet). The industrial sector will consume the largest share of the remaining gas in the system due to hard-to-electrify applications, such as high-temperature industrial processes.

The natural gas that remains will need to be decarbonized through the addition of biomethane and hydrogen. Each of these low-carbon fuels have specific technological and cost challenges. Research and development are needed for these technologies to be commercially viable before 2045. Biomethane production costs and environmental impacts vary significantly with the feedstock and production process used.¹⁴ Hydrogen challenges include high production and transportation costs.

As demand for natural gas declines, fixed infrastructure costs and ongoing system maintenance costs will be spread over a diminishing number of customers. If current investment and cost allocation trends continue, residential and commercial gas rates in 2045 could significantly increase from 2020.^{15,16}

California policymakers will need to examine investment strategies to avoid stranding natural gas investments. Fossil infrastructure needs to be assessed through the lens of future reduced demand, and — when demand cannot be sustained through 2045 — substitute investments in electrification need to be incentivized and cost impacts on remaining gas customers need to be managed.



TRANSPORTATION

Decarbonizing the transportation sector requires widespread vehicle electrification. However, in hard-to-electrify applications, such as ballast tractors or long-haul tractor-trailers that cover hundreds of miles and need to refuel quickly, other technologies including hydrogen and biofuels may also prove important.

RESULTS

Based on current car ownership and usage patterns,* three-quarters of light-duty vehicles, two-thirds of medium-duty and one-third of heavy-duty vehicles, will need to be electric by 2045 (Figure 8, page 10).

* The future of personal vehicle usage is outside the purview of this analysis; hence, this analysis relies on current usage/ownership patterns. The emergence of ride sharing, autonomous vehicles and evolving travel patterns could reduce the number of vehicles needed in 2045, however, it is unclear the impact this may have on vehicle miles traveled.

Transportation electrification will increase electric load by nearly 130 terawatt hours (TWh) — representing more than one-third of the grid-served load. Faster charging rates and higher concentrations of vehicles will require grid upgrades. To minimize these upgrades, vehicles will need to charge in locations and at times that reduce the stress on the grid. While Pathway 2045 does not consider the application of vehicle-to-grid (V2G) technologies, with such a large electric vehicle fleet in 2045, having access to even 5-10% of the vehicle fleet for battery capacity could have a substantial impact on resource needs.

IMPLICATIONS

Achieving 2045 goals is significantly more difficult if interim 2030 goals have not been met. Public awareness of EVs and the benefits associated with them continues to lag.¹⁷

In light-, medium- and heavy-duty vehicle electrification, vehicle model availability and at-scale electric fueling infrastructure continue to be barriers to adoption. Addressing these barriers in the early years is critical to drive technology improvement, product availability and the diversity of the customer base. This in turn can help bring price parity between EVs and internal combustion vehicles by 2030.

There are opportunities for biofuels and hydrogen to play a role in transportation for those medium- and heavy-duty vehicles that are not suitable for electrification. Given that biofuels produce criteria pollutant tailpipe emissions,¹⁸ Pathway 2045 only uses them in hard-to-electrify segments. In this analysis, approximately 1 billion gallons of renewable diesel and biodiesel are consumed in 2045, representing almost 50% of the total diesel fuel consumed.*

Hydrogen could be the fuel source for a material portion of vehicles (Figure 8). However, significant progress, requiring technology improvements, will need to be made in vehicle availability and fuel production and distribution for this result to be realized.

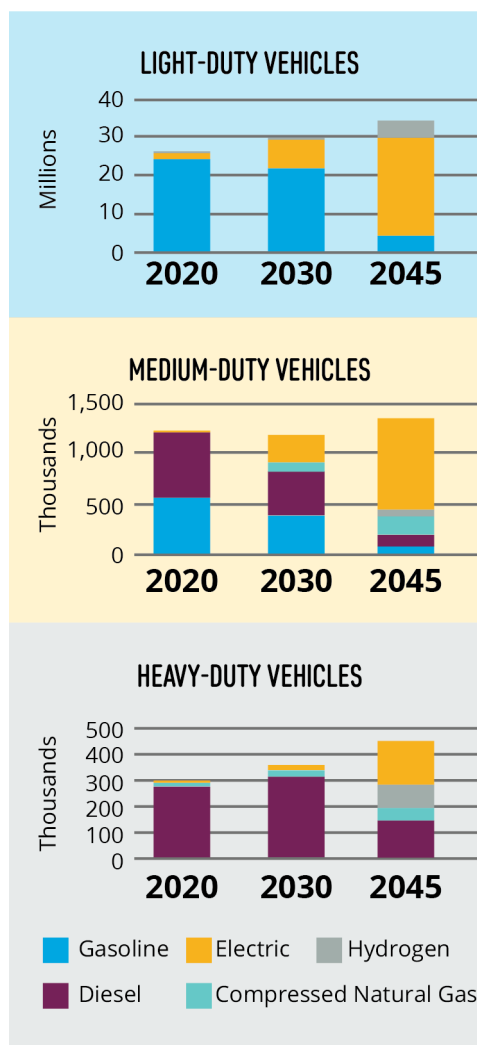
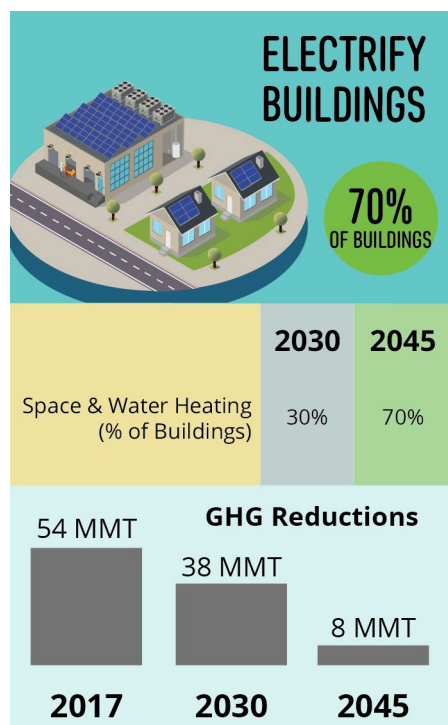


Figure 8: Vehicles by fuel sources

Getting to 2045 is significantly more difficult if interim 2030 goals have not been met.

* Energy Information Administration’s Annual Energy Outlook 2019 (AEO2019) projects 2 to 5 billion gallons of renewable and biodiesel to be consumed in the U.S. in 2045. AEO2019 does not contain a scenario with deep decarbonization targets. This would likely show higher demand with increased renewable diesel and biodiesel production to match.



BUILDINGS

GHG emissions from the commercial and residential sectors today are dominated by natural gas for household and commercial business use, such as space heating, cooking and hot water or steam generation.¹⁹ Emissions from building electricity use, such as air conditioning, lighting and refrigerators, are already accounted for in the electric power section of the analysis.

RESULTS

Building electrification today reduces total GHG emissions in single-family homes by 30% to 60% relative to a natural gas-fueled home. As electricity gets cleaner, these reductions are estimated to increase to almost 90% by 2050.²⁰ Continued advances in energy efficiency will reduce the amount of electricity consumed.

Approximately one-third of building space and water heating will need to be electric by 2030 and almost three-quarters by 2045. Building electrification will increase electric load nearly 50 TWh by 2045 – representing almost 15% of the total 2045 grid load. Like transportation, buildings offer an opportunity to provide flexible loads, which can be optimized to use power when it is most efficient and reduces grid upgrade costs. In 2045, California’s grid will continue to be a summer peaking system driven by air-conditioning loads, however space heating electrification during the winter will improve system utilization.²¹

IMPLICATIONS

Achieving customer conversions from natural gas to electric technologies requires customers to understand and realize the benefits of electrification. Electric alternatives and trained technicians to install and maintain them need to be easily available. Challenges with building retrofits in the rental market where owners make investments but tenants see bill savings, will also need to be addressed. Easy-to-access and inclusive financing, incentives and optimized utility pricing must be available to help offset the initial costs of conversion to electric (including panel upgrades) and provide ongoing affordability.

Building electrification helps California meet climate adaptation and equity goals. For builders and buyers, all-electric new homes can reduce building costs when compared to mixed-fuel new homes.²² For residents, especially in vulnerable communities, heat-pump HVAC systems, which provide both air conditioning and heating, can help protect public health as heat waves become more severe and non-air-conditioned homes will be less tolerable.

INDUSTRY

California's industrial sector is diverse — comprising refineries, oil and gas extraction, cement plants, manufacturing and waste. From a technological standpoint, industry presents diverse and difficult decarbonization challenges. Its many subsectors employ a range of industrial processes, many highly energy intensive, heavily reliant on high-carbon raw materials or requiring a large, steady supply of natural gas. While the sector contributes significant GHG reductions to the economy, it also consumes most of the remaining carbon-based fuels. Pathway 2045 does not assess the competitiveness of California industries after GHG abatement actions are taken. This important issue needs to be addressed as California continues to decarbonize.

The industrial sector reduces GHG emissions from 101 MMT CO₂e (CO₂ equivalent) to 74 MMT CO₂e by 2030, and to 37 MMT CO₂e by 2045, through a 40% reduction of methane emissions, a 35% reduction of gasoline production and 70% electrification of HVAC systems, in addition to use of low-carbon fuels for process heat.

CARBON NEUTRALITY

To achieve carbon neutrality, the equivalent amount of GHGs remaining after decarbonization efforts must be removed from the atmosphere. This sequestration process can be achieved through additional natural resources that absorb CO₂ from the atmosphere, such as trees, or through engineered solutions — although most engineered solutions, such as carbon capture and storage and direct air capture, are still nascent technologies. California's natural and working lands

provide one option for sequestration. State action to minimize wildfire threats, restore natural lands and manage agricultural soil will store carbon and enhance the land's resilience to worsening climate impacts.

Affordable carbon sequestration is a significant challenge — and sequestering 108 MMT of CO₂e in 2045 will require deploying every viable resource. California should take a leadership role in this area by piloting new technologies over the next decade.

AFFORDABILITY

Decarbonizing California's economy is only going to be successful if the transition remains affordable to all of California's consumers, including California's most vulnerable residents. The question that California needs to answer is not if it can afford to achieve its long-term decarbonization goals, but what is the most feasible, cost-effective path to do so.

Pathway 2045's economywide net annual incremental costs in 2045 is \$33 billion (in 2019 dollars) relative to a baseline case which does not meet California's GHG reduction targets but includes SB 350 and SB 100. This cost assessment includes the upfront, annualized capital costs and the expected fuel costs net of savings incurred from all GHG abatement mechanisms chosen. It does not include any societal benefits from reduced emissions.

... a decarbonized, electrified world produces energy savings for an average household.

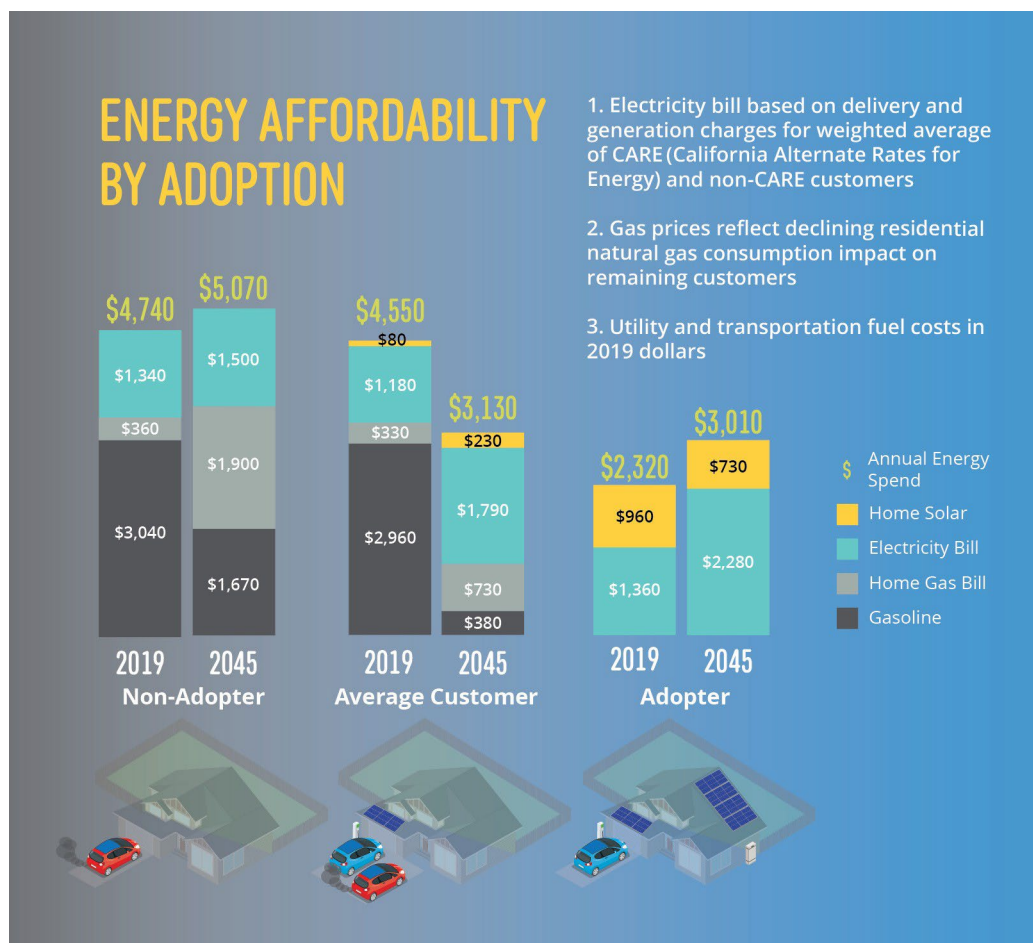


Figure 9: Annual energy costs for residential households (using SCE data)

California must manage the macro-economic costs associated with GHG reduction through thoughtful, coordinated policy and actions that address both the costs of adoption and energy costs post-adoption.

The good news is that, when assuming reasonable cost and efficiency improvements over time,²³ a decarbonized, electrified world produces energy savings for an average household (Figure 9) due in part to significant energy efficiency gains (Figure 4, page 4). While electricity bills increase over time, the energy consumption cost for an average household decreases by one-third by 2045. Household savings are driven by reduced gasoline consumption due to the high market penetration of electric vehicles.

As the economy progresses toward decarbonization, a mixture of clean energy adopters and non-adopters will emerge. Non-adopter energy consumption costs are almost double that of adopters. Over one-third of a non-adopter’s energy consumption costs stem from home gas bills by 2045²⁴ because the total natural gas system infrastructure costs are shared among a smaller set of customers. This disparity between adopters and non-adopters needs to be addressed proactively through appropriate policies.

POLICY DIRECTION

While Pathway 2045 charts a long-term course, given the long planning and infrastructure life cycles (Figure 10), clear and robust policy actions in 2020 and the next few years will be pivotal in defining California’s clean energy trajectory.

FOSTER CONSUMER ADOPTION OF END-USE TECHNOLOGY

Adequate and reliable funding for vehicle purchase incentives is required to bolster zero-emission vehicle adoption levels until the markets are self-sustaining. This should be complemented by phased-in regulations for vehicle emissions, air-quality and vehicle technology requirements. Additionally, deployment of public charging infrastructure at scale in the right locations needs to be accelerated through swift regulatory and municipal decisions.

Accessible up-front incentives and financing assistance for purchases and retrofits will incent growth in residential and commercial space and water heating electrification. Updating building codes and standards for new homes by 2025 will be essential.

Targeted and coordinated DER programs and time-of-use rates can be used to encourage customers to reduce energy use at peak times and to invest in behind-the-meter energy storage. Robust programs that reinvigorate energy efficiency and tie it to GHG reduction can support customer adoption of energy saving behaviors and equipment.

ADVANCE CLEAN RESOURCE DEVELOPMENT AND SUPPLY

California’s current path for electric system resource planning makes reaching even 2030 GHG reduction targets challenging. The California Public Utilities Commission (CPUC) Integrated Resource Planning (IRP)

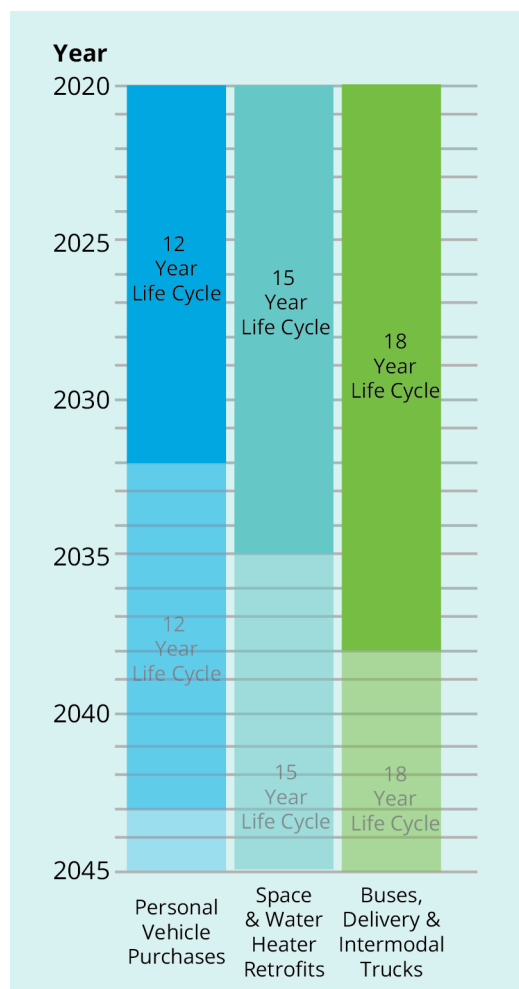


Figure 10: Equipment life cycles

process provides a ripe opportunity for inter-agency coordination to secure the appropriate pace of clean resource development by:

1. California Air Resources Board setting cross-sector GHG reduction targets that mirror the state’s 2030 and 2045 goals,
2. California Energy Commission reflecting appropriate levels of increased electrification and DERs when forecasting load in the Integrated Energy Policy Report, and
3. CPUC adopting enforceable IRPs that require all load-serving entities to preserve reliability while meeting decarbonization goals.

The state must also rationalize current retail choice models with future long-term wholesale procurement requirements and evaluate efficient regional energy markets if in-state development is constrained.

BUILD AND OPERATE RELIABLE AND RESILIENT ENERGY SYSTEMS

Evaluation of cost-effective options for scope and scale of interconnections, capacity upgrades and DER interoperability beyond 2030 must be undertaken in parallel with determination of precise location and volumes of future resource development. This must happen in coordination with resiliency planning for wildfires and climate adaptation. Besides accounting for higher electrification in load forecasts, lengthening the system planning windows will afford more efficient and effective scenario planning for system improvements while maintaining optionality. Approval processes for infrastructure deployment that provide flexibility during licensing, permitting and construction, such as establishing programmatic environmental reviews for suites of infrastructure options, will enhance the utilities' responsiveness to emergent or changing needs.

FILL TECHNOLOGY GAPS

Scalable innovations are needed for:

1. Clean power production, including biomethane and hydrogen technologies,
2. Grid design, analytics and DER integration, and
3. End-use electrification and energy management.

Technological progression to improve performance efficiency, reduce costs and diversify product offerings will be accelerated if government funding along with targeted public-private partnerships prioritize R&D and pilot projects.

PROMOTE EQUITABLE PARTICIPATION

Decarbonization will come with costs, but incentive and pricing policies must target clean power opportunities in vulnerable communities and help prevent any customer group from being disproportionately burdened. It is crucial to assess affordability and cost-effectiveness using the total financial impact of energy, not just electricity costs. Customers who are least able to transition to other fuels must be protected from being stranded with high-carbon costs. Regulatory processes should be initiated that address infrastructure decommissioning and rate structure modifications to provide an orderly transition away from fossil fuels.

The clean energy transition is a tremendous opportunity for California. Helping our workforce develop and evolve by funding programs that increase opportunities in clean energy fields will provide additional avenues to uplift the economy and society.

The state has initiated and implemented many green policies, but much work remains to ensure that an effective policy framework is in place for the clean future Californians seek.

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24. Appendix

Electronic copies of this paper and its appendices are available at [edison.com/pathway2045](https://www.edison.com/pathway2045)



VIA ELECTRONIC FORM (<https://corridoreis.anl.gov/involve/report-input/>)

TO: U.S. Department of Energy, the Department of the Interior, the U.S. Forest Service, and their contractors

FROM: Southern California Edison; Shannon Stewart, Senior Advisor

DATE: January 26, 2021

RE: West-Wide Energy Corridors Regional Review, Regions 4, 5, and 6 Report Input

Southern California Edison (SCE) appreciates the opportunity to provide input to the U.S. Department of Energy, the Department of the Interior, the U.S. Forest Service, and their contractors on the West-Wide Energy Corridors Regional Review for Regions 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 from third-party generators to SCE's customers.

SCE has developed an integrated framework referred to as the Clean Power and Electrification Pathway to fight climate change and improve air quality. It builds upon existing state policies to achieve California's environmental goals, including reducing greenhouse gas (GHG) emissions by 40 percent from 1990 levels by 2030 and by 80 percent by 2050, as well as reducing nitrogen oxides (NOx) and other health-harming pollutants in areas of the state with the highest levels of air pollution by 2032. SCE's published Pathway 2045 White Paper (November 2019) examines the energy implications of California's long-term decarbonization goals on both the economy and the electric sector and maps out a feasible and low-cost path to meeting these goals (see enclosed).

As detailed in the enclosed comment table, SCE has identified a number of the proposed corridors in Regions 4, 5, and 6, as well as in other Regions, within and outside of the State of California that may be used for new transmission facilities identified in SCE's Pathway 2045. These identified corridors could help California meet its 2045 GHG and air quality goals. SCE accordingly supports the designation of these corridors.

As additional input, SCE notes that corridor 18-23 which is located within our service territory currently has marginal capacity for new generation projects due to the low capacity of the existing 115 kV and 12 kV SCE facilities. SCE's Ivanpah-Control Project proposes to rebuild the 115 kV lines in this corridor by year 2026. This project is currently under review by the California Public Utility Commission and the Bureau of Land Management.

SCE encourages the designation of thoughtfully sited energy corridors on Federal lands established through robust coordination between Federal and State agencies and other critical stakeholders including public utilities. Section 368 energy corridors and accompanying analysis have the potential to improve the efficiency of the permitting process for constructing new transmission and distribution projects. New transmission and distribution projects will be necessary in helping SCE and the State of California to combat climate change and improve air quality through clean power and electrification solutions.

Enclosures:

SCE Section368 Comment Table_Jan 2021.xlsx

Pathway 2045 White Paper (Nov 2019)

Corridor	Region
3-8	5
7-8	5 & 6
7-11	6

7-24	6
11-228	6

18-23	1 & 5
18-224	1 & 5

24-228	6
36-228	6

Revision#	Region
Wagontire Mountain Corridor Addition (Corridor alternative to 7-24)	6
18-244 Revision	1 & 5
24-228 Revision	6

*<https://www.cpuc.ca.gov/environment/info>

** <https://www.edison.com/home/our-persp>

SCE Transmission & Interconnection Planning Notes

No existing SCE transmission and/or subtransmission facilities near this corridor. This corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- four new 500 kV AC transmission lines

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

No existing SCE transmission and/or subtransmission facilities near this corridor. This corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- two new ± 500 kV DC transmission lines

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

State/local/industry/developer efforts for generation to intersect with corridor: Unsure,

No existing SCE transmission and/or subtransmission facilities near this corridor. This corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- three new ± 500 kV DC transmission lines

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

State/local/industry/developer efforts for generation to intersect with corridor: Unsure, outside of SCE service territory.

corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- one new ± 500 kV DC transmission line

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

No existing SCE transmission and/or subtransmission facilities near this corridor. This corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- one new ± 500 kV DC transmission line

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

State/local/industry/developer efforts for generation to intersect with corridor: Unsure, outside of SCE service territory.

SCE transmission and/or subtransmission facilities in this corridor include:

- three 115 kV lines
- two 12 kV lines

CAISO queued gen near or which could use the corridor: 0 MW

SCE queued gen near or which could use the corridor: ~41 MW (trans/Subtrans gen) & 0.006 MW distribution

Previously triggered and/or proposed projects near this corridor that did not move forward include:

- New 115 kV or 220 kV lines
- distribution circuit upgrades

Likely to be used: Yes, currently queued generation would make use of this corridor.

Sited to provide max utility & min environmental impact: Yes, multiple SCE 115 kV & 12 kV facilities exist in this corridor.

Effect of corridor gaps: Since SCE has an existing 115 kV ROW, gaps would have a minor effect.

Capacity for new transmission projects: Marginal capacity for new generation projects due to the low capacity of the existing 115 kV & 12 kV SCE facilities. SCE's Ivanpah-Control Project proposes to rebuild the 115 kV lines in this corridor by year 2026. This project is currently under review by the CPUC* and SCE submitted a SF-299 and Plan of Development to the BLM in April 2020.

No existing SCE transmission and/or subtransmission facilities near this corridor. This corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

State/local/industry/developer efforts for generation to intersect with corridor: Unsure, outside of SCE service territory

corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- one new ± 500 kV DC transmission line

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

State/local/industry/developer efforts for generation to intersect with corridor: Unsure, outside of SCE service territory.

No existing SCE transmission and/or subtransmission facilities near this corridor. This corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- one new ± 500 kV DC transmission lines

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

State/local/industry/developer efforts for generation to intersect with corridor: Unsure, outside of SCE service territory.

Description

corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- one new \pm 500 kV DC transmission line

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

corridor may be used for new transmission facilities identified in SCE's Pathway 2045 Whitepaper which could help California meet its 2045 greenhouse gas goals.**

Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

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Pathway 2045 Transmission Facilities:

- two new 500 kV AC transmission lines
- one new \pm 500 kV DC transmission line

Likely to be used: Unsure, outside of SCE service territory.

Sited to provide max utility & min environmental impact: Unsure, outside of SCE service territory.

Effect of corridor gaps: Unsure, outside of SCE service territory.

Capacity for new transmission projects: Unsure, outside of SCE service territory.

Provides connectivity to renewable generation while ensuring reliability: Unsure, outside of SCE service territory.

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ective/pathway-2045.html

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10069] - Webmaster Receipt
Date: Wednesday, January 27, 2021 4:14:10 PM
Attachments: [ID_10069_Corridorreviewfinalcomments230248brennabell.pdf](#)

Thank you for your input, Brenna Bell.

The tracking number that has been assigned to your input is **10069**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 27, 2021 16:11:34 CST

First Name: Brenna

Last Name: Bell

Email: brenna@bark-out.org

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

Organization: Bark and Columbia Riverkeeper

Input

I've attached our comments, which advocate for deleting Corridor 230-248 from the WWEC maps.

Attachments

Corridor review final comments 230-248 brenna bell.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



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January 27, 2021

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 revised Corridor Abstract for Corridor 230-248 in Region 6 of the Section 368 West-wide Energy Corridors (WVEC).

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.

Since 2000, Columbia Riverkeeper has been actively working to protect and restore the Columbia River and all life connected to it. Since 2007, several proposals have arisen connected to the Mt. Hood National Forest that would deliver fracked gas to major fossil fuel and petrochemical projects on the Lower Columbia River. The Palomar and Trail

West Pipelines have been and continue to be of interest to Columbia Riverkeeper (CRK). Columbia Riverkeeper members and supporters (including Dan Serres) live, work, recreate and find spiritual guidance in the Clackamas Watershed and often visit areas of the Clackamas River canyon that would be impacted by the proposed Energy Corridor. The Clackamas River provides drinking water for many downstream communities.

Both groups have been tracking this corridor since 2007 when it was proposed as the “Palomar Pipeline,” a controversial gas pipeline to deliver gas to and from proposed Liquefied Natural Gas (LNG) terminals on the Lower Columbia River. Shortly after the line was proposed, 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, which we have shared with you and your staff throughout this corridor review process.

We appreciate the updated information in the 230-248 Corridor abstract, but most of our concerns went unresolved and are still relevant. Rather than repeating everything from our May 2019 comments, these comments will focus on moving forward a productive conversation held in December 2020 between Bark’s staff attorney, Brenna Bell, Rupak Thapaliya (Defenders of Wildlife), Jeremy Bluma, Reggie Woodruff and others from your team discussing options for the corridor. The conversation focused on three alternatives to the currently designated multi-modal corridor: 1) delete the corridor from WVEC maps; 2) if deletion is not possible, consider collocating the corridor with the existing 500kV transmission line to the south of the corridor from MP 0 to 30; or 3) alternatively, designate the corridor be overhead only. This comment will discuss the relative merits of each approach.

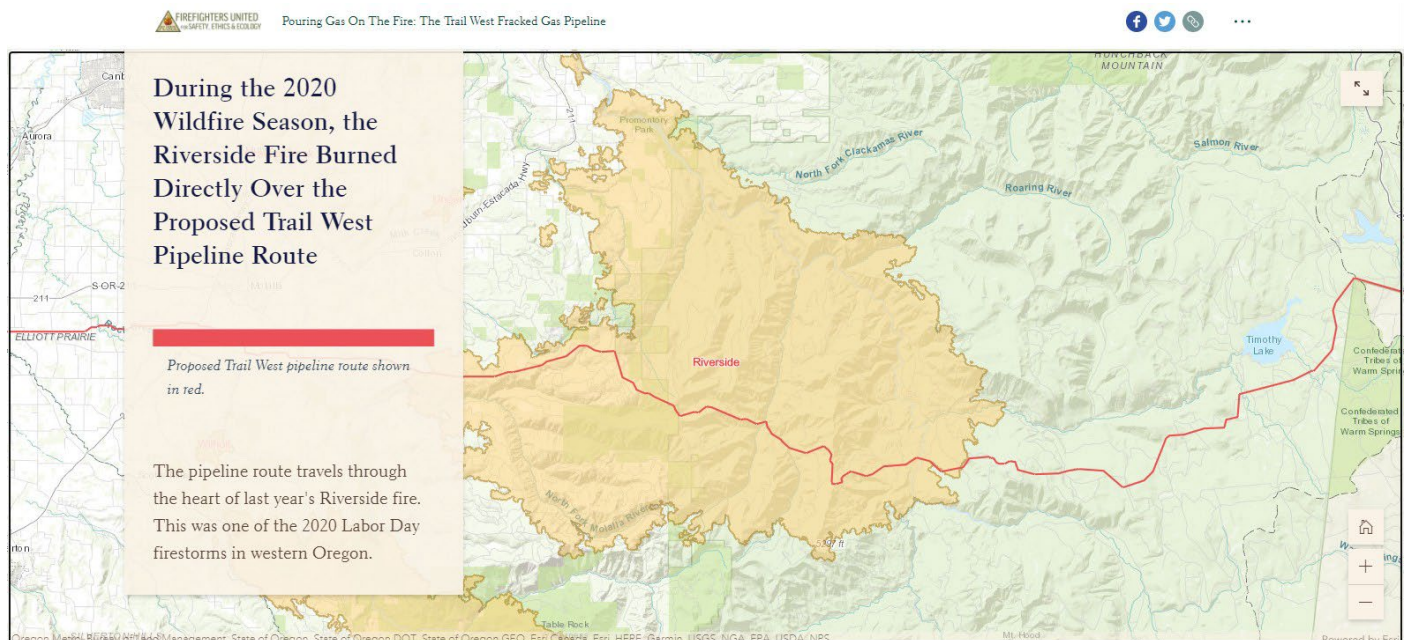
1) Delete the corridor

As per the settlement agreement, 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 conflicts with Northwest Forest Plan Late-Successional Reserves.¹

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. Significantly, since the abstract was updated, a large portion of the proposed route experienced a stand-replacing fire and the already geologically unstable Fish Creek watershed was severely burned, increasing the likelihood of slope failure and landslides. The Riverside Fire burned through

¹ http://corridoreis.anl.gov/documents/docs/Settlement_Agreement_Package.pdf

138,000 acres in the Clackamas River corridor, with the corridor running right through its heart.



If there had been an active pipeline *or* energy transmission lines already built in this corridor, the impacts of the fire could have been even more devastating.

The proposed Trail West and Palomar pipelines would have crossed the Clackamas River in the immediate vicinity of the starting point of the Riverside fire, and the pipelines were once considered for an aerial crossing to avoid in-stream impacts. The potential consequences of the presence of a high-pressure, non-odorized, gas pipeline in an intense, stand-replacing fire would have been dramatic for the forest, the river, and most of all, the safety of nearby campers and first responders. The Riverside fire experience shows that a gas pipeline is ill-suited for the proposed corridor, would hamper future fire-fighting efforts, and is unlikely to act as a fire break because of the routing of its construction up and down steep slopes in the Clackamas watershed.



Riverside Fire High Severity Burn area, Photo: U.S. Forest Service

Because of the breadth and depth of the conflicts discussed at length in our initial comments and the revised abstract, the major change in the landscape brought about by the Riverside Fire, and the fact that many of the conflicts cannot be resolved, we believe the best remedy is to delete this corridor from the WWEC map. In fact, the evidence for this remedy is overwhelming in the wake of the fire. However, as noted above, if you choose to retain the corridor, there are two alternate approaches that could limit its ecological impacts and other potential conflicts. Of these two options, re-aligning the corridor with existing transmission lines limits development to an already impacted area and avoids some of the most ecologically sensitive areas.

2) Collocate with the existing 500kV transmission line to the south

Our December discussion about the corridor led to a conversation about re-aligning the corridor to avoid the sensitive and unstable Fish Creek watershed and other ecologically and culturally important areas, specifically focused on using the transmission corridors included in the now-shelved Cascade Crossing proposal. In 2011, Bark staff had a meeting with PGE and TetraTech to discuss the Cascade Crossing, in which we took the following notes about that proposal which we include to help inform the viability of this option:

- There is currently a transmission corridor running the length of the proposed new line, which is 250 ft. wide and has two lines, one BPA and one PGE. The current lines carry 230kV.

- The proposed line would add another 250 feet to the existing corridor (in most places – in a few, there would be a gap between the existing and new corridors) and would have bigger, taller towers that would carry 500kV.
- The purposes of this line would be to 1) free up PGE from using BPA transmission lines (the use contract expires in 2014); and 2) increase capacity to transmit power from the existing Boardman Coal-power generating station and Coyote Springs gas-power generating station, as well as the proposed Carty gas-power generating station, and projected wind-power generating stations. The bulk of the energy transmitted will be from fossil fuels.
- When we asked about the need for the project, given that energy use is not increasing, PGE did not have a good answer. PGE said that they want to not use BPA lines anymore, that there are more wind generating plants being built and they are required to provide them with transmission, and that this is “part of a broad program of increasing energy movement around the West”. What they did *not* demonstrate was that there is an increasing demand for energy.
- The main place of alternatives and uncertainty for the proposed route is where it crosses the Mt. Hood & Willamette National Forests – what PGE is calling the “Breitenbush Alternatives”. There are currently three alternate routes mapped out, which all have different levels of impact (the main impacts are to soils, water, wildlife and recreation)
- Of particular interest is the “BPA Idle” alternative – which they *never mentioned* until we asked about it. Turns out that there is an existing BPA transmission corridor through the Breitenbush section that has never been electrified, and PGE could negotiate to run its line through the existing corridor. This seemed like a clear best option to us enviros, but PGE wasn’t too excited about it (they want to have more control, and not rent space from BPA).

While some of the issues in these notes are no longer relevant, as the future of energy generation in Oregon has shifted significantly, they show that there are several possible existing transmission corridors with which the 230-248 corridor could collocate. We encourage your team to look closely at both the preferred alternative from the Cascade Crossing project as well as the “BPA Idle” and other alternative routes.

3) Designate 230-248 as overhead transmission only

This 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, in addition to the wild & Scenic Clackamas River. These river crossings, as well as the very steep and unstable terrain in the pipeline corridor, raise serious concerns about maintaining 230-248 as a multi-modal corridor.

The Abstract itself has internal contradictions about what type of energy transmission should be installed in this corridor. The introduction to the abstract acknowledges: “There are better east-west locations for electric transmission lines across the Cascades. Despite its limitations, 230-248 may be worth retaining as a Section 368 Corridor for underground-only use.” In contrast, the concern about the corridor crossing Wild & Scenic Rivers is “resolved” with this statement: “The addition of utility infrastructure, **particularly transmission lines**, would not impede the river’s free-

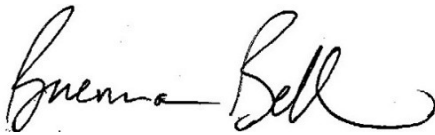
flowing condition." *Revised Abstract at 9.* But an underground-only, or multi-modal, designation continues to conflict with the Wild & Scenic Rivers Act and Northwest Forest Plan. Then again, if 230-248 were considered for transmission only, we agree with the abstract that "there are better east-west locations for electric transmission lines," bringing us back to suggestion 2, above.

Conclusion

For the above reasons, as well as all the conflicts identified in the WWEC Settlement agreement, Bark & CRK's previous comments, and the revised Corridor Abstract, we strongly urge you to delete Corridor 230-248 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 thank you for your engaged participation in this review and look forward to reading the final report

Sincerely,



Brenna Bell
Bark Staff Attorney/Policy Coordinator



Dan Serres
Conservation Director, Columbia Riverkeeper
M.S., B.S. Stanford University

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10070] - Webmaster Receipt
Date: Wednesday, January 27, 2021 6:13:03 PM
Attachments: [ID_10070_PCTAResponsetotheSection368EnergyCorridorReportJan.2021.pdf](#)

Thank you for your input, Justin Kooyman.

The tracking number that has been assigned to your input is **10070**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 27, 2021 18:12:44 CST

First Name: Justin
Last Name: Kooyman
Email: jkooyman@pcta.org

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

Input

Attached is the Pacific Crest Trail Association's response to the Regions 4, 5, and 6 Draft Report. Thank you for your consideration of our comments relating to the Pacific Crest National Scenic Trail.

Attachments

PCTA Response to the Section 368 Energy Corridor Report--Jan. 2021.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

January 27, 2021

This letter submitted to <https://www.corridoreis.anl.gov/involve/report-input/>

RE: Pacific Crest Trail Association response to the Section 368 West-wide Energy Corridor Regions 4, 5, and 6 November 2020 Report

Dear Bureau of Land Management and U.S. Forest Service Project Staff,

I am writing on behalf of the 14,000 member Pacific Crest Trail Association (PCTA). The PCTA is the 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 is rooted in the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states, "... 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." As such, it is the PCTA's role to work with our land management partners to ensure appropriate management of the PCT.

We appreciate that some of the PCTA's 2019 recommendations were incorporated into the Regions 4, 5, and 6 draft report and corridor abstracts; however, language persists in the draft report that does not provide the Bureau of Land Management and U.S. Forest Service strong and clear direction to protect National Scenic Trails (NST), in future local-level land use planning efforts or project-level decisions.

The PCT and other National Scenic Trails were designated, as described by the act, to, "...be extended trails 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." The Act continues, "Other uses along the trail, which *will not substantially interfere with the nature and purposes of the trail* [emphasis added], may be permitted by the Secretary charged with the administration of the trail. Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, to the extent practicable, *efforts be made to avoid activities incompatible with the purposes for which such trails were established* [emphasis added]."

Building upon the National Trails System Act, a federal interagency task force developed these guidelines, which appear in the U.S. Forest Service PCT Comprehensive Management 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* [emphasis added], 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."

It is with this foundation that the PCTA recommends that the forthcoming final report contains clearer language that will protect important resources, such as NSTs. This rationale is supported in the draft report as page 11 describes the first siting principle, "...to promote maximum utility and *minimum impact on the environment* [emphasis added]."

Section 3.2, General Considerations for Future Energy Development, identifies actions that would help agency decision-makers address concerns and protect valuable resources. Three key actions are:

- "Consider a corridor shift when a Section 368 energy corridor straddles a road or trail (e.g., an Interstate Highway, an *NST*, an *NHT*, or a Scenic Byway) to increase the potential for *meeting applicable VRM objectives* [emphasis added].
- Encourage proponents of projects in Section 368 energy corridors to integrate visual resource planning and design principles during the early phases of project planning to *meet BLM VRM and USFS scenic integrity objectives* [emphasis added] and avoid land use plan amendments.
- Consider realigning corridors with existing infrastructure to allow maximum utilization. Figure 3-2 from the Regions 2 and 3 Review report shows how a corridor can be shifted along existing infrastructure to maximize utilization as well as avoid an ACEC and *lands with wilderness characteristics* [emphasis added]."

The PCTA supports these statements and suggests they be retained in the Regions 4, 5, and 6 forthcoming final report.

Section 3.4, General Considerations for IOP Revisions, Deletions, and Additions, states that, "The reports for Region 1 and Regions 2 and 3 identify potential new IOPs and IOP revisions:

- The Region 1 report identified the need for new IOPs related to habitat connectivity as an ecological resource, lands with wilderness characteristics, and *NSTs* [emphasis added] and *NHTs*.
- The Region 1 report identified the need for IOP revisions for three IOPs related to *visual resources* [emphasis added], vegetation management, and DoD coordination."

The PCTA supports these actions and recommends they be incorporated into the Regions 4, 5, and 6 forthcoming final report.

Additional IOPs should be developed to protect the Pacific Crest National Scenic Trail. This recommendation is closely supported in section **3.4.1** of the draft report which details that the Regions 1, 2, and 3 reports states:

- "For the potential new IOP related to *NHTs*, the Agencies should consider adding language that provides for consideration of designating a corridor as underground-only where the corridor crosses high potential segments of the *NHT*."

PCTA strongly supports the recommendation for a new IOP related to *NHTs*; however, this direction should also be applied to *NSTs*.

Specific corridors that have the potential to negatively impact the PCT are: **3-8, 6-15, 10-246, 18-23, 23-106, 102-105, 230-248, 244-245, and 261-262**. Many of these corridor abstracts state, "Agencies could consider a new IOP for *NSTs* and *NHTs* to enhance BMPs for proposed

development within the energy corridor.” We recommend replacing “could” with “should” in the above statements to provide stronger direction for protection of the PCT and other National Scenic and Historic Trails.

In addition to this language change, we suggest the following IOPs (which we included in our 2019 responses) be incorporated into the forthcoming final report, and specifically applied to the corridors that affect the PCT, to provide clearer direction for National Scenic and Historic 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 (300') to foreground (one-half mile) viewshed prior to the trail 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 appreciate your consideration of the PCTA's comments. It is our hope that energy develop can occur, while minimizing impacts on the PCT and other important resources. Please do not hesitate to contact me with any questions or follow up you would like to have.

Thank you,



Justin Kooyman
Associate Director of Trail Operations

CC:
Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10071] - Webmaster Receipt
Date: Thursday, January 28, 2021 4:07:28 PM
Attachments: [ID_10071_BLMUSFSEnergyCorridorsWGAComments.pdf](#)

Thank you for your input, James Ogsbury.

The tracking number that has been assigned to your input is **10071**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 28, 2021 16:07:11 CST

First Name: James
Last Name: Ogsbury
Email: tvigil@westgov.org

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

Input

On behalf of the Western Governors' Association, attached please find comments on the draft Regions 4, 5 and 6 Report of the West-wide Energy Corridors Regional Review.

Attachments

BLM USFS Energy Corridors WGA Comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

January 28, 2021

Mr. Jeremy Bluma
National Project Manager
Bureau of Land Management
U.S. Department of the Interior
1387 South Vinnell Way
Boise, ID 83709

Mr. Reggie Woodruff
Energy Program Manager
U.S. Forest Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Mr. Bluma and Mr. Woodruff:

The Western Governors' Association (WGA) appreciates the opportunity to provide comments on the draft Regions 4, 5 and 6 Report (Report) of the West-wide Energy Corridors Regional Review. The designation of, and adjustments to, these corridors can have significant effects on state and regional energy, infrastructure, and land use planning across the West.

In WGA Policy Resolution [2018-04](#), *Energy in the West*, Western Governors establish the following as an energy policy priority for the region: "Advance efficient environmental review, siting, and permitting processes that facilitate energy development and the improvement and construction of necessary electric grid (transmission and distribution) and pipeline infrastructure, while ensuring environmental and natural resource protection." Federal agencies' effective implementation of the West-wide Energy Corridors Regional Review helps support this goal. WGA's further perspectives on the West-wide Energy Corridors Regional Review and the importance of state consultation are contained in this 2017 Governors' [letter](#).

The Report considers a number of changes to the Bureau of Land Management (BLM) and U.S. Forest Service's (USFS) interagency operating procedures (IOPs). As noted in the Report, IOPs are "mandatory and apply to all proposals, applications, and authorizations for energy transmission projects in Section 368 energy corridors administered by the BLM or USFS." This "mandatory" application practice underscores IOPs' importance in promoting consistent and cohesive cross-boundary management across multiple federal land jurisdictions.

Western Governors' policy relates to a number of new and revised IOPs described in the Report. These include a potential new IOP focused on Greater Sage-grouse habitat and a revised IOP related to habitat connectivity and wildlife corridors. WGA Policy Resolution [2021-04](#), *Species Conservation and the Endangered Species Act*, discusses the importance of coordinated management between state and federal agencies in regards to sensitive species and migration corridors.

The Report notes that the 2019 Region 1 Report includes proposed additional language to an IOP addressing vegetation management and invasive and noxious weeds common in western states.

Integration of this language aligns with WGA Policy Resolution [2021-03](#), *National Forest and Rangeland Management*, which states: “Western Governors believe clear, coordinated and consistent application of federal vegetation management practices is integral to maintaining the health of western forests, preventing dangerous and damaging wildfires, and maintaining grid reliability.”

The Report also discusses the need for “improved clarity and consistent guidance for managing existing corridors,” and recommends that agency land use plans include additional information related to corridor uses and compatible infrastructure, including telecommunications and fiber optic infrastructure. WGA Policy Resolution [2020-08](#), *Broadband Connectivity*, discusses challenges with siting broadband infrastructure on federal lands and offers Governors’ support for federal “efforts to improve permitting timelines for broadband infrastructure co-located with existing structures and other linear infrastructure, such as roads, transmission lines and pipelines.”

WGA appreciates that BLM and USFS have designed these IOPs to promote consistent land management practices across multiple jurisdictions. We request, however, that the agencies consult with Western Governors and states regarding the final details of these IOPs and corridor designations prior to their incorporation into BLM or USFS land use plans, guidance, manuals, or handbooks. The fact that these designations are exclusively contained within western states highlights the need for robust state-federal consultation across the region.

Thank you for your attention to this matter. Western Governors look forward to working cooperatively with the BLM and USFS in the implementation of these corridor designations and policy changes.

Respectfully,

James D. Ogsbury
Executive Director

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10072] - Webmaster Receipt
Date: Friday, January 29, 2021 7:46:08 AM
Attachments: [ID_10072_WWECRegions456DraftReportCommentsTWSICL12921.pdf](#)

Thank you for your input, Alex Daue.

The tracking number that has been assigned to your input is **10072**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 07:45:42 CST

First Name: Alex
Last Name: Daue
Email: alex_daue@tw.s.org

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

Input

Hello,

Please accept the attached comments.

Thank you,
Alex Daue

Attachments

WWEC Regions 4, 5, 6 Draft Report Comments (TWS, ICL - 1-29-21).pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

January 29, 2021

Nicholas E. Douglas
Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Gregory C. Smith
Director
Lands and Realty Management
U.S. Forest Service

Melissa Pauley
Management and Program Analyst
Office of Electricity
U.S. Department of Energy

Submitted electronically via the web form at <https://corridoreis.anl.gov/involve/report-input/>

Re: Comments on Section 368 Energy Corridor Review Regions 4, 5, and 6 Report

Dear Mr. Douglas, Mr. Smith and Ms. Pauley:

Please accept the following comments from The Wilderness Society and the Idaho Conservation League on Section 368 Energy Corridor Review- Regions 4, 5 and 6 (“Report”)¹ released by the Bureau of Land Management (BLM), U.S. Forest Service (USFS) and the Department of Energy (DOE) (collectively the “Agencies”) on November 2, 2020.

In addition to these comments, we are also submitting comments with numerous partner organizations that address general issues, Interagency Operating Procedures, and many other individual corridors. This comment letter addresses a narrow set of additional corridors that are not addressed in the other letter.

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 Final Regional Review Report; and c) through future land use planning.

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. As stated in our 2019 comments, because of the conflicts with the NCA, the Agencies should delete this corridor.

¹ Energy Policy Act of 2005 Section 368 Energy Corridor Review, Regions 4, 5, and 6. Available at https://corridoreis.anl.gov/documents/docs/Regions_4-5-6_Draft_Report.pdf The Report includes “Corridor Summaries” and “Appendices,” also available at <https://corridoreis.anl.gov/regional-reviews/regions-4-5-6/>

Despite these issues, the Agencies do not recommend deleting this corridor in the Draft Report. The Agencies are considering a potential realignment from MP 32 to MP 95 that would avoid the NCA by shifting the corridor south to follow the Gateway West Alternative 9E. While this revision would eliminate some overlap with the NCA, it would create new problems by creating significant impacts to the viewshed of the wilderness areas to the south. We re-iterate our recommendation that the Agencies delete this corridor – the existing corridor is inappropriate for infrastructure development and inconsistent with the Corridor Siting Principle of providing “minimum impact on the environment,” and so is the proposed shift to follow Gateway West Alternative 9E.

The Agencies are also considering adding a corridor beginning at MP 89 along the Gateway West Route, heading east to connect with corridor 29-36. This realignment adds about 18 miles of new corridor inside of the Morley Nelson Snake River Birds of Prey NCA. We strongly oppose adding a new corridor within the boundaries of the NCA – the Agencies should not carry this recommendation forward into the final report. The process to approve the final route for this northern portion of the Gateway West transmission line (known as Segment 8 of Gateway West) was long and difficult and ultimately required an act of Congress to legislatively remove a 250’ wide ROW from the NCA, with the Gateway West transmission line running down the center of it. Based on the map on p. 78 of the Corridors Summaries document, it appears the Agencies are proposing a new corridor of significant width on the northern edge of the Gateway West transmission line, overlapping with the NCA. The Agencies should not designate any new corridors that overlap with the NCA.

Corridor 29-36: This corridor crosses the Morley Nelson Snake River Birds of Prey NCA in two locations, from MP 31-33 and at MP 37. As noted above, the process to approve the final route for Segment 8 of the Gateway West transmission line ultimately required an act of Congress to legislatively remove a 250’ wide ROW from the NCA. And Gateway West was not even sited within corridor 29-36 for the portion of the route that intersects the NCA, instead running parallel to 29-36 just to the northeast, demonstrating that 29-36 is not a viable pathway for transmission lines. Because of the conflicts with the NCA, the Agencies should delete this corridor.

Proposed Wamsutter-Powder Rim Corridor: TWS opposes the designation of a new corridor following the route that BLM approved for the TransWest Express Transmission Project. As stated in TWS’ protest letter for the TransWest Express Transmission Project, dated June 1, 2015, TransWest Express would have significant impacts to BLM-inventoried LWC in Northwest Colorado and Nevada. Development would affect eight BLM-LWC inventory units and eliminate one unit in Northwest Colorado alone. Furthermore, TransWest Express would impact state and federally designated Preliminary Priority Habitat for Greater sage-grouse, as well as conservation easements, in Wyoming and Colorado. The region in which the proposed corridor would be sited contains over two-thirds of Colorado’s Greater sage-grouse population and the region of Southwestern and central Wyoming and northwestern Colorado are considered strongholds for sage-grouse. Development in this region would have detrimental effects on the species due to direct habitat loss and population connectivity. TransWest Express also runs through primarily roadless areas, including important Greater sage-grouse habitat. Due to the deleterious effects increased development would have along TransWest Express, which runs through lands of high conservation value, TWS opposes designation of a new corridor following

TransWest Express, and we urge the Agencies not to designate this new corridor. Instead, corridor 138-143 should be used for any future transmission development needs in this area.

Thank you for the opportunity to comment.

Alex Daue, Assistant Director, Energy & Climate
The Wilderness Society
1660 Wynkoop St # 1150, Denver, CO 80202
alex_daue@twc.org
(720) 647-9369

John Robison, Public Lands Director
Idaho Conservation League
PO Box 844, Boise, ID 83701
jrobison@idahoconservation.org
(208) 345-6933

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10073] - Webmaster Receipt
Date: Friday, January 29, 2021 8:54:19 AM
Attachments: [ID_10073_20210128GenesisAlkaliCommentsstoBLMonSection368EnergyCorridor.pdf](#)

Thank you for your input, Barbara Ritchie.

The tracking number that has been assigned to your input is **10073**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 08:49:08 CST

First Name: Barbara
Last Name: Ritchie
Email: barbara.ritchie@genlp.com

Are you submitting input on the behalf of an organization? Yes
Organization: Genesis Alkali, LLC

Input

Please see attached comments from Genesis Alkali, LLC.

Attachments

2021-01-28 Genesis Alkali Comments to BLM on Section 368 Energy Corridor.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

January 28, 2021

Via upload: <https://corridoreis.anl.gov/involve/report-input/>

Re: West-wide Energy Corridors Region 4 Review comments

Genesis Alkali, LLC is a trona mining and soda ash production company in Western Wyoming, producing approximately four million tons per year of natural soda ash and employing almost 900 people at our two facilities near Green River, Wyoming. Soda ash is the largest inorganic material exported from the United States and Genesis Alkali is the largest US producer. Ninety percent of all soda ash produced in the United States is produced in Wyoming, just west of Green River. Southwest Wyoming holds almost all of the nation's mineable trona reserves, the majority of which lie within the approximately 700,000-acre Known Sodium Leasing Area (KSLA).

Genesis Alkali supports the Section 368 Energy Corridor concept. It is an innovative approach to facilitating land use for energy transmission while minimizing conflicts. Genesis Alkali is providing these comments to better ensure that the corridors will be successful.

It should be noted that two proposed Section 368 corridors pass over Genesis Alkali underground mining areas, specifically (1) corridor 121-240 between mile markers 20 and 35 and (2) corridor 218-240 between mile markers 25 to 35. Because these corridors pass through existing mineral leases, any potential rightsholders of these sections should know that underground mining may create ground movements in these corridors that could impact pipelines and power lines. Potential rightsholders should be on notice and prepared to fully fund any necessary mitigation to protect their energy transmission equipment where our mining rights are senior in priority. BLM's process to authorize uses of these sections should ensure that the potential rightsholders are informed in writing in this regard prior to acquiring any such rights.

Additionally, it should be noted that BLM should evaluate whether corridor 121-240 is in fact needed, considering that corridor 218-240 is located only a few miles to the south. Corridor 121-240, especially between mile markers 17 and 30, runs through largely undisturbed wildlife habitat. If corridor 121-240 were to be eliminated from the proposal and future energy infrastructure alternatively routed through 218-240, habitat impacts can be minimized.

As noted above, Genesis Alkali supports the Section 368 Energy Corridor concept and wants it to succeed without hindering Wyoming's wildlife preservation efforts or the operations of Wyoming's largest mining and trona industries. Please let us know if you would like to further discuss the contents of this matter.

Sincerely,



Fred von Ahrens
VP, Manufacturing, Genesis Alkali

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10074] - Webmaster Receipt
Date: Friday, January 29, 2021 11:28:05 AM
Attachments: [ID_10074_StateofIdahocommentsontheRegions45and6Report.pdf](#)

Thank you for your input, Marissa Warren.

The tracking number that has been assigned to your input is **10074**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 11:27:56 CST

First Name: Marissa
Last Name: Warren
Email: marissa.warren@oer.idaho.gov

Are you submitting input on the behalf of an organization? Yes
Organization: State of Idaho

Input

Please see attachment.

Attachments

State of Idaho comments on the Regions 4, 5, and 6 Report.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

IDAHO GOVERNOR'S OFFICE OF ENERGY & MINERAL RESOURCES

304 N. 8th Street, Suite 250, P.O. Box 83720
Boise, Idaho 83720-0199

(208) 332-1660
FAX (208) 332-1661

To Whom It May Concern,

The State of Idaho has reviewed the Section 368 Energy Corridor Review Regions 4, 5, and 6 Report produced by the U.S. Bureau of Land Management (**BLM**), the U.S. Forest Service (USFS), and the U.S. Department of Energy.

Overall, the proposed changes in the Report will enhance energy corridors located in Idaho. The potential corridor revisions, deletions, and additions reflect applications of the corridor siting principles and appropriately balance the need for safe and reliable energy connectivity with concerns for potential resource impacts on BLM-managed public lands and USFS-managed National Forest System lands.

The State of Idaho appreciates the opportunity to submit these comments. Please feel free to contact me should you have any questions or need of clarification.

Sincerely,

A handwritten signature in blue ink that reads "John Chatbum". The signature is fluid and cursive, with a large loop at the end.

John Chatbum
Administrator
(208) 332-1660

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10075] - Webmaster Receipt
Date: Friday, January 29, 2021 12:12:15 PM
Attachments: [ID_10075_20210129LTRWDEQcommentsonWestwideenergycorridors.pdf](#)

Thank you for your input, Colin McKee.

The tracking number that has been assigned to your input is **10075**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 12:10:33 CST

First Name: Colin
Last Name: McKee
Email: colin.mckee1@wyo.gov

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

Input

[Blank]

Attachments

20210129LTR WDEQ comments on West-wide energy corridors.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Mark Gordon, Governor



Todd Parfitt, Director

January 29, 2021
U.S. Bureau of Land Management
U.S. Forest Service
U.S. Department of Energy

To whom it may concern,

Please find comments from the Wyoming Department of Environmental Quality's review of the proposed West-wide Energy Corridors. WDEQ appreciates the opportunity and looks forward to its continuing cooperator agency status through the course of this review.

Comments on Section 368 West-wide Energy Corridors in Region 4

Water Quality Division

The Watershed Protection Program has reviewed the Bureau of Land Management, U.S. Forest Service, and the U.S. Department of Energy's Energy Policy Act of 2005 Section 368 Energy Corridor Review for Regions 4, 5, and 6 and is providing the following comments for consideration. The review is in response to a 2012 Settlement Agreement and proposes changes to placement of future oil, gas, and hydrogen pipeline, and electricity transmission and distribution infrastructure that were finalized in a 2009 Programmatic Environmental Impact Statement. Comments are due January 31st.

In accordance with Title 35, Section 11 of the Wyoming Statutes and Wyoming's Water Quality Rules and Regulations, the Wyoming Department of Environmental Quality/Water Quality Division (WDEQ/WQD) is responsible for the protection and restoration of the quality of waters of the state. The WQD also implements portions of the federal Clean Water Act, including development of surface water quality standards, identification of impaired waters and development of total maximum daily loads for impaired waters under Section 303; inventorying water quality under Section 305; discharge permitting under Section 402; water quality certifications under Section 401; and addressing nonpoint sources of pollution under Section 319.

WDEQ/WQD recognizes that subsequent environmental analyses will take place on a project-specific basis. WDEQ/WQD is providing the following comments to help facilitate the review of potential impacts to water quality of future projects that may occur within the corridors, and ensure that the review and any future project analyses adequately reflect and adhere to Wyoming's Water Quality Rules and Regulations.

200 West 17th Street, Cheyenne, WY 82002 • <http://deq.wyoming.gov> • Fax (307) 635-1784

ADMIN/OUTREACH	ABANDONED MINES	AIR QUALITY	INDUSTRIAL SITING	LAND QUALITY	SOLID & HAZ. WASTE	WATER QUALITY
(307) 777-7937	(307) 777-6145	(307) 777-7391	(307) 777-7369	(307) 777-7756	(307) 777-7752	(307) 777-7781

WDEQ/WQD recommends the review consider and evaluate potential impacts to the quality of surface and ground waters of the state and identifies steps to minimize potential impacts. WDEQ/WQD also recommends the review explain how groundwater and surface waters will be protected from the release of chemicals, petroleum products, produced water, and any other hazardous substances that may occur during project implementation.

WDEQ/WQD recommends any future projects ensure consistency with Title 49 of the Code of Federal Regulations (CFR), Part 195 and 192, that establish Integrity Management (IM) regulations for hazardous liquid and gas transmission pipelines. The IM regulations require operators to identify High Consequence Areas (HCA), in which a pipeline leak or failure would result in significant adverse conditions, as well as develop a management plan for protection of HCAs and implementation. Drinking water resources and sensitive receptors would be considered HCAs that would need to be assessed and included in a management plan.

In addition to the above recommendations, WQD would also like to highlight the following permits and requirements that may apply to projects located within the corridors and should be noted in any future environmental analyses, depending on the eventual scope of the project. Spill Reporting. Wyoming Water Quality Rules and Regulations, Chapter 4, requires that the WQD be notified of any oil or hazardous substances which have been released and which enter, or threaten to enter, waters of the state. Spills can be reported to WDEQ by calling 307-777-7501 or through the following website: <http://wyospills.org/>.

- Clean Water Act Section 401 Water Quality Certifications. WDEQ/WQD is responsible for issuing Clean Water Act Section 401 Water Quality Certifications for Clean Water Act Section 404 Dredge and Fill permits issued by the United States Army Corps of Engineers and federal licenses for hydroelectric power projects issued by the Federal Energy Regulatory Commission. The 401 Certification ensures that the federal permit or license will comply with Wyoming's Water Quality Rules and Regulations, Chapter 1, Wyoming Surface Water Quality Standards. Conditions of the 401 Certification are included as conditions of the federal permit or license. Additional information is available: <http://deq.wyoming.gov/wqd/40I-certification/>
- Temporary Turbidity Waiver. Wyoming's Water Quality Rules and Regulations, Chapter 1, Wyoming Surface Water Quality Standards, Section 23(a) include turbidity criteria for waters designated as fisheries and/or drinking water supplies. Any type of construction activity within such waters is likely to result in exceedances of these criteria. In accordance with Chapter 1, Section 23(c)(ii), the Water Quality Division Administrator may authorize temporary increases in turbidity above the numeric criteria and may impose whatever controls, monitoring, and best management practices are necessary to maintain and protect all water uses. In circumstances where a project has the potential to exceed the turbidity criteria, a waiver is recommended. Applications must be submitted and waivers approved by the administrator before work begins. Additional information is available: <http://deq.wyoming.gov/wgd/cwa-section-401-turbidity-wetland/resources/turbidity/>
- Nonpoint Source Pollution. WDEQ/WQD encourages project sponsors to minimize the potential impacts of projects to surface and groundwater quality by implementing best management practices for activities that do not require WDEQ issued permits. These

include, but are not limited to, practices associated with chemical use and management (e.g., fertilizers, pesticides, petroleum products, toxic chemicals, and other potential pollutants); silviculture; wildland fire; rangeland management; certain road construction and maintenance; stream and lakeshore restoration; recreation management; and vegetation and minerals management. Additional information is available:

<http://deg.wyoming.gov/wgd/non-point-source/>

- Assessed Waters and Restoration Plans. Projects should evaluate potential impacts to surface waters that have been assessed as either meeting or not meeting surface water quality standards by WDEQ/WQD, as reflected in Wyoming's Clean Water Act Sections 305(b) and 303(d) Integrated Report. Projects should minimize potential impacts to surface waters that are meeting designated uses, should not exacerbate pollutant loading to waters that are not currently meeting Surface Water Quality Standards, and take into consideration any restoration plans that have been developed to meet surface water quality standards. Additional information is available: <http://deq.wyoming.gov/wgd/water-quality-assessment/>
- Wyoming Pollutant Discharge Elimination System (WYPDES) Program Permits. The WYPDES Program issues permits for any point source discharges into surface waters of the state, consistent with Wyoming's Water Quality Rules and Regulations, Chapter 2, Permit Regulations for Discharges to Wyoming Surface Waters. WYPDES permits contain limitations and conditions to assure that Wyoming Water Quality Rules and Regulations, Chapter 1, Wyoming Surface Water Quality Standards, are met. Permits that may be applicable to the project include those for stormwater discharges, temporary discharges associated with construction activities, and discharges to and mitigation for isolated wetlands.
- Storm Water Permits. A WYPDES permit is required for storm water discharges resulting from all construction activities that cumulatively disturb one or more acres. A Large Construction General Permit is required for construction activities that cumulatively disturb five or more acres and a Small Construction General Permit is required for construction activities that cumulatively disturb between one and five acres. WDEQ is working with the Wyoming Game and Fish Department to minimize the impact of development on the Greater Sage-Grouse population in Wyoming pursuant to the requirements of the Governor's Executive Order 2019-3, Greater Sage-Grouse Core Area Protection. If any part of a construction project falls within a Greater Sage-Grouse Core Area (SGCA), the owner or operator must coordinate with Wyoming Game and Fish to ensure that the project is consistent with the Executive Order. A map of sage-grouse core areas in Wyoming can be found here: <https://wgfd.wyo.gov/Habitat/Sage-Grouse-Management/Sage-Grouse-Data>. Additional information is available: <http://deg.wyoming.gov/wqd/storm-water-permitting/>.
- Temporary Discharges from Construction Activities Permits. A WYPDES permit is required for temporary discharges to surface waters from activities such as construction dewatering where this is a significant groundwater component; disinfection of potable water lines; and/or hydrostatic testing of pipes, tanks, or other similar vessels. Additional information is available: <http://deq.wyoming.gov/wgd/discharge-permitting/>
- Isolated Wetland Mitigation General Permits. Isolated wetlands are those wetlands, as defined in Wyoming Statutes 35-11-103(c)(x), that do not meet the federal definition of Waters of the United States and regulated under the federal Clean Water Act, but meet

the state's definition of waters of the state, as defined in Wyoming Statutes 35-11-103(c)(vi). A WYPDES General Permit for Wetland Mitigation is required in circumstances where the discharge of dredge or fill material results in the loss or destruction of greater than one cumulative acre of (1) naturally occurring isolated wetlands or (2) man-made isolated wetlands used to mitigate the loss of naturally occurring wetlands. Prior to commencement of the discharge, a notice of intent and mitigation plan to offset the loss of wetland function and values must be filed with the Administrator of the Water Quality Division. Additional information is available: <http://deq.wyoming.gov/wqd/discharge-permitting/>.

- Underground Injection Control (UIC) Permits. A WDEQ/WQD issued UIC permit is necessary for certain discharges into groundwater of the state, consistent with Wyoming's Water Quality Rules and Regulations, Chapter 27. UIC permits contain limitations and conditions to assure that the Wyoming Water Quality Rules and Regulations, Chapter 8, Wyoming Groundwater Quality Standards, are met. Additional information is available: <http://deq.wyoming.gov/wqd/underground-injection-control/>
- Land Application of Hydrostatic Test Water Permits. Land Application of Hydrostatic Test Discharge Water permit is required when discharging uncontaminated water used during a hydrostatic test. Additional information is available: <http://deq.wyoming.gov/wqd/permitting-2/resources/other-permits/>

Abandoned Mine Land Division (AML)

AML has reviewed the interagency report authored by the Bureau of Land Management (BLM), US Forest Service (USFS) and Department of Energy (DOE), entitled *Energy Policy Act of 2005 Section 368 Energy Corridor Review, Regions 4, 5, and 6*. The interagency review action was required by a 2012 settlement agreement that requires these agencies to periodically review designated energy corridors across federal lands to ensure that environmental resources are protected to the extent possible while allowing for approved energy corridors crossing federal lands. A Programmatic Environmental Impact Statement previously addressed these corridors as required by NEPA. The corridors reviewed include consideration of major energy infrastructure rights-of-way including Energy Gateway South Transmission Project, Energy Gateway West Transmission Line Project, and TransWest Express Transmission Project that AML recently reviewed. The Ruby Pipeline, with which AML interacted in 2011, is also included within the corridors. In addition, the Wyoming Pipeline Corridor Initiative, currently involved in the NEPA process is also discussed. AML has provided comments and data to agencies, the Industrial Siting Division, and the project proponents on all the listed project undertakings within Wyoming.

While abandoned mines generally are not among "environmental resources" that are of concern in such a NEPA review, and therefore are not normally discussed in such documents, when AML is requested to provide input we always provide information on known abandoned mines that might affect proposed projects. In particular, projects such as those involved in energy transmission lines whether electrical powerlines or pipelines for conveyance of various liquid or gaseous commodities, should be made aware of the existence of abandoned underground workings that may affect the integrity of such installations. However, from a NEPA standpoint,

these abandoned mines are not resources that may be adversely affected by such projects except in the cases where the historic mine features may be considered culturally significant properties. If these sites are culturally significant, they would fall under cultural resource reviews when actual project planning and clearances are under way.

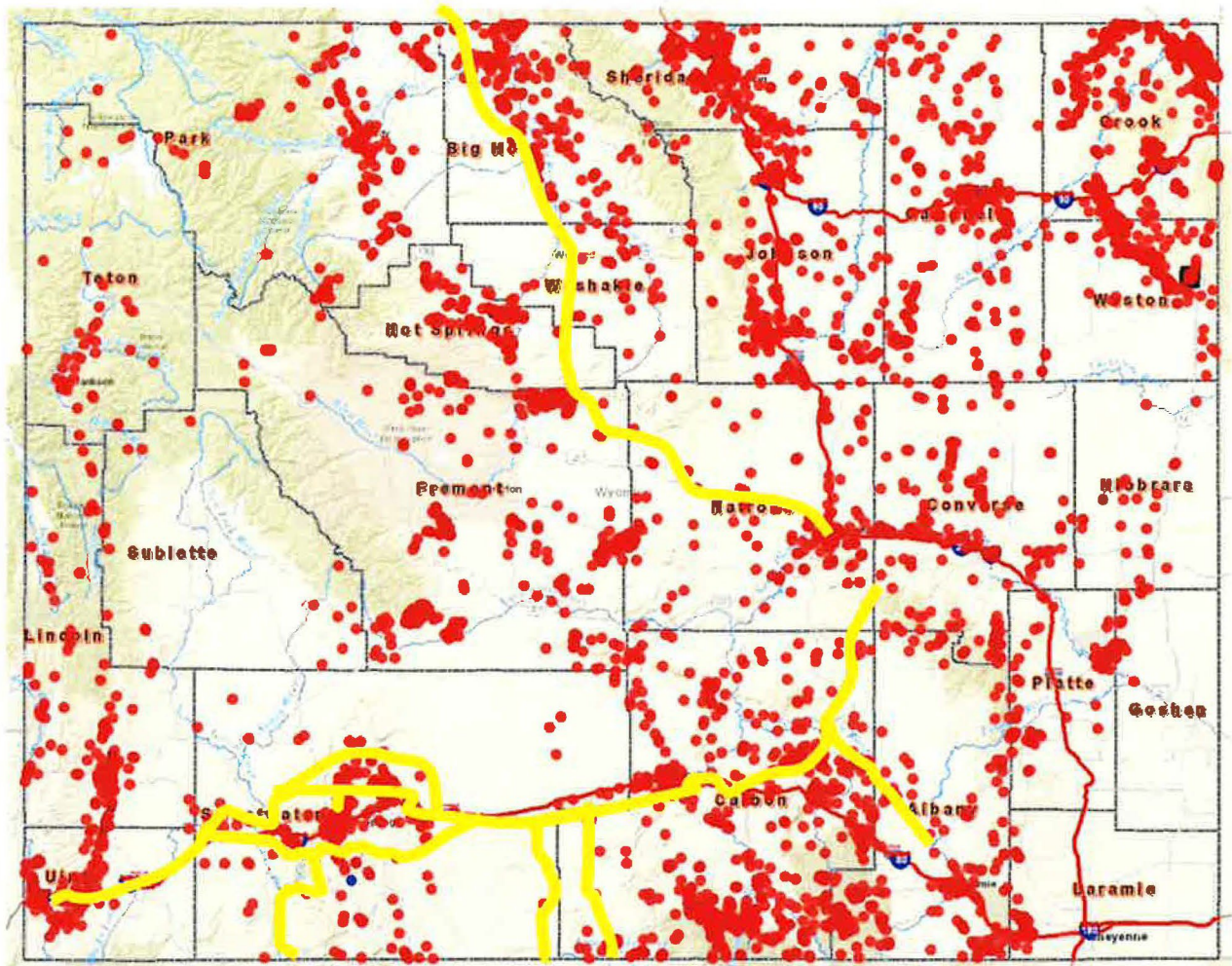
The attached map shows that many of the corridor segments involved in the review will or may intersect known abandoned mines in Wyoming. The sketch map superimposes solid lines where the Section 368 documents show discrete corridor parcels only on federal lands. The illustrated trend lines show the alignments versus the locations and densities of abandoned mines. Any project proponent for such transmission lines or pipelines should be made aware of the existence of abandoned mines in the vicinity of their proposed installations. In situations where new installations are planned over known existing underground mines, it is not the policy of AML to mitigate the subsidence potential at these locations. It is incumbent upon the proponent to avoid these locations or to engineer in protective designs that would prevent damage to these new facilities should mine subsidence occur. During the planning, clearance, and permitting processes for such installations, AML will provide any existing data on these abandoned mines to aid the proponent in planning for protective designs.

Thank you again for the opportunity to review. If you have further questions, please contact me at colin.mckeel@wyo.gov.

Sincerely,



Colin McKee
Senior Policy Advisor
Wyoming Department of Environmental Quality



Section 368 West-wide Energy Corridors in Region 4 versus recorded abandoned mines in Wyoming.

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10076] - Webmaster Receipt
Date: Friday, January 29, 2021 2:29:33 PM
Attachments: [ID_10076_ONDAWWECcomments_Final_1.29.21.pdf](#)

Thank you for your input, Jeremy Austin.

The tracking number that has been assigned to your input is **10076**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 14:28:33 CST

First Name: Jeremy
Last Name: Austin
Email: jeremy@onda.org

Are you submitting input on the behalf of an organization? Yes
Organization: Oregon Natural Desert Association

Input

To Whom It May Concern:

Please find attached Oregon Natural Desert Association's comments on the Energy Policy Act of 2005 Section 368 Energy Corridor Review - Region 4, 5, and 6.

Please do not hesitate to contact us if you have any question.

Thank you,
Jeremy Austin

Attachments

ONDA WWEC comments_Final_1.29.21.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

BRAD LITTLE
Governor

JOHN CHATBURN
Administrator



January, 29, 2021

VIA ELECTRONIC SUBMISSION

VIA EMAIL: blm_wo_368corridors@blm.gov

Nicholas E. Douglas
Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Gregory C. Smith
Director
Lands and Realty Management U.S. Forest Service

Melissa Pauley
Management and Program Analyst
Office of Electricity
U.S. Department of Energy

Re: Energy Policy Act of 2005 Section 368 Energy Corridor 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 west wide 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 5,000 members that is dedicated to protecting, defending and restoring public lands in 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 continues to urge for 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 also has significant concerns regarding potential conflicts with, and the need for, newly proposed corridor additions in Oregon. ONDA urges the reexamination of these corridors to minimize conflicts between the corridors and other sensitive resources.

1. Recommended additional data sources for environmental assessment of WVEC

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. 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.

There are multiple ongoing data collection and wildlife range mapping efforts in Oregon relevant to energy corridor siting and development. The Oregon Renewable Energy Siting Assessment (ORESAs) is currently conducting an assessment that will:

[C]ollect and assess information regarding the presence of valuable natural and environmental resources, regulatory structure and jurisdictional protections as they exist across Oregon's landscape and other development constraints. It will build an understanding of renewable energy opportunities and constraints in Oregon and where the state can support renewable energy growth and economic development while protecting important natural resources.

Additionally, the [Oregon Habitat Connectivity Consortium](#) ("OHCC"), led by Oregon Department of Fish and Wildlife ("ODFW"), has developed an implementation plan for how to assess existing habitat connectivity for terrestrial wildlife across the state. The goal is to map a variety of both game and non-

game species that are representative of a broad diversity of taxa, dispersal capabilities, conservation need, and movement types. OHCC's implementation plan is currently guiding the Oregon Connectivity Assessment and Mapping Project, a collaborative effort to analyze and map statewide wildlife habitat connectivity at fine resolutions for up to 60 species.

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. Cumulative effects analysis

Designation of Section 368 priority corridors will prioritize and direct future renewable energy development. It is important that cumulative effects of potential corridor additions, as well as existing corridors, are considered when making informed decisions about corridor location. BLM must consider and evaluate the cumulative effects of proposed corridors and additions.

5. Specific input relating to an apparent corridor error in Oregon and Nevada

The “Energy Policy Act of 2005 Section 368 Energy Corridor Review” for Regions 4, 5, 6, issued November 2020 identifies potential corridor revisions, deletions, and additions to corridors on page 27, Figure 3-1. The map depicts a proposed new corridor in northern Nevada (identified in red), extending west from corridor 16-24, traversing south of Sheldon National Wildlife Refuge, and then north into Oregon, connecting with corridor 7-24 (recommended for deletion) (see Figure 1). This corridor is not discussed in the “Interagency Corridor Modification Summaries, Potential Corridor Additions and Deletions” report and appears to be a mapping error. This potential corridor would have significant conflicts along its route; the error must be corrected and the corridor deleted from the report.

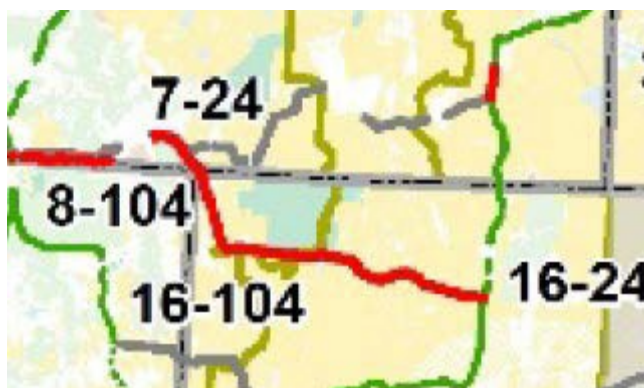


Figure 1. Potential corridor addition identified on page 27 of the “Energy Policy Act of 2005 Section 368 Energy Corridor Review” for Regions 4, 5, 6.

6. Specific input relating to corridors in Oregon

7-24: We appreciate that the draft report and review for Region 6 has heeded public input and has proposed eliminating Corridor 7-24 from further consideration in this process. This corridor crosses a large expanse of southeastern Oregon in Malheur, Harney and Lake counties, bisecting the ecologically and culturally vital region between Hart Mountain National Antelope Refuge and the Sheldon

National Wildlife Refuge. These are two of the largest wildlife refuges in the lower 48 states, managed in concert as a complex for migrating wildlife, and would be negatively impacted by Corridor 7-24. The corridor crosses the only two designated Sagebrush Focal Areas (“SFA”) in the country, 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. Given the significant acreage of priority and general sage-grouse habitat impacted by the corridor, as well as possible effects on the Steens Mountain Cooperative Management and Protection Area and wilderness-quality public lands, even acceptable modifications to reroute this corridor are not possible.

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, and BLM identified Climate Change Consideration Area (“CCCA”), Restoration Opportunity Area (“ROA”) and High Density Breeding Area (“HDBA”). This corridor traverses a large area of an SFA, one of only two designated SFAs in the country, and bisects priority sage-grouse habitat that provides critical habitat connectivity for sage-grouse populations in Malheur and Harney counties. SFAs are designated as exclusion areas for wind and solar energy development, and avoidance areas for ROW location under the Oregon ARMPA.

The proposed northern extension of this corridor crosses BLM Wilderness Study Areas (“WSA”), as well as BLM Lands with Wilderness Characteristics.

Further, it is unclear what need there is for an additional corridor in this region. The summary report states that:

The corridor promotes efficient use of the landscape by providing a link to other section 368 corridors...creating an interstate pathway for electrical and pipeline transmission from Nevada to Oregon.

Report at 37. Three potential projects are referenced in the report (Star Peak, North Valley and Baltazor) that would need “tie-in connections” to existing transmission lines. However, all three projects are located in Nevada, and would not require an “interstate pathway” between Oregon and Nevada.

Due to the configuration of the SFA, priority sage-grouse habitat and WSAs in this region, and ROW avoidance areas that are not compatible with the corridor's purpose, acceptable modifications to reroute this corridor and avoid sage-grouse and wilderness impacts would be unlikely. This corridor, and the proposed extension, should be eliminated as a Section 368 priority corridor by BLM in the current process, as well as subsequent land-use planning and environmental analyses.

24-228: Corridor 24-228 in Oregon (and extending into Idaho) passes areas of priority and general sage-grouse habitat, BLM Lands with Wilderness Characteristics and citizen-proposed wilderness areas. The corridor cuts through the Soldier Creek Priority Area for Conservation ("PAC") for sage-grouse. The [Soldier Creek PAC sage-grouse population declined by 51%](#) from 2019 to 2020, tripping a hard trigger to revise management under the Oregon ARMPA. Hard triggers represent the most concerning threshold for sage-grouse population loss, requiring immediate and more restrictive plan-level action to address sage-grouse conservation objectives. This corridor would require significant modifications to avoid sage-grouse habitat and wilderness resources.

Further, it is unclear what need there is for an additional corridor in this region. The summary report states that:

The corridor promotes efficient use of the landscape by providing a pathway for energy transport from Oregon to Boise, Idaho, following Highway 95. The corridor crosses GHMA and PHMA, ROW avoidance areas that may not be compatible with the corridor's purpose as a preferred location for infrastructure.

Report at 63. As the summary report states, this corridor is not a preferred location for infrastructure. Further, there is no discussion about whether there is any demand driving the need for energy transport between this part of Oregon and Boise, Idaho or, why corridor 11-228 cannot meet any potential transmission needs between Oregon and Boise, Idaho.

It is also important to note that Corridor 24-228 may not be viable due to significant resource conflicts associated with Corridors 7-24 (which the draft report recommends for deletion) and 16-24, to which 24-228 would connect.

Due to the configuration of priority sage-grouse habitat, wilderness character, and ROW avoidance areas that are not compatible with the corridor's purpose,

acceptable modifications to reroute this corridor and avoid sage-grouse and wilderness impacts would be unlikely. This corridor should be eliminated from further consideration as a Section 368 priority corridor in the current process, and in subsequent land-use planning and environmental analyses.

7-11: Corridor 7-11 crosses BLM Lands with Wilderness Characteristics, elk and mule deer migration corridors and winter range, and passes priority and general habitat for sage-grouse. Modifications are necessary to avoid conflicts.

Proposed Wagontire Mountain Corridor Addition: The proposed Wagontire Mountain Corridor Addition crosses areas of priority and general sage-grouse habitat, BLM Lands with Wilderness Characteristics and citizen proposed wilderness areas, ODFW identified [Conservation Opportunity Area](#), Elk and Mule Deer Crucial Winter Range and BLM identified Climate Change Consideration Area (“CCCA”) and Restoration Opportunity Area (“ROA”). The corridor passes through the Picture Rock PAC for sage-grouse. The [Picture Rock PAC sage-grouse population declined by 50% from 2019 to 2020](#); the PAC had already tripped a hard trigger under the Oregon ARMPA due to population decline. Hard triggers represent the most concerning threshold for sage-grouse population loss, requiring immediate and more restrictive plan-level action to address sage-grouse conservation objectives.

Further, it is unclear what need there is for an additional corridor in this region. The summary report states that:

[I]n order to transmit the energy to load centers, there is a need for a north-south pathway from the Wagontire/Burns area into California that cannot be met through Corridors 11-228 and 7-11.

Report at 18. However, no explanation is given regarding why the existing infrastructure, or adjacent corridors, cannot meet that need.

Due to the configuration of priority and general sage-grouse habitat, Elk and Mule Deer Crucial Winter Ranges, and wilderness quality lands, acceptable modifications to reroute this corridor and avoid sage-grouse impacts would be unlikely. This corridor should not be added 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,

s/ Jeremy Austin

Jeremy Austin, Policy Manager
Oregon Natural Desert Association

50 SW Bond St, Ste 4
Bend, OR 97702
Jeremy@onda.org

Cc: Mark Salvo, Program Director
Oregon Natural Desert Association
msalvo@onda.org

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10077] - Webmaster Receipt
Date: Friday, January 29, 2021 3:16:48 PM
Attachments: [ID_10077_NGOCommentsonSection368ReportforRegions45620200129.pdf](#)

Thank you for your input, Rupak Thapaliya.

The tracking number that has been assigned to your input is **10077**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 15:14:58 CST

First Name: Rupak
Last Name: Thapaliya
Email: rthapaliya@defenders.org

Are you submitting input on the behalf of an organization? Yes
Organization: Defenders of Wildlife et. al.

Input

Please find attached the comments of Defenders of Wildlife on behalf of Audubon California, Audubon Rockies, Bark, California Wilderness Coalition, Center for Biological Diversity, Friends of Nevada Wilderness, Friends of the Inyo, Idaho Conservation League, KS Wild, National Audubon Society, Natural Resources Defense Council, Oregon Natural Desert Association, Soda Mountain Wilderness Council, The Wilderness Society, The Wildlands Conservancy, and Wyoming Wilderness Association

Attachments

NGO Comments on Section 368 Report for Regions 4-5-6 (20200129).pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Audubon California | Audubon Rockies | Bark | California Wilderness Coalition

Center for Biological Diversity | Defenders of Wildlife

Friends of Nevada Wilderness | Friends of the Inyo | Idaho Conservation League

KS Wild | National Audubon Society | Natural Resources Defense Council

Oregon Natural Desert Association | Soda Mountain Wilderness Council

The Wilderness Society | The Wildlands Conservancy

Wyoming Wilderness Association

January 29, 2021

Nicholas E. Douglas
Assistant Director
Energy, Minerals, and Realty Management
Bureau of Land Management

Gregory C. Smith
Director
Lands and Realty Management
U.S. Forest Service

Melissa Pauley
Management and Program Analyst
Office of Electricity
U.S. Department of Energy

Submitted electronically via email at blm_wo_368corridors@blm.gov and online at <https://corridoreis.anl.gov/involve/report-input/>

Re: Comments on Section 368 Energy Corridor Review Regions 4, 5, and 6 Report

Dear Mr. Douglas, Mr. Smith and Ms. Pauley:

Please accept the following comments from Audubon California, Audubon Rockies, Bark, California Wilderness Coalition, Center for Biological Diversity, Defenders of Wildlife, Friends of Nevada Wilderness, Friends of the Inyo, Idaho Conservation League, KS Wild, National Audubon Society, Natural Resources Defense Council, Oregon Natural Desert Association, Soda Mountain Wilderness Council, The Wilderness Society, The Wildlands Conservancy, and Wyoming Wilderness Association on the draft Energy Policy Act Section 368 Energy Corridor Review- Regions 4, 5 and 6

(“Report”)¹ released by the Bureau of Land Management (“BLM”), U.S. Forest Service (“USFS”) and the Department of Energy (“DOE”) (collectively the “Agencies”) on November 2, 2020.

Defenders of Wildlife is dedicated to protecting native animals and plants in their natural communities. Founded in 1947, Defenders is a national conservation organization that represents approximately 1.8 million members and supporters in the United States and around the world who are concerned with wildlife and habitat conservation, including on public lands in the West.

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. Bark represents over 30,000 people who support our mission.

The California Wilderness Coalition (CalWild) protects and restores the state’s wildest natural landscapes and watersheds on public lands. These important wild places provide clean air and water, refuges for wildlife, mitigation against the effects of climate change, and outstanding opportunities for recreation and spiritual renewal for people. CalWild is the only statewide organization dedicated solely to protecting and restoring the wild places and native biodiversity of California’s public lands.

The Center for Biological Diversity 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.

Friends of Nevada Wilderness is dedicated to preserving all qualified Nevada public lands as wilderness, protecting all present and potential wilderness from ongoing threats, educating the public about the values of and need for wilderness, and improving the management and restoration of wild lands.

Friends of the Inyo is a 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 1,000 members, FOI is an active partner with federal land management agencies including the USFS and BLM.

Since 1973, Idaho Conservation League (ICL) has worked to protect and enhance Idaho’s clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. Idaho Conservation League has a long history of involvement with both habitat protection and statewide energy issues. As Idaho’s largest statewide conservation organization, ICL represents over 30,000 supporters who want to ensure that energy development and infrastructure is consistent with natural resource protection.

KS Wild's mission is to protect and restore wild nature in the Klamath-Siskiyou region of southwest Oregon and northwest California. We envision a Klamath-Siskiyou region where local communities

¹ Energy Policy Act of 2005 Section 368 Energy Corridor Review, Regions 4, 5, and 6. Available at https://corridoreis.anl.gov/documents/docs/Regions_4-5-6_Draft_Report.pdf The Report includes “Corridor Summaries” and “Appendices,” also available at <https://corridoreis.anl.gov/regional-reviews/regions-4-5-6/>

enjoy healthy wildlands, where clean rivers are teeming with native salmon, and where connected plant and wildlife populations are prepared for climate change.

The National Audubon Society, Audubon California, and Audubon Rockies protect birds and the places they need, today and tomorrow. We work throughout the Americas using science, advocacy, education, and on-the-ground conservation. Audubon California and Audubon Rockies are regional offices of the National Audubon Society for California and Colorado, Wyoming, and Utah. State programs, nature centers, chapters, and partners give Audubon an unparalleled wingspan that reaches millions of people each year to inform, inspire, and unite diverse communities in conservation action.

The Natural Resources Defense Council is an international nonprofit environmental organization with more than 3 million members and online activists. Since 1970, our lawyers, scientists, and other environmental specialists have worked to protect the world's natural resources, public health, and the environment.

Oregon Natural Desert Association is dedicated to protecting, defending and restoring eight million acres of public lands in Oregon's high desert. Maintaining offices in Bend and Portland, Oregon, ONDA represents more than 5,000 members nationwide.

Formed in 1984, the Soda Mountain Wilderness Council works in SW Oregon and NW California to rewild the important biological corridor between the Siskiyou Mountains, globally significant for their botanical diversity, and the southern Cascade Range. Formerly called the Soda Mountain area, this region is now better known as the Cascade-Siskiyou National Monument area after the Monument was established in 2000 and expanded in 2017 to its current size of ~114,000 federal public land acres. Cascade-Siskiyou is the only national monument explicitly set apart to protect biodiversity.

Since 1935, The Wilderness Society has been dedicated to protecting America's wild places for current and future generations. We are also committed to smart and sensible regulation and management of our public lands to ensure that where energy development does occur it is done in a safe and responsible manner. We are working to ensure that our public lands are managed to help address climate change, including by supporting responsible renewable energy development.

Founded in 1995, The Wildlands Conservancy (TWC) is dedicated to preserving the beauty and biodiversity of the earth and to providing programs so that children may know the wonder and joy of nature. In working to achieve this mission, TWC has established the largest nonprofit nature preserve system in California, comprised of nineteen preserves encompassing 156,000 acres of diverse mountain, valley, desert, river, and oceanfront landscapes. These preserves are open to the public free of charge for passive recreation, including camping, hiking, picnicking, birding, and host more free outdoor education programs for youth than any other nonprofit in California.

The mission of the Wyoming Wilderness Association is to protect Wyoming public wildlands. Our three operational pillars of advocacy, education, and stewardship ensure these lands remain intact and untrammled for the enjoyment of the public now and into the future.

A. Introduction

Our organizations have a long history of engagement in the Section 368 West-wide Energy Corridors (WWECs) planning process. In 2012, several of our groups were part of the settlement agreement² in which the Agencies and other stakeholders agreed to, among other things, reevaluate energy corridor designations on public lands in the west and undertake periodic reviews of those corridors. Since then, our organizations have provided extensive comments in 2014, 2016, 2018 and 2019 as part of these reviews.

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 conservation objectives on public lands. The planning process also provides the BLM an important opportunity to support its Solar Energy Program and the Wind and Solar Leasing Rule by identifying new corridors and modifying existing corridors to incentivize transmission and development in lower-conflict areas. Without transmission, many of the solar energy zones (SEZs) that BLM identified and designated in the Solar Energy Program Programmatic Environmental Impact Statement will fail to attract development interest.

While we continue to support the planning process for energy corridors, specifically transmission corridors that would facilitate renewable energy development in the west, we also have some concerns and recommendations on both the WWEC regional review process as well as specific designated corridors within Regions 4, 5, and 6.

B. 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 numerous data layers as listed on the Appendix G of the Report.

However, 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.⁵ However, quite often many of these fields are without any information.⁶ We recommend that the BLM provide complete metadata for each ACEC, especially information on 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.

² Wilderness Soc’y et al. v. U.S. Dep’t of Interior, No. 3:09-cv-03048 JW (N.D. Cal.) (July 3, 2012).

³ Available at <https://bogi.evs.anl.gov/section368/portal/>

⁴ Energy Policy Act of 2005, 42 U.S.C. § 15926 (a)(1).

⁵ See Little Mountain ACEC, Greater Sand Dunes ACEC, and Greater Red Creek ACEC in Wyoming as examples.

⁶ See Donkey Hills ACEC in Montana, Timbered Crater ACEC or Mount Dome ACEC in California, and Buffalo Creeks Canyon in Nevada as examples.

In addition, we encourage the Agencies to add a data layer for National Recreation Trails (NRT) based on the information at <http://www.nrtdatabase.org/>. NRTs are designated by the Secretaries of Interior or Agriculture to recognize exemplary trails of local and regional significance. The database and a nation-wide map of NRTs is maintained by American Trails, in partnership with the National Park Service. We think addition of the data layer will add to the robustness of the Section 368 Corridor Mapping Tool.

II. Stakeholder Engagement

We appreciate the 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. As we requested previously through our comment letters, we appreciate that the Agencies will make the public comments provided during the regional review available on the WWEC Information Center website. We believe this will increase transparency in addition to allowing for better coordination among stakeholders and the Agencies for more effective and efficient planning.

III. Interagency Operating Procedures (IOPs)

The Report proposes adding new IOPs for ecological resources, specifically a new IOP related to greater sage-grouse (“GRSG”) habitat that addresses predation issues, in addition to the potential new IOPs previously identified in draft reports for Regions 1 and 2 and 3.⁷ We support the addition of these IOPs and provide following comments and recommendations for IOPs.

a. IOP for GRSG

We support the recommendation to add an IOP related to GRSG habitat but this IOP should be focused on preventing visual disturbance to GRSG from transmission structures and seasonal disturbance from construction, operations, and maintenance of transmission infrastructure, in addition to addressing the potential to increased predation along Section 368 corridors. This is needed to minimize impacts to GRSG from infrastructure development both within and beyond corridors and ensure that the impacts on sage-grouse are addressed consistently across federally managed lands. As noted in the Greater Sage-Grouse Habitat Implementation Guide,⁸ “Habitat management areas should not be confused with seasonal habitats,” and this is why a special IOP for GRSG is warranted in addition to avoidance of Management Areas (see below).

Transmission lines have both direct and indirect effects on GRSG, as noted by the BLM and US Fish and Wildlife Service (USFWS) in the following two passages:⁹

“Besides the physical footprint of a power line that permanently alters sage-grouse habitat, power lines also can cause long-term direct effects to sage-grouse by posing collision and electrocution hazards (Braun 1998; Connelly et al. 2000a; Schroeder 2010) and can have long-term indirect effects by decreasing lek recruitment (Braun et al. 2002; Schroeder 2010), increasing predation (Connelly et al. 2004; Gibson et al. 2013a), facilitating the invasion of nonnative invasive annual plants that degrade habitat (Knick et al. 2003; Connelly et al. 2004), causing behavioral avoidance (Gillan et al. 2013; Dinkins et al. 2014b), and acting as a potential barrier to movement (Pruett et al. 2009; WHCWG 2010;

⁷ Report, Pg. 40.

⁸ Greater Sage Grouse Habitat Implementation Guide. Available at https://www.fs.usda.gov/sites/default/files/media_wysiwyg/habitat_implementation_guide_v1_0.pdf

⁹ U.S. Fish and Wildlife Service and Bureau of Land Management. 2015. *Assessing indirect effects of transmission lines on greater sage-grouse for the Gateway West Interstate Transmission Line Project.*

Shirk et al. 2015). The indirect influence, or ecological footprint, of a power line extends out further than the physical footprint of the infrastructure (Knick et al. 2011).”

“In west-central Idaho, a spatial analysis of sage-grouse locations showed a significant avoidance of power lines by 600-m (Gillan et al. 2013). In a study of sage-grouse scat (i.e., pellets) locations in the Wyoming Basins Ecoregional Assessment areas, presence of anthropogenic features (e.g., power lines) negatively affected sage-grouse occurrence, as indicated by significantly lower number of sage-grouse pellet piles within 500-m of power lines (Hanser et al. 2011). Similarly, models developed in Washington state demonstrated that power lines affect sage-grouse movement, gene flow, and lek activity to distances greater than 500-m (WHCWG 2012; Shirk et al. 2015). These studies indicate that while avoidance-related indirect impacts will be greater during sage-grouse breeding season and within breeding habitat, these indirect impacts also will occur during other periods of the year and in all sage-grouse habitats. Avoided habitats may otherwise exhibit vegetative characteristics equal to highly suitable habitat (Hall and Haney 1997; Braun 1998).”

As the Agencies develop the IOP, we recommend that the following provisions be added avoid and minimize impacts to sage-grouse during siting, construction, operation, and maintenance of transmission lines:

- Consult state wildlife agencies and/or federal agencies for known leks (breeding areas), nesting areas, brood-rearing habitat, Winter Concentration Areas or identified winter ranges, and known/identified migratory corridors/routes and any other areas where disturbance from tall structures could impact greater sage-grouse (APLIC 2015)¹⁰
- Maximize avoidance when siting new overhead transmission lines, particularly for PHMA as specified in the 2015 plans currently in effect. When complete avoidance isn't possible, ensure net conservation gain as specified in the 2015 plans.
- Avoid suitable sage-grouse habitat to ensure habitats remain intact. When not possible, minimize effects on sage-grouse populations by siting transmission lines beyond 3.1 km (2 mi) from occupied leks (LeBeau et al. 2019).¹¹
- Comply with other requirements of the existing plans in effect.
- Incorporate cumulative impacts of developing multiple corridors and of the impacts of corridor development combined with other existing and planned disturbance.
- Post-siting, disturbance to nesting areas, late summer brood rearing, and winter ranges should also be avoided during periods of activity. As noted by Manier et al. (2014)¹² “for some populations, the minimum distance inferred here (5 km [3.1 mi]) from leks may be insufficient to protect nesting and other seasonal habitats.” Ensure that all late summer brood-rearing habitat and all crucial winter range are also protected from disturbance. Minimize impacts by implementing seasonal stipulations/restrictions for specific dates and times. Federal land use plans and state sage-grouse conservation plans/agencies should be consulted. In the absence of

¹⁰ Avian Power Line Interaction Committee (APLIC). 2015 Best Management Practices for Electric Utilities in Sage-Grouse Habitat. Edison Electric Institute and APLIC. Washington, DC.

¹¹ LeBeau, C.W., K.T. Smith, M.J. Holloran, J.L. Beck, M.E. Kauffman, and G.D. Johnson. Greater sage-grouse habitat function relative to 230-kV transmission lines. *Journal of Wildlife Management* 83(8):1773–1786.

¹² Manier, D.J., Bowen, Z.H., Brooks, M.L., Casazza, M.L., Coates, P.S., Deibert, P.A., Hanser, S.E., and Johnson, D.H., 2014, Conservation buffer distance estimates for Greater Sage-Grouse—A review: U.S. Geological Survey Open-File Report 2014–1239, 14 p., Available at <https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf>, p 2.

specific dates and times, APLIC's Best Management Practices for Electric Utilities in Sage-Grouse Habitat¹³ should be referred to.

- As noted by APLIC in this GRSG best management practices document, special care is needed when restoring vegetation in rights-of way after disturbance to prevent establishment of cheatgrass and other invasive exotic grass and conifer species. We strongly recommend adherence to these guidelines, which emphasize interagency coordination to fine-tune vegetation restoration and management to local conditions.

In addition, we recommend a separate IOP for Bi-State sage-grouse (BSSG) as it relates to corridor 18-23 which cuts through proposed critical habitat for BSSG.

b. IOP Related to Habitat Connectivity and Wildlife Migration

The Report states that “for the potential new IOP related to habitat connectivity, the Agencies should consider adding language that provides for addressing wildlife corridors and migration patterns at the project level more consistently.”¹⁴ We agree. Many Section 368 energy corridors in Regions 4, 5, and 6 go through wildlife migration corridors and habitat for wildlife, including species listed under the Endangered Species Act, such as Canada Lynx (*Lynx canadensis*), Sierra Nevada Yellow-legged Frog (*Rana sierrae*), Northern spotted owl (*Strix occidentalis caurina*), and Sierra Nevada Bighorn Sheep (*Ovis canadensis sierrae*). The construction and operation of electric transmission lines and natural gas pipelines within these corridors could fragment habitat and affect movement of these species, introduce and facilitate invasive species into the project area, or facilitate unlawful species take.

We applaud the recognition of the need to minimize impacts to wildlife habitat connectivity. Protection of connectivity is one of the most broadly recognized strategies to help species adapt and survive the impacts of climate change. The idea is that connectivity gives wildlife species the ability to shift their ranges in response to changing climate. However, the long term protection of wildlife habitat connectivity relies not only on identification and protection of connectivity as it exists today but also the expectation that connectivity needs must be regularly assessed in coming years as the needs of wildlife change in the face of a changing climate.

The proposed language seems to suggest that wildlife habitat connectivity will be addressed solely on this current “snapshot in time” of how connectivity exists today. Land and wildlife managers must be able to regularly assess the wildlife habitat connectivity needs as they evolve over time, particularly in the face of climate change, and take action to adjust the management and use of corridors to reflect these inevitable changes in wildlife habitat connectivity. Connectivity needs based solely on current conditions may not allow species to adapt to a changing climate and shifting future connectivity needs. Managers need to spell out what efforts they will take to assess wildlife habitat connectivity as it is changed by a changing climate in the coming years in the affected landscapes.

As the Agencies develop the IOP, we recommend adding the following specific IOPs on wildlife migration corridor and habitat.

- Activities within wildlife corridors/linkages for special status species that may have a negative impact on connectivity will require further evaluation in environmental document(s) of the

¹³ Avian Power Line Interaction Committee (APLIC). 2015 Best Management Practices for Electric Utilities in Sage-Grouse Habitat. Edison Electric Institute and APLIC. Washington, DC.

¹⁴ Report, Pg. 41.

effects on long-term population viability. The analysis will consider the extent of suitable habitat, including areas required for climate adaptation, needed to ensure viability within each linkage given local population density, long-term demographic and genetic needs, degree of existing habitat disturbance/impacts, current causes of mortality, and the latest population viability modeling. Activities that would compromise the long-term viability of a corridor/linkage population or the function of the linkage, as determined by the lead Agencies, in coordination with the U.S. Fish and Wildlife Service and state wildlife agency, are prohibited and will require reconfiguration or re-siting.

While this Report does not reference Secretarial Order 3362,¹⁵ the draft report for Regions 2 and 3 recognized the need to adhere to Secretarial Order 3362, particularly, Section 3(d) that calls for “[r]eview and use the best available science to inform development of specific guidelines for the Department’s lands and waters related to planning and developing energy, transmission, or other relevant projects to avoid or minimize potential negative impacts on wildlife”) when developing the new IOP as we recommended in April 2019 during the regional review process for Regions 4, 5 and 6. We appreciate the Agencies for recognizing the need to adhere to the Secretarial Order. In addition, we encourage the Agencies to identify specific actions for working with states in context of the corridor review process and explain how the state wildlife action plans (SWAP)¹⁶ will be consulted. We have attached a map in Appendix 1, which depicts big game winter habitat areas identified in SWAPs for reference.

In addition, we request the Agencies to add data layers for big game migration corridors in states where data is currently available to the Section 368 Energy Corridor Mapping Tool.

c. IOP for Minimizing Avian Collision through Siting

We recommend adding an IOP under ecological resources to minimize the potential for avian collision. Specifically, the IOP should require that applicants:

- Identify any locations where overhead lines would bisect avian movements between important bird use areas, particularly when flight heights put birds at risk for transmission line collision. As noted by Heck¹⁷, “Power lines that are situated in areas that are attractive to birds, such as wetlands, conservation areas, agricultural fields, and industrial lands will pose a risk for collisions (APLIC 1994). Wetlands often support significant numbers of waterfowl and other water birds and power lines located in close proximity will have a significant influence on collision risk. Conservation areas are often attractive to birds because there is less disturbance and more natural wetlands and vegetation (APLIC 1994). Cranes, waterfowl, and blackbirds feed in grain fields that are close to wetlands thus agricultural fields are attractive; collision problems often develop when birds must cross power lines to make daily, low-altitude flights to and from croplands. Industrial lands may also increase the chance of collisions if, for example, there is a landfill in the area attracting scavenging birds such as gulls (APLIC 1994).

¹⁵ Secretarial Order 3362. (2018) Available at https://www.doi.gov/sites/doi.gov/files/uploads/so_3362_migration.pdf.

¹⁶ Available at <https://www.nfwf.org/westernmigrations/Pages/state-action-plans.aspx>

¹⁷ Heck, N. N. (2007). A landscape-scale model to predict the risk of bird collisions with electric power transmission lines in Alberta (Unpublished master's thesis). University of Calgary, Calgary, AB. Available by request at <https://prism.ucalgary.ca/handle/1880/102483>

- Not site overhead transmission lines within corridors in locations that bisect important use areas as described above, focusing on species vulnerable to mortality and crippling from collisions with overhead lines such as ducks, geese, cranes, and herons.

d. IOP for Wilderness-quality Lands

Several corridors in Regions 4, 5, and 6 as well as in other WWEC regions intersect both BLM and USFS wilderness-quality lands. Therefore, to address the impacts on wilderness-quality lands, we recommend adding an IOP for wilderness-quality lands. Specifically, we recommend the following as they related to BLM and USFS wilderness-quality lands, respectively:

- 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.
- 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.

e. IOP for Surface Water

We also support revising the existing IOP on Surface Water to provide for consideration of reducing the corridor width at wild and scenic river crossings. Reducing corridors widths at wild and scenic river crossings will ensure that impacts of infrastructures on aquatic resources and on the rivers themselves are reduced due to smaller footprint.

f. IOP for Access Roads

We recommend adding an IOP for access roads with following provisions:

- Construction of new roads and/or routes will be avoided to the maximum extent practicable within special status species habitat, including corridors/linkages, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern.
- Any new road considered within special status species habitat, including corridors/linkages, will not be paved and will be designed and sited to minimize the effect to the function of identified linkages or special status species populations and shall have a maximum speed limit of 25 miles per hour.
- All roads within rights of way for individual projects authorized for construction and maintenance will be closed to motorized vehicle use by the general public.

g. IOP for Important Bird Areas (IBAs)

Coordinated by BirdLife International, the Important Bird Areas (IBA) Program is a global initiative which aims at identifying and conserving the most important places for bird populations. The foundation of the Important Bird Areas Program is its emphasis on science-based identification, assessment, and conservation of birds and the habitats they need to survive¹⁸. IBAs are peer-reviewed designations that identify the most important habitat for birds. Audubon maintains information regarding the reasons for designation of each IBA and provides mapping information, as well¹⁹. Note that IBAs are formally recognized in the BLM's interim strategic plan,²⁰ as well as attached to its guidance on protecting migratory birds subject to a Memorandum of Understanding with the U.S. Fish & Wildlife Service²¹ as a trigger for areas to protect.

We recommend an IOP that provides for:

- Identification of IBAs in the footprint of potential siting.
- Evaluation of measures to avoid, minimize and mitigate impacts to birds identified in the IBAs related to avoiding collisions and restricting construction operation and maintenance during key seasons in nesting and breeding habitat.

h. IOP for Agency Coordination

The Agencies have an IOP for Agency Coordination which requires Right-of-Way (ROW) applicants to coordinate with federal agencies such as the Department of Defense, National Park Service, Federal Aviation Administration and State Historic Preservation Offices etc. during project planning. We recommend that the agencies add an IOP to require consultation and coordination with the federal Department of Transportation and/or the state departments of transportation during project planning to coordinate and consolidate transportation corridors with WWEC corridors. Coordinating energy corridors with transportation corridors can reduce and mitigate environmental and ecological impacts of both energy and transportation corridors and improve habitat connectivity and migration corridors.

IV. Buffer for GRSG

We note that the Agencies have recommended shifting corridor 50-203 to avoid multiple leks within 2 miles of the corridor.²² The Agencies have specified a buffer of 2 miles for PHMAs, 1.2 miles for IHMAs, and 0.6 miles for GHMAs. This is the only corridor where the Agencies have recommended shifting the designation to avoid leks. We recognize and appreciate that in some instances, the Agencies have recommended shifting corridors due to GRSG concerns but corridor 50-203 is the only corridor where we've noticed the Agencies actually doing so. We recommend that the Agencies identify other corridors where similar adjustments are necessary and re-route corridors as necessary to avoid leks.

¹⁸ https://rockies.audubon.org/sites/default/files/iba_fact_sheet.pdf

¹⁹ <https://www.audubon.org/important-bird-areas>.

²⁰ https://www.blm.gov/sites/blm.gov/files/uploads/IM2013-119_att1.pdf

²¹ <https://www.blm.gov/policy/im-2013-119>

²² Section 368 Energy Corridor Review Volume 2- Regions 4, 5, and 6 Appendices: Supporting Information. p. C-9. Available at https://corridoreis.anl.gov/documents/docs/Regions_4-5-6_Appendices.pdf

The Greater Sage-Grouse Habitat Implementation Guide²³ emphasizes the varying processes by which different sage-grouse Management Areas were defined for each state; and that in some states within Regions 4, 5, and 6 management areas contain areas of non-habitat (Nevada), others have a unique habitat to capture connectivity (IHMA in Idaho), some lump connectivity habitat into PHMA (Wyoming), and that PHMA can be further subdivided into the higher category of Sagebrush Focal Area, described as a stronghold used by the species. These are the differences and nuances that make it necessary to develop a detailed IOP for GRSG to ensure important habitat and use areas are ultimately avoided where new infrastructure may impact the species. However, we also support programmatically avoiding and minimizing intersection with Management Areas whenever possible, and support Management Area buffers as specified for 50-203 above for all corridors with similar conflicts.

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 report²⁴ 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.

V. Bi-State Sage-grouse Population

The BSSG, which is found in and near the Mono Basin in Eastern California and Western Nevada, is continuing to decline and the protections provided to this Distinct Population Segment (DPS) must be sufficient to prevent further decline of this species which is designated as both a BLM special status species and a Forest Service sensitive species. This may require deletion or modification of Corridor 18-23 (see below). In addition, there is currently a legal challenge to the USFWS decision to withdraw the listing proposal for the BSSG Distinct Population Segment (DPS) under the ESA because it was not based on the best available science including data that show significant population declines in this DPS and increasing extinction risk.

Corridor alignment remains inconsistent regarding the analysis of BSSG habitat. The proposed path of the 18-23 corridor goes directly through proposed critical habitat including known lek and breeding locations. Transmission lines adversely impact BSSG populations by reducing nesting and brooding success in areas within 2.8 km of the transmission line. Current corridor adjustments do not reflect locations at least 2.8 km away from any active BSSG leks to mitigate impacts on breeding success. The draft report also does not indicate any consultation or recommendations from USFWS, Nevada Department of Wildlife and California Department of Fish and Wildlife to avoid adversely impacting BSSG populations in the area. Best Management Practices are for development to have a 3.1-mile buffer around leks, yet the current alignment of 18-23 does not provide for this.

The BSSG population as a whole has been declining since 2011. The corridor cuts through at least three of the Population Management Units (PMUs)—Mount Grant, Bodie Hills, and South Mono.

²³ Greater Sage Grouse Habitat Implementation Guide. Available at https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwieprfmi5DuAhUoIDQIHUaDFMQFjABegQIBhAC&url=https%3A%2F%2Fwww.fs.fed.us%2Fsites%2Fdefault%2Ffiles%2Fmedia_wysiwyg%2Fhabit_at_implementation_guide_v1_0.pdf&usq=AOvVaw2kvN4cE6hlKuKR-ZIaTNrE

²⁴ Conservation Buffer Distance Estimates for Greater Sage-grouse- A Review (2014). Available at <https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf>

Scientific data shows the Bodie Hills PMU as stable or slightly increasing in stark contrast to most other PMUs that are in consistent decline.

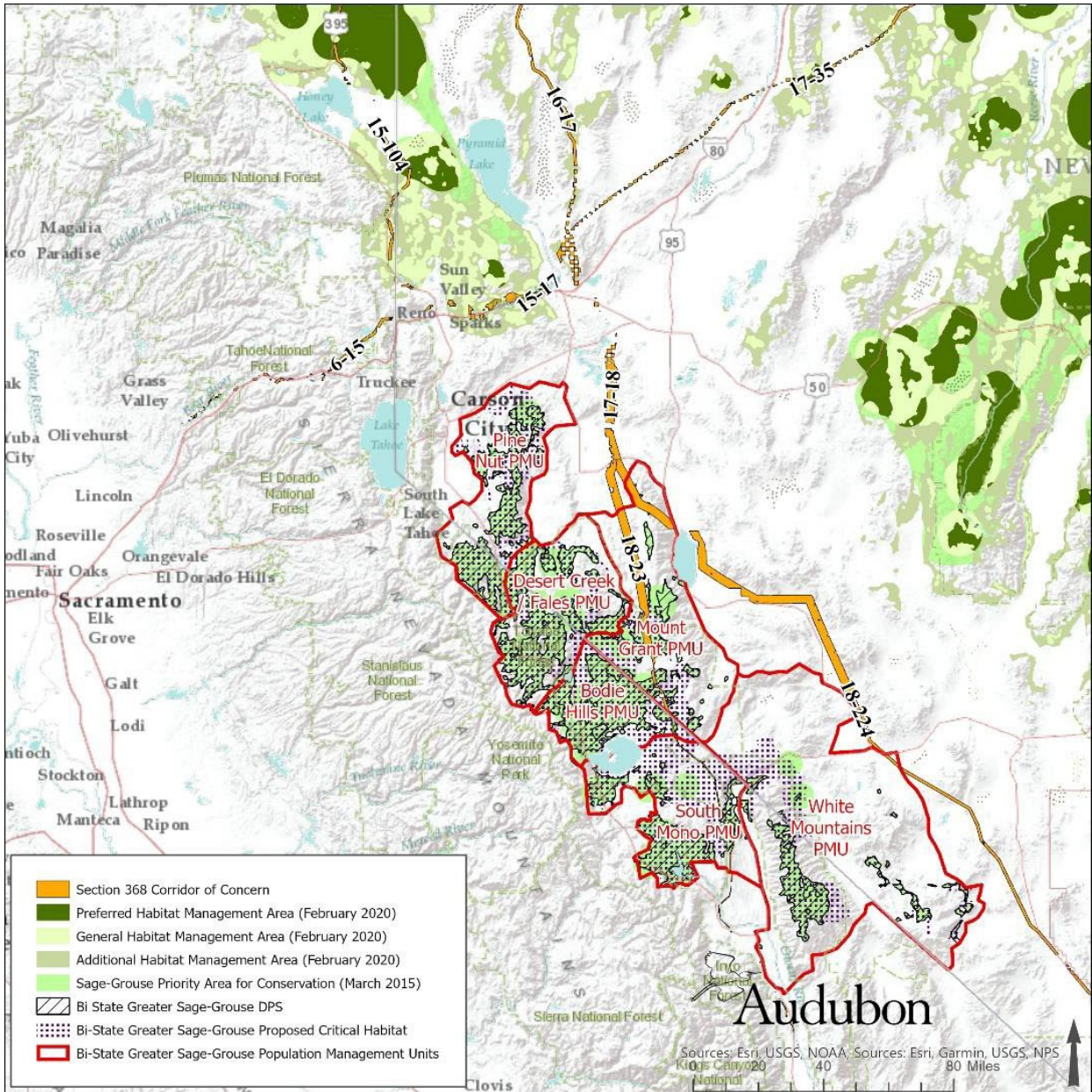


Figure 1: WVEC corridors intersection with BSSG DPS

VI. Areas of Critical Environmental Concerns (ACECs)

As mentioned in our previous comment letters, we continue to contend that ACECs should be avoided in corridor designations and at a minimum ACECs should be classified as “high potential conflict areas.”

ACECs are areas “where special management attention is required.... to protect and prevent irreparable damage to important historical, cultural, or scenic values, fish and wildlife resources, or

other natural systems or processes...”²⁵ Section 202(c)(3) of the Federal Land Policy and Management Act (FLPMA) of 1976²⁶ requires BLM in land use planning to “[g]ive priority to the designation and protection of areas of critical environmental concern.” Allowing development, including new development such as pipelines or transmission lines, in ACECs is likely to impact ACECs and the values for which they were recognized and designated. Based on federal law and policy and the purpose of the current planning effort, the Agencies should avoid designating corridors in ACECs and identify them as “high potential conflict areas,” requiring any projects be sited, designed, constructed and operated in a manner that produces no net loss of habitat and populations of special status and other species in the ACEC.

Appendix 2 shows the overlap of the Agencies’ proposed additions or changes to corridors in Regions 4, 5 and 6 (at least those revisions which were included in the GIS data provided by the Agencies) and ACECs and the potential acreage affected by the intersection that the Agencies should look to avoid.

VII. Research Natural Areas (RNAs) and Outstanding Natural Areas (ONAs)

Both the USFS and the BLM designate Research Natural Areas (RNAs) on public lands under their jurisdiction. RNAs are established to preserve outstanding, unique or representative natural habitats or features for both conservation and research purposes.²⁷ They often protect native plant communities and can also be important for protecting threatened or endangered species.²⁸ Similarly, administratively designated ONAs are areas with high scenic values that have been little altered by human impact. Under current BLM policy, RNAs must meet the relevance and importance criteria of ACECs.²⁹ As of 2017, BLM managed 207 RNAs totaling more than 1.5 million acres³⁰ and the USFS managed more than 450 RNAs encompassing more than 570,000 acres.³¹

We recommend that the Agencies identify RNAs and ONAs intersected by Section 368 corridors and add a data layer for RNAs and ONAs to the online corridor mapping tool.³² In addition, we recommend that the RNAs and ONAs be avoided in corridor designations where possible and at a minimum be classified as “high potential conflict areas.”

VIII. Lands with Wilderness Characteristics (LWC)

BLM lands with wilderness characteristics (LWC) are addressed many times in the Report. These areas—which are large roadless natural areas that provide opportunities for solitude or primitive and unconfined recreation—need to be fully protected from infrastructure that could destroy their wilderness values. In some of the corridors the Agencies have plans to avoid these areas, which we support, but in a number of areas there would remain conflicts with intersected LWC, which we recommend avoiding, or at least mitigating through IOP. While in many cases the BLM may not have

²⁵ 43 CFR §1601.0–5.

²⁶ 43 U.S.C. 1702.

²⁷ 43 CFR §§ 8223.0-5, 8223.1.

²⁸ 43 CFR § 8223.0-5.

²⁹ 43 CFR § 1610.7-2.

³⁰ BLM Public Land Statistics 2017, p. 229.

³¹ “Research Natural Areas” (webpage), <https://www.fs.usda.gov/detail/r1/specialplaces/?cid=stelprdb5172218>. Accessed July 21, 2019.

³² A current list of BLM-designated ACECs, including RNAs and ONAs are available at <https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/accs>. Similarly, a current list of USFS-designated RNAs is available at <https://www.fs.fed.us/psw/rna/description.shtml>.

made final management decisions in the governing Resource Management Plan (RMP) about how LWC in the area will be managed, the Agencies in designating the corridors should not contribute to decision-making that would degrade or even destroy LWC values. The option of protecting wilderness values in LWC must be preserved. This will have the benefit of giving BLM latitude to ensure these areas are fully protected in future RMP decision-making.

Appendix 2 to this letter shows the overlap of the Agencies' proposed additions or changes to corridors in Regions 4, 5 and 6 (at least those revisions which were included in the GIS data provided by the Agencies) and BLM LWCs, which the Agencies must seek to avoid in their corridor designations. The appendix shows where the overlaps between the LWC and the corridor occur as well as the acreage of the potential overlap. It also shows the mileposts where there should be a potential adjustment. We request the Agencies to consider this information for the final corridor designations.

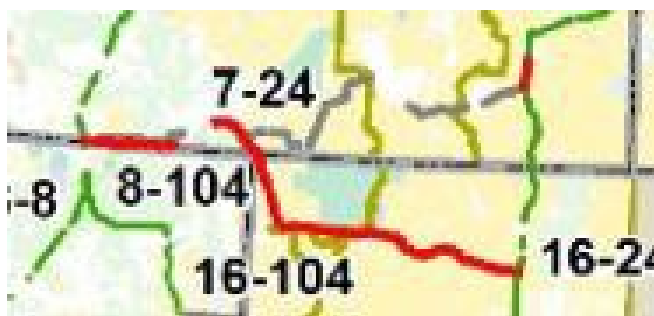
The Report mentions that the Report 1 report identified the need for new IOPs for BLM LWC. We support new IOPs for BLM LWC and support IOPs that are applicable to all corridors that may be intersecting or in close vicinity of LWC. In addition, the IOPs should help maximize the utility of the corridors and minimize impact on LWC. We recommend specific language for a BLM LWC IOP in Section III (d) of these comments.

IX. Wilderness Areas and Wilderness Study Areas (WSA)

Several corridors currently intersect with protected lands such as designated Wilderness Areas and Wilderness Study Areas where infrastructure development is prohibited by law; several proposed revisions also intersect with Wilderness Areas and Wilderness Study Areas. (Appendix 2 shows overlap with the Agencies' proposed corridor additions and revisions; our April 2019 comments show overlap with the existing corridors.) The Agencies must eliminate these intersections by adjusting or deleting these corridors. See, Manual 6340 – Management of Designated Wilderness Areas,³³ including Section 1.6.C.16.b (new rights of way are prohibited in Wilderness Areas); Manual 6330—Management of BLM Wilderness Study Areas,³⁴ 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).

X. Mapping Errors

There are two errors on the map presented as Figure 3-1 of the Report.³⁵ The map shows a new proposed corridor extending west from Corridor 16-24 in northern Nevada traversing south of Sheldon National Wildlife Refuge, and then connecting to corridor 7-24 in Oregon, which has been recommended for deletion (see Figure 2 below).



³³ Available at https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual6340.pdf

³⁴ Available at https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual6330.pdf

³⁵ Report, Pg. 27.

Figure 2: “Potential corridor revision/addition” in Nevada and Oregon on Figure 3-1 of the Report

Similarly, Figure 3-1 also shows another corridor starting from Corridor 79-216 and going southwest to connect with Corridor 121-221 (see Figure 3 below)

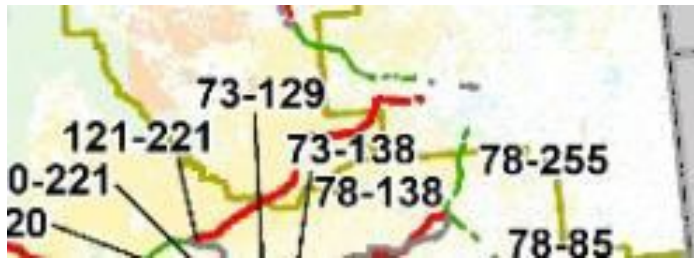


Figure 3: “Potential corridor revision/addition” in Wyoming on Figure 3-1 of the Report

Neither of these “potential corridor revision/addition” are identified in the Report, the corridor summaries or the corridor table (Table 3.1) of the Report. These mapping errors must be addressed in the final report.

C. Corridor Specific Comments and Recommendations

In addition to the issues and recommendations stated above, we offer the following comments and recommendations on potential corridors revisions, deletions and additions in Regions 4, 5 and 6. 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 Final Regional Review Report; and c) through future land use planning.

I. Corridors Revisions

a. 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. As stated in our 2019 comments, the Agencies, transmission developers and utilities should focus on increasing the capacity of the existing lines in corridor 229-254 before building additional lines. The Report does not emphasize upgrading existing transmission lines – the Agencies should emphasize this in the Final Report. 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.

b. 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. 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 GRSG- at least 3% of the state population. As stated in our 2019 comments, 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.

The Agencies are considering shifting the corridor from MP 10 to MP 11 to align the corridor with I-15 or existing transmission line in order to avoid the Lewis and Clark NHT and WSR Study River segment of the Beaverhead River. The Agencies are also considering shifting the corridor from MP 118 to MP 123 to avoid the Markely Lake Wildlife Management Area. We support these potential revisions and encourage the Agencies to find further ways to collocate corridors with existing infrastructure when it minimizes the impact to important resources.

In addition, the Agencies note that there are multiple GRSG leks within two miles of the corridor and that the corridor may have to be shifted to avoid these areas. We note that 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). The potential conflicts associated with development of this corridor highlight the need for the sage-grouse and IBA IOPs recommended above. We strongly recommend finding additional opportunities to shift the corridor to avoid GRSG leks, wherever possible.

c. Corridor 24-228

In Idaho, the Agencies are considering shifting the corridor from MP 82 to MP 85 to the edge of Hwy 95 or the existing transmission line to reduce conflicts. This shift would avoid the Blackstock Special Recreation Management Area (SRMA). The Agencies are also considering shifting the corridor from MP 90 to MP 95 west of the Squaw Creek RNA ACEC to avoid the ACEC, Squaw Creek Addition SRMA and the Owyhee Front SRMA. These revisions will have benefits of reducing impacts to important resources, but they will not address the broader need for the Agencies to delete this corridor.

The continuation of this corridor into Oregon includes serious conflicts with GRSG PHMA, GHMA and IHMA, BLM LWC, and citizen-proposed wilderness areas, and has the potential to affect pygmy rabbit habitat. The corridor cuts through the Soldier Creek Priority Area for Conservation (“PAC”) for sage-grouse. The Soldier Creek PAC sage-grouse population declined by 51% from 2019 to 2020,³⁶ tripping a hard trigger to revise management under the Oregon Approved Resource Management Plan Amendment (ARMPA). Hard triggers represent the most concerning threshold for sage-grouse population loss, requiring immediate and more restrictive plan-level action to address sage-grouse conservation objectives. This corridor would require significant modifications to avoid sage-grouse habitat and wilderness resources which may not be possible. In addition, the Agencies have already identified corridor 7-24 to which this corridor connects and therefore this corridor may not be feasible to provide an east-west pathway from Idaho to Oregon. Corridor 16-24 which also connects to

³⁶ See https://www.dfv.state.or.us/wildlife/sagegrouse/docs/ODFW_2020_Sage-Grouse_Population_Report_Final.pdf

this corridor has significant challenges as we discuss below and warrants deletion. For all these reasons, the Agencies should delete corridor 24-228, as we've previously requested.

d. Corridor 36-226

This corridor parallels an existing transmission for much of its length. As stated in our 2019 comments, the Agencies should consider adjusting the corridor to follow the existing transmission line, unless doing so would increase impacts from development. The Agencies are considering potentially shifting the corridor west to follow the existing transmission line from MP 64.9 to MP 40. The Agencies are also considering shifting the corridor to follow the route for the recently authorized Gateway West transmission line from MP 40 to MP 0 and connecting to corridor 36-228 at MP 8 of that corridor. This potential revision would conflict with the Salmon Falls Creek Canyon ACEC from around MP 36 to MP 33. Instead of shifting west to follow the Gateway West transmission line at MP 40, the Agencies should shift the corridor west starting at MP 28, just north of the northern end of the Salmon Falls Creek ACEC's northern boundary, to avoid impacting the ACEC.

e. Corridor 50-51

The Agencies are considering shifting the corridor to the west of the Interstate Highway and into the area between two transmission lines. Impacts to wildlife connectivity are a concern in this area and should be addressed through the mitigation hierarchy. That said, moving the corridor to collocate with the two existing transmission lines would reduce impacts compared to the existing alignment, and we support the revision.

f. 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. While the Agencies acknowledge impacts to the Black Rock Desert/High Rock Canyon NCA, and intersection with the California NHT, they fail to acknowledge conflicts with the historic Lassen-Applegate trail and visual impacts to the old historic water tower in Gerlach. In addition, in Oregon corridor 16-24 has conflicts with priority and general sage-grouse habitat, pygmy rabbit habitat, BLM LWC and citizen-proposed wilderness areas. The corridor traverses a large part of a Sagebrush Focal Area, one of only two designated Sagebrush Focal Areas in the country. Sagebrush Focal Areas are designated as exclusion areas for wind and solar energy development, and avoidance areas for ROW location under the Oregon ARMPA. Because of the conflicts with this corridor, the Agencies should delete it in both Nevada and Oregon.

Despite these conflicts, the Agencies do not recommend deleting this corridor in the Report. The Agencies are considering shifting the corridor to run along an existing transmission line from MP 0 to MP 12. However, this shift doesn't address the conflicts described above, and it creates some new conflicts. The suggested change conflicts with the Selenite Mountains WSA at roughly MP 4. The Agencies are also considering shifting the corridor from MP 44 to MP 56, MP 115 to MP 130, and MP 154 to MP 160 to follow existing transmission lines, which may reduce some impacts through

collocation, but do not address the issues regarding the corridor along the southern edge of the NCA. Again, the Agencies should delete the corridor.

g. Corridor 18-224

As stated in our 2019 comment letter, corridor 18-224 intersects with numerous BLM LWC inventory units, and the Agencies must address these conflicts, as detailed in Section III of our 2019 comment letter. The Agencies do not note the intersection of corridor 18-224 with BLM LWC inventory units or recommend adjustments to avoid them, though they do recommend an IOP on inventorying for wilderness characteristics. One area of particular concern is where the corridor intersects several high-quality LWC units east of Silver Peak in the Montezuma Range, as well as additional LWC units farther to the southeast. The Agencies should adjust the corridor to turn east at MP 106 and follow Hwy 95 on past Tonopah and Goldfield, rejoining the existing alignment at MP 165. This adjustment would avoid the high quality LWC and other wildland values currently threatened by the current alignment between MP 106 and MP 165. Alternatively, the Agencies should adjust the corridor to turn east at MP 85.5 to follow the existing transmission line through the Monte Cristo Valley and on to the southeast into the Big Smoky Valley and then following Hwy 95 to the east and south past Tonopah and Goldfield. Both of these adjustments would also have the benefit of providing true access to the Millers SEZ to facilitate solar development there, as well as the opportunity to collocate solar development in lower-impact lands between the existing Crescent Dunes solar project and the Millers SEZ, which the current alignment does not.

The Agencies must work together with Nevada Department of Transportation (NDOT) to coordinate the siting of corridor 18-224 with the siting of the proposed Interstate 11(I-11) northern half (alternatives B) and southern half (alternative A1), including analysis of cumulative impacts and consideration of possible co-location of corridor 18-224 with I-11 to consolidate the environmental impacts to a single corridor.

In the Report the Agencies propose shifting the corridor 1 to 5 miles west from MP 163 to MP 225. While the Corridor Summaries document states that this revision might help avoid Desert Tortoise connectivity habitat, this new route would cut through two BLM-identified LWCs (BLM Unique ID# NV-050-352A: Stonewall Pass, and BLM Unique ID# NV-050-03R-15: Tokop) and would run for 20 miles across two Citizen-Identified LWC units in the Sarcobatus Flat. The Agencies should not make this shift into largely undeveloped habitat. Instead, the Agencies should keep the original route until MP 193 and then turn south, following existing disturbances, including the existing transmission line, previously installed for the Air Force Tolicha Peak Facility, and then down around the town of Beatty on the west side. This alignment will also keep this section of the corridor within the alignment of I-11 and allow for comprehensive planning with NDOT to provide for wildlife migration corridors, biological connectivity, and minimize habitat disruption. This existing transmission line runs alongside Hwy 95 before it deviates and runs parallel to the Hwy 95. By placing the corridor adjacent to an existing transmission line, the Agencies could avoid important Desert Tortoise connectivity habitat, as well as several LWC units south of Hwy 95. In order to limit impacts of future infrastructure development to the community of the town of Beatty, we recommend that the Agencies work closely together with community members and representatives to ensure the just siting of 18-224 around the town.

Alternatively, the Agencies should keep the existing alignment along Hwy 95 from MP 163 to about MP 190 (narrowed where needed to avoid LWC), and then turn due south, connecting up with the

revision proposed in the Report just north of the Bullfrog Hills and following it from there on to the southeast to Beatty and beyond.

h. 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 GRSG 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 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. Beyond the unacceptable impacts that pipeline development would have in this landscape, the fact that major portions of corridor 126-218 south of the Wyoming/Colorado Border were undesignated through an RMP revision makes it completely unclear what the purpose and value of having the corridor on the Wyoming side of the border. As stated in our 2019 comments, it is imperative the Agencies delete this corridor in order to avoid these impacts, and we reiterate this recommendation.

Despite these issues, the Agencies do not recommend deleting this corridor altogether in the Report. The Agencies are considering deleting the corridor from MP 62 to MP 109 and re-routing the corridor along either an existing pipeline or an existing transmission line to the east. Although the Agencies should delete corridor 126-218 altogether, the proposed revision in the Report would reduce impacts in important ways. That said, these potential revisions still conflict with ACECs and LWC, specifically, the Greater Red Creek ACEC, the Red Creek Watershed ACEC, Clay Basin Camp LWC, and Sage Creek LWC. One impact of particular concern is sedimentation in waterways for the ACECs and trout fisheries. These impacts, if they cannot be avoided, must be mitigated.

Of the two revision options identified in the Report, the option to re-route the corridor further east along the existing highway and pipeline is the better option, because it would largely collocate with both an existing pipeline and Hwy 191, which would reduce impacts compared to following the existing transmission line. In addition, it is more logical to collocate with the existing pipeline than an existing transmission line because corridor 126-218 is underground only in this area. We also urge the Agencies

to keep the corridor restricted to underground only, especially as any above ground infrastructure raises concerns south of the Wyoming/Colorado border in Browns Park.

i. 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 PHMAs. This large expanse of relatively intact sagebrush habitat provides important breeding, foraging, nesting, wintering, or migratory stop-over habitat for GRSG. 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 Greater Sand Dunes (which support the Steamboat desert elk herd), 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 ACECs, 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.

The Agencies are considering shifting the corridor from MP 31 to the end. This suggested change conflicts with the South Pinnacles WSA and the Alkali Basin-East Sand Dunes WSA. Infrastructure development is prohibited by law in WSAs, and the agencies cannot designate corridors overlapping with WSAs. Thus, instead of slightly shifting the corridor and creating WSA conflicts, the Agencies should delete this corridor.

We also note that while the Agencies acknowledge some of the issues described above in the Report, they fail to acknowledge or address other important issues as detailed following; the Agencies must do so in the Final Report. The corridor conflicts with greater sage-grouse PHM areas from MP 0 to MP 21 and MP 28 to MP 60. While the Agencies are considering some changes that would avoid some of these areas, the Agencies do not acknowledge or address disruption from MP 15 to MP 21 or MP 28 to MP 31. While the Agencies are considering changes that would avoid the Greater Sand Dunes ACEC, Killpecker Sand Dunes SRMA, the Agencies do not acknowledge Boar's Tusk, North and South Table Mountain, Cedar Mountain, or White Mountain Petroglyph ACECs.

j. 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.

The Agencies are considering shifting the corridor to align with existing infrastructure from MP 103 to MP 125, MP 158 to MP 170, and MP 185 to MP 209. The Agencies' proposed change from MP 185 to MP 209 avoids an LWC unit – we support this change.

While the Agencies acknowledge intersection of the corridor with the GHMA and PHMA, the Agencies do not recommend shifting the corridor from MP 125-147 west to follow an existing transmission line and to reduce impacts to grouse habitat from overhead transmission lines, as we had recommend in our 2019 comments. Instead, the Agencies state that GRSG PHMA and GHMA encompass the entire area and cannot be avoided. We reiterate our recommendation that the Agencies shift the corridor west from MP 125-147 to collocate with the existing transmission line. In addition, we recommend that the corridor be shifted east from MP 249-255 to avoid the Bridger Sage-steppe IBA which supports the largest concentration of Greater Sage-grouse in south-central Montana and roughly 3% of the male grouse surveyed in the state.

k. Corridor 230-248

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. The Report notes that "...the corridor faces numerous challenges including river crossings, terrain and stability concerns, and it is not collocated with existing infrastructure"³⁷ and that several concerns were highlighted during the stakeholder workshops, including environmental concerns, tribal issues, complications due to terrain, river crossings, especially at Fish Creek etc. We continue to believe that the corridor should be deleted.

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. Since the corridor abstract for this corridor was updated in 2019, a large portion of the proposed route experienced a stand-replacing fire. These add to all the reasons set forth in the previous comments that strongly support deleting this corridor from the WWEC maps.

However, if deletion is not possible, we recommend that the corridor be collocated with the existing 500kV transmission line to the south of the corridor from MP 0 to 30. Alternatively, we recommend that the corridor be designated overhead only.

³⁷ Corridor Summaries. Pg. 170.

l. Corridor 101-263

We appreciate the commitment to co-locate the corridor from MP 14 to 18 and reiterate our previous recommendation to consult with USFWS to avoid, minimize, and compensate for impacts to Northern Spotted Owl and critical habitat designated for this species within the corridor.

m. Corridor 18-23

As noted by the Agencies “The corridor is located in an area of high biological, recreational, visual and cultural value,”³⁸ and there were many factors that led to its being designated a corridor of concern. This concern extends beyond conservations groups to Mono and Inyo counties (see their comments from 2014, 2016, 2019 and 2021). We continue to strongly recommend that this corridor be deleted. If the corridor is not deleted it must, at minimum, co-locate with the existing transmission line as proposed by the Agencies, not be widened as proposed in several locations, and be re-adjusted to avoid designated wilderness, WSAs, ACECs and critical habitat. Additional IOPs using the mitigation hierarchy should be developed for resources at risk.

The Report indicates there are several SEZs near corridor 18-224 in Nevada that could serve as areas for future renewable energy development. The Report cites a lack of transmission as being a challenge to transmitting power to load centers in southern California, and indicates that “Existing substations in the Bishop, California, area (near Corridor 18-23) are a preferred hub to move solar energy in and out of the area to load centers.”³⁹

Our organizations are deeply concerned about constructing new transmission lines to move power from western Nevada to southern California via Bishop and corridor 18-23, especially when corridor 18-224 is adjacent to the Millers SEZ and surrounding region. Power cannot be transmitted from western Nevada to Bishop and through the Owens Valley without significant impacts to environmental, cultural, and scenic values, some of which are documented in these comments. Transmission for projects in the Millers SEZ region should be focused on tying into adjacent corridor 18-224.

Bi-State Sage Grouse

Numerous sections of the 18-23 corridor within western Nevada and Mono County pass through proposed critical habitat for BSSG (see section V above). Although the Report recommends an IOP for GRSG habitat under Ecological Resources, the agency should consider an additional IOP for BSSG, based upon the distinct population segment (DPS) of this species and its ongoing litigation for listing under the Endangered Species Act (See 2019 comments for further background). The IOP developed for BSSG could be largely the same as those developed for the GRSG and should be subject to public input.

Sierra Nevada Bighorn Sheep

Although the corridor review document indicates that the alignment at MP 207 could be shifted east to avoid critical habitat, this is not reflected in the mapping tool. As currently presented, MP 207 is

³⁸ Report, Pg. 52.

³⁹ Report, Pg. 16.

still within Sierra Nevada Bighorn Sheep critical habitat. This particular area is a source population for reintroduction efforts to aid in the recovery of the species.

Desert Tortoise

The area between MP 222-239 is suitable habitat for Desert Tortoise. Recent sightings and sign (burrows) of tortoise in this area by BLM Ridgecrest Field Office staff and independent biologists may indicate the species is moving northward and up in elevation. As we have suggested above, IOPs should be developed for habitat connectivity to minimize impacts to both Desert Tortoise habitat and individuals. The opportunity for public input should be provided.

Migratory Birds

The alignment runs along the Pacific migratory bird flyway. Songbirds, shorebirds, and waterfowl pass through the Owens Valley and Rose Valley on their way to and from breeding grounds. The flyway has stopover riparian and wetland habitat in the Sierra Nevada canyons and at Little Lake, Owens Lake and Haiwee Reservoir. The corridor adjustment at MP 145-148 would go through the Baker Meadow. An ongoing Los Angeles Department of Water and Power (LADWP) mitigation project is attempting to restore what once was a Yellow-Billed Cuckoo nesting area. The corridor should be moved out of areas that are designated for habitat restoration and species recovery.

Walker River State Recreation Area (WRSRA)

The 18-23 corridor runs adjacent to the newly designated WRSRA between MPs 12-50, with the greatest potential impact occurring at MPs 23-30. Transmission construction in MPs 23-30 will impact recreation, cultural and scenic values at WRSRA. Furthermore, the online Mapping Tool has not been updated to reflect the State Recreation Area. WRSRA should appear as state land under the Surface Management Agency layer. We request Agencies consult with WRSRA to analyze potential impacts of the proposed corridor on park operations and adjust or delete this section as recommended by Park staff.

USFS Roadless Areas

The corridor along MP 83-85 is adjacent to three areas the Inyo National Forest has recommended for wilderness designation: Adobe Hills (10,354 acres) Huntoon (8,876 acres) and South Huntoon (5,898 acres). See INF Land Management Plan (LMP), 2019. The corridor also would impact portions of the Excelsior IRA at MP 66-79. This entire region provides habitat connectivity between the northern White Mountains and the eastern wild lands of the Bodie Hills. The Report needs to be updated to incorporate the new LMP's findings; the draft report still references the 1988 plan. The LMP directs that recommended wilderness areas be managed as wilderness and it identifies IRAs as Designated Areas pursuant to the Roadless Area Conservation Rule (36 CFR 294 subpart C). To understand the impacts of the corridor on recommended wilderness area and IRAs, additional analysis should be included in the final Report and as any part of future NEPA analyses.

Golden Trout Wilderness

According to our mapping, corridor 18-23 would adversely impact 423 acres of designated wilderness within the Golden Trout Wilderness managed by the Inyo National Forest at MP 208-211 (See Appendix 2). Since new ROWs are prohibited in designated wilderness, the corridor alignment must be adjusted by moving it outside the wilderness boundary.

Wilderness Study Areas (WSAs)

The revised corridor alignment poses direct conflicts with WSAs on the Volcanic Tablelands. The Volcanic Tablelands are part of the ancestral territory of the Owens Valley Paiute and Shoshone tribes, and all of the WSAs contain highly significant wilderness, cultural, wildlife/vegetation and geological values. The agencies propose to expand the width of the existing corridor between MP 110-116, which would adversely impact Casa Diablo WSA (503 acres), Chidago Canyon WSA (8 acres) and Fish Slough WSA (160 acres). The BLM's Manual for Management of BLM Wilderness Study Areas prohibits development of new rights of way and infrastructure in WSAs unless they can meet the agency's non-impairment standard (See Manual 6330—Management of BLM Wilderness Study Areas, including Section 1.6.D.4.ii). To get around this roadblock the agencies inappropriately recommend that the potentially impacted acreage within these WSAs be released from wilderness study by Congress so that development of new transmission or pipelines can proceed within these WSAs. The BLM has a duty to manage these WSAs for potential wilderness designation, not for potential release. In proposing that release be part of future legislative deal-making, the agencies are abrogating their duty and responsibility to protect the values of these fragile and sensitive WSAs until Congress acts. The agencies must eliminate its proposal to widen the corridor on the Volcanic Tablelands.

Our mapping also indicates that 56 acres in the Volcanic Tableland WSA (MP 117-124) would be impacted by the corridor. According to the Report, 18-23 is proposed to be co-located atop the existing transmission corridor on the Tablelands that is directly adjacent to Volcanic Tableland WSA. We support co-location but not widening of the corridor.

The agencies must consult with the Bishop Paiute Tribe and other tribes whose ancestral territories include the Volcanic Tablelands and include them in any agency-initiated deliberations about future land status or proposed development of additional transmission infrastructure on the Tablelands.

The proposed realignment at MP 153 would adversely impact 26 miles of Crater Mountain WSA. Crater Mountain WSA contains unique lava tubes and abundant tribal cultural resources. The alignment should be moved back to what was proposed in the 2018 corridor abstract and mapping tool so that these sensitive resources are not adversely impacted.

Areas of Critical Environmental Concern (ACEC)

The Fish Slough ACEC intersects the corridor between MP 112-113. 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 ACEC is an extensive system of springs and marshes cooperatively managed by multiple agencies. The restoration of native pupfish populations is a major undertaking in this area with infrastructure, vegetation control, and exotic fish removal. In addition, 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)). Allowing transmission development within these locations could adversely impact the values for which these areas were designated.

Although corridor width is greatly reduced, the corridor locations at MP 212-225, 232-235 are still within the Mohave Ground Squirrel (MGS) ACEC and California Desert National Conservation Lands identified in the Desert Renewable Energy Conservation Plan (DRECP, 2016). The ACEC was

established to protect the long-term survival of this species and ensure connectivity. 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.

We appreciate that the southern part of the 18-23 corridor width has been reduced to what appears to be the existing ROW. The reduction, however, negates the impacts to ACECs along this section of the corridor. The Sierra Canyons ACEC is located at MP 224-226, 229-239 and overlaps NCLs that have important cultural significance and history. 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 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 federal and state-listed threatened Desert tortoise and the East Monache mule deer herd. 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).

Impacts to the Rose Spring ACEC (and overlapping NCLs) still occur at MP 224-225 and could impact 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.⁴⁰

The same corridor width reduction continues further south as it enters the Fossil Falls ACEC. This ACEC was designated for wildlife values, significant prehistoric and historic cultural values, and unique geological formations. 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. 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.

Owens Lake

Owens Lake and its shoreline between MP 194-210 is very important to local tribes and contains a wealth of tribal cultural resources. Owens Lake has been nominated by the Native American Heritage Commission as a National Historic Landscape. Owens Lake and the surrounding shoreline should be characterized in the final report as an area of "high conflict." The corridor also overlaps with the Owens Lake Important Bird Area, and the IOPs for Minimizing Collision Through Siting and IBAs should be applied here.

We appreciate the Agencies' ongoing work to correct 18-23 corridor alignments and address conflicts based on public comment. However, the iconic scenic landscapes, world class tourism, and fragile biological, cultural and recreational resources make this corridor particularly problematic for the

⁴⁰ DRECP. Appendix A. Pg. 19-20.

development of future transmission infrastructure. We strongly recommend the Agencies remove the corridor all together in light of the numerous issues we and other stakeholders have raised.

II. Corridors Additions

a. Gateway West Corridor

We support the addition of this corridor that follows the path of the recently authorized Gateway West transmission line and provides an east-west pathway from Wyoming into Idaho. An existing 345-kV transmission line is located along this route, it contains a designated Executive Order two-mile wide transmission line corridor through sage-grouse core area, avoids Cokeville Meadows National Wildlife Refuge, and would likely have less impact on migrating raptors. However, because raptors utilize the entire north-south ridgeline of Commissary Ridge as a migration corridor, the siting of the transmission line in should avoid transecting any high elevation north-south ridgelines to reduce the risk to migrating raptors that commonly use such features throughout the West.⁴¹ We recommend that the IOPs for avian risk collision be developed as recommended and be made a part of the corridor management plan for this corridor.

b. Wagontire Mountain Corridor

The Report identifies a potential new energy corridor from Burns, Oregon, heading south/southwest along the existing 500-kV transmission line to connect to Corridor 7-11. This corridor is being added to replace the corridor 7-24 which is being considered for deletion. The Agencies note that the potential corridor addition would create a preferred route for potential future energy development, including wind energy development, while avoiding PHMAs to the greatest extent possible. However, the proposed corridor would run through Picture Rock Priority Conservation Area for Greater Sage-grouse, whose population has declined by half between 2019 and 2020 and 94 percent between 2003 and 2020.⁴² The Picture Rock PAC had already tripped a hard trigger under the Oregon ARMPA due to population decline. Hard triggers represent the most concerning threshold for sage-grouse population loss, requiring immediate and more restrictive plan-level action to address sage-grouse conservation objectives. Even though the corridor runs along an existing transmission line, further development in the corridor could jeopardize the GRSG population in the Picture Rock PAC. Furthermore, the new corridor would intersect BLM LWC and citizen proposed wilderness areas, state identified Conservation Opportunity Area,⁴³ and Elk and Mule Deer Crucial Winter Range. We recommend not designating this corridor due to the numerous conflicts mentioned above, especially when the corridor 7-11 connects with corridor 11-228.

c. Southern Idaho Corridor

The Agencies are considering a potential corridor addition in southern Idaho to “provide an east-west pathway through southern Idaho on federally administered land.” This potential new corridor intersects with the Granite Pass/Goose Creek Trail ACEC, the Little Goose Creek LWC, and the Sawtooth Forest-Black Pine Roadless Area. Further, the corridor addition conflicts with citizen-LWC

⁴¹ Goodrich, L. J., and J. P. Smith. 2008. Raptor migration in North America. Pages 37–149 in Bildstein, K. L., J. P. Smith, E. Ruelas Inzunza, and R. R. Veit (Editors), *State of North America’s Birds of Prey*. Series in Ornithology 3. Nuttall Ornithological Club, Cambridge, MA, and American Ornithologist’s Union, Washington, DC.

⁴² Oregon Greater Sage-Grouse Population Monitoring: 2020 Annual Report. Pg. 33. Available at https://www.dfv.state.or.us/wildlife/sagegrouse/docs/ODFW_2020_Sage-Grouse_Population_Report_Final.pdf ⁴³ See <https://oregonconservationstrategy.org/conservation-opportunity-areas/>

and raises potential conflict with the viewshed of the City of Rocks Reserve. In addition, the Report states that “Both Cassia County and Power County oppose new Section 368 energy corridor development located where the corridor would traverse corridor gaps along agricultural lands.” We believe corridor 49-112 combined with corridor 112-226 provide the east-west pathway through southern Idaho and the new addition would be redundant. Due to these numerous concerns, we strongly recommend that the Agencies not designate this corridor.

III. Corridors Deletions

a. Corridor 7-24

We appreciate that the Agencies have identified Corridor 7-24 for deletion. This was an original Corridor of Concern due to its location through Sage-grouse habitat, including Sagebrush Focal Area, pygmy rabbit habitat, and citizen-proposed wilderness area. This corridor would cross a large expanse of southeastern Oregon in Malheur, Harney and Lake counties, bisecting the ecologically and culturally vital region between Hart Mountain National Antelope Refuge and the Sheldon National Wildlife Refuge possibly affecting wildlife migration. In addition, the corridor would intersect Visual Resource Management (VRM) Class II area, is adjacent to VRM Class I area and could affect Alvord Desert Wilderness Study Area. We had previously recommended deleting this corridor due to the concerns identified above. We appreciate that the Agencies have noted that the corridor crosses GRSG SFAs and PHMAs along much of its length and that there is no foreseeable utility-scale east-west energy demand that this corridor could have supported. We commend the Agencies for deleting this corridor.

b. Corridor 16-104

The Agencies have identified to delete this original Corridor of Concern because of concerns on wilderness areas and GRSG habitat. The corridor would run through GHMA and PHMA from MP 11 to the end and there are GRSG lek sites present throughout the corridor. In addition, there is no reasonable alternate pathway to avoid GHMA or PHMA. In addition, as the Report notes that other corridors in the area can meet future energy demands. Therefore, the siting of this corridor does not meet the corridor siting principles. We commend the Agencies for identifying this corridor for deletion.

D. Conclusion

Thank you for this opportunity to provide comments on the Report. We commend the Agencies for the progress made to date on planning for energy corridors at a landscape scale and with consideration to renewable energy development and wildlife conservation. We look forward to continuing to work with the Agencies and other stakeholders in the process. Please direct any questions regarding our comments and recommendations to Rupak Thapaliya at rthapaliya@defenders.org.

Sincerely,

Mike Lynes
Audubon California

Daly Edmunds
Audubon Rockies

Brenna Bell
Bark

Linda Castro
California Wilderness Coalition

Lisa Belenky
Center for Biological Diversity

Rupak Thapaliya
Defenders of Wildlife

Shaaron Netherton
Friends of Nevada Wilderness

Jora Fogg
Friends of the Inyo

John Robison
Idaho Conservation League

George Sexton
KS Wild

Nada Culver
National Audubon Society

Helen O'Shea
Natural Resources Defense Council

Jeremy Austin
Oregon Natural Desert Association

Dave Willis, Chair
Soda Mountain Wilderness Council

Alex Daue
The Wilderness Society

John Trammell
The Wildlands Conservancy

Khale Century Reno
Wyoming Wilderness Association

Attachments:

Appendix 1: Priority Big Game Winter Range map

Appendix 2: Revisions and Additions to WWEC Reg 4, 5, and 6 - intersections with
Wilderness Areas, WSAs, ACECs, BLM LWC, NCAs, Roadless Areas

CC via email: Jeremy Bluma, BLM (jbluma@blm.gov)
Erica Pionke, BLM (epionke@blm.gov)
Reggie Woodruff, USFS (rwoodruff@fs.fed.us)

Appendix 1

Priority Big Game Winter Range map



**Appendix 2 - WWEC Revisions Reg 456 - intersections with Wilderness Areas,
WSAs, ACECs, BLM LWC, NCAs, Roadless Areas**

Corridor	Change	Region	Name of conflict/ Unit name	Type of conflict	Acres	Milepost (MP)	State
121-221	Addition	4	South Pinnacles	WSA	96	42	WY
121-221	Addition	4	Alkali Basin-East Sand Dunes	WSA	1	43	WY
126-218	Addition	4	Red Creek Watershed	ACEC	350	63	
126-218	Addition	4	Clay Basin Camp	LWC	358	66	
126-218	Addition	4	Sage Creek	LWC	1,571	63-108	
126-218	Addition	4	Greater Red Creek ACEC (Red Creek Watershed)	ACEC	4,070	69-85	
126-218	Addition	4	Greater Red Creek ACEC (Currant Creek Watershed)	ACEC	2,802	83-90	
126-218	Addition	4	Greater Red Creek ACEC (Sage Creek Watershed)	ACEC	5,616	87-100	
16-24	Addition	5	Selenite Mountains	WSA	127	4	NV
16-24	Addition	6	Bedground Reservoir	LWC	128	194	
16-24	Addition	6	Cherry Well	LWC	450	194	
16-24	Addition	6	Red Hills	LWC	130	194	
16-24	Addition	6	Alvord Desert	WSA	2,217	195	OR
16-24	Addition	6	Bowden Hills	WSA	256	195	OR
18-224	Addition	5	03R-15	LWC	501	169	
18-224	Addition	5	352A	LWC	1,389	164-167	
18-23	Addition	5	Chidago Canyon Wilderness Study Area	WSA	8	110	CA
18-23	Addition	5	Fish Slough	ACEC	91	112	
18-23	Addition	5	Crater Mountain Wilderness Study Area	WSA	26	153	CA
18-23	Addition	5	Owens Lake	ACEC	112	194	
18-23	Addition	5	Inyo Forest- South Sierra	Roadless	19	222	CA
18-23	Addition	5	Rose Spring	ACEC	0	224	
18-23	Addition	5	Sierra Canyons	ACEC	14	224	
18-23	Addition	5	Fossil Falls	ACEC	0	236	
18-23	Addition	5	Casa Diablo Wilderness Study Area	WSA	503	110-116	CA
18-23	Addition	5	Fish Slough Wilderness Study Area	WSA	160	114-116	CA
18-23	Addition	5	Volcanic Tablelands Wilderness Study Area	WSA	56	117-124	CA
18-23	Addition	5	Crater Mountain	ACEC	48	149-153	
18-23	Addition	5	Golden Trout Wilderness	Wilderness	423	208-211	CA

**Appendix 2 - WWEC Revisions Reg 456 - intersections with Wilderness Areas,
WSAs, ACECs, BLM LWC, NCAs, Roadless Areas**

Corridor	Change	Region	Name of conflict/ Unit name	Type of conflict	Acres	Milepost (MP)	State
18-23	Addition	5	Mohave Ground Squirrel	ACEC	903	216-224	
36-226	Addition	6	Salmon Falls Creek Canyon ACEC	ACEC	469	31-35	
36-228	Addition	6	Morley Nelson Snake River Birds of Prey National Conservation Area	NCA	5,289	88	ID
Southern Idaho Corridor Addition	Addition	6	Granite Pass/Goose Creek Trail ACEC	ACEC	294	no official mile post	
Southern Idaho Corridor Addition	Addition	6	Little Goose Creek	LWC	19	no official mile post	
Southern Idaho Corridor Addition	Addition	6	Sawtooth Forest- Black Pine	Roadless	327	no official mile post	ID
Wagontire Mountain Corridor Addition	Addition	6	Burma Rim	LWC	2,197	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Burma Rim	LWC	2,115	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Capehart Lake-Dusenberry Lake	LWC	25	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Capehart Lake-Murphy Lake	LWC	0	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Capehart Lake-Silver Lake	LWC	1,113	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Chase	LWC	100	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Dead Indian South	LWC	1,687	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Deadhorse	LWC	801	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Dog Leg South	LWC	1,708	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Fandango	LWC	796	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Goodrich Well South	LWC	1,250	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	none	LWC	3,143	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	None	LWC	415	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	OR-015-0000	LWC	15	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Palomino-	LWC	2,179	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Palomino-Grassy Butte	LWC	1,289	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Sheep Rock	LWC	3,414	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Sheep Rock	LWC	2,617	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Sheeplick Draw	LWC	4,932	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Squaw Lake South	LWC	1,983	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	St. Patrick South	LWC	2,954	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	St. Patrick West	LWC	0	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-	LWC	1,032	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-1	LWC	2,298	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-4	LWC	835	no official mile post	

**Appendix 2 - WWEC Revisions Reg 456 - intersections with Wilderness Areas,
WSAs, ACECs, BLM LWC, NCAs, Roadless Areas**

Corridor	Change	Region	Name of conflict/ Unit name	Type of conflict	Acres	Milepost (MP)	State
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-5	LWC	70	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-022	LWC	249	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-023	LWC	1,242	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-029	LWC	411	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-031	LWC	226	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-033	LWC	192	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-046	LWC	783	no official mile post	

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10078] - Webmaster Receipt
Date: Friday, January 29, 2021 6:34:27 PM
Attachments: [ID_10078_01292021Section368EnergyCorridors456SERCD.pdf](#)

Thank you for your input, Leanne Correll.

The tracking number that has been assigned to your input is **10078**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 18:34:06 CST

First Name: Leanne
Last Name: Correll
Email: leannecorrell@gmail.com

Are you submitting input on the behalf of an organization? Yes
Organization: SER Conservation District

Input

Please see the letter for our full comments.

Attachments

01-29-2021 Section 368 Energy Corridors 4,5,6 - SERCD.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



SARATOGA-ENCAMPMENT-RAWLINS CONSERVATION DISTRICT

101 Cypress Avenue P.O. Box 633 Saratoga, WY 82331
Phone: 307-326-8156 www.sercd.org

January 29, 2021

Bureau of Land Management
Jeremy Bluma

Electronic Delivery via West-wide Energy Corridor Web Form

U.S. Forest Service
Reggie Woodruff

SUBJECT: SECTION 368 ENERGY CORRIDORS REVIEW: REGIONS 4, 5, & 6

Dear Mr. Bluma and Mt Woodruff,

Following are the Saratoga-Encampment-Rawlins Conservation District's (SER CD) comments pertaining to the Section 368 Energy Corridors Review for Regions 4, 5, and 6 (Report). The U.S. Bureau of Land Management (BLM), the U.S. Forest Service (USFS), and the U.S. Department of Energy (DOE) requested stakeholder input regarding energy placement on Federal lands across portions of California, Idaho, Montana, portions of Nevada, Oregon, Washington, and Wyoming.

Our comments are specific to our mission as a local government entity within the project area: "develop and direct programs to promote long-term conservation and enhancement of our natural resources while contributing to the economic stability of the district and its residents." As this project impacts the conservation of our natural resources and the stability of the district and residents, we believe it is important you continue to inform us of proposed actions and decisions on the 368 Energy Corridors.

We appreciate the opportunity review the Report and comment on pertinent issues and concerns on designating energy corridors in the SER CD and Carbon County. As a cooperating agency, we attended the *Regions 4, 5, and 6 Stakeholder Workshop* May 31, 2019 in Rock Springs, Wyoming, and the *Section 368 Energy Corridors Review Webinar* on June 27, 2019.

SER CD's comments are based upon the Long Range Land Use and Natural Resource Management Plan for SER CD 2017-2021 (SER CD Long Range Plan) that includes policy statements developed, open for public comment, adopted by the SER CD Board of Supervisors, and filed with the Carbon County Clerk.

Specific Comments

1. **Figure 2-2 Location of Proposed WPCI ROWs Relative to Section 368 Energy Corridors (page 17):** The SER CD strongly suggests this figure be updated to show the corridors designated by the Resource Management Plan Amendments Environmental Impact Statement Wyoming Pipeline Corridor Initiative Record of Decision dated January 2021. There were changes that significantly changed the proposed corridors.

2. **Section 2.2.1 Amendments to RMPs and LMPs (page 23):** The SER CD suggests updating this section to reflect the recently (2020) updated Greater Sage-Grouse plans for the Bureau of Land Management and U.S. Forest Service.
3. **Potential Revision of Corridor #73-129 (Wyoming), Corridor #73-138 (Wyoming), Corridor #138-143 (Wyoming), and Corridor #73-138 (Wyoming):** The SER CD agrees with the changes to these corridors and supports collocating the corridor with the previously permitted transmission line project. Collocating projects helps to reduce habitat fragmentation, disturbance, erosion, and the size of the area needing reclaimed.
4. **Potential Revision of Corridor #78-138 (Wyoming):** The SER CD agrees with the changes to this corridor and supports collocating the corridor with the previously permitted transmission line project. A key component of this corridor that was not mentioned in the Corridor Summaries document is that moving the location of the corridor between mile marker 30 and 40 to align with the Gateway West route also alleviates the conflict that currently exists with this corridor segment and the Ft. Steele Historic Site.
5. **Potential Deletion of Corridor #138-143 (Wyoming):** The SER CD agrees with deleting this corridor. Removing this corridor segment and replacing it with the recently authorized TransWest Express/Gateway South route is appropriate. Collocating projects helps to reduce habitat fragmentation, disturbance, erosion, and the size of the area needing reclaimed.

Conclusion

Thank-you for the opportunity to review and comment on the Section 368 Energy Corridors Review Regions 4, 5, & 6 Report. We look forward to our continued participation as a cooperating agency. If we can be of further assistance, please feel free to contact us.

Respectively,



Arla Strasser
Board Chair

AS/lc

Cc: Medicine Bow Conservation District
Wyoming Association of Conservation Districts
Wyoming County Commissioners Association
Wyoming Department of Agriculture

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10079] - Webmaster Receipt
Date: Friday, January 29, 2021 7:56:56 PM
Attachments: [ID_10079_FOI_BHCP_WWEC_FinalComments_Jan2021.pdf](#)

Thank you for your input, Jora Fogg.

The tracking number that has been assigned to your input is **10079**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 29, 2021 19:56:51 CST

First Name: Jora

Last Name: Fogg

Email: jora@friendsoftheinyo.org

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

Organization: Friends of the Inyo

Input

Please accept the attached letter with our comments.

Attachments

[FOI_BHCP_WWEC_FinalComments_Jan2021.pdf](#)

Questions? Contact us at: corridoreiswebmaster@anl.gov



January 30, 2020

Nicholas E. Douglas
Assistant Director
Energy, Minerals and Realty Management
Bureau of Land Management

Gregory C. Smith
Director Lands and Realty Management
U.S. Forest Service

Melissa Pauley
Management and Program Analyst Office of Electricity
U.S. Department of Energy

Submitted via email: blm_wo_368corridors@blm.gov and online:
<https://corridoreis.anl.gov/involve/report-input/>

Re: Comments on Draft Report for Section 368 West-wide Energy Corridors Region 5,
Corridor 18-23

Introduction

Thank you for the opportunity to provide comments on the WWEC region 4,5,6 Draft Report specific to corridor 18-23. We previously provided comments on the regional corridor review for abstract 18-23 in April of 2019. Friends of the Inyo (FOI) is a 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 1,000 members, FOI is an active partner with federal land management agencies including the U. S. Forest Service (USFS) and Bureau of Land Management (BLM). The Sierra Club Range of Light Group is a member of the Toiyabe and offers outings and advocates for public lands and environmental protection on a wide range of issues in Mono and Inyo Counties. 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.

Corridor 18-23 traverses a national and international tourist destination that provides abundant recreational opportunities to millions of visitors annually. The region's

lifeblood is its tourism-based industry. There is a growing concern about the impact of new powerlines and transmission infrastructure being developed in this area. A substantial concern is the prioritization of this corridor via the Section 368 process, which would facilitate development of inappropriately-sited renewable energy facilities and related infrastructure in the greater Eastern Sierra region. This concern extends beyond environmental groups to our local Counties (see Mono and Inyo County comments from 2014, 2016 and 2019).

Although we appreciate the need and intent to recommend a new corridor that will co-locate with 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. With this in mind, we maintain as in our April 2019 comments that the final report should remove the 18-23 corridor.

There is no feasible alternative for construction of transmission from western Nevada to the Owens Valley and south. Therefore, we are strongly opposed to the recommendation of this corridor as part of the Regions 4, 5, 6 draft report. Alternatively, a corridor should be co-located with existing transmission through western Nevada and connected to 18-224 in order to get Renewable Energy to the Los Angeles area.

If deletion is not possible, the report should further refine sections of the corridor to address unacceptable environmental, cultural and scenic resource impacts. If the final report does not reflect deletion of 18-23, we support the recommendation in the draft report for restricting development to existing Right of Ways (ROW) and limiting the entire corridor to this ROW. It is unclear why the width of the designed corridor 18-23 varies considerably (1,320 to 10,560 ft) across agency jurisdictions. Any additional analysis should detail the rationale for the inconsistencies in corridor width.

Local Government Initiatives

The Report (p. 16) indicates there are several Solar Energy Zones (SEZs) near corridor 18-224 in the Region 5 portion of Nevada that could serve as areas for future renewable energy development. The Report cites a lack of transmission as being a challenge to transmitting power to load centers in southern California, and indicates that “Existing substations in the Bishop, California, area (near Corridor 18-23) are a preferred hub to move solar energy in and out of the area to load centers.”

Our organizations very strongly oppose constructing new transmission lines to move power from western Nevada to Bishop. There is simply no feasible or acceptable alternative to transmit power from western Nevada to Bishop without significant and unacceptable impacts to environmental, cultural, and scenic values.

What’s more, the development of additional transmission to be routed through Inyo County is in conflict with Inyo County’s Renewable Energy General Plan Amendment (REGPA) limits on transmission. The Report acknowledges this local initiative and states that “new transmission in or through Inyo County above what is necessary for the megawatt cap [20 mw] placed on each Solar Energy Group is not supported by the

County. Therefore, co-location of transmission and intertie facilities is encouraged (section 2.1.3, pg. 18).

The Report must be modified to eliminate the future possibility of further expanding transmission to Bishop and through Inyo County to accommodate energy development in western Nevada. If there is interest in development of SEZs in western Nevada and related energy projects in this region then transmission for these projects should tie into corridor 18-224 which is in closer proximity than Bishop.

Bi-State Sage Grouse

Numerous sections of the 18-23 corridor within western Nevada and Mono County pass through proposed critical habitat bi-state sage grouse (BSSG). Although the draft report recommends an IOP for Greater Sage Grouse habitat under Ecological Resources, the agency should consider an additional IOP for BSSG. Based upon the distinct population segment (DPS) of this species and the ongoing litigation for listing this DPS under the Endangered Species Act (See 2019 comments for further background). Such an IOP would further refine the multiple threats this DPS faces along the 18-23 corridor and specifically address predation issues that transmission infrastructure can cause.

Infrastructure is a moderate priority threat in the Bodie Hills Population Management Unit (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.

Transmission towers provide nesting sites for ravens, which are a main predator of sage grouse in the Bi-state region. Artificial nest sites such as transmission infrastructure allow ravens to access sage grouse habitat that otherwise does not have raven nesting habitat, and the greatly increased and subsidized local raven populations are a primary threat to the sage grouse hens and chicks. Mitigation measures to reduce raven nests are in testing stages and need to be analyzed.

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. Although we appreciate the perspective given in the report that an GRSG IOP would provide consistency across BLM and USFS managed lands to ensure that the Agencies address impacts to habitat, BSSG have separate and unique status and conservation efforts underway that may facilitate the development of a separate IOP. The IOP developed for BSSG could be largely the same as those developed for the GSG and should be subject to public input.

Corridor alignment remains inconsistent regarding the analysis of sage grouse habitat. The proposed path of the 18-23 corridor goes directly through proposed critical habitat including known lek and breeding locations. The corridor overlaps with BSSG critical habitat between MPs 38-49, 55-78, 80-88, and 94-103. The corridor is directly within BSSG proposed critical habitat in the Bodie Hills and South Mono PMUs. Transmission

lines adversely impact BSSG populations by reducing nesting and brooding success in areas within 2.8 km of the transmission line¹. Current corridor adjustments do not reflect locations at least 2.8 km away from any active BSSG leks to mitigate impacts on breeding success. The draft report also does not indicate any consultation or recommendations from USFWS, Nevada Division of Wildlife (NDOW) and California Department of Fish and Wildlife (CDFW) to avoid adversely impacting BSSG populations in the area. Best Management Practices are for development to have a 3.1-mile buffer around leks, yet the current alignment of 18-23 does not provide for this. If such modifications are not possible this may be a further indication that deletion of the 18-23 corridor is appropriate.

The BSSG population as a whole has been declining since 2011. Scientific data show 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.

Bighorn Sheep

Although the corridor review document indicates that the alignment at MP 207 could be shifted east to avoid critical habitat, this is not reflected in the mapping tool. As currently presented, MP 207 is still within Sierra Nevada Bighorn Sheep Critical Habitat. This particular area is a source population for reintroduction efforts to aid in the recovery of the species. Previously we recommended CDWF and USFWS be consulted and a Biological Opinion prepared, regarding impacts to the species. The draft report does not indicate further work has been done to address this issue.

Desert Tortoise

The area between MP 222-239 is potential habitat and recently occupied habitat for Desert Tortoise. Recent sightings and sign (burrows) of tortoise in this area by BLM Ridgecrest Field Office staff and independent biologists (see attached photos) may indicate the species' is moving northward and up in elevation. We do appreciate that this section of corridor has been reduced in width and been co-located with existing transmission but future impacts to habitat would not be completely negated. IOPs should be developed for Desert Tortoise that minimize impacts to both habitat and individuals. The opportunity for public input should be provided.

Migratory Birds

The alignment runs along the Pacific migratory bird flyway. Songbirds, shorebirds, and waterfowl pass through the Owens Valley and Rose Valley on their way to and from breeding grounds. The flyway has stopover riparian and wetland habitat in the Sierra Nevada canyons and at Little Lake, Owens Lake and Haiwee Reservoir. The corridor adjustment at MP 145-148 would go through the Baker Meadow. An ongoing Los Angeles Department of Water and Power (LADWP) mitigation project is attempting to restore what once was a Yellow-Billed Cuckoo nesting area. The corridor should be moved out of areas that are designated for habitat restoration and species recovery.

Walker River State Recreation Area (WRSRA)

The 18-23 corridor runs adjacent to the newly designated WRSRA between MPs 12-50, with the greatest potential impact occurring at MPs 23-30. Transmission construction in MPs 23-30 will impact recreation, cultural and scenic values at WRSRA. Furthermore, the online Mapping Tool has not been updated to reflect the State Recreation Area. WRSRA should appear as state land under the Surface Management Agency layer. We request Agencies consult with WRSRA to analyze potential impacts of the proposed corridor on park operations and adjust or delete this section as recommended by Park staff.

USFS Roadless Areas

The corridor along MP 83-85 is adjacent to three areas that the Inyo National Forest (INF) has recommended for wilderness designation: Adobe Hills (10,354 acres) Huntoon (8,876 acres) and South Huntoon (5,898 acres). See INF Land Management Plan (LMP), 2019. The corridor also would impact portions of the Excelsior Inventoried Roadless Area (IRA) at MP 66-79. 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 INF. 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 Report needs to be updated to incorporate the new LMP's findings; the draft report still references the 1988 plan. The LMP directs that recommended wilderness areas be managed as wilderness and it identifies IRAs as Designated Areas pursuant to the Roadless Area Conservation Rule (36 CFR 294 subpart C).¹ To understand the impacts of the corridor on recommended wilderness area and IRAs, additional analysis should be included in the final Report and as any part of future NEPA analyses.

Golden Trout Wilderness

According to our mapping, corridor 18-23 would adversely impact 423 acres of designated wilderness within the Golden Trout Wilderness Area managed by the Inyo National Forest at MP 208-211. New rights of way are prohibited in designated wilderness, thus the corridor alignment must be adjusted by moving it outside the wilderness boundary.

Volcanic Tablelands Wilderness Study Area (WSA)

The 18-23 corridor intersects with protected lands such as designated Wilderness Areas and Wilderness Study Areas where infrastructure development is prohibited by law;

¹ Land Management Plan for the Inyo National Forest. September 2019. R5-MB-323a. pg 108-109.

several proposed revisions also intersect with Wilderness Areas and Wilderness Study Areas. (Appendix 2 shows overlap with the Agencies' proposed corridor additions and revisions; our April 2019 comments show overlap with the existing corridors.) The Agencies must eliminate these intersections by adjusting or deleting these corridors. See, Manual 6340 – Management of Designated Wilderness Areas,³³ including Section 1.6.C.16.b (new rights of way are prohibited in Wilderness Areas); Manual 6330— Management of BLM Wilderness Study Areas,³⁴ 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).

The revised corridor alignment poses direct conflicts with WSAs on the Volcanic Tablelands. The Volcanic Tablelands are part of the ancestral territory of the Owens Valley Paiute and Shoshone tribes, and all of the WSAs contain highly significant wilderness, cultural, wildlife/vegetation and geological values. The agencies propose to expand the width of the existing corridor between MP 110-116, which would adversely impact Casa Diablo WSA (503 acres), Chidago Canyon WSA (8 acres) and Fish Slough WSA (160 acres). The BLM's Manual for Management of BLM WSAs prohibits development of new rights of way and infrastructure in WSAs unless they can meet the agency's non-impairment standard (See Manual 6330—Management of BLM Wilderness Study Areas, including Section 1.6.D.4.ii). To get around this roadblock the agencies inappropriately recommend that the potentially impacted acreage within these WSAs be released from wilderness study by Congress so that development of new transmission or pipelines can proceed within these WSAs. The BLM has a duty to manage these WSAs for potential wilderness designation, unless and until Congress acts to release them. In proposing that release be part of future legislative deal-making, the agencies are abrogating their duty and responsibility to protect the values of these fragile and sensitive WSAs until Congress acts. The agencies must eliminate their proposal to widen the corridor on the Volcanic Tablelands.

Our mapping also indicates that 56 acres in the Volcanic Tableland WSA (MP 117-124) would be impacted by the corridor. According to the Report, 18-23 is proposed to be co-located atop the existing transmission corridor on the Tablelands that is directly adjacent to Volcanic Tableland WSA. We support co-location but not widening of the corridor.

The agencies must consult with the Bishop Paiute Tribe and other tribes whose ancestral territories include the Volcanic Tablelands and include them in any agency-initiated deliberations about future land status or proposed development of additional transmission infrastructure on the Tablelands.

The proposed realignment at MP 153 would adversely impact 26 miles of Crater Mountain WSA. Crater Mountain WSA contains unique lava tubes and abundant tribal cultural resources. The alignment should be moved back to what was proposed in the 2018 corridor abstract and mapping tool so that these sensitive resources are not adversely impacted.

Areas of Critical Environmental Concern (ACEC)

The Fish Slough ACEC intersects the corridor between MP 112-113. 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 CDFW, 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 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)). 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_Milk-vetch_5yrReview_2009.pdf. Allowing transmission development within these locations could adversely impact the values for which these areas were designated.

Although corridor width is greatly reduced, the corridor locations at MP 212-225, 232-235 are still within the Mohave Ground Squirrel (MGS) ACEC and California Desert National Conservation Lands (NCL) identified in the Desert Renewable Energy Conservation Plan (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.

We appreciate that the southern part of the 18-23 corridor width has been reduced to what appears to be the existing ROW. The reduction of width does not, however, negate the impacts to ACECs along this section of the corridor. The Sierra Canyons ACEC is located at MP 224-226, 229-239 and overlaps 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 and they remain culturally significant to this day. Multiple sites within this corridor include many large, prehistoric

properties, eligible for the National Register of Historic Places, 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).

Impacts to the Rose Spring ACEC (and overlapping NCLs) still occur at MP 224-225 and could impact 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 same corridor width reduction continues further south as it enters 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 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. 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.

Owens Lake

Owens Lake and its shoreline between MP 194-210 is very important to local Tribes and contains a wealth of tribal cultural resources. Owens Lake has been nominated by the Native American Heritage Commission as a National Historic Landscape. Owens Lake and the surrounding shoreline should be characterized in the final report as an area of "high conflict." The corridor also overlaps with the Owens Lake Important Bird Area, and the IOPs for Minimizing Collision Through Siting and IBAs should be applied here.


Conclusion

We appreciate the agency's ongoing work to reanalyze corridor 18-23 to correct corridor alignments and address conflicts based on public comment. However, the iconic scenic landscapes, world class tourism, and fragile biological, cultural and recreational resources makes this corridor particularly problematic for future transmission infrastructure. We

strongly recommend the Agencies remove the corridor all together in light of the numerous issues raised by previous stakeholders. We will continue to work with local government, BLM, Forest Service, and state agencies 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.



Wendy Schneider
Executive Director, Friends of the Inyo



Jora Fogg
Campaign Coordinator, Bodie Hills Conservation Partnership



Lynn Boulton
Chair
Sierra Club Range of Light Group

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10080] - Webmaster Receipt
Date: Saturday, January 30, 2021 2:18:35 PM
Attachments: [ID_10080_BLM368EnergyCorridor_ODFWComments_01.30.2021.pdf](#)
[ID_10080_BLM368EnergyCorridor_ODFWComments_04.17.19.pdf](#)

Thank you for your input, Sarah Reif.

The tracking number that has been assigned to your input is **10080**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 30, 2021 14:18:19 CST

First Name: Sarah

Last Name: Reif

Email: sarah.j.reif@state.or.us

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

Organization: Oregon Dept Fish and Wildlife

Input

Please see attachments.

Attachments

BLM 368 Energy Corridor_ODFW Comments_01.30.2021.pdf, BLM 368 Energy Corridor_ODFW Comments_04.17.19.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



Oregon

Kate Brown., Governor

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Bureau of Land Management, Region 6
West-wide Energy Corridor Section 368 Corridor Regional Review
Input submitted online at <https://corridoreis.anl.gov/involve/report-input/>



January 30, 2021

To Whom it May Concern,

Thank you for the opportunity to provide input on the Bureau of Land Management (BLM) West-Wide Energy Corridors Regional Review Report for Regions 4, 5, and 6, released November 2020. Oregon Department of Fish and Wildlife (ODFW) provides the following comments specifically focused on the BLM's proposed revisions, deletions, and additions to energy corridors within the State of Oregon. Should you have any questions or seek further coordination with ODFW on this matter, please contact Sarah Reif, Energy Coordinator, at sarah.j.reif@state.or.us or 503-947-6082.

General Comments

ODFW requests continued consideration of the comments provided in our April 17, 2019 letter (attached to this letter, for reference).

Section 3.2 of the Regional Review Report discusses the need for enhanced coordination between the BLM and the US Forest Service (USFS), and the need for greater consideration or limitation of nonlinear projects such as geothermal and solar. ODFW supports these recommended measures, but recommends enhanced coordination with State of Oregon be added to the list of recommendations.

ODFW recommends further coordination between the federal action agencies and the State of Oregon to discuss ways of better integrating the federal energy corridor siting process with state statute, rule, and policy.

Specific Comments

Aside from the specific corridors discussed in the table below, ODFW found that most of the designated energy corridors in Oregon had little concern for fish and wildlife, or were co-located with existing infrastructure (transmission lines of similar size, 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.

Please see the comment table below.

Thank you, again, for the opportunity to provide comment. ODFW looks forward to engaging with the BLM and USFS in this process as well as on future, site-specific projects within the designated corridors.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Reif".

Sarah Reif
Energy Coordinator, Wildlife Division

ODFW Specific Comments on BLM Region 6 Section 368 Corridor Changes (November 2020)

Corridor Number	BLM Proposed Change	ODFW Comment
7-24	Deletion	ODFW finds the BLM’s determination to be consistent with the avoidance goals of the State of Oregon’s Greater Sage-grouse Conservation Strategy (Oregon Administrative Rules [OAR] 635-140-0000 through -0025). The proposed corridor had the potential for significant impacts to greater sage-grouse core and low-density habitats (PHMAs), and would have been in close proximity to an existing sage-grouse lek.
24-228	Modification	Note: ODFW mistakenly failed to comment on Corridor 24-228 in its April 2019 comments, but should have given the potential for negative impacts to greater sage-grouse habitat. This proposed corridor is not co-located with an existing larger transmission line, which would have reduced the incremental impacts to adjacent sage-grouse habitats. Corridor 24-228 has a large number of known sage-grouse leks within a 10-mile buffer (which is the indirect impact buffer specific to transmission lines used in the Oregon Habitat Quantification Tool), relative to miles of sage-grouse habitat impacted – please see the summary analysis below. The proximity of Corridor 24-228 to high numbers of sage-grouse leks may indicate that this alternative could be more impactful to sage-grouse as compared to other proposed corridors. However, if there is a need to have electrical transmission in this geographic area, Highway 95 is one of the most prominent anthropogenic features co-location will reduce (but not eliminate) potential indirect impacts to adjacent sage-grouse habitats. ODFW recommends further siting considerations be given to avoid and minimize sage-grouse habitat impacts associated with this proposed corridor.
11-228	Modification	Corridor 11-228 has the potential for impacts to greater sage-grouse habitat (see the analysis table below). However, the proposed corridor would follow a large, existing transmission line (at least in part), which helps to minimize the incremental increase in indirect impacts to adjacent sage-grouse habitat. ODFW recommends further consideration be given to avoidance and minimization of impacts by limiting new roads (especially in the eastern portion of 11-228), by micro-siting within the 3500-foot corridor, strategic siting of substations or facilities that generate noise and increase human presence, and by implementing timing restrictions during construction. Any proposed development within this corridor would require compliance with State of Oregon statutes and rules.
Wagontire Mountain	Addition – New	Wagontire Mountain Corridor has the potential for impacts to greater sage-grouse habitat (see the analysis table below). However, the proposed corridor would follow a large, existing transmission line (at least in part), which helps to minimize the incremental increase in indirect impacts to adjacent sage-grouse habitat. ODFW recommends further

		consideration be given to avoidance and minimization of impacts by limiting new roads, by micro-siting within the 3500-foot corridor, strategic siting of substations or facilities that generate noise and increase human presence, and by implementing timing restrictions during construction. Any proposed development within this corridor would require compliance with State of Oregon statutes and rules.
230-248	No proposed change	<p>While the BLM is not proposing any change to this corridor designation, ODFW has some supplemental comments to those raised in our April 2019 letter (which were specific to impacts to Northern spotted owls and late-successional forest habitats).</p> <p>Where the eastern end of the proposed corridor aligns with Highway 216, there is the potential for negative disturbance impacts to a nearby gray wolf den site. Depending on the type of energy development in this area there could also be disruption of north-south wolf movement which is already hampered by Highway 216. Site-specific consultation with ODFW is recommended to avoid and minimize these impacts.</p> <p>The proposed corridor also crosses multiple creeks and rivers that serve as important aquatic habitat for fish and wildlife. Pipeline developments within this corridor would need to comply with State of Oregon statutes and rules specific to habitat mitigation, fish passage, in-water work schedules, and water quality.</p>

Considerations ODFW used in its analysis of corridor impacts to greater sage-grouse

Corridor	Total Corridor Length	Corridor in SG Core & Low Density Habitat	Total # Leks in 10k buffer (Avian predation)	Total area of Corridor in SG Habitat (considering the 3500 ft. width)	Does the Corridor Follow Existing Infrastructure
24-228	95 miles	~ 33 miles	51 Leks	~14,200 acres	Hwy 95
11-228	221 miles	~135 miles	93 Leks	~57,200 acres	East of Hines - 500 kV t-line West of Burns - <199 kV line & Hwy 20
Wagontire Mountain	96 miles	~32 miles	24 Leks	~13,500 acres	500 kV line



Oregon

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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

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10081] - Webmaster Receipt
Date: Sunday, January 31, 2021 4:09:08 AM

Thank you for your input, Laura M. Ohanian.

The tracking number that has been assigned to your input is **10081**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 31, 2021 04:08:53 CST

First Name: Laura M.

Last Name: Ohanian

Email: lmo@efn.org

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

Input

Please deny permits for the Warm Springs Corridor 230-248 portion of the Trail West Pipeline.

During last year's wildfire season, the Riverside Fire burned directly over the proposed Trail West Pipeline route. I'm sure we can all imagine just how much worse that fire would have been had there already been a pipeline under the ground there transporting 450 million cubic feet of planet-heating fracked gas per day.

Gas pipelines are nothing but a losing proposition for the land and communities through which they are sited, and this one would simply be carrying fracked gas from the Rockies or Canada across the Cascades to ports on the Columbia River. Oregon gets nothing of value, but the environmental costs are borne by our communities and our citizens.

Please, no Trail West Pipeline in Oregon. In fact, no more pipelines in Oregon at all. It's too bad that we're ruled by money and powerful corporations instead of the Precautionary Principle, which civilized societies use to protect people and not corporate profits.

Thank you for your consideration.

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10082] - Webmaster Receipt
Date: Sunday, January 31, 2021 10:04:57 AM
Attachments: [ID_10082_20210131368corridorcomments.pdf](#)

Thank you for your input, Gabe Tabak.

The tracking number that has been assigned to your input is **10082**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 31, 2021 10:04:44 CST

First Name: Gabe
Last Name: Tabak
Email: gtabak@cleanpower.org

Are you submitting input on the behalf of an organization? Yes
Organization: American Clean Power Association

Input

[Blank]

Attachments

2021-01-31 - 368 corridor comments.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Comments of the American Clean Power Association on Section 368 Energy Corridor Review: Regions 4, 5, and 6

January 31, 2021

The American Clean Power Association (“ACP”) appreciates the opportunity to comment on the Section 368 Energy Corridor report for Regions 4, 5, and 6.¹ ACP is a national trade association representing a broad range of entities with a common interest in encouraging the expansion and facilitation of wind, solar, energy storage, and electric transmission in the United States, and provides these comments specifically regarding the designation of Section 368 corridors for electric transmission.

Section 368 of the Energy Policy Act of 2005² requires the Departments of Agriculture, Commerce, Defense, Energy, and the Interior (in consultation with the Federal Energy Regulatory Commission [“FERC”], states, tribes, local governments, utilities, and other stakeholders) to designate energy right-of-way corridors on Federal lands in 11 Western states. Regions 4, 5, and 6 – encompassing Washington, Oregon, Idaho, Montana, Wyoming, and parts of California and Nevada - are rich in wind and solar resources, but require transmission expansion to ensure that clean, affordable energy can be delivered to customers. ACP appreciates the significant work undertaken by the Bureau of Land Management, the United States Forest Service, and the Department of Energy (“the Agencies”) in developing the Corridor Report, and offers several comments to inform any changes to current corridors as well as the agencies’ approach to Section 368 corridors in the future.

¹ Region 4, 5, 6 Draft Report (Nov. 2020) https://corridoreis.anl.gov/documents/docs/Regions_4-5-6_Draft_Report.pdf (“Corridor Report”).

² Codified at 42 USC 15926.

1. **The Agencies Should Apply Section 368 Consistent with the 25 Gigawatt Goal of the Energy Act of 2020.**

Recent legislation has increased the need for electric transmission corridors on Federal lands, and an efficient interagency process to designate those corridors. Section 3104 of the Energy Act of 2020, contained within the Consolidated Appropriations Act of 2021, requires the Secretary of the Interior to “seek to issue permits that, in total, authorize production of not less than 25 gigawatts of electricity from wind solar, and geothermal energy projects by not later than 2025, through management of public lands *and administration of Federal laws.*”³ ACP submits that Section 368 is just such a Federal law.

ACP therefore urges the Secretary of the Interior and the Agencies to use their authority over Section 368 corridors to ensure that sufficient transmission is available to deliver the 25 gigawatts of electricity to customers. As of 2019, there were over 5 gigawatts of renewable energy capacity on public lands;⁴ while expansion to 25 gigawatts will not necessarily require a fivefold increase in transmission lines (due to use of existing lines in some cases), significant transmission development is nevertheless needed. Indeed, absent sufficient transmission capacity, projects may be unable to move forward with leases, putting this Congressionally-directed target in jeopardy. Transmission development – even with expedited processes, as discussed in the next section – remains a multiyear process,⁵ and the Agencies should act quickly to align transmission development on Federal lands with national renewable generation goals.

Additionally, ACP notes that five Western states have adopted 100% clean energy goals, and that the 2019 Western Flexibility Study noted the importance of coordinated

³ See Pub. L. No. 116-620, Consolidated Appropriations Act, 2021, at Div. Z – Energy Act of 2020, §3104(b), <https://www.congress.gov/bill/116th-congress/house-bill/133> (emphasis added).

⁴ See N. Springer and A. Dauc, *Key Economic Benefits of Renewable Energy on Public Lands* at 5 (May 2020), <https://www.wilderness.org/renewableenergyreport>.

⁵ See e.g. J. Eto, *Building Electric Transmission Lines: A Review of Recent Transmission Projects*, at 13 (Sept. 2016) (SunZia “process spanned approximately four years”) <https://www.energy.gov/sites/prod/files/2017/01/f34/Building%20Electric%20Transmission%20Lines--A%20Review%20of%20Recent%20Transmission%20Projects.pdf>

transmission development to attainment of these goals.⁶ The Agencies should also use their Section 368 role to ensure that states can successfully attain these goals, which are consistent with (and, indeed, reinforced by) the 2020 Federal 25 gigawatt target.

2. Corridor Designation Must Give Effect to Subsection 368(c)(2), and Provide a Clear Path to Expedited Permitting.

Section 368 requires the Agencies (in coordination with FERC, utilities, and other stakeholders) to establish procedures that “expedite applications to construct or modify oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities within such corridors, taking into account prior analyses and environmental reviews undertaken during the designation of such corridors.”⁷ This requirement for interagency coordination *resulting in expedited permitting* is at the very core of the statutory framework: once the Agencies designate corridors, future infrastructure located within their bounds should be able to benefit from an expedited application and environmental review process.

Additionally, the January 27, 2021 Executive Order on Tackling the Climate Crisis at Home and Abroad⁸ amplifies the importance of streamlining environmental permitting for electric transmission. Section 213 of the Climate Crisis EO requires agencies to coordinate through the Council on Environmental Quality and the Office of Management and Budget to “identify steps that can be taken, consistent with applicable law, to accelerate the deployment of clean energy and transmission projects in an environmentally stable manner.” ACP submits that Section 368 is just such an “applicable law.” The Agencies should read subsection 368(c)(2)’s directive to

⁶ See Western Interstate Energy Board, Western Flexibility Study (Dec. 2019), <https://westernenergyboard.org/wp-content/uploads/2019/12/12-10-19-ES-WIEB-Western-Flexibility-Assessment-Final-Report.pdf>

⁷ 42 USC 15926(c)(2).

⁸ See <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/> (“Climate Crisis EO”).

“expedite” reviews for electric transmission facilities in corridors as specific Congressional direction which supports the aims of the Climate Crisis EO.

Finally, ACP notes that the Agencies’ guidance documents may require review and reissuance. Although the Forest Service’s 2014 interim directive provided some indication of how projects in 368 Corridors would comply with the requirements of the National Environmental Policy Act (“NEPA”),⁹ this directive expired in 2016. ACP urges the Agencies to review and update their guidance consistent with the Climate Crisis EO, and to allow subsequent projects located in corridors to benefit from expedited NEPA reviews to the maximum extent possible. Specifically, ACP urges that the NEPA review process for projects within a Section 368 Corridor should utilize a single point of accountability, should impose a firm two-year limit from application to record of decision (ideally with anticipated action earlier than two years), and should not apply new or revised rules to pending applications.

3. The Agencies Should Utilize the Best Available Information to Ensure that Transmission Development Aligns with Renewable Potential.

In keeping with Section 368’s goals of ensuring effective infrastructure development on Federal lands while minimizing adverse impacts, ACP also urges the Agencies to carefully align corridors with locations where renewable energy is planned, or for high-potential areas. For instance, the 2009 Western Renewable Energy Zones report¹⁰ identified transmission needs as a key constraint, and identified “hubs” where significant renewables could be developed.¹¹ This type of analysis could be updated with modern technical assumptions – including more detailed hub height analysis for wind potential, and irradiance data for solar potential,

⁹ See 2726.43k - Use of 368 Corridors In Siting Energy Projects (Aug. 8, 2014), https://corridoreis.anl.gov/documents/docs/Interim_Directive_2726.43k.pdf

¹⁰Western Renewable Energy Zones, Phase 1 Report (2009) https://www.energy.gov/sites/prod/files/oeprod/DocumentsandMedia/WREZ_Report.pdf

¹¹ Id. at 14, included as App’x A.

Additionally, the Agencies should also incorporate data from other sources. ACP suggests that the Agencies coordinate with grid operators (in Regions 4, 5, and 6, the California Independent System Operator and the Southwest Power Pool), utilities, and FERC to identify areas with significant renewable resources in interconnection queues. These are frequently high-potential areas for wind and solar, but insufficient transmission can prevent projects from moving forward, or can result in congestion or curtailment. The Agencies can and should account for this information, and consider whether new transmission corridors (or new projects in existing corridors) could support further deployment and delivery of renewable energy.

4. Designating Corridors Along Existing or Planned Energy Infrastructure Can be Effective, if Done Properly.

Several of the proposed additions to Section 368 Corridors would allow co-location alongside existing or planned energy infrastructure. For instance, the Wamsutter-Powder Rim corridor would align with the route of the TransWest Express Transmission Project, and the Gateway West corridor would follow the Gateway West Transmission Project.¹² ACP believes this approach has merit, as aligning corridors with linear infrastructure that has already been constructed or permitted should, in theory, reduce any adverse impacts and expedite permitting of subsequent projects. However, ACP urges the Agencies to ensure that corridors utilizing existing rights-of-way are sufficiently broad to allow for multiple future lines. Applicable reliability criteria, administered by the North American Reliability Corporation and the Western Electricity Coordinating Council, typically require 250 feet of separation between adjacent transmission circuits.¹³ Accordingly, Section 368 Corridors for electric transmission

¹² See Corridor Report at pp35-36.

¹³ See Section 368 Corridor Study at 85 (2016), https://www.corridoreis.anl.gov/documents/docs/Section_368_Corridor_Study.pdf (noting “the 2012 WECC new Adjacent Transmission Circuits definition that reduced the separation distance between center lines from 1,500 to 250 ft.”).

should have sufficient breadth to allow subsequent transmission lines to utilize the same corridor while complying with all reliability standards.

ACP and its members will continue to engage with the Agencies as the Section 368 corridor process progresses, and look forward to continued collaboration towards the development of much-needed electric transmission on Federal lands.

Respectfully submitted,

/s/ Gabe Tabak

Gabe Tabak
Counsel
Tom Darin
Sr. Director, Western State Affairs
American Clean Power Association
1501 M St. NW, 9th Fl.
Washington, DC 20007
(202) 383-2500
gtabak@cleanpower.org
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From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10083] - Webmaster Receipt
Date: Sunday, January 31, 2021 8:46:58 PM
Attachments: [ID_10083_CWCommentonCorridor230248.pdf](#)

Thank you for your input, Rebecca White.

The tracking number that has been assigned to your input is **10083**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 31, 2021 20:46:40 CST

First Name: Rebecca

Last Name: White

Email: rebecca@cascwild.org

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

Organization: Cascadia Wildlands

Input

Please see attached pdf comments.

Attachments

CW Comment on Corridor 230-248.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

January 29, 2021

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,

Thank you for reviewing these comments, which are focused on the Corridor Abstract for Corridor 230-248 in Region 6 of the Section 368 West-wide Energy Corridors (WWEC).

Cascadia Wildlands represents over 10,000 members who seek a wilder and healthier Cascadia. Our mission is to defend and restore Cascadia's wild ecosystems in the forests, in the courts, and in the streets. We envision vast old-growth forests, rivers full of wild salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion. Our members and staff live in, use, and enjoy the relevant planning area for Corridor 230-248.

As an initial matter, we echo the concerns of our colleagues at Bark, representing over 30,000 citizen advocates concerned with the protection and restoration of Mt. Hood National Forest and the surrounding ecoregion. In reference to the initial proposal for this pipeline, when it was called the Palomar Pipeline, Bark wrote:

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

The West-wide Energy Corridors (“WVEC”) EIS settlement agreement designated Corridor 230-248 a “Corridor of Concern” based on major environmental concerns including: effects to 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 protections in place for Northwest Forest Plan Late-Successional Reserves.²

We believe conflicts with these and other environmental, land-use, and legal designations are irreconcilable and that the only reasonable path is to delete Corridor 230-248 from the WVEC map, for the specific reasons given below.

A. In contrast to representations made in the abstract, this corridor is not intended for the transport of renewable energy, but would, if built as currently configured, transfer fracked gas across the Cascades for export. Our members are vocal advocates supporting the Power Past Fracked Gas campaign. We are opposed to any fossil fuel infrastructure that would lock in additional Pacific Northwest (or worldwide) greenhouse gas emissions.

B. We are extremely concerned regarding the potential for pipeline leaks and their impacts on fragile ecosystems. Pipelines leak, and in a high-fire risk zone like the one at issue, the potential for catastrophic impacts must be considered seriously. Additionally, the Clackamas River would potentially be impacted by any leak; it supplies drinking water to hundreds of thousands of downstream citizens.

C. The corridor would have an immediate and irreparable impact on the visual values of the Pacific Crest National Scenic Trail and upon a classified-“scenic” segment of the Wild and Scenic Clackamas River. The river has five categories determined “outstandingly remarkable”: recreation, fish, wildlife, historic, and vegetation. FERC may not permit projects that interfere with the river’s outstanding values or its scenic, recreational, fish or wildlife values. (Wild & Scenic Rivers Act, sec. 7.)

Additionally, the corridor as proposed (and any likely re-alignments) would cross the Fish Creek watershed at least once, if not many times. This is a geologically unstable, flood-prone, and landslide-prone watershed that is also habitat for several ESA-listed aquatic species such as salmon, trout, and eel, and in addition, is a Wild and Scenic River. Pipeline construction and operation in this watershed is unacceptable. It would also cross the Wild and Scenic Deschutes River. And, the pipeline route would also cross six Tier 1-designated watersheds, which under the Northwest Forest Plan, should be carefully conserved for habitat purposes.

D. Construction of the corridor and pipeline would have immediate and irreparable impacts on Northern Spotted Owl critical habitat. In addition, according to the NSO Revised Recovery Plan

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

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

(2011), older, moist forest stands should be preserved wherever they are located, regardless of land designation. Infrastructure development within MHNH is incompatible with Northern Spotted Owl recovery, for which every federal agency is responsible pursuant to the Endangered Species Act.

E. The corridor as proposed would require clearcutting 80+ year old stands in portions of the Late-Successional Reserve in Mt. Hood National Forest. This is prohibited by the Northwest Forest Plan and related forest management planning documents.³ Additionally, the corridor construction would fail to comply with a long list of Northwest Forest Plan standards and guidelines, subject to specific determination by forest managers. At a minimum, the corridor construction would be out of compliance with forest standards and guidelines meant to prevent detrimental impacts to soil, riparian areas, aquatic habitat, and recreational uses.

F. Finally, wildfire hazard potential (WHP) is an index that depicts the relative potential for a wildfire that would be difficult for suppression resources to contain, based on wildfire simulation modeling. This dataset is produced by the USDA Forest Service, Fire Modeling Institute.⁴ It shows that much of the route of this corridor would be in the very highest category, "Very High" WHP. Indeed, much of the pipeline route was burned in 2020's Riverside Fire. This new information about the fire risk of this particular route must be seriously evaluated and suggests deletion of this corridor as the wise decision to protect lives and property. In addition, the pipeline construction itself, by clearing and drying out the forest, creates the conditions for higher fire risk.

Conclusion

In sum, this proposed pipeline corridor encompasses a wide range of unmitigable legal, ecological, environmental, climate, and health impacts that our members find unacceptable. Please strongly consider deleting Corridor 230-248 from the WWEC map.

Thank you for considering these comments, and please include us in future communications and decisions regarding this project.

Sincerely,



Rebecca White
Cascadia Wildlands
PO Box 10455
Eugene, Oregon 97440
rebecca@cascwild.org
541.434.1463

³ Northwest Forest Plan Standards & Guidelines, C-12.

⁴ <https://www.fs.usda.gov/rds/archive/Catalog/RDS-2015-0047-3>

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10084] - Webmaster Receipt
Date: Sunday, January 31, 2021 10:00:45 PM

Thank you for your input, CONNIE HOLLOWAY.

The tracking number that has been assigned to your input is **10084**. Please refer to the tracking number in all correspondence relating to your input.

Date: January 31, 2021 22:00:32 CST

First Name: CONNIE
Last Name: HOLLOWAY
Email: imaflyingcloud@hotmail.com

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

Input

Thank you for the opportunity to comment once again on the regions 4,5,and 6 report for the West-wide Energy Corridor, dated November 2020. My concerns focus on the Corridor 36-228.

I actually thought this was already decided for West Segments 8 and 9 Route Options in or near the Morley Nelson Snake River Birds of Prey National Conservation Area (NCA), which was produced in 2014. It is the only option that makes sense for us living here in Oreana and surrounding communities .

I am surprised and extremely disappointed that this latest review left out any reference to the Boise District Resource Advisory Council Subcommittee Report. I am upset that West-wide review was still considering routes that the RAC had determined to have serious impacts on our communities, resources, and private landowners, such as myself .

In 2013 and 2014 the RAC subcommittee evaluated 26 different route options for the Gateway West transmission line (12 for the northern route and 14 for the southern route). After 11 meetings , one work session ,two field tours, input from dozens of citizens, utility staff, and other experts, the subcommittee identified two route options that minimized all conflicts.

I was pleased to see that the West-wide review is considering revising the existing corridor to "avoid private lands in Owyhee County, where there is no existing infrastructure and where we locals all extremely oppose the future development within the corridor. "

However, I am extremely disappointed to see that Gateway Alternative 9E is still being considered as a viable option. The RCA subcommittee reviewed Route 9E and it was a disaster for protecting the Greater Sage-grouse populations and their habitat, as well as impacting private lands . But in this review these important issues are not mentioned and how they would be impacted by Alternative 9E.

The statement in Volume 2, page 76 that "potential revision through the NCA would be

dependent on whether or not it is compatible with the purposes of the NCA"seems to ignore the fact that the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act removed land along the Gateway West transmission line right-of-way from NCA status.

I strongly urge that this portion of report be rewritten to include all of the important relevant information and then re-evaluate based on the information that has been omitted .

Thank you again for allowing my input . This area of the Owyhee Front that I call home matters immensely to me. This is an incredible ecosystem if you get out and just walk here. Just 2 miles from my home , up on plateau I have seen the Greater Sage-grouse doing its mating dance. All of us neighbors are going to do what we can to protect our home.

Connie Holloway

Bates Creek Road , Oreana,Idaho

Attachments

[None]

Questions? Contact us at: corridoreiswebmaster@anl.gov

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10085] - Webmaster Receipt
Date: Monday, February 1, 2021 6:10:06 AM
Attachments: [ID_10085_WestwideCommentsJanuary2021.pdf](#)

Thank you for your input, Kevin Emmerich.

The tracking number that has been assigned to your input is **10085**. Please refer to the tracking number in all correspondence relating to your input.

Date: February 01, 2021 06:09:56 CST

First Name: Kevin
Last Name: Emmerich
Email: atomicquailranch@gmail.com

Are you submitting input on the behalf of an organization? Yes
Organization: Basin and Range Watch

Input

Hello,

These comments were finished on Friday. Your deadline is on a Sunday - not a work day and I was not able to submit the comments on the weekend.

I would like you to accept these comments even though they are about 5 hours late from the deadline.

Attachments

Westwide Comments January 2021.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov



Basin and Range Watch

January 29th, 2021

To:

Re: Comments on West Wide Energy Corridor – 18-224

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.

Basin and Range Watch requests that the section 18-224 Energy Corridor be abandoned. We believe that most of the energy that would be produced from this corridor would be exported to Southern California so we would ask that you consider alternatives of upgrading existing transmission that goes through Eastern California along Corridor 18-24.

We are concerned about the following impacts that would occur from building a large-scale transmission line in the area as well as the cumulative impacts of building solar projects in the region.

We will discuss the impacts by region which is why we oppose this corridor:

Walker Lake:

A transmission line at Walker Lake will create collision risks for raptors, waterbirds and impact bighorn sheep.

The Walker Lake is an Important Bird Area and is habitat for several raptors and waterfowl that pass through the area. Walker Lake provides habitat for Western Snowy Plover, Common Loon, Western, Clarks, and Eared Grebes, Double-crested Cormorant, White-faced Ibis, Tundra Swan, Snow Goose, Gadwall, Redhead, Ruddy Duck, Northern Shoveler, and American White Pelican.

Walker Lake is also wintering habitat for bald eagles. New transmission can cause collision hazards and cause Take of bald and golden eagles under the Bald and Golden Eagle Protection Act.

Federally Threatened Lahontan cut-throat trout live in Walker Lake. Construction of transmission can cause sediment to erode into the lake and impact water quality. Equally, new transmission could provide new perches for fish eating birds and this could be a subsidized predator issue.

The cliff and shores of Walker Lake are habitat for desert bighorn sheep. New transmission and construction will disrupt and disturb bighorn sheep.

A new transmission line will also disrupt military radar in this area.

Columbus Marsh Area, Excelsior Range:

A new transmission project will disrupt pronghorn migration and connectivity in this area. A new transmission line will also cause a big visual impact to this region.

Tonopah Region, Big Smokey Valley:

New transmission in this area will have impacts to pronghorn migration, bighorn sheep and many raptors and migratory birds.

The Big Smokey Valley is a broad valley that contains a population of pronghorn that would be disrupted by new transmission. The area also has herds of wild horses that would be impacted and disturbed by new transmission.

Several migratory and rare bird species have been documented at Miller's Rest Stop and this indicates there will be collision hazards from new transmission. Species that have been documented here are: waterbirds (herons and kingfishers), raptors (falcons, accipiters, harriers, buteos), Mexican species (Hepatic Tanager), Eastern species (Hooded Warbler, Least Flycatcher, Ovenbird), shorebirds (peeps of various types), montane species (Mountain Chickadee), non-native species (House Sparrow, European Starling, Eurasian Collared Dove), migrants (Yellow-breasted Chat, Lincoln Sparrow, Rufus Hummingbird, MacGillivray's Warbler), and even a few desert species (Western Kingbird, Say's Phoebe, Sage Thrasher, Black-throated Sparrow, and House Finch).

The Miller's Solar Energy Zone or Designated Lease Area is 16,000 acres. Bird mortality has been documented at solar projects and it is believed that they mimic lakes. Collisions happen at photovoltaic projects and solar power towers. If large-scale solar projects are built here, the lake effect will attract birds and cause collision and mortality. This will also attract birds which will collide with new transmission.

The Crescent Dunes Solar Project has been shut down for a couple years, but they hope to restart it. It has killed multiple birds with a solar flux. The same company at one time wanted to build 8 more of these towers. This could also create a cumulative avian impact associated with new transmission.

Info on avian lake effect: [Solar Farms Threaten Birds - Scientific American](#)

Goldfield/Sacrobatus Flat:

A new transmission line will disrupt pronghorn migration and breeding habitat in the Sacrobatus Flat area as well as the Lida Valley.

This is also some of the northern most habitat for the Western Joshua tree. New data suggests that the Joshua tree is threatened by drought and climate change. In California, the Fish and Game Commission is protecting the Joshua tree now: [California Grants Joshua Trees Temporary Endangered Species Protections : NPR](#)

New transmission will directly impact Western Joshua Trees and new solar projects will remove several thousand Joshua trees.

Transmission also causes greater risk for wildfire and as we know, Joshua trees are at great risk from fire. [Dome Fire - Mojave National Preserve \(U.S. National Park Service\) \(nps.gov\)](#)

Much of the region is a Visual Resource Management Class II designation with the BLM. The **VRM Class II Objective** is to retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

The VRM Class II areas are Stonewall Mountain, Lida Valley, Areas east of Oasis Valley, Bare Mountain in Amargosa Valley and others.

Some of the areas are VRM Class III with the objective of: To partially retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

New transmission in the area would disrupt both of these objectives.

If a new transmission line is built, the Gold Point Solar Energy Zone may be developed. Should this happen there will be impacts to:

- Pronghorn connectivity
- Western Joshua trees
- Visual resources
- Historic quality of Gold Point Ghost Town
- Limited groundwater resources in Lida Valley

New transmission will be visible from the historic town of Goldfield, Nevada.

Scotty's Junction/Sacrobatus Flat:

New transmission will impact:

- Pronghorn

Western Joshua trees

Northern most habitat for the Threatened desert tortoise

Visual Resources from Eastern Death Valley National Park

Residential properties and quality of life at Scotty's Junction.

Raptors

New transmission will also encourage a buildout of sprawling solar projects in Sacrobatus Flat.

Oasis Valley/Beatty:

New transmission will impact:

Amargosa river: It will have to go over the Amargosa River, The corridor will go right next to the Nature Conservancy owned preserve – the Flying L Ranch about 900 acres.

Transmission Construction will impact water quality and sensitive Amargosa River species:

Amargosa toad
Speckled dace
Oasis Valley Spring snail

Other species impacted would be
Bighorn sheep,
Mule deer
Pronghorn
Desert tortoise

Oasis Valley is an Important Bird Area.

“In Southern Nevada, the Oasis Valley is one of only two north/south oriented migration corridors - the other being Pahrnagat Valley. Theoretically, all land birds migrating into the Great Basin and other locales to the north, must pass through these two corridors. Although there are some areas of extensive tamarisk, the riparian areas throughout the Valley are to a large extent one of the healthiest examples throughout southern Nevada. With the Town of Beatty working hard to protect these areas, this site offers birds a reliable safe-haven to rest and refuel before continuing their migratory journey. Without such a site, major migration patterns would be interrupted and significant population declines could result.” [Oasis Valley | Audubon Important Bird Areas](#)

It is habitat for Threatened Least Bell's verio
Yellow billed cuckoo
Golden eagle and bald eagle.

[Wilson's Warbler](#), [MacGillivray's Warbler](#), [Northern Parula](#), [Yellow Warbler](#), [White-breasted Nuthatch](#), [Lincoln Sparrow](#), [Warbling Vireo](#), [Mourning Dove](#), and [Bullock's Orioles](#). [Vermilion Flycatchers](#) have been seen here. [Great Horned Owls](#) are resident.

Check the marshy areas for [Marsh Wrens](#), [Violet-green Swallows](#), [Tree Swallows](#), [Red-tailed Hawks](#), [Common Raven](#), [Killdeer](#), and [Lark Sparrows](#).

Oasis Valley now has been determined to have a large desert tortoise population (consult Fish and Wildlife Service).

New transmission will be visible from private property and may lower property values. New transmission may also cause life threatening wildfires along the thick vegetation near the Amargosa River.

Amargosa Valley:

New transmission will impact:

Raptors/Golden Eagles

Kit Fox/Burrowing owls (big populations there)

Pronghorn (many sightings now)

Migratory birds from Ash Meadows.

Over 300 species of birds use Ash Meadows National Wildlife Refuge and Amargosa Valley is a flyway between Ash Meadows and Oasis Valley.

[Ash Meadows Bird Checklist_web.pdf \(fws.gov\)](#)

The Federally Endangered Yuma clapper rail has been documented at Ash Meadows.

New transmission in Amargosa Valley will encourage a big solar buildout which will create more avian collision hazards as well as fugitive dust. This will also compromise the property values and quality of life for people living in the region.

A new transmission line will be highly visible from the scenic Lava Dune.

A big solar build out in Amargosa Valley will disrupt sand transport for the Big Dune. The Nevada Department of Wildlife recently found a population of Mojave fringe-toad lizards on Big Dune. Four endemic beetles have also been documented on Big Dune: [Three other sensitive beetle species can also be found at Big Dune: \(basinandrangewatch.org\)](#)

Pahrump Valley/Mercury:

New transmission will disrupt and impact:

Desert tortoise habitat and connectivity. It will destroy the habitat and create perches for ravens. It will create invasive weeds that will create wildfire risk.

It will encourage the build out of thousands of acres of new solar on tortoise habitat. Efforts to mow vegetation are just experimental and there is no peer reviewed evidence that this works for the desert tortoise.

There are several applications for large scale solar in the region which will be enabled by new transmission.

New transmission and solar will also remove habitat for Gila monster, Las Vegas bear poppy, burrowing owl and the rare Parish's club-cholla with only a limited range in this region in Nevada.

New transmission and solar will result in the removal of millions of Mojave yuccas and Eastern Joshua trees in this region.

New transmission will disrupt the historic quality of the Old Spanish National Historic Trail in this park of Nevada.

In conclusion,

We again would like to request that Corridor 18-224 be abandoned over impacts to wildlife, groundwater, visual resources, property values, quality of live and cumulative impacts.

Thank you for considering our comments

Sincerely,

Kevin Emmerich

Basin and Range Watch

P.P. Box 70

Beatty, NV 89003

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10086] - Webmaster Receipt
Date: Monday, February 1, 2021 11:03:05 AM
Attachments: [ID_10086_2021.01.11Monowweccommentssigned.pdf](#)
[ID_10086_2019.04.08Monocomments.pdf](#)
[ID_10086_2014.05.27MonoWWECLetter.pdf](#)

Thank you for your input, Michael Draper.

The tracking number that has been assigned to your input is **10086**. Please refer to the tracking number in all correspondence relating to your input.

Date: February 01, 2021 10:57:20 CST

First Name: Michael
Last Name: Draper
Email: mdraper@mono.ca.gov

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

Input

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 29, 2021 followed by July 29 in Mammoth Lakes, CA.

Corridor 18-23

In letters dated May 27, 2014 and April 8, 2019 (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:

- Numerous sections of the 18-23 corridor within western Nevada and Mono County pass through proposed critical habitat bi-state sage grouse (BSSG), a distinct population segment (DPS) of the Greater Sage Grouse. Although the draft report recommends an IOP for Greater Sage Grouse habitat under Ecological Resources, the agency should consider an additional IOP for BSSG.
 - o A GRSG IOP would provide consistently across BLM and USFS managed lands to ensure that the Agencies address impacts to habitat, BSSG have separate and unique status and conservation efforts underway that may facilitate the development of a separate IOP.
- The 18-23 corridor overlaps with BSSG critical habitat between MPs 38-49, 55-78, 80-88, and 94-103. The proposed path is directly through proposed critical habitat including known lek and breeding locations and habitat in the Bodie Hills and South Mono PMUs. Transmission lines adversely impact BSSG populations by reducing nesting and brooding success in areas within 2.8 km of the transmission line. Current corridor adjustments do not reflect locations at least 2.8 km away from any active BSSG leks to mitigate impacts on breeding success. The draft report also does not indicate any consultation or recommendations from USFWS, NDOW and CDFW to avoid adversely impacting BSSG populations in the area. Best Management Practices are for development to have a 3.1 mile buffer around leks, yet the current alignment of 18-23 does not provide for this. If such modifications are not possible this may be a further indication that deletion of the 18-23 corridor is appropriate.
- The corridor between MP 110 and MP 116 causes habitat fragmentation of the Wilderness Study Areas. Widening this section will further interrupt the habit and is not consistent with the intent of the Wilderness Act.
- With the consideration of widening the corridor at MP 110 to MP 116, the County requests that vegetation removal and/or ground clearing be minimized to lessen impacts to environmental resources, specifically visual and biological resources.
- 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.

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 previous letters 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.

Attachments

2021.01.11 Mono wwec comments signed.pdf,2019.04.08 Mono comments.pdf,2014.05.27 Mono WWEC Letter.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Mono County
Community Development Department

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Mammoth Lakes, CA 93546
(760) 924-1800, fax 924-1801
www.monocounty.ca.gov

P.O. Box 8
Bridgeport, CA 93517
(760) 932-5420, fax 932-5431
www.monocounty.ca.gov

May 27, 2014

TO: Stephen Fusilier, Bureau of Land Management

Re: Response to Request for Information for West-Wide Energy Corridor Review

The Mono County Community Development Department appreciates the opportunity to respond to the Request for Information on the West-Wide Energy Corridor (WWEC) Review under way by the Bureau of Land Management, U.S. Department of Interior; Forest Service, U.S. Department of Agriculture; and Office of Electricity Delivery and Energy Reliability, U.S. Department of Energy. We also appreciate that the July 11, 2012, settlement provides for public input and an open and transparent process with engagement by local governments and other interested parties as part of the procedure for making potential revisions, deletions, or additions to Section 368 Corridors.

Mono County Involvement

To facilitate Mono County involvement in the corridor review, a Mono County Board of Supervisors workshop with the BLM will be scheduled in July to discuss the complex Section 368 WWEC process. 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, 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 July 31 in Mammoth Lakes, CA.

Corridor 18-23

Corridor 18-23 passes through sensitive environmental areas of Mono County, 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 and is adjacent to important cultural resources and several designated roadless and wilderness study areas. These areas provide essential connectivity corridors and seasonal migratory habitat for a variety of wildlife including mule deer and important habitat for species that are particularly sensitive to disturbance and require very large ranges.

The corridor passes through visually sensitive terrain and is visible from several designated scenic highways, locally designated scenic routes and wilderness areas. In addition to the formal protections and constraints provided by these designations, the physical terrain also presents development obstacles. In particular, the northern portion of the corridor in Mono County crosses rugged terrain through which pipeline development would be difficult.

While the Eastern Sierra has a past history of accommodating infrastructure to serve distant populations, this particular corridor traverses sensitive terrain challenging to additional development. The corridor currently accommodates the Pacific DC intertie, but with the issues mentioned above, the feasibility of additional infrastructure development within the corridor, including additional transmission lines or energy development projects, is questionable.

Mono County and its citizens have traditionally expressed concerns on placement of new corridors and possible expansion of existing corridors and energy development projects. Due to our remote location, scenic attributes and local sensitivities, large-scale energy development is not anticipated in Mono

County. Significant renewable energy development has already occurred in Mono County, including hydro and geothermal. Recent discussions by our Board of Supervisors have been more focused on the development of a distributed, point of use, energy grid.

Alternative Corridors

We are particularly interested in reviewing appropriate alternatives, such as a corridor through southwestern Nevada. It appears that such a corridor would transverse land less sensitive both environmentally and visually, coincide with other infrastructure including a major state highway, and potentially provide better transmission connectivity from the developing energy resources of central Nevada to the rapidly growing population centers of the Southwest.

Mono County Policy

Existing Mono County policy regarding energy corridors is contained within the Mono County General Plan, and is currently under review for updating; applicable policies include:

GOAL 7: Minimize the visual and environmental impacts of electrical transmission lines and fluid conveyance pipelines.

Objective 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.

Policy 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.

Action 1.1: Require selection of rights of way to preserve the natural landscape and minimize conflict with present and planned uses of land on which they are to be located.

Action 1.2: Encourage the joint use of transmission and pipeline corridors to reduce the total number of corridors and service and access roads required.

Action 1.3: Require the coordination of siting efforts so that other comparable utility uses can share rights of way in a common corridor where feasible.

Action 1.4: The County shall adopt a proactive position in the future siting of transmission and pipeline corridors by working with utilities and project proponents to specify those locations where transmission corridors are acceptable.

Action 1.5: Cooperate with the USFS and BLM in planning the use of utility corridors.

Policy 2: At the expense of the project proponent, comprehensive and detailed planning studies, including review of all feasible alternatives, shall demonstrate a clear need for new transmission lines or fluid conveyance pipelines, prior to the siting of these facilities.

Policy 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 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 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 6: Where transmission line rights of way cross major highways or rivers, the transmission line towers shall be carefully placed for minimum visibility.

Policy 7: Avoid diagonal alignments of transmission lines through agricultural fields to minimize their visibility.

Policy 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 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 10: Above-ground transmission lines shall be non-specular wire construction.

Objective B

Transmission and distribution lines shall not adversely impact wildlife or fisheries.

Policy 1: New transmission or distribution lines shall avoid open expanses of water and wetland, particularly those heavily used by birds. They shall also avoid nesting and rearing areas.

Policy 2: Avoid the placement of transmission or distribution lines through crucial wildlife habitats, such as deer fawning and migration areas.

Policy 3: Design transmission lines to minimize hazards to raptors and other large birds.

Sage Grouse Information

The Bi-State Action Plan for Conservation of the Greater Sage-Grouse Bi-State Distinct Population Segment (DPS), March 15, 2012, should be considered as new relevant information for the Regional Periodic Review. With over 82% of Mono County's private property within the proposed critical habitat for the Bi-State DPS, Mono County is pursuing all actions to avoid US Fish and Wildlife Service listing of the sage grouse as threatened or endangered. Mono County's primary focus is participation with the Bi-State Local Area Working Group in implementation of the Bi-State Action Plan and separately seeking legislative solutions to funding the action plan implementation. It should be noted that the Action Plan identifies the existing linear infrastructure such as Corridor 18-32 as a threat to sage-grouse.

Your consideration of these comments is appreciated. We look forward to future coordination and collaboration in the development of the Section 368 Corridor Study, beginning with the July workshop with the Mono County Board of Supervisors. Please call Associate Analyst Brent Calloway at 760.924.1809 if you have questions concerning these comments.

Sincerely,

Scott Burns
Director

cc: Jim Leddy, CAO
Mono County Board of Supervisors

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
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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

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



Sugimura



OWYHEE COUNTY BOARD OF COMMISSIONERS
COURTHOUSE P.O. BOX 128 MURPHY, ID 83650-0128
TELEPHONE (208) 495-2421

District 1 -Jerry Hoagland - P.O. BOX 128 MURPHY, ID 83650-0128
District 2 - Kelly Aberasturi - P.O. BOX 128 MURPHY, ID 83650-0128
District 3 -Chairman--Joe Merrick- P.O. BOX 128 MURPHY, ID 83650-0128

March 15, 2021

Erica Pionke, JD, PMP
BLM Realty Specialist Program Lead for Powerline Rights-of-Way and Energy Corridors
Bureau of Land Management
ATTN: HQRN, BLM Nevada State Office
1340 Financial Blvd.
Reno, NV 89502

And

Jeremy Bluma
Realty Specialist - PMP
Headquarters
Bureau of Land Management

Re: Additional Owyhee County Comment on Review of the Section 368 Energy Corridors
Regions 4, 5, and 6 Report

This document will be delivered electronically to Jeremy Bluma at iblumat@blm.gov and Erica Pionke at epionke@hlm.gov

Dear Ms. Pionke and Mr. Bluma:

This document provides additional comment to the Owyhee County Comment dated January 25, 2021.

Jim Desmond and Mary Huff of our staff have briefed us on the conversation you had with them on March 9th in regard to the revision of the Westwide Energy Corridor and particularly in regard to Proposed Corridor 36-228.

In the discussion our staff reiterated some of the points we have previously raised in written comments and by our staff at the 2019 Workshop in Missoula, Montana, that the currently proposed locations, even with the possible changes as noted in pages 75-78 of Volume 2 of the November 2020 Regions 4, 5, and 6 Energy Corridor Review Document, still contain significant adverse impacts to Owyhee County private lands as well as to the livelihood and quality of life of our citizens.

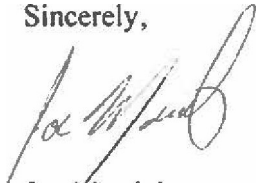
Included in the discussion with our staff members was the concern that a route south of Highway 78, as proposed in the Review Document would still have impacts to the private lands and businesses of our county. An example cited was through potential impacts to sage grouse habitat which would be likely to "trip triggers" as found in the BLM Sage Grouse Management plan. Loss of sage grouse habitat as would occur with the creation of a route south of Highway 78 would occur in intact habitat where there is little in the way of existing roads/infrastructure. Loss of that habitat would impact ranching and other uses of federal lands that are not necessarily located along the proposed corridor route as a mitigation effort is put in place on other federal lands to offset the harm from the corridor development.

Also discussed was the impact to the private lands in the County if the Corridor is proposed along its original route. That route had significant impact to the private lands in the county. Owyhee County land ownership is predominantly federal and state. Only 17% of the land in our county is in private ownership. Private land owners have, in the course of the Gateway West planning, made it abundantly clear through written statements that they will not willingly grant Rights of Way or easements across their lands. That sentiment is also valid in regard to the proposed Corridor.

During the course of the discussion, Mr. Bluma commented that the review process may ultimately reach the conclusion that there is no corridor route for 36-228 that is sufficiently viable as to be determined to be a preferred route and, thus, the route should be abandoned.

We most strongly concur with that view and urge the review team to reach that conclusion.

Sincerely,



Joe Merrick
Chairman

Jerry L. Hoagland
Commissioner

Kelly Aberasturi
Commissioner



GridLiance is an independent electric transmission utility holding company. GridLiance collaborates with rural electric cooperatives, municipal utilities, joint action agencies and others to plan for the future of the grid, invest in necessary electric infrastructure and implement strategies to improve system reliability and resiliency and reduce overall costs to customers. Based in Dallas, GridLiance operates more than 700 miles of transmission lines and related substation facilities in Illinois, Kansas, Kentucky, Missouri, Nevada and Oklahoma.

GridLiance West LLC, a subsidiary of GridLiance, was formed specifically to develop, own and operate transmission facilities within the California Independent System Operator (CAISO) region. GridLiance has particular interest in the Section 368 Energy Corridor Review for Regions 4, 5 and 6, because of GridLiance West's ownership of transmission facilities in the Nevada portion of the CAISO-controlled grid. In addition to GridLiance's current ownership of 165 miles of 230 kV transmission line in southern Nevada, the company is actively exploring upgrading existing 138 kV lines and building additional 230 kV lines proximate to the 18-224 368 Energy Corridor.

With that potential upgrading/expansion in mind, GridLiance submits the following comments and questions on the West-Wide Energy Corridor Regional Review for regions 4, 5 and 6.

At the outset, GridLiance states that it is generally in favor of the energy corridor concept. Any undertaking that facilitates the development and construction of new or upgraded electric transmission facilities on Western public lands is embraced and supported by the company. As anyone who has developed and constructed on federal land knows, the environmental and permitting processes can be lengthy, complicated and expensive, and to the extent that development in energy corridors eases any component of the process, it would be welcomed by the companies developing these projects.

GridLiance respectfully requests that the final Report address the following matters:

- How wide will corridor 18-224 be, and how many 230 kV lines will it be able to accommodate?
- Will transmission project proponents with projects in the vicinity of the corridor be encouraged or required to site their project in the corridor? If so, how far from the corridor would a proposed project have to be located before such requirements would not apply?
- Should proposed projects be encouraged or forced into the corridor, would an applicant with an existing application at the time of the corridor designation be provided preferential treatment over a subsequently filed application?
- What are the benefits of locating a project within a corridor?
- Will a transmission project within a corridor have the same or superior rights and privileges of project outside a corridor?
- Do corridors cross private as well as public land, and if so, how is private land treated in the process? Is the power of eminent domain available for use in the siting process?

Thank you for the opportunity to give input and please let us know if you have any questions regarding these comments.

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10088] - Webmaster Receipt
Date: Wednesday, February 3, 2021 5:43:35 PM
Attachments: [ID_10088_RobynThompsonCommentreducedsizepdf_Part1.pdf](#)

Thank you for your input, Robyn Thompson.

The tracking number that has been assigned to your input is **10088**. Please refer to the tracking number in all correspondence relating to your input.

Date: February 03, 2021 17:43:17 CST

First Name: Robyn
Last Name: Thompson
Email: ocnrkdir@aol.com

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

Input

I am submitting this comment for Robyn Thompson of 16033 Bates Creek Road, Oreana, Idaho who does not have computer capability.

She had originally attempted to have the document submitted prior to January 31, 2021 however it may not have uploaded due to its size of 22.4 MB.

I have split the document into three parts for upload and will do a separate upload for each part in order to remain under the 10MB limit for each document.

This is Robyn Thompson Comment Part 1.

James Desmond

Attachments

Robyn Thompson Comment reduced size pdf_Part1.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

January 14, 2021

Comments Re: Section 368
Energy Corridor Revised
Vol 2 - Regions 4, 5, 6
Corridor 36-228 (AKA) seq 9 of
the GNWTLF (Gateway West
Transmission Line Project)
Corridor 36-228 (AKA) seq 9E

Names: Ernie Breuer and
Robyn Thompson

Organization: Owyhee County Task
Force / GNWTLF and NWEC

Mailing Address 16033 Bates Creek Rd
Oreana, ID 83650

Phone Number 208-834-2337

Order of Comments:

- 1) History
- 2) Comment on 29-36
- 3) Agriculture
- 4) Sage-Grouse
- 5) Settlement Agreement

History

GWWTLP & WVEC

February 26, 2009 Attended meeting hosted by Owyhee County Planning & Zoning. Topic: GWWTLP. Their map did not discern private land from public. The map was 70 yrs old.

Feb 28: Looked over BLM maps noting that there are transmission lines in the SRBOP.

Mar 2 We located the albatross map from 2-26-09. and transferred it over on to BLM. Now we could see the impact to our home, community and the County @ large

Mar 3: Met with Jerry Hoaglund and presented our proposal to him; follow the existing 138 kV line to the existing 500 kV line @ Guffy and parallel that line to the sub station.

Mar - April tried to get the word out. End of April got my grubby paws on a list of affected land owners; 48 hours latter 4 pages were mailed to 179 residents.

End of April: Frank Bachman hosted an informational meeting; over 180 people attended. Frank asked, John Sullivan BLM in charge of the SRBOP NCA, if we are able to re-site GWWTLP would

4

the Corridor go with it. John's answer = yes. Two weeks later the Owyhee County task force was formed: Our mission --- we have every right to move the power line into public land. We have no right to shove our problem over someone else's head.

June 11, 2009. Kuna public meeting Kristy Pardue (Idaho Power) stated eminent domain can not be invoked if the property owner does not apply for a conditional us permit.

June 18, 09 OCTF presented alternatives to BLM and Tetratec. Rosey Thomas (BDO) insisted that the OCTF develop a southern route. Three members caved and started drawing 9E. Three other members started screaming @ them 1.) the map they were using was unclear regarding private land from public. 2.) They did not have the consensus of the OCTF let alone the BOCC and the property owners in Owyhee County. The line was drawn haphazardly and has haunted us every since.

August 11, 09 OCTF meeting Jim Nickerson and Walt Vering (both = Tetra Tec employees shared that

they flew over 9E and that there is noway any utilities could be sited in this geography. This very rugged terrain. The cost would be prohibitive, John Sullivan announced that the Department of Interior and the Department of Agriculture are being sued by environmental groups on behalf of 6 Western States because the Agencies had violated every aspect of Sec 368 of the 2005 Energy Act. These Agencies were served July 7, 09.

The BOCC, OCTF and the citizens of Owyhee County have never endorsed 9E or the original 9 (GWTLTP)

Sept 1, 2009 OCTF presented the alternatives to BOCC.

July 29, 2011 - October 28 = comment period for GWTLTP (DEIS.) They did not choose the Agencies preferred alternative making commenting extremely difficult and laborious and confusing.

October 2011: President Obama put GWTLTP on the "fast track" DEIS meetings were held in Boise, Kuna, Melba and Murphy. We went to all of these meetings. Where we had the pleasure of meeting Mr. Walt²⁵⁰ George. Murphy

6
had the highest turnout in the Treasure Valley.

At 6:55 pm, I was fortunate enough to get Mr George's attention. I showed him where the Joyce Ranch is located and the proximity to the community of Oreana, 10 miles to the east. There is absolutely no infrastructure in these 10 miles; not so much as a service line.

Siting 500 kV lines in Eastern Owyhee County would be an abomination. Mr George's response: that it looked to him that the corridor needed to be moved. January 13, 2012 President Obama sent the Interagency Rapid Response Team for Transmission to Boise ID. Owyhee County had to share one hour of their time with 4 other counties and the city of Kuna. In the last 5 min. of this hour Diane (the monitor of this information gathering team) asked what went wrong with the scoping process for the GWWTL? I flew out of my seat rattling off the Agencies violations of Sec 368 - trembling with fear - mindful of the fact that I ^{was} addressing

9 cabinet Head's appointed by President of the United States of America

February 2012 the BDO-BLM sent a map to the BOCC. At the Feb 27, '12 coordination meeting the BDO identified their preferred alternative; the only alternative the BOCC endorsed - alternative 9D.

Finally a hard earned 100% consensus from Owyhee County citizens, OCTF, BOCC, ID State representatives / Senate, Governor Butch Otter, The 1st Congressional District and Idaho Power!

April 2012 Walt George, Steve Ellis and Donald Simpson traveled to Washington D.C. to bring the BDO-BLM's preferred route for seq 9 "across" the finishline. An E-mail dated April 27th 2012 from Cecil Werven (BDO-BLM) to Karen Steenhof (expert on raptors and OCTF member) informing us that "the Washington DC office does not want to allow any more transmission lines in the NCA because it would establish a bad precedent for the other 15 NCA's.

8

September 2012 the BLM re-leased their preferred alternatives for Segment 9. This new alternative pushed the GWWTLP out into the rugged terrain of 9E, the swung back south into Oreana over 5 OCTF members properties as well as other Owyhee County land owners.

July 3, 2012 As you know the 9th district court decided on behalf of the plaintiffs for violating every aspect of Section 368 of the 2005 Energy Act. Thus - here we are. We will specifically address issues we have with 9 & 9E (AKA 36-228 & 29-36.) within this comment.

September 2013 We were advised by Walt George to ask for "phasing" in our next public comment. This would get us back to the table regarding the siting of seg 9. We accomadated the Agency in spades!

The Agency complied. The Agency's decision was to assign the RAC to look @ all possible

routes where seg 9 could be sited. The RAC committee appointed select members to address this issue with an open mind. This committee chose Karen Steenhof and Neil Rimbey as co-chairs. Walt George attended, traveled from Wyoming to assure us that this issue would be resolved to our satisfaction. He had put off his retirement for 2 years and was convinced that we were in good hands. The Agency stated that they would abide by the decision of the RAC committee. Jim Stobaugh from Reno filled Walt's shoes. 3 OCTF members and Joe Merric (Owyhee County Commissioner and now a member of the RAC committee) attended all meetings from Dec 5, 2013 until May 2014. This was a very diverse group. John Chatburn, Administrator, Idaho Department of Energy, provided for two field trips; boots on the ground for every proposed route. The end of May the RAC recommended 9.D (GWWTLF) in the SRBOP; the very route we had been endorsing since Mar 1, 2009

10

March 11 - June 9, 2016 The Agency released the ROD. Owyhee County would take a double hit. Both segments 8 & 9 would enter the east boundary of Owyhee County 250 ft. apart; crossing the Wild and Scenic River - right over the sign declaring this status October 2, 1968 by Lyndon B Johnson, impacting farms and ranching through Eastern Owyhee County to the Hemingway Substation. The 10 miles between the Joyce Ranch that Walt George agreed with the OCTF (that the WVEC needed to be moved) would now have 2 500kV lines plopped where there is not so much as a service line in it.

The GWWTLP no longer consumes us. We have been vindicated by our 1st or 2nd Congressional Districts. Our Congressmen drafted HR 2104 signed into law May 2017!

Comment:
Reference DEIS GWWTLP
Table 2.2-8 pg 2-202

According to this table the proposed 36-228 (AKA) Seg 9 of the GWWTLP has 6 residences within 300 ft of the center line, 9 residence within 1,000 feet.

This is woefully inaccurate.

Owyhee County has 13 homes within 300 ft of the centerline of 36-228, 40 homes within 1,000 ft of 36-228. There are 197 homes homes within the 2 mile wide corridor (36-228).

This information was deduced off of a 911 map obtained from the Owyhee County Assessors Office.

A VERY SMALL SAMPLING OF THE PEOPLE *AND* PROPERTIES AFFECTED SY THE WEST WIDE ENERGY CORRIDOR. Many photographs have already been submitted in previous comments.

Presented by Robyn Thompson with a little help from her friends.

As you look thur this presentation please try to internalize the impacts as if you are an Owyhee County resident.

This presentation is also applicable to:

- 3.3 Cultural Resources (including History)
- 3,4 Socioeconomics
- 3.18 Agriculture
- 11,4 Cumulative Impact Analysis

Oreana, Idaho



Great Aunt
Rosanna Rooks
Sister to Alice

Great Grandmother
Kate Robinson Rooks
Mother to Alice & Rosanna

Grandmother
Alice Rooks Youman
Mother to:
Mildred Youan Smith

As you can see these women are Native American. Mildred Smith had nine children. Four of her children still live in the community of Oreana. Three of these children (now in their eighties) are eligible to live on the reservation. Financially they would be better off. The "children" choose to stay in Oreana; it is their **HOME**, Wayne Smith lives out Rye Patch with his wife, son and daughter-in-law and grandchild. The other three "children" all own property in the west wide Energy Corridor. Alvie (Ann) Smith, Darlene (Smith) Maiden, lives with her son Doug and last but not least Reed Smith who is a widower and lives alone. None of these people endorse any Alternatives this side of the Snake River. The Smith Family only endorse Alternative 1.

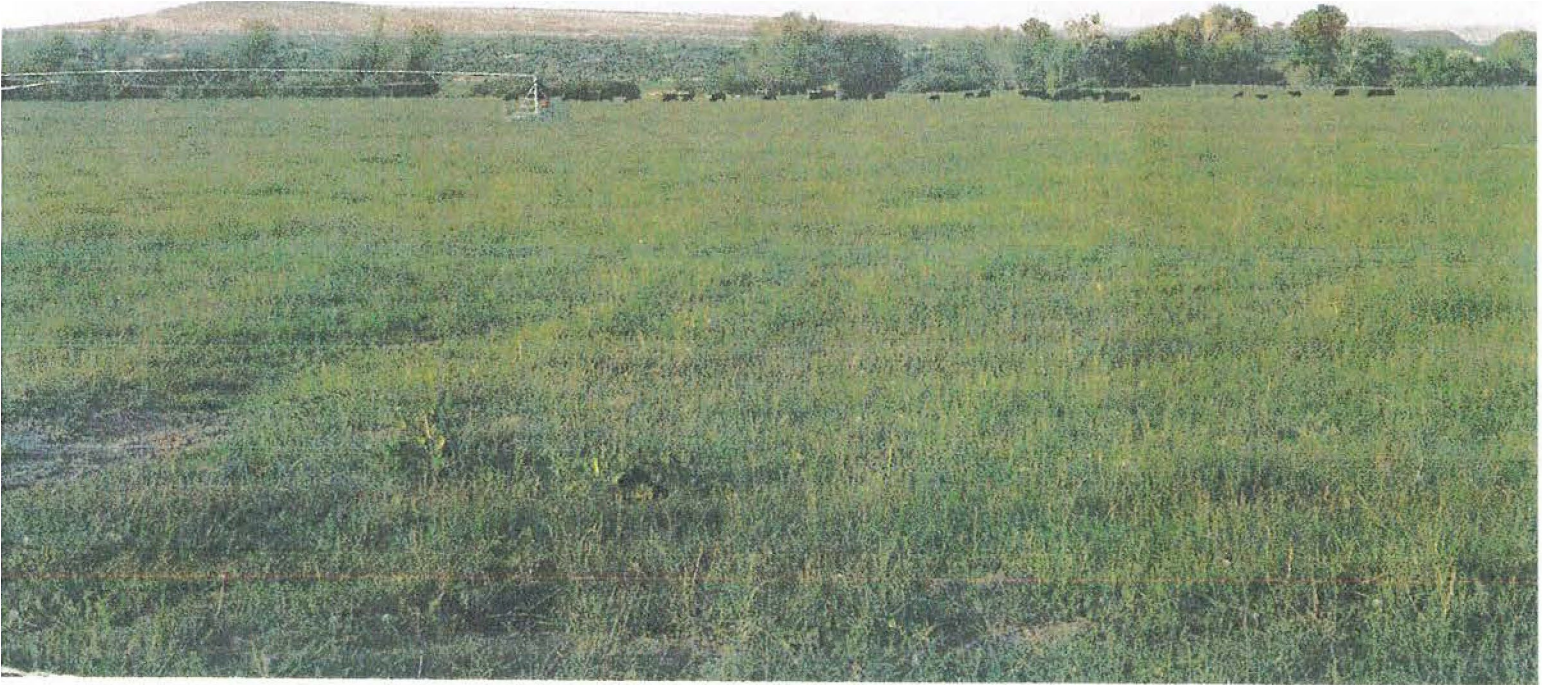
Mr. & Mrs. Merv Robinson

Oreana, Idaho



Oreana, Idaho has been Peggy's home her **entire life**. Merv moved to Owyhee County in the 1940's. No one will admit how, long; they were married (sadly Merv passed in 2014). As you can see they *were* a team. They spent many decades together ranching and farming. Merv personified Paul Harvey's "So God Made a Farmer." Peggy spent some years as an Owyhee County employee. Peggy is also an accomplished artist, oils and sketches.

Peggy grew up on the property known as Cal & Susie Low's. You just saw pictures of the Low's property in the 8G/9k pictorial. The house Peggy grew up in was demolished a few years back; a sad chapter in Peggy's life. Peggy now lives in the home her Dad built. This picture was taken by Bev White on Peggy's deeded ground when the Whites & Robinson's cut Christmas trees. Peggy's home is in the west wide Energy Corridor. She only endorses Alternative 1.



The Hyde Ranch

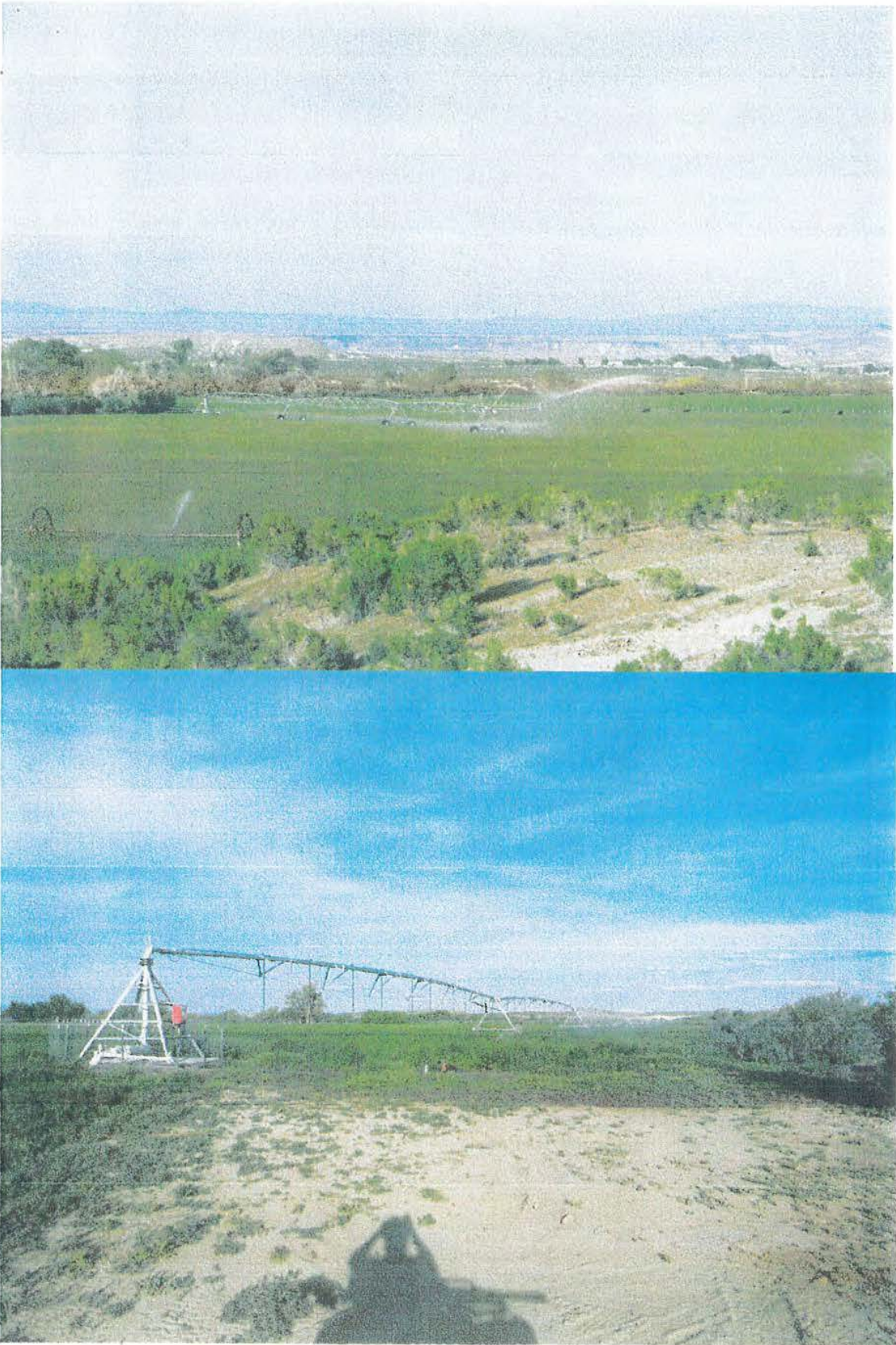
bill & Bev White, owner's

Oreana Loop Road Oreana, Idaho

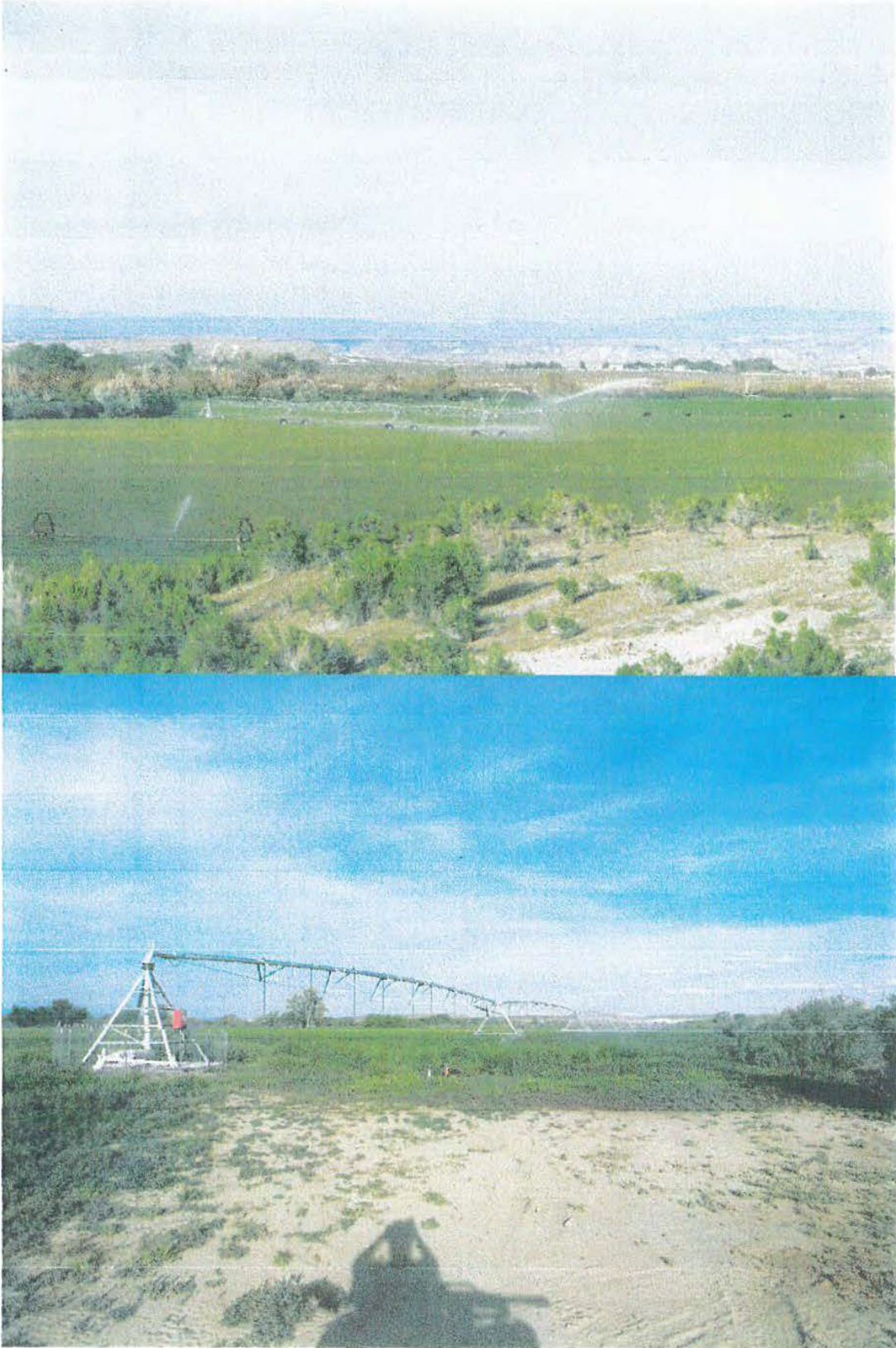
Bill & Bev married in 1979. They worked hard, purchased this historic property and resurrected it into what you see today. Bill has received many awards for his Black Angus cattle. They are a one man one woman operation. They raised four kids here. They spent years as 4-H leaders. They maintain The Oreana Community Hall, located on this property, as well as Our Lady Queen of Heaven Catholic Church. Bev has only taken pictures of their property that are located in the West-wide Energy Corridor.











WORKING THE LAND

Three weeks to travel America's heartland to capture the essence of the farmer hardly seemed adequate time, but it proved enough for the ten world-class photographers assigned to the task.

Their inspiration: a speech titled "SO God Made a Farmer," delivered decades ago by legendary radio broadcaster Paul Harvey to a room full of future farmers.

The goal: to create the visual backdrop for a television commercial celebrating the Year of the Farmer.

The two-minute tribute, which aired during Super Bowl XLVII, stopped the nation in its tracks, reigniting an appreciation of the spirit of American farmers and their staggering contributions to this country. Thirty-five images slowly emerged, one after the other, on the screen that day, while the dulcet voice of Harvey-known for his weekly radio stories from the Midwest echoed about the exceptional day-in, day-out understanding that is the life of a farmer.

When Ram Trucks unearthed the broadcaster's original recording and paired it with the collection of stunning images, little did anyone anticipate the incredible response from all walks of American life. Notes, e-mails, phone calls and letters poured in from those who were moved by this timeless anthem to farmers around the country. 1

The next 3 pictures you are about to see are the last (but certainly not the least) of this pictorial. These pictures are from the 2013 Super Bowl XLVII commercial featuring Oreana's own Bill White, farmer/rancher and Past President of the Owyhee Cattlemen's Association.

1. PUBLISHED BY "THE NATIONAL GEOGRAPHIC SOCIETY
1145 17th Street, N.W. Washington, D.C.
20036-4688 U.S.A.
www.nationalgeographic.com/books

So God made a farmer
Paul harvey

And on the eighth day, God looked down on His planned paradise and said,
"I need a caretaker. " So God made a farmer.

God said, "I need somebody willing to get up before dawn, milk cows,
work all day in the fields, milk cows again, eat supper, then go to
town 2nd stay past midnight at a meeting of the school board So God
made a farmer.

"I need somebody with arms strong enough to rustle a calf and yet
gentle enough to deliver his own grandchild. Somebody to call hogs, tame
cantankerous machinery, colle home hungry, have to wait lunch until
his wife's done feeding visiting ladies, then tell the ladies to be
sure and come back real soon-and mean it." So God made a farmer.

God said, "I need somebody willing to sit up all night with a newborn
colt and watch it die, then cry his eyes and say, "maybe next year. "
I need somebody who can shape an ax handle from a persimmon sprout,
shoe a horse with a hunk of car tire, who can make harness out of hay wire,
feed sacks and shoe scraps. Who, planting and harvest season, will
finish his forty hour week by Tuesday noon, and then pain'n from 'tract-or
back,' put another seven-two hours." So God made a farmer.

God had to have somebody willing to ride the the ruts at double speed
to get hay in ahead of the rain clouds and yet stop in mid-field and
race to help when he sees the first smoke from a neighbor's place.
So God made a farmer.

God said, "I need somebody strong enough to clear trees and heave bales, yet
gentle enough to yean lambs and wean pigs and tend the pink combed pullets,
who will stop his mower for an hour to splint the broken leg of a meadowlark.

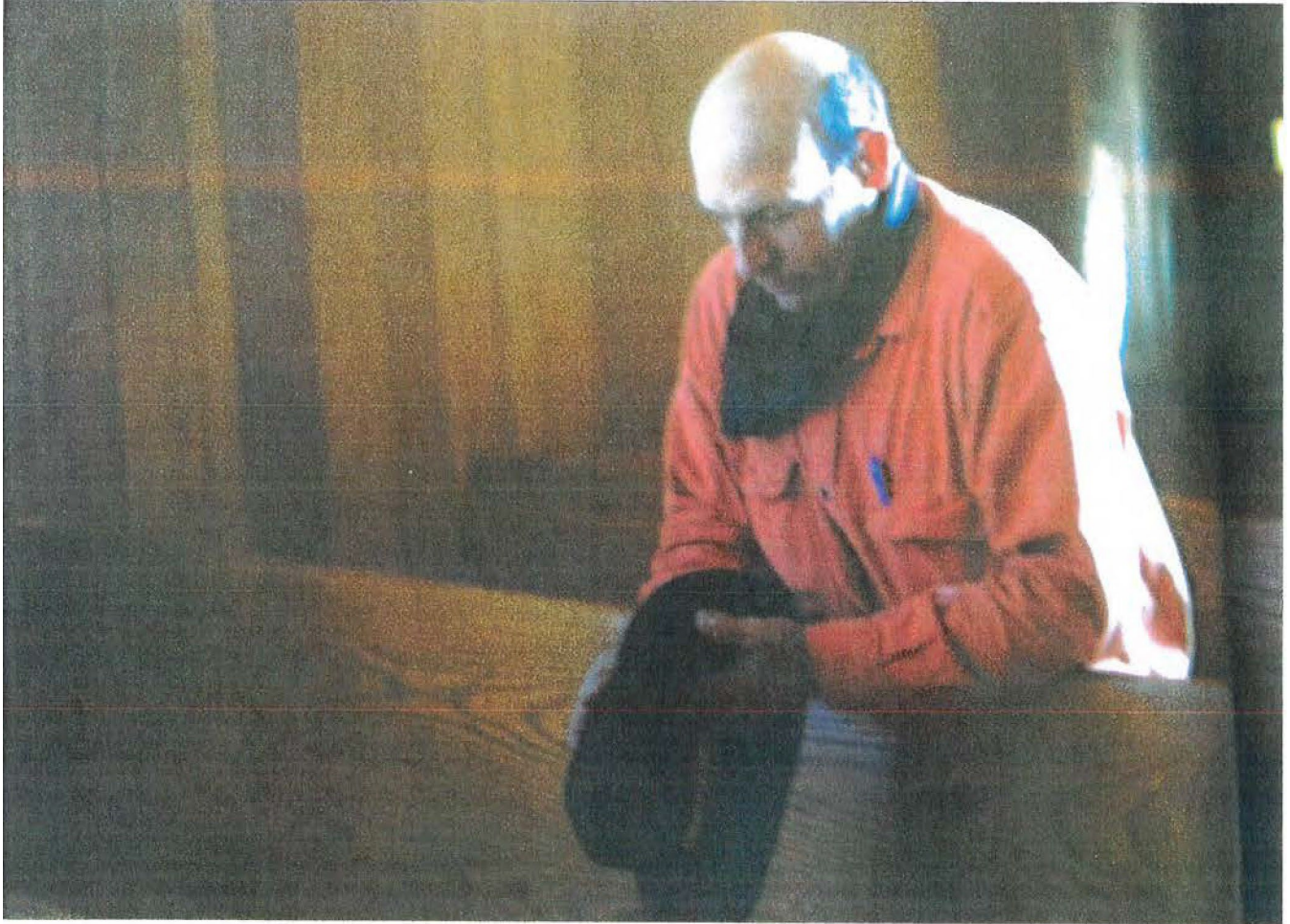
It had to be somebody who'd plow deep and straight and not cut corners.
Somebody to seed, weed, feed, breed and rake and disc and plow and plant
and tie the fleece and strain the milk and replenish the self-feeder
and finish a hard week's work with a five-mile drive to church.

Somebody who'd bale a family together with the soft, strong bonds of sharing,
who would laugh and then sigh, and then reply, with smiling eyes, when his
son says he wants to spend his life "doing what Dad does".

So God made a farmer.







Oreana's own Sill hite, inside the Our Lady Queen of Heaven Catholic Church (listed as Registered Historical Site), and also located in the West Wide Energy Corridor. We are all praying the Agency will choose Alternative 1.

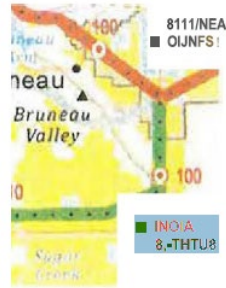
A PICTORIAL PRESENTATION OF ALTERNATIVES 8G /9K OWYHEE COUNTY, IDAHO

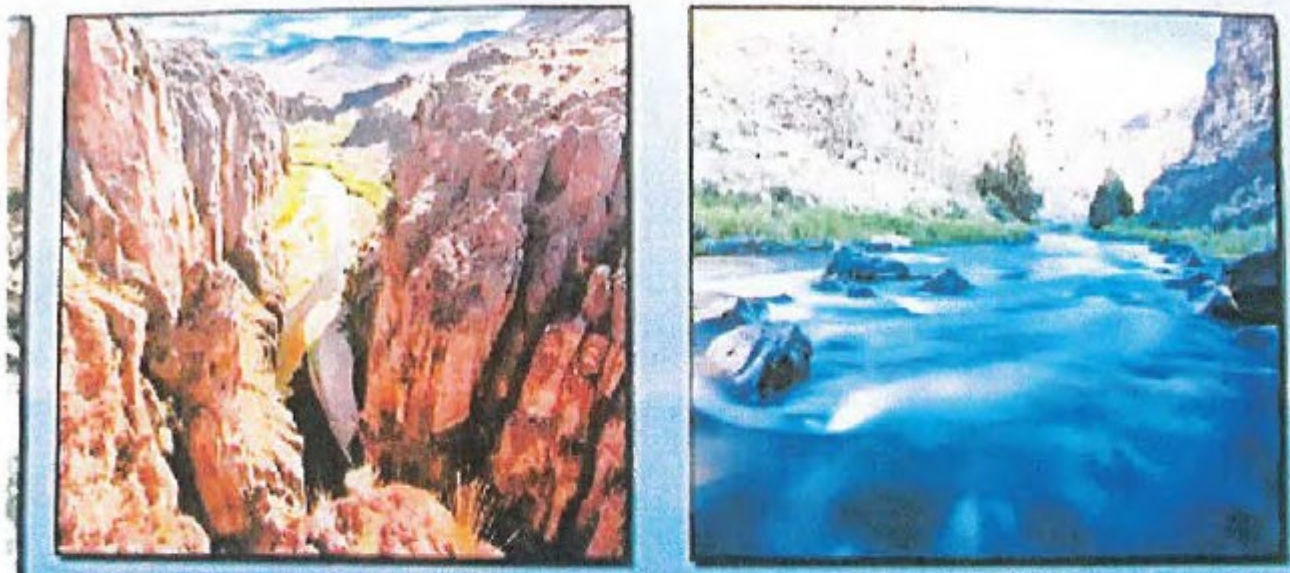
Directed by John Chatburn and staff

With the assistance of the Owyhee County Commissioners, Joe Merrick, Chairman and the Owyhee County Task Force: Frank Bachman Chairman Karen Steenhof Ernie Breuer, Robyn Thompson and Leah Osborn.

May 18, 2015

The below photos are of the Bruneau Buckaroo Ditch Company Diversion Dam out of the Bruneau River.





In the past 50 years, we have learned - all too slowly, I think - to prize and protect...precious gifts. Because we have our own children and grandchildren will come to know and come to love the great forests and the wild rivers that we have protected and left them...an unspoiled river is a very rare thing in this nation today. Their flow and vitality have been harnessed by dams and too often they have been turned into open sewers by communities and by industries. It makes us all very fearful that all rivers will go this way unless somebody acts now to try to balance our river development.

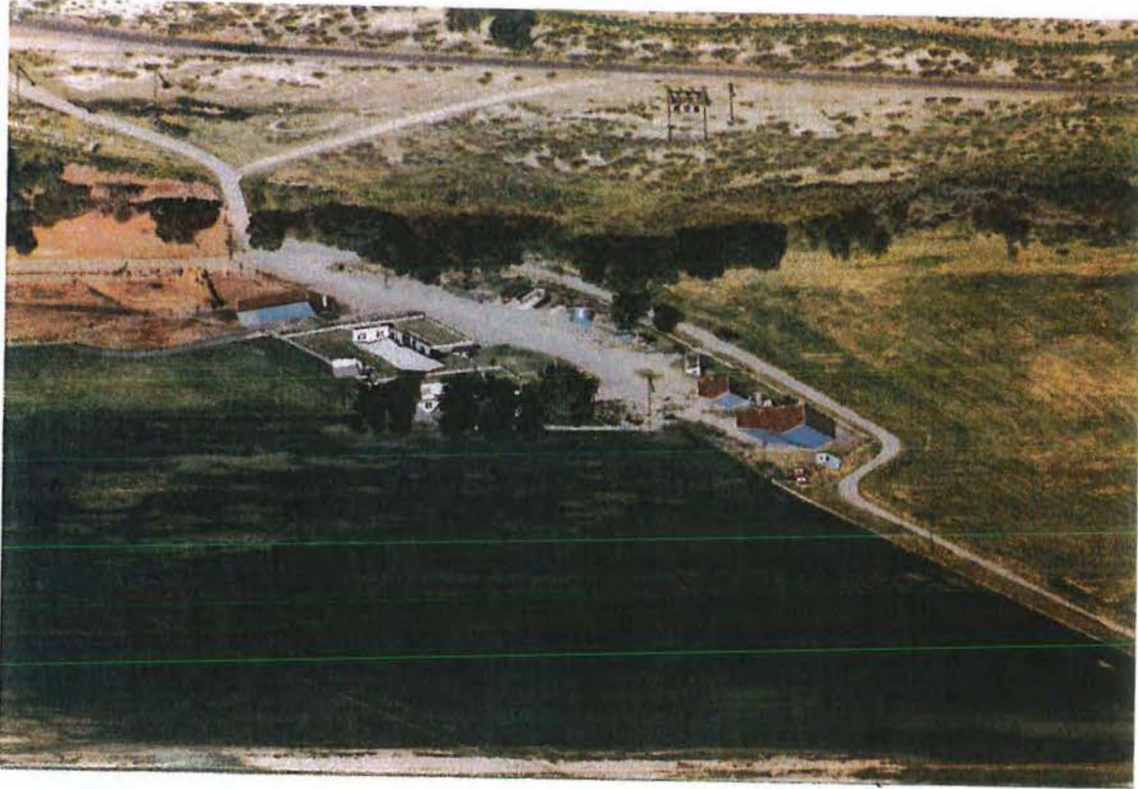
-President Lyndon B. Johnson on signing the Wild & Scenic Rivers Act, October 2, 1968.

Please refer to the previous page. 9K and 8G/9K parallel this portion of the Burneau Wild and Scenic River. These 500kV lines cross the river just to the south of this sign.

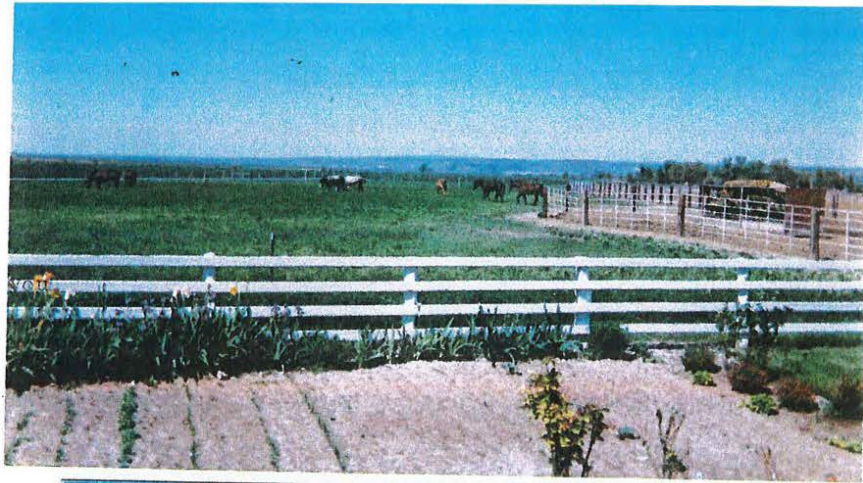
We do not understand.

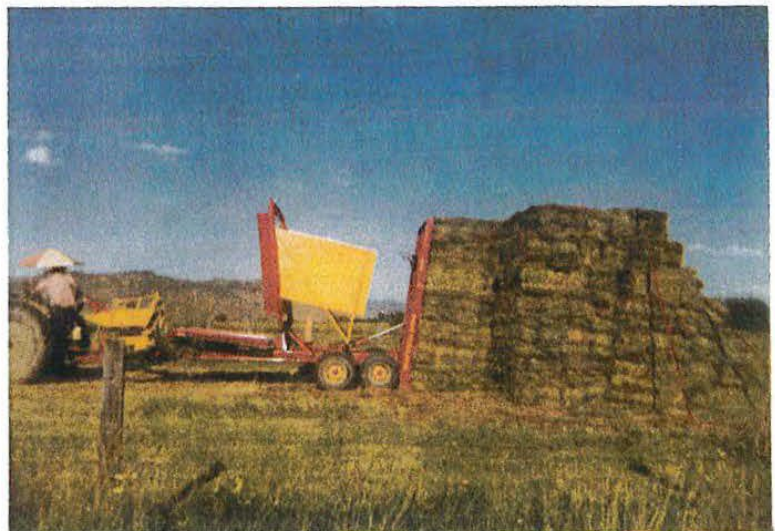
WE DO NOT UNDRSTAND!

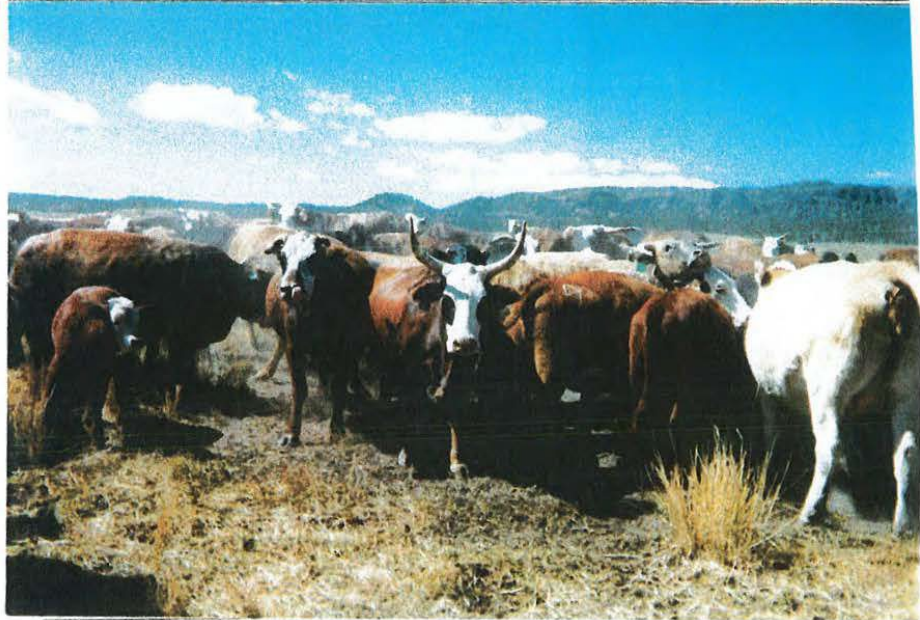
The King Ranch
Oreana Loop Road
Oreana, Idaho

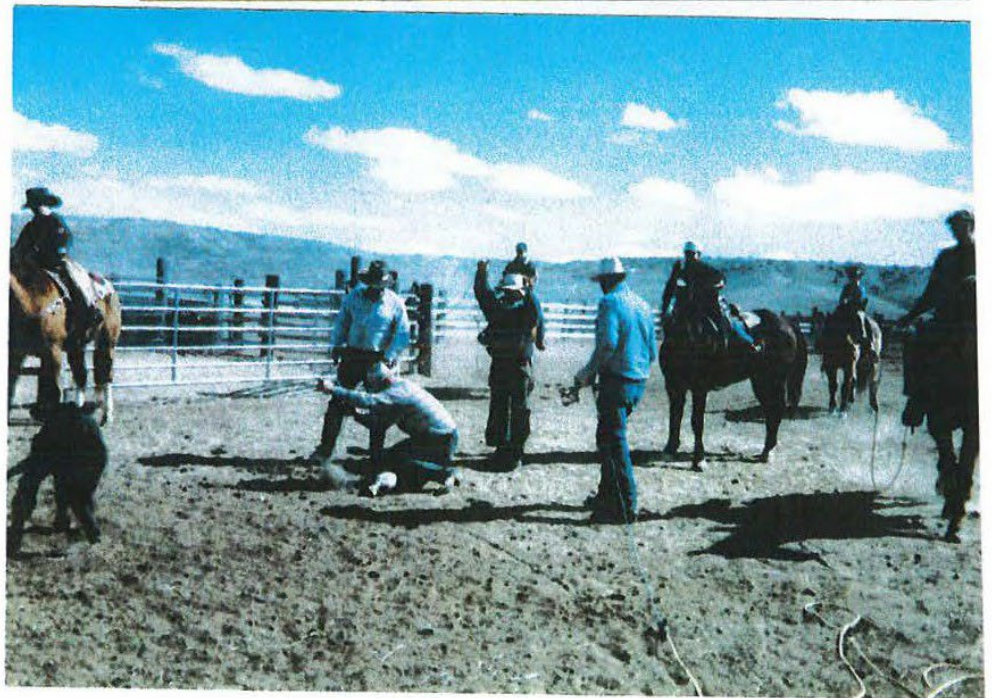
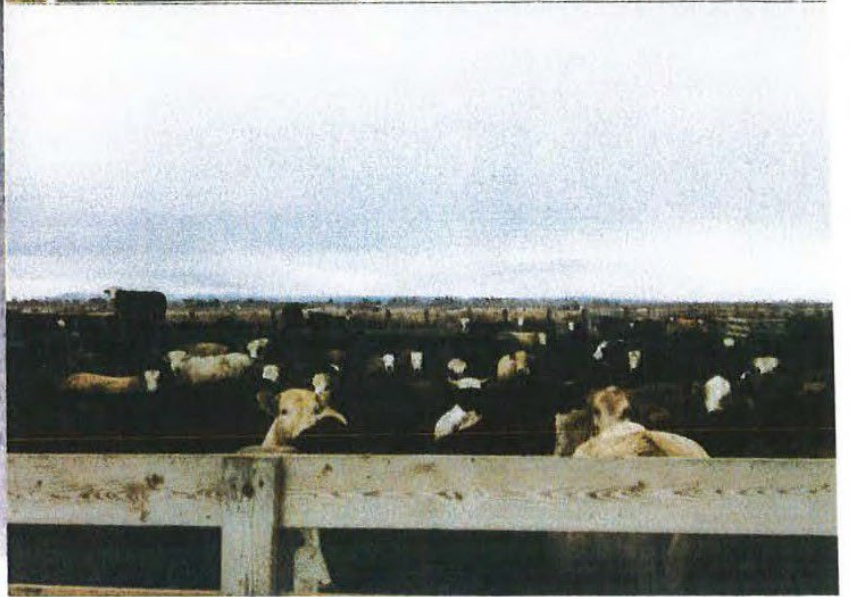
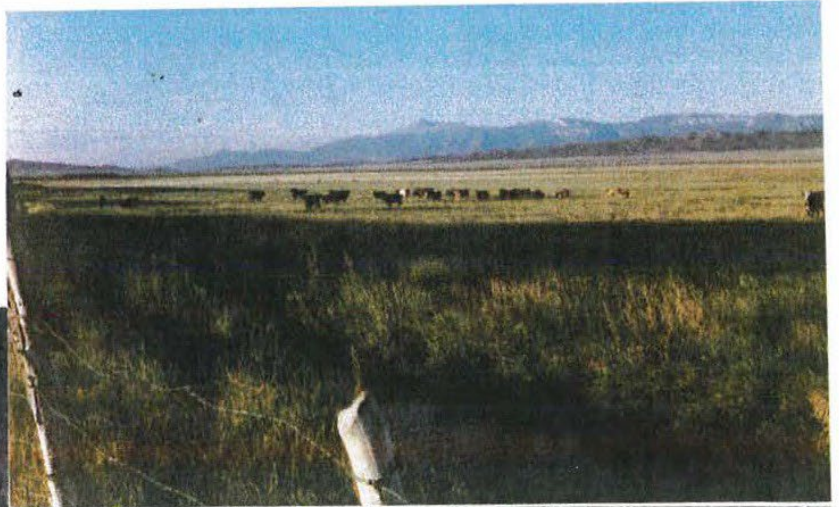
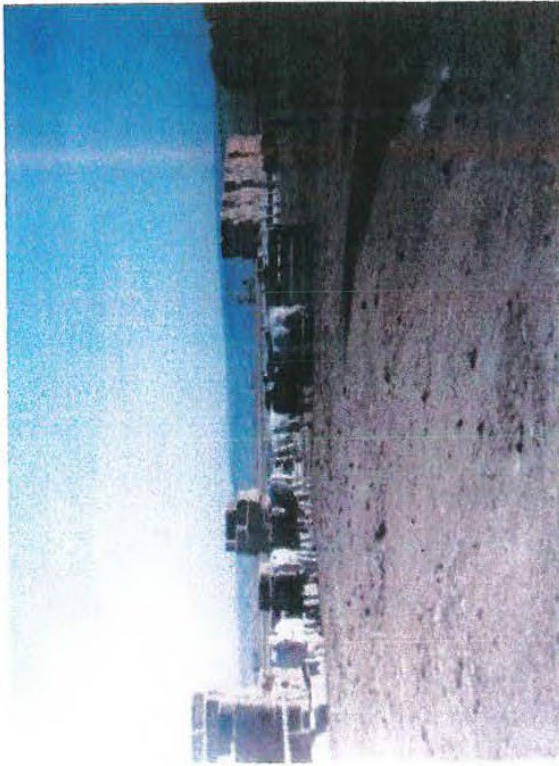


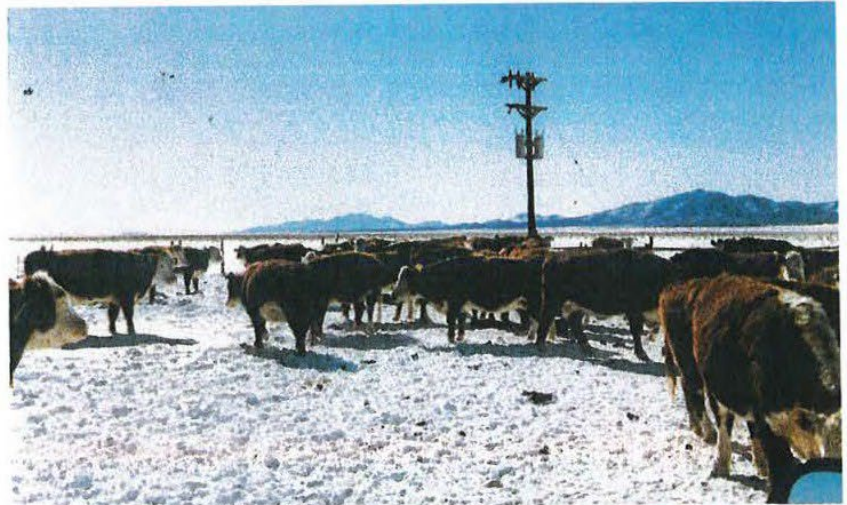
As you can see this is a family owned Farming / ranching Operation. King met as teenager's. Every picture you see they scratched and scraped for. Their children and grandchildren learned how to work from a very young age. This property is on the edge of 8G/9K. Pose (Gordon has passed) only endorses Alternative 1.











Cal and Susie Lowe's property on Oreana Loop Road

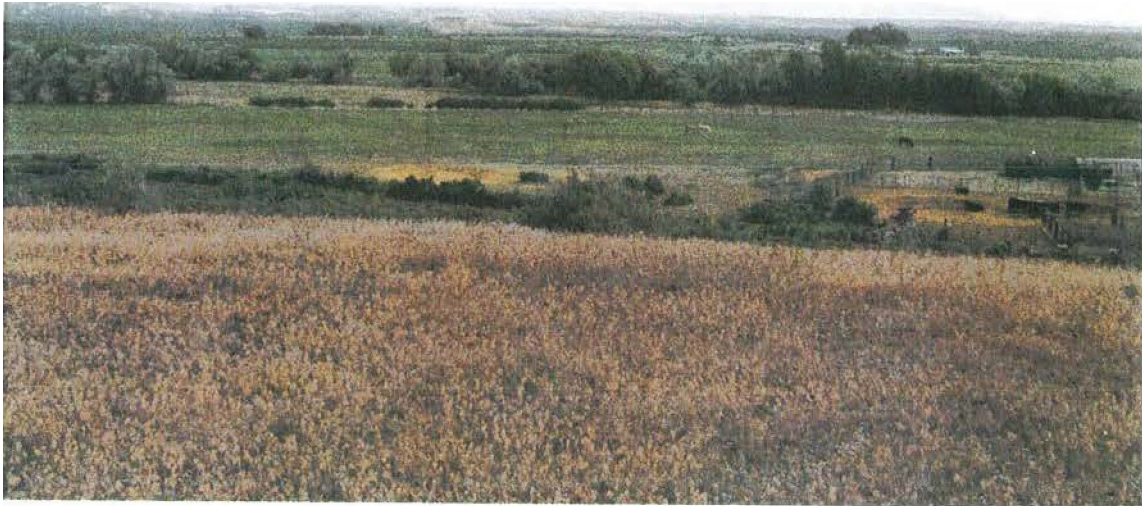


The east 500kV line is 250 feet west of this home.

The Lewis Ranch on Oreana Loop Road



The Lowe's Property continued



The west view from Cal & Susie's living room. 8G/9K would traverse just right of center of this picture; 425' to the east of Forman's (Reservoir Historic) and 425' to the east of John Fuquay's home.

The Lewis property continued



The east view from the front of the Lewis home. The west 500 kV line =5/8 mi east of home.

The west view (living room, dining room & kitchen) of this property. Note: Forman's Reservoir (left) & the Fuquay property just right of center.



The Thomas Brothers Ranch on Short Cut Road.



Bob and Kelly Thomas's home. The west 500 kV line= 936 ft east of this home.

The southern view off the deck of this home. These are geothermal hot ponds.

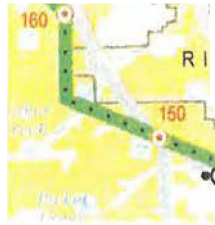




Julie Magee purchased this high end horse property complete with an inclosed arena on March 24,2014. At that time this property was not effected by the Gateway West Transmission Line Project; it is now! Her lovely new home/ranch is in the new corridor of 9K & 8G/9K., Had this been the case in March 2014 she would not have made this transaction.

NOT FAIR!

The Joyce Ranch



8G/9K would slash through these registered historical sites.



Mr. Paul Nettleton's home 1.25 mile from the east 500 kV line

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

Section 368 Energy Corridor Regional Review

 **IDAHO
FARM BUREAU**

Quarterly

A PUBLICATION OF IDAHO FARM BUREAU

Spring 2015 Volume 15, Issue 2

MJ

ESTABLISHED 1865

J

**THE
JOYCE RANCH**

OLDEST FAMILY-OWNED RANCH IN IDAHO

JOYCE LIVESTOCK CO., LTD.

Paul Nettleton, General Manager

**Idaho's Oldest
Ranch Celebrates
150 Years
- pg. 41**

**Sheep Shearing
Photos, Raw Milk
& GMO Labeling
Articles**

**Food Page,
Word Search
and Much More
Inside**

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

Section 368 Energy Corridor Regional Review

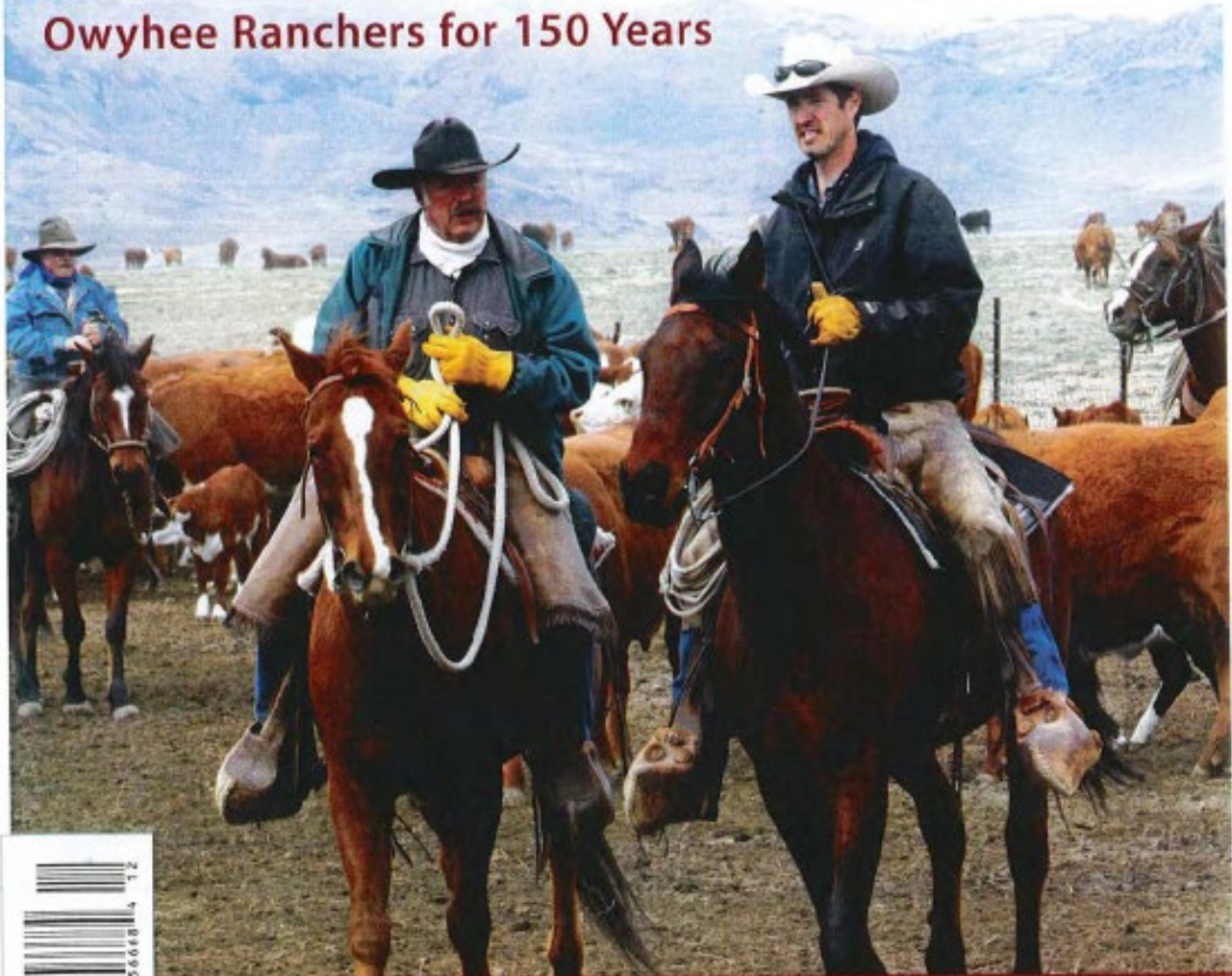
IDAHO

magazine

DECEMBER 2015 | VOL. 15, NO. 3

The Real Deal

Owyhee Ranchers for 150 Years



US \$3.50

Reubens
Spotlight City

Heeding the Call
Of the White Clouds

You'll Be Glad
Back in Big Creek

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From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10089] - Webmaster Receipt
Date: Wednesday, February 3, 2021 5:46:26 PM
Attachments: [ID_10089_RobynThompsonCommentreducedsizepdf_Part2.pdf](#)

Thank you for your input, Robyn Thompson.

The tracking number that has been assigned to your input is **10089**. Please refer to the tracking number in all correspondence relating to your input.

Date: February 03, 2021 17:45:57 CST

First Name: Robyn
Last Name: Thompson
Email: ocnrcdir@aol.com

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

Input

I am submitting this comment for Robyn Thompson of 16033 Bates Creek Road, Oreana, Idaho who does not have computer capability.

She had originally attempted to have the document submitted prior to January 31, 2021 however it may not have uploaded due to its size of 22.4 MB.

I have split the document into three parts for upload and will do a separate upload for each part in order to remain under the 10MB limit for each document.

This is Robyn Thompson Comment Part 2.

James Desmond

Attachments

Robyn Thompson Comment reduced size pdf_Part2.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

- Gateway West Transmission Line Project Segments 9 and 9E: The personal impacts to Ernie Breuer and Robyn Thompson, Oreana, Idaho.

February 26th, 2009 we began our journey of education and active landowner solutions to minimize the impact of segment 9 to private property owners, ranchers and farmers in Owyhee County. I have previously submitted a lengthy public comment dated October 22nd, 2011 primarily regarding the multiple impacts to landowners of segment 9 so I will not be redundant. We purchased a home September 2004 that is now in the 2 mile wide WWE Corridor of segment 9.

We were present at all meetings of the Owyhee County Task Force of which alternatives 9 D and 9E evolved with the inclusion of Idaho Power, Tetra Tech BODBLM and Owyhee County BOCC. We know exactly where the 2 mile wide WWE Corridor is on the map as well as the 2-mile swatch for the County Commissioners proposal of 9E.




We purchased land Feb 2011 for the sole purpose to escape from living in the WWE Corridor and Segment 9 Gateway West. We have worked tirelessly to build our new nest; spending months cleaning up trash, moving an old home off the property, building a brand new home (doing 1/3 the amount of work ourselves) and erecting a 60' x 50' R&M Steel Building ourselves, an ambitious undertaking for a

67 year old man and a 54 year old woman. We have done much of this work ourselves because we had to in order to financially pull off this endeavor. Our bank accounts are both now depleted all in order to escape Gateway West. You can imagine our devastation as we have become aware of BLM's significantly altered proposed 9E, the centerline right between our new home and that of our closest neighbor.

This is a huge injustice to say the least. It flies in the face of fairness and decency to so substantially impact citizens. The mission of the Owyhee County Task Force was to protect every landowner in Owyhee County and we actually managed to do that with our submitted alternatives. Alternative 9D is still the alternative that has 100% support of the landowners in Owyhee County and the Owyhee County BOCC because of the minimal impact to private property rights, agriculture, our economy, our history, our culture and our health.

During the development of Alternative 9E one of the Tetra Tech maps mistakenly took the course that the current BLM Alternative now takes. The property owners on Bachman Road, Bates Creek Road and on Sinker Creek flamed out, justifiably so. The Owyhee County Task Force caught the mistake during this process and saw to it that these Oceana and Murphy property owners were protected. None of these property owners have changed their minds regarding the siting of Gateway West. Only 17 % of Owyhee County is privately owned. The new BLM proposed alternative would hugely affect two or more homes on Bates Creek Road wherever you place Gateway West in the 2-mile wide corridor. All of these properties are agricultural. The BLM's new proposed 9E will negatively impact our ability to irrigate, fences will have to be grounded to reduce hazards to livestock. All of these properties have cultural/historic significance. The Jess ranch has been family owned since the early 1900's. Paul Nettleton's (the Joyce Ranch) is family owned/ operated since 1865; the longest owned ranch in the history in the state of Idaho. Folks have been running cattle through our property, as long as there have been cattle in Oreana.



Every US Citizen is painfully aware of the downturn of the economy and the loss of wealth to every homeowner /landowner in the state of Idaho. Two of our new neighbors spent over 4 years attempting to sell their properties on Bates Creek Road. Both property owners had to settle for leasing their homes /properties at a much reduced rate from their initial asking price. We already cannot recoup our money if we try to sell either one of our Oreana properties. The BLM Preferred Alternative is not going to "sweeten the deal". The potential for any future wealth, income is also stricken for us. Our option to subdivide our property in our old age to sustain us financially is being stolen from us.

Last but not least and sadly the only point that has the potential to be effective is the Sage Grouse issue. We are aware in Owyhee County that the plight of the Sage Grouse is "delicate". The addendum to the DEIS "Effects of the Proposed Project on Greater Sage Grouse" well documents the negative effects of 9E (as well as 9) to Sage Grouse. Moving Segment 9E 3 ½ miles onto our private property does not negate this effect. The BLM has a seasonal road closure on the Federal Land just to the south of all the private land of the new 2 mile corridor of the BLM's altered

9E.



The BLM cannot have it both ways! They cannot close roads due to Sage Grouse habitat and then run a 500 KV line right over said property. That is preposterous!!!

Thank you so much for attention and efforts in regards to this most pressing issue.

Respectively,

Ernie Breuer and Robyn Thompson

Comment on corridor 36-228 (AKA 9E)

As you can see this is beautiful but very rugged land scape. Pipelines thru this area would greatly damage the beauty of this land, not to mention the damage to wildlife, sage grouse, Antelope etc.

At a Aug 11, 09 OCTF meeting Jim Nickerson and Walt Vering (Tetra Tec employees) stated that, that terrain was too rugged for power lines. That would make it far too rugged for pipelines. Not only would the many canyons to be bridged or siphoned cause a construction nightmare, Also to inspect and repair leaks, would be extremely difficult. The bad winter weather would only add to the problem

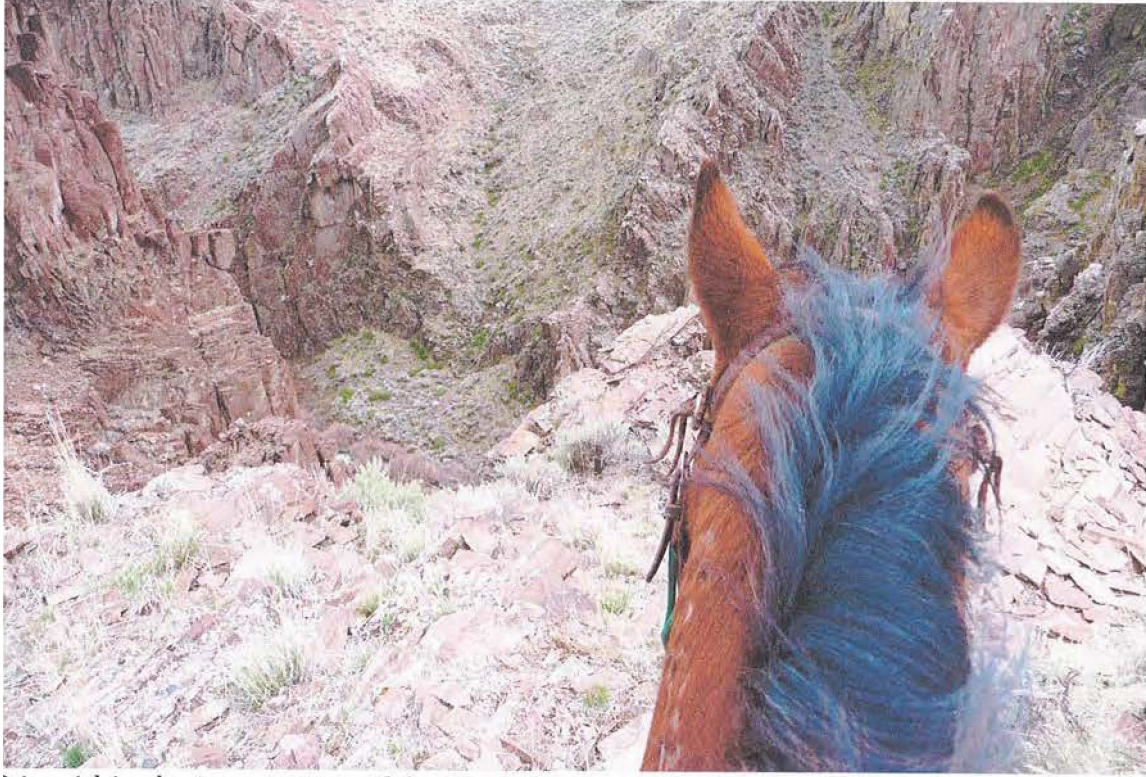
Therefore: 36-228 (AKA 9E) is not a suitable route for Pipelines

Ernest Brewer

OCTF member

Robyn Thompson
OCTF Secretary

Segment 9 of the BLM Preferred Alternative will have a negative impact on non-consumptive recreationist. Horseback riders, walkers, mountain bikers, motorized vehicle users and sightseers. The BLM Preferred Alternative will have a negative impact on the quality of the experience. This area of Owyhee County is serene and beautiful.



The view(above) is within the impact area of the BLM Alternative og Segment 9. Castlecreek, Owyhee County.

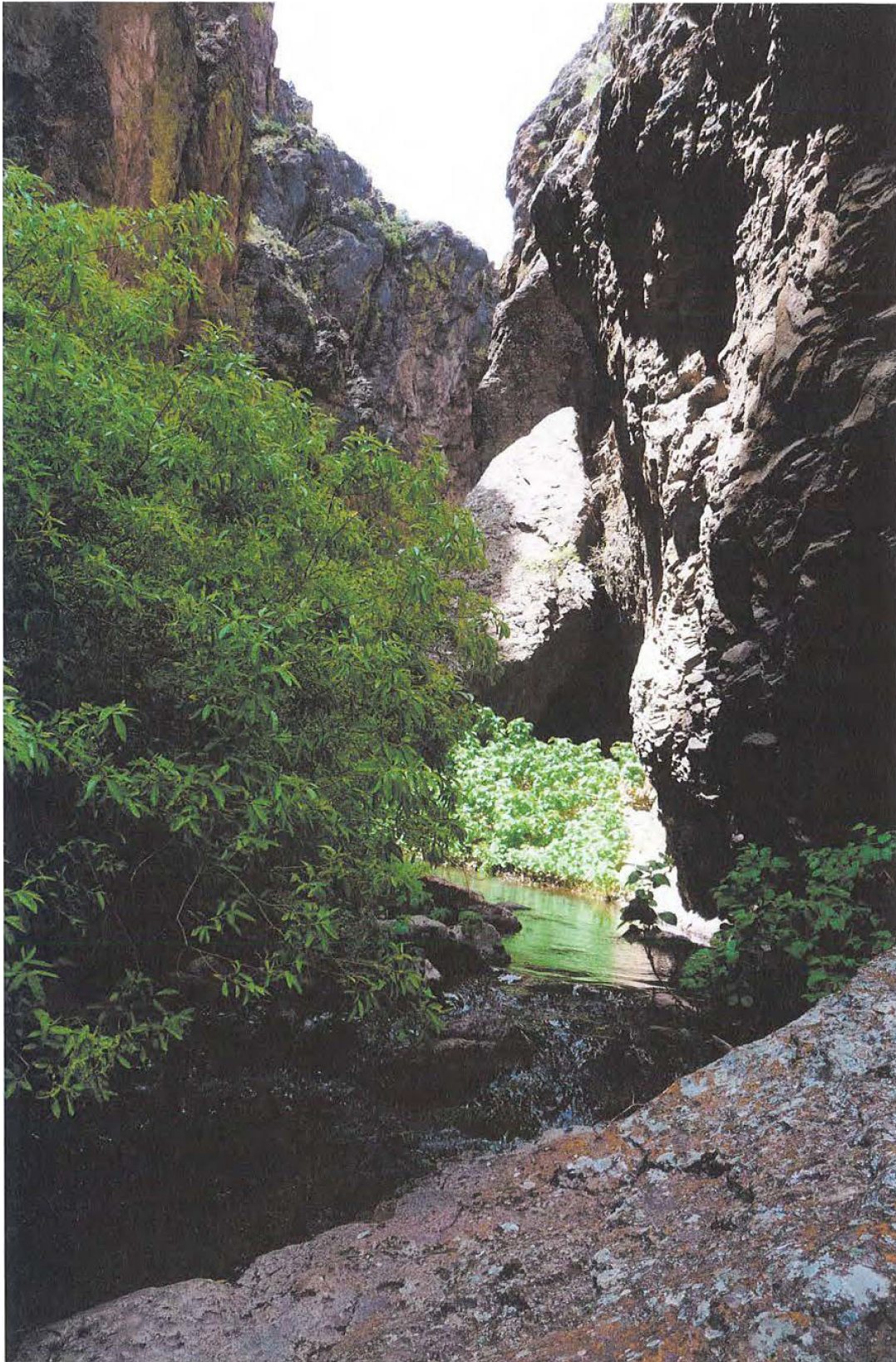




The unique rock formation and seasonal creek draw many motorized and non-motorized recreationists. The BLM's Preferred Alternative to Segment 9 will very negatively impact the sollicitude and awe inspiring harsh beauty of this area.

Birch Creek, Owyhee County.





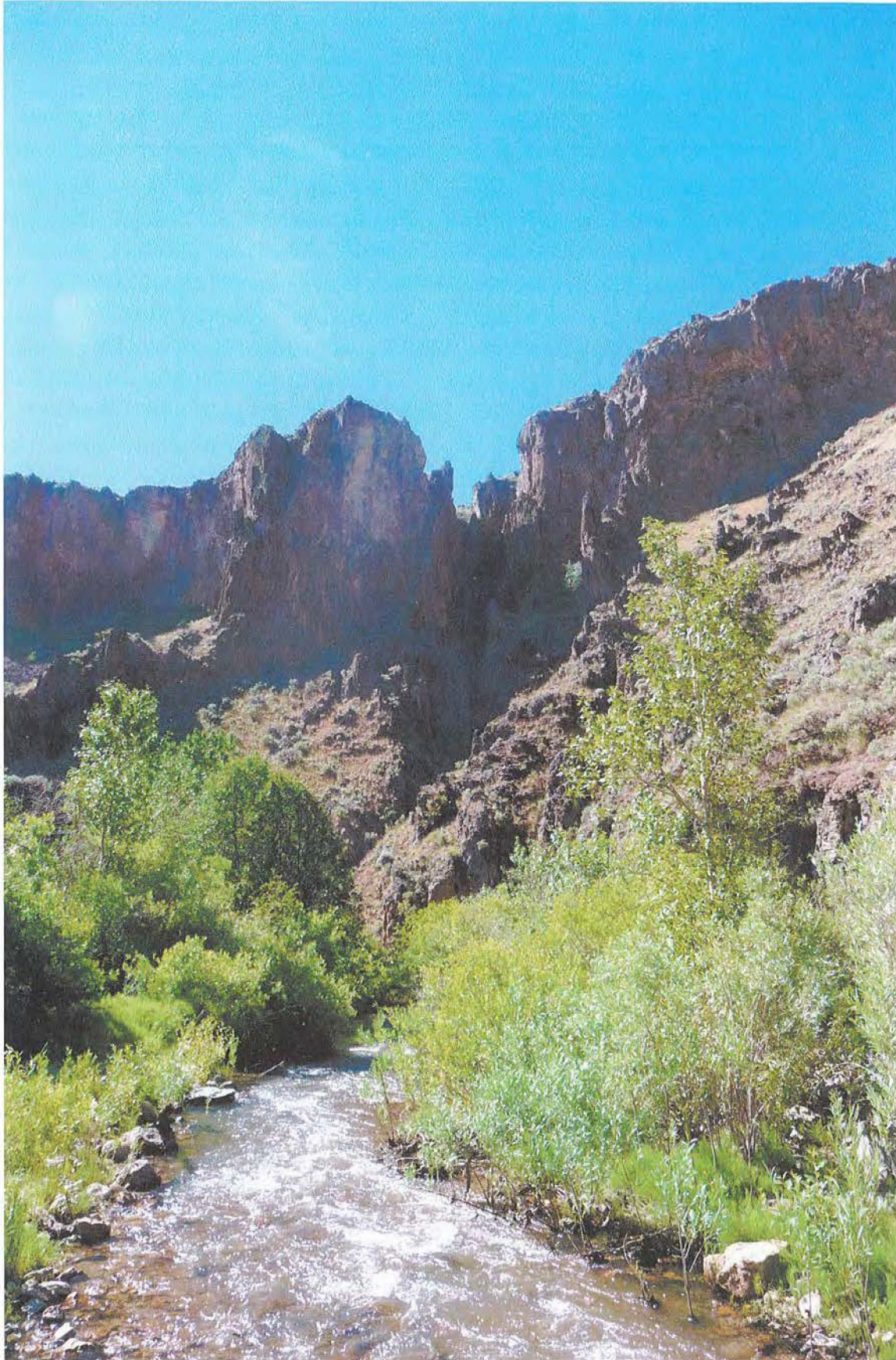
This quiet canyon may have a 500 KV power line running overhead. This canyon is very close to the middle of the impact area of the BLM Preferred Alternative of Segment 9. This is a beautiful spot to stop for lunch while out riding. Browns Creek, Owyhee County.



The BLM Alternative of Segment 9 might go over this recreationist and her dog. 500 KV transmission lines will have a negative impact on even outing for pets. Browns Creek area, Owyhee County.

Sinker Canyon, Owyhee County.

This canyon is very popular with every sort of recreationist. It is heavily used. The BLM Preferred Alternative for Segment 9 will cross Sinker Canyon. This popular canyon will be negatively impacted.



Comment : Agriculture

The BOCC, OCTF and us as stakeholders we have commented voraciously on this topic since 2009.

Agriculture is our economy, our life blood, our history and our culture.

We are submitting pictures of who we are hoping to appeal to your hearts.

We are also sending documentation so that you may understand that agriculture and 36-228 are incompatible.

3.18 Agriculture

We are including 3.18-1 thru 3.18-10 and 3.18-13 thru 3.18-22 of the DSEIS as well as 3.18-13 and 14 of the FEIS. We are also including pages 7-15, Appendix K of the FEIS. We will point out inconsistencies and inaccurate information by comparing these three separate documents.

Pg 3.18-6 re: Construction states "unlikely to noticeably affect overall agricultural production and employment in any of the affected counties." We find this to be an amazing statement considering Alternatives 2, 4 and 6 re: segment 9 - traverse's 24 miles of prime farmland. This is easily discerned by studying the Tetra Tec maps obtained April 21, 2016 @ the DSEIS public meeting. The center pivots are quite visible and we have the advantage of knowing the geography. This is our home. Please reference Table 3.18-4 of the DSEIS.

We refute the Agencies numbers re: Prime Farmland Affected by Construction and Operations in Segment 9.

Remember the Revised Proposed Route is largely sited paralleling a 138 kV line with an existing road. The FEIS Proposed 9 traverses 24 miles of prime farmland without an existing road. The actual Prime Farmland Acres Affected =

Route	County	Prime Farmland Acres Affected	
Revised Proposed Route	Owyhee	Construction 0	Operations 0
FEIS Proposed 9	Owyhee	732	81

We included the 250' easement in our calculations. We know these numbers are accurate.

We have served on the Owyhee County Task Force since its inception, April 2009. The Revised Proposed Route has been the endorsed route of the Owyhee County Task Force and the Owyhee³⁰¹ County Commissioners

since August 2009.

FEIS Proposed 9 has been vehemently opposed since February 26, 2009. The Agency is painfully aware of this. We have opposed this route ad-nauseam via floods of comments and record attendance @ the Agencies public meetings. The reason: impacts to private property especially agriculture.

We encourage the reader to study the enclosed pages of the DSEIS, FEIS and Appendix K. The impacts to agriculture are glaringly underestimated in the DSEIS and FEIS. Thankfully Appendix K shines the light of truth on this most pressing component of our very lively hood.

We are not commenting on segment 8 re: agriculture. In this DSEIS, thankfully, it is moot. Canyon and Ada Counties have been spared concerning their private property and

agricultural impacts; as well they should be.

Owyhee County can not and will not tolerate Alternatives 2, 4 or 6 due to detrimental impacts on agriculture and private property. This very DSEIS acknowledges 74% of our private land is in agriculture.

Again, the only Alternative that citizens, farmers/ranchers, The Owyhee County Task Force and The Owyhee County Commissioners will endorse is Alternative 1.

3.18 AGRICULTURE

This section addresses potential impacts to agriculture from the Segments 8 and 9 Revised Proposed Routes; FEIS Proposed 9; Routes BG, 8H and 9K; and the Toana Road Variations to the Segment 9 Revised Proposed Route. The BLM has identified seven action alternatives, each a combination of one route from Segment 8 and one from Segment 9 (see Section 2.3.3 in Chapter 2). This section analyzes the potential impacts of the Project, including the potential impacts on prime farmland; livestock grazing; crop production; lands enrolled in the Conservation Reserve Program (CRP), Grassland Reserve Program (GRP), Wetlands Reserve Program (WRP); and dairy farms. Effects associated with the routes analyzed in the 2013 FEIS were disclosed in that document. With the exception of FEIS Proposed 9, those FEIS routes are not being re-analyzed here, as only new information is included in this resource-specific section.

3.18.1 Affected Environment

This section of the SEIS begins with a discussion of the Analysis Area considered, identifies the issues that have driven the analysis, and characterizes the existing conditions in the area crossed by Project. We reviewed the data and regulatory requirements in the FEIS and concluded that they are still valid for this SEIS. Data on farms and grazing have been updated. The Analysis Area for this SEIS is restricted to that area crossed by the routes in Segments 8 and 9; therefore, not all agriculture types discussed in the FEIS would be affected by the routes and alternatives being considered.

The Project would cross landscape primarily used for rangeland and pasture, as well as other agricultural purposes, with occasional towns, cities, or other urbanized or developed areas. The Project would cross the Snake River Plain, which is characterized by agricultural crop production, as well as areas of urban development. Figure 3.17-1 in the FEIS shows generalized land use in the areas crossed by the Revised Proposed Routes for Segments 8 and 9.

Morley Nelson Snake River Birds of Prey National Conservation Area

Portions of the Project would cross through the SRBOP. Agriculture is not one of the environmental resources and values for which the SRBOP was established to manage and protect.

3.18.1.1 Analysis Area

The Analysis Area for impacts on agriculture consists of an area 250 feet on each side of the proposed routes and variations, as well as 25 feet on each side of the centerline for access roads that extend outside this area, and includes the areas needed for new or expanded substations as well as temporary facilities such as multi-purpose yards and fly yards. Agricultural land use in the Analysis Area is discussed in Section 3.17 - Land Use and Recreation.

3.18.1.2 Issues Related to Agriculture

The following agriculture-related issues relevant to Segments 8 and 9 were brought up by the public during public scoping (Tetra Tech 2009) or in comments on the DEIS,

Gateway West Transmission Une Draft SEIS

raised by federal and state agencies during scoping and agency discussions, or are issues that must be considered as stipulated in law or regulation:

- How much agricultural land would be impacted, and what the effects would be;
- What the effects on livestock grazing would be from construction and operations of the transmission line;
- Whether there would be a loss of prime farmland;
- What the impacts would be to agricultural production including equipment operation and aerial spraying;
- Whether there would be a disruption to dairy operations and other types of CAFOs;
- How the transmission line would interfere with crop dusting; and
- Whether the transmission line would cause electrical and/or electronic interference with agricultural equipment.

We reviewed the scoping comments received for this SEIS and determined that agriculture-related issues considered in the FEIS have not changed. No additional issues were identified.

3.18.1.3 Methods

The Agriculture section in the 2013 FEIS discusses those aspects of the environment that could be impacted by the Project, as well as the methods that were used to assess potential Project-related impacts to these resources. We reviewed the data analysis methods used in the FEIS and concluded that they are still valid for this SEIS. No significant new data were identified with respect to agriculture in the analysis area.

3.18.1.4 Existing Conditions

Rangeland in the Analysis Area occurs on both public land and private land. Cropland in the Analysis Area is primarily in private ownership and includes annually cultivated or rotated cropland, land in perennial field crops, improved pasture, hayfields, and hay meadows. Cropland is divided for the purposes of analysis into irrigated cropland and dryland farming. Some private land in Idaho is managed as CRP lands. CRP lands are treated as agricultural land for this analysis.

Prime Farmland

According to the NRCS, prime farmland is defined as land that contains soils with the best physical and chemical characteristics for production of food, feed, forage, fiber, and oilseed crops, which have not already been targeted for urban development or water storage. Prime farmland has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods, including water management. The NRCS identifies soil mapping units that qualify as prime based on specific soil criteria. Soil mapping units may be classified as prime farmland under current conditions or as prime farmland if certain qualifying conditions exist on the site (e.g., "prime farmland if irrigated," "prime farmland when protected from flooding," etc.). In such cases, if the

qualifying conditions do not exist, then the unit is considered "not prime." For this analysis, "prime farmland with no restrictions," "prime farmland when irrigated," and "prime farmland when drained" are included in the definition and estimated acres of prime farmland. The 2013 FEIS indicated that about one-third of the combined Analysis Area for Segments 8 and 9 was considered prime farmland.

Livestock Grazing

Livestock grazing occurs on both publicly managed and private lands. Rangeland and pasture are the dominant land uses in the Analysis Area.

The Analysis Area includes lands that are part of SLM-managed grazing allotments, as well as Idaho state lands that are leased for grazing. BLM allotments typically include a mixture of public, private, and state lands. BLM grazing allotments that are within the Analysis Area are listed by name and segment/route in Table 3.18-1. This table also identifies grazing leases by number.

Table 3.18-1. Grazing Allotments and Leases within the Analysis Area by Segment and Route

Segment/Route	BLM Allotment (Range)	Grazing Lease
Revised Proposed Route 8	Bowns Creek, Camp 1, Clover Creek, Cornell, Davis Mtn, Dempsey, Ditto Creek, Double Anchor FFR, East Reynolds Creek, Emigrant Crossing, Goodtime, Hammett #1, Hardtrigger, Hog Creek, Indian, Indian Creek FFR, King Hill, King Hill Canyon, Martha Avenue, Melba Seeding, Mountain Home Subunit, Mud Springs, North Cold Springs, Pioneer, Poleline, Rabbit Creek/Peters Gulch, Sand Bt, Seven Mile, South Cold Springs, Sunnyside Spring/Fall, Sunnyside Winter, West Pioneer White Butte	G600044, G6005 G6009, G6057, G6326, G6383, G6535, G6710, G700105, G700158, G7603
Segment 8 Proposed - Existing 500-kV Removal	Sunnyside Spring/Fall	
Route 8G	Battle Creek, Black Mesa, Browns Gulch, Bruneau Hill, Camp 1, Cheatgrass, Common, Diamond Basin, East Castle Creek, East Reynolds Creek, Fossil Butte, Goodtime, Hagerman Group, Hardtrigger, Joyce FFR, Little Three Island, Lower Saylor Creek, Northwest, Poleline, Rabbit Creek/Peters Gulch, Sand Bt, Saylor Creek/N Three Island, Seven Mile, Silver City, Thompson, Three Island, W Saylor Creek, Wendell Ct West Castle, West Castle Creek	C700006, G600007, G600062, G6091, G6255, G6317, G700061, G700077, G700086, G700115, G7056, G7631
Route 8H	Battle Creek, Black Mesa, Browns Gulch, Bruneau Arm, Bruneau Hill, Camp 1, Chattin Hill, Cheatgrass, Common, Con Shea, East Reynolds Creek, Flat Iron, Goodtime, Hagerman Group, Hardtrigger, Little Three Island, Lower Saylor Creek, Poleline, Rabbit Creek/Peters Gulch, Sand Bt, Saylor Creek/N Three Island, Seven Mile, Sinker Butte, Sunnyside Winter, Thompson, Three Island, W Saylor Creek, Wendell Ct	C700006, G600085, G600100, G6152, G6255, G6466, G6634, G6636, G700061, G700077, G700086, G700115, G7056, G7300, G7302, G7631
Route 8H - Existing 138-kV Removal	Battle Creek, Bruneau Arm, Chattin Hill, Sunnyside Winter	G600085, G600100, G6152, G6466

Gateway West Transmission Line Draft SEIS

Table 3.18-1. Grazing Allotments and Leases within the Analysis Area by Segment and Route (continued)

Segment/Route	BLM Allotment (Range)	Grazing Lease
Revised Proposed Route 9	Artesian-Kidd, Battle Creek, Browns Gulch, Bruneau Arm, Bruneau Hill, Buhl Group-Berger, Chattin Hill Cheatgrass, Con Shea, Devil Creek Balanced Rock, East Reynolds Creek, Ellis Tews-Berger, Griff, Hardtrigger, Hub Butte-Western Sg, Kerr-Berger, Kinyon, Kubic, Lilly Grade, Little Three Island, Loughmiller, Lower Saylor Creek, Martens Bros.-Berger, Noh Field, Rabbit Creek/Peters Gulch, Roseworth Point, Salmon Tract-U2, Saylor Creek/N Three Island, Sinker Butte, Squaw Joe, Squaw Joe Isolated, Sunnyside Winter, Thompson, Three Island, Twin Butte, W Saylor Creek, Western Stockgrowers	G600085, G600100, G6152, G6255, G6466, G6634, G6636, G7056, G7128
Segment 9 FEIS Proposed Route	Artesian-Kidd, Battle Creek, Black Mesa, Browns Gulch, Bruneau Arm, Bruneau Hill, Buhl Group-Berger, Cheatgrass, Con Shea, Devil Creek Balanced Rock, E Roseworth Point, East Castle Creek, East Reynolds Creek, Ellis Tews-Berger, Flat Iron, Fossil Butte, Griff, Hardtrigge, Hub Butte, Hub Butte-Western Sg, Joyce FFR, Kerr-Berger, Kinyon, Kubic, Lilly Grade, Little Three Island, Loughmiller, Lower Saylor Creek, Martens Bros.-Berger, Noh Field, Northwest, Pvga-Berger, Rabbit Creek/Peters Gulch, Roseworth Point, Salmon Tract-U2, Saylor Creek/N Three Island, Silver City, Squaw Joe, Squaw Joe Isolated, Thompson, Three Island, Twin Butte, Vinson Wash, W Saylor Creek, West Castle, West Castle Creek, Western Stockgrowers, Yahoo	G600035, G6255, G7056, G7128, G7300, G7302
Route 9K	Artesian-Kidd, Battle Creek, Browns Gulch, Bruneau Hill, Buhl Group-Berger, Cheatgrass, Devil Creek Balanced Rock, Diamond Basin, East Castle Creek, East Reynolds Creek, Ellis Tews-Berger, Fossil Butte, Griff, Hardtrigger, Hub Butte-Western Sg, Joyce FFR, Kerr-Berger, Kinyon, Kubic, Lilly Grade, Little Three Island, Loughmiller, Lower Saylor Creek, Martens Bros.-Berger, Noh Field, Northwest, Rabbit Creek/Peters Gulch, Roseworth Point, Salmon Tract-U2, Saylo' Creek/N Three Island, Silver City, Squaw Joe, Squaw Joe Isolated, Thompson, Three Island, Twin Butte, W Saylor Creek, West Castle, West Castle Creek, Western Stockgrowers	G600007, G6255, G7056, G7128
Segment 9 Proposed - Comparison portion for Toana Road Variations 1/1-A	Devil Creek Balanced Rock, Kinyon	G7006
Toana Road Variation 1	Devil Creek Balanced Rock, Kinyon	G7006
Toana Road Variation 1-A	Devil Creek Balanced Rock, Kinyon	G7006
Segment 9 Proposed - Existing 138-kV Removal	Battle Creek, Bruneau Arm, Sunnyside Winter	G600085, G600100, G6152, G6466

Source: BLM GIS

Crop Production

Crop production in the Analysis Area includes annually cultivated or rotated cropland, land in perennial field crops, improved pasture, hayfields, and hay meadows. Crop production is divided for the purposes of analysis into irrigated cropland and dryland farming

Irrigated cropland includes cropland irrigated using pivot, wheel and hand line, and flood irrigation systems. Irrigated land may have existing subsurface drainage systems (drain tiles) and surface irrigation ditches. Dryland farming does not involve any type of irrigation. Dryland farmed acres in the Analysis Area for Segments 8 and 9 are typically used to grow grains or hay.

Crop Spraying

Crop spraying is used to apply fertilizer, fungicides, or pesticides during the growing season. Aerial crop spraying is supported by a network of controlled airports and secondary airstrips. The quantity of farmed land receiving aerial crop spraying is unknown. As a result, the following analysis assumes that all irrigated farmland could receive aerial spraying. Airstrips within 3 miles of the proposed routes and variations are identified in Section 3.19.1.4.

USDA Reserve Lands

CRP is a popular USDA set-aside program that encourages farmers to convert highly erodible cropland or other environmentally sensitive acreage to vegetative cover, such as tame or native grasses, wildlife plantings, trees, filterstrips, or riparian buffers. Farmers receive an annual rental payment for the term of the multi-year contract. Cost sharing may be provided to establish the vegetative cover practices.

Dairy Farms

The detailed mapping conducted by Tetra Tech (2010) grouped dairy operations and feed lots with other commercial agricultural operations. These areas, identified as CAFOs for the purposes of this analysis, are discussed by segment in Section 3.18.2.3.

3.18.2 Direct and Indirect Effects

This section is organized to present effects to agricultural resources from construction, then operations, followed by decommissioning activities for the proposed Project.

A comprehensive list of all Project design features and EPMs, as well as the land ownership to which they apply, can be found in Table 2.7-1 of Chapter 2 of the FEIS. The following impact assessment takes these Project design features and EPMs into account when considering the potential impact that the Project could have on environmental resources.

Plan Amendments

Amendments to the BLM RMPs and MFPs are summarized for each alternative in Table 2.3-1 (see Chapter 2 for more details). The BLM plan amendments are discussed in detail in Appendices F and G. Amendments are needed to permit the Project to cross various areas of BLM-managed land. No amendments specific to agriculture are

Gateway West Transmission Line Draft SEIS

proposed for the Project and no impacts to agriculture resulting from approving the amendments beyond the impacts of the Project are anticipated.

3.18.2.1 No Action Alternative

Under the No Action Alternative, the SLM would not issue a ROW grant to the Proponents of Gateway West and the Project would not be constructed across federal lands. No land management plans would be amended to allow for the construction of this Project. No Project-related impacts to agriculture would occur; however, impacts would continue as a result of natural events (such as fire, drought, and severe weather) as well as from existing and planned developments within the Analysis Area, and from other projects, including wind farms, mining, agricultural, or other competing land uses. The demand for electricity, especially for renewable energy, would continue to grow in the Proponents' service territories. If the No Action Alternative is implemented, the demand for transmission services, as described in Section 1.4, Proponents' Objectives for the Project, would not be met with this Project and the area would have to turn to other proposals to meet the transmission demand. Under the No Action Alternative, impacts similar to those described below may occur due to new transmission lines built to meet the increasing demand in place of this Project.

3.18.2.1 Effects Common to All Routes

The general impacts that would occur to agricultural resources from construction, operations, and decommissioning of the Gateway West Project were associated in detail in Section 3.18.2.2 of the FEIS and summarized in the following section. Direct and indirect effects by route alternatives are assessed in Section 3.18.2.3; the direct and indirect effects of alternatives are assessed in Section 3.18.2.4. Proponent-proposed design features and mitigation measures are presented in Sections 3.18.2.5 and 3.18.2.6, which include an assessment of potential impacts related to the MEP, as well as a list of additional mitigation measures that would be recommended by the SLM related to impacts on the SRSOP.

Construction

Short-term disruption of farming activities along the ROW could occur locally during construction. However, with implementation of the EPMS identified below in the section pertaining to agricultural protection plans, impacts are expected to be minimal. **Viewed** in terms of agricultural operations in the potentially affected counties, the total estimated Project-related construction disturbance represents a small share of the nearly 11.5 million acres of agricultural land in the Analysis Area counties and is unlikely to noticeably affect overall agricultural production and employment in any of the affected counties. The Proponents do, however, recognize that construction of the proposed Project could have detrimental impacts on farms and have stated that they would negotiate damage-related issues, such as temporary reductions in the acreage available for cultivation, with affected farmers during the easement acquisition process.

Prime Farmland

Direct impacts to prime farmland would generally result from construction-related soil disturbance expected to occur at tower locations, work areas, multipurpose yards, wire-pulling/splicing sites, substation sites, regeneration sites, and access roads. Potential

soil impacts to prime farmland from transmission line construction include soil erosion, disruption of drainage patterns, mixing of topsoil and subsoil, potential loss of topsoil, and soil compaction. Estimated acres of prime farmland soils that would be disturbed during construction are identified by county and route and alternative in Sections 3.18.2.2 and 3.18.2.4, respectively. The reclamation measures presented in the Framework Reclamation Plan (see Appendix B of the FEIS) would be used to keep prime farmland soil losses to a minimum. Affected areas not subsequently used for operations would be reclaimed as soon as possible following construction.

Most prime farmland in the Analysis Area is privately owned and actively cultivated. Potential impacts to cropland common to all action alternatives are discussed below under crop production.

livestock Grazing

Construction could affect livestock grazing by temporarily reducing forage and displacing livestock. In addition, increased dust in areas adjacent to construction sites could reduce forage palatability. Dust has also been known to cause livestock health impacts. Construction using helicopters may displace livestock where it occurs. Construction may affect livestock control and distribution if a gate is left open or a fence is damaged. Vehicular access during construction would increase the likelihood of livestock injury or death from collisions. However, construction crews would be required to immediately repair any damaged fences or gates to ensure livestock are adequately controlled.

Transmission line construction is linear in nature, with periods of intense activity separated by relatively long intervals of little or no activity. Disturbance in any one area would, however, generally last for most of one construction season, given that there are several sequential steps required. In some situations, disturbance may begin in one season and, due to weather or timing restrictions, not be completed until the next year. During intense construction periods, some areas currently used for livestock grazing would be temporarily off limits. These sites would be identified in advance of construction, and any needed restrictions and the method of restriction (e.g., fencing, gates) would be coordinated with the respective landowner or land-managing agency.

Potential impacts to livestock grazing from construction are presented below for the proposed routes, alternatives, and Toana Road Variations in terms of temporary reductions of forage and expressed in acres. In all cases, the potentially affected acres represent a small share of the total acres used for livestock grazing within the Analysis Area and surrounding area, and would result in relatively small temporary reductions in the area available for grazing. Other potential economic impacts related to livestock grazing are discussed in Section 3.4 - Socioeconomics.

Crop Production

Construction could affect crop production by temporarily reducing the area available for cultivation. Construction-related impacts would depend on the type of crop, the season, and whether the land was in use or fallow. Without proper coordination between the Proponents and farm operators, impacts associated with ingress and egress to the

Gateway West Transmission Une Draft SEIS

ROW, damage to irrigation systems, timing notification, segregation and protection of topsoil, and compaction could be potentially substantial.

The effects to farming operations could also result in impacts outside the areas where soil would be disturbed as part of construction activities. These effects could include damage to or loss of crops, decreases in crop yield, restrictions to farm vehicle access or aerial spraying operations, and disruption of drainage and irrigation systems. These types of potential effects are difficult to quantify and would likely be determined through negotiation with landowners. As a result, the affected acres analyzed in this section refer to areas where the soil would be directly disturbed by the Project, and do not include other areas that might be indirectly affected. These types of additional potential impacts are assumed for the purposes of analysis to be proportional to the direct estimated impacts based on surface disturbance. Potential economic impacts related to cropland are discussed in Section 3.4 - Socioeconomics and in Appendix K of the FEIS. The analysis presented in Appendix K focused on Power, Cassia, and Jerome Counties but the analysis of how structure and line placement would affect irrigated farm land would also apply to other lands in southern Idaho.

Crop Spraying

Construction of the transmission line could reduce the extent of crops that could be treated by aerial spraying. Transmission towers or construction cranes could interfere with the flight paths of aerial applications. This potential effect would vary, depending on the location of tall structures relative to crop planting patterns, the presence of other tall structures, and the comfort level of the individual pilot. Aerial spraying is also sometimes used to control large-scale insect infestations on public and private land. The short-term inability to use aerial spraying could reduce productivity and cause economic effects to farming or rangeland operations (see Section 3.4 - Socioeconomics). The presence of construction workers could also delay applications.

CRPLands

The location of CRP lands is not public information. Section 1619 of the 2008 Farm Bill prohibits FSA disclosure of any information provided by an agricultural producer or owner of agricultural land participating in federal agricultural programs. The Idaho NRCS/FSA office provided the BLM with a list of CRP land miles crossed by the Project for the FEIS, and a partial list in support of the SEIS. They are, however, prohibited from providing the location and extent of CRP acreage that may be affected. Therefore, the amount of CRP lands that could be removed from the CRP is not known. The Proponents would address the issue by consulting with the FSA and landowners to determine if construction would affect the CRP status of the land (see EPM AGRI-1 below).

- AGRI-1 Consult with the Farm Service Agency and landowners to determine how construction may affect the CRP status of the land currently enrolled in CRP.

Section 3.18.2 of the FEIS discusses FSA Handbook for the Agricultural Resource Conservation Program for State and County Offices (USDA 2008, p. 12-8) guidance for managing CRP lands affected by the Project. The FSA Handbook indicates that

transmission line towers and roads would not be compatible with CRP, GRP, or WRP lands; however, the land under the transmission lines between the towers (which are generally placed 1,200 to 1,300 feet apart) would remain eligible. The land under the roads and towers would be removed from the conservation program. As noted above, EPM AGRI-1 would be implemented to address this issue.

Operations

The total estimated Project-related operations disturbance represents a small share of the agricultural land in the seven counties crossed in Segments 8 and 9 and is unlikely, to noticeably affect overall agricultural production and employment in any of the affected counties. The Proponents have stated, however, that they recognize that construction of the Project has the potential to have detrimental impacts on farms and would negotiate damage-related issues, such as reductions in the acreage available for cultivation, with affected farmers during the easement acquisition process.

ROWs for transmission line facilities on private agricultural lands would be obtained in fee simple or perpetual easement by the Proponents. The effect that a transmission line easement may have on agricultural property values is a damage-related issue that would be negotiated between the landowner and Proponents during the fee-simple or / **easement acquisition process**. The easement acquisition process is designed to provide fair compensation to the landowner for the right to use the property for transmission line construction and operation. The easement value in theory is equal to the difference in value of the affected property before and after easement acquisition and construction of the proposed facilities.

Prime Farmland

Reclamation after construction would reduce the Project's long-term effects to prime farmland. Estimated acres of prime farmland soils that would be disturbed during Project operations are identified by county and route and alternative in Sections 3.18.2.3 and 3.18.2.4, respectively. Impacts to prime farmland during Project operations would primarily be related to those areas that would be occupied by tower structures and not available for agricultural use. /

Livestock Grazing

During Project operations, rangeland and pasture occupied by support structures, substations, regeneration stations, or access roads would no longer be available for grazing. As discussed above with respect to construction, the estimated acres of lands used for livestock and grazing that would be permanently affected by the Segment 8 and 9 routes, alternatives, and variations represent a small share of the total acres used for livestock grazing within the Analysis Area and surrounding area, and would result in relatively small temporary and permanent reductions in the area available for grazing. In addition, metal fences or large metal objects adjacent to, running parallel to, or passing under the proposed Gateway West transmission lines may develop a different electrical potential than the surrounding ground if not properly grounded. Most cows would need a current of 3 to 4 volts before behavioral changes could be noticed. More than 4 volts are needed before the most sensitive cows resist drinking water (Lefcourt 1991).

Gateway West Transmission Line Draft SEIS

Long-term impacts to private grazing landowners or public land grazing permittees would need to be mitigated, likely through negotiated terms of land leases or easements. In some cases, the acres of individual BLM grazing allotments may need to be reduced. Other operations and maintenance activities would not *affect* livestock grazing.

Crop Production, Crop Spraying

Effects to crop production, including effects on the use of aerial spraying, are described in Section 3.18.2.2 of the FEIS. No additional effects associated with the Project routes, alternatives, or variations were identified.

GPS Interference, Irrigation System Electrolysis, Induced Current

Possible GPS interference, electrolysis, and induced current effects are described in Section 3.18.2.2 of the FEIS. No additional effects associated with the Project routes, alternatives, or variations were identified.

CRPLands

As noted with respect to construction, the agencies recommend that the Proponents consult with the FSA and landowners to determine if construction would affect the CRP status of the land or if special construction or revegetation techniques would be necessary. If the Project were to result in lands being removed from the CRP, the economic costs to private agricultural landowners would be mitigated by the Proponents on a case-by-case basis, most likely through negotiated terms of easements between the landowner and the Proponents.

CAFOs

CAFOs, including dairy farms, could be subjected to stray voltage during Project operations. Stray voltage in this context refers to a phenomenon that is primarily of concern in wet environments, such as a dairy barn or feedlot. Stray voltage occurs when an animal makes contact with a metal object that is at a different electrical potential than another point in contact with the animal (e.g., the nearby ground or earth). This may occur when there is poor grounding or bonding of the metal object to the earth and the electrical ground. Most often, this arises from electrical equipment on the farm and local electrical wiring, not because of the operation of nearby transmission lines. Metal fences or large metal objects adjacent to, running parallel to, or passing under the proposed Gateway West transmission lines may develop a different potential than the surrounding ground if not properly grounded. Most cows would need a current of 3 to 4 volts before behavioral changes could be noticed. More than 4 volts is needed before the most sensitive cows resist drinking water (Lefcourt 1991).

Refer to Section 3.21.1.4 of the FEIS for a discussion of the effects of EMF on the health of farm animals.

Honeybee Hives

Effects to honeybee hives are described in Section 3.18.2.2 of the FEIS. No additional effects associated with the Project routes, alternatives, or variations were identified. Impacts to honeybee hives outside of the wire zone are not expected.

Table 3.18-3. Agricultural Land Disturbed during Construction and Operations along Segment 8

Route	Acres Disturbed by Route		
	Rangeland and Pasture	Irrigated Cropland	Dryland Farming
Construction			
Segment 8 Revised Proposed Route	1,989	188	-
Route BG	2,449	163	-
Route 8H	2,242	184	2
Operations			
Segment 8 Revised Proposed Route	194	15	-
Route BG	280	12	-
Route 8H	220	14	111

Acreages are rounded to nearest acre.

1/ "t" indicates values <0.1

Crop Production

Approximately 188 acres of irrigated cropland would be disturbed during construction of the Revised Proposed Route, with 15 acres permanently disturbed (Table 3.18-3). Construction of Route BG would disturb approximately 163 acres of irrigated cropland, with 12 acres expected to be permanently disturbed. Construction of Route SH would disturb approximately 184 acres of irrigated cropland, with 14 acres expected to be permanently disturbed. Route SH would also disturb about 2 acres of dryland farming (Table 3.18-3).

CRP Lands

The Idaho NRCS/FSA office provided the BLM with a list of CRP land miles crossed by the Project for the FEIS, and a partial list in support of the SEIS. They are, however, prohibited from providing the location and extent of CRP acreage that may be affected. Therefore, the amount of CRP lands that could be removed from the CRP is not known. The Proponents would address this issue by consulting with the FSA and landowners to determine if construction would affect the CRP status of the land (see EPM AGRI-1 below).

Dairy Farms

Based on the indicative route used for this analysis, the Revised Proposed Route in Segment 8 would cross one CAFO, pass within 100 feet of another, and within 300 feet of eight more. Route BG would pass within 20 feet of one CAFO and within 300 feet of five others. Route SH would pass within 300 feet of one CAFO (Table D.17-1). However, during Project design, micrositing changes to avoid or reduce impacts would be considered. Siting and construction of the transmission line on private lands, including areas where the transmission line would cross or pass in close proximity of a CAFO, would require county approval.

Segment 9

Revised Proposed Route, FE/5 Proposed 9, and 9K

The Revised Proposed Route in Segment 9 would link the proposed Cedar Hill and existing Hemingway Substations with a 165.3-mile single-circuit 500-kV transmission line that skirts the Jarbidge and Owyhee Military Operating Areas to the north, then

Gateway West Transmission Line Draft SEIS

follows the WWE corridor just north of the Saylor Creek Air Force Range, passing through Owyhee County before entering the Hemingway Substation (see Figure A-1). It follows an alignment similar to the 2013 FEIS Route 9D/9G between MP 95.6 and 154.7, except that two portions of the route (totaling 25.7 miles) would be double-circuited with existing 138-kV lines. The first area is 5.2 miles near C.J. Strike Reservoir and the Bruneau Arm (MP 106.2 to 109.3 and 109.9 to 112.1), and the second area is 20.2 miles along the Baja Road (MP 121.0 to 141.2). Several rebuilds totaling approximately 0.6 mile are also required to tie the existing 138-kV lines into the new double-circuit alignments. Except for minor variations, the route is similar to the 2013 FEIS Route 9D/9G between MP 141.2 to 154.7. From MP 154.7 and into the Hemingway Substation, the route is the same as FEIS Proposed 9.

The Proponents originally designed the 162.2-mile-long FEIS Proposed 9 to follow existing utility corridors and avoid the SRBOP and other protected areas where feasible. Approximately 54 miles of the route is within or adjacent to a utility corridor. FEIS Proposed 9 is approximately 3.1 miles shorter than the Revised Proposed Route but it crosses 13.6 miles of the SRBOP compared to 54.2 miles for the Revised Proposed Route. Both the Revised Proposed Route and FEIS Proposed 9 cross the Salmon Falls Creek at Lilly Grade adjacent to an existing single-phase 34.5-kV distribution line just north of the Salmon Falls Creek WSA.

Route 9K is being considered by the BLM as a modified version of FEIS Route 9E (the FEIS Preferred Route) to avoid crossing the northwestern portion of the SRBOP and to minimize direct and indirect impacts to priority sage-grouse habitat. The route is approximately 174.6 miles long, compared to the 165.3-mile-long Revised Proposed Route (see Figure A-1).

Prime Farmland

Approximately 1,531 acres of prime farmland would be disturbed during construction of the Revised Proposed Route, and 140 acres would be permanently disturbed (Table 3.18-4). Construction of the FEIS Proposed 9 would disturb approximately 1,024 acres of prime farmland, with 99 acres expected to be permanently disturbed. Construction of Route 9K would disturb approximately 964 acres of prime farmland, with 110 acres expected to be permanently disturbed.

Table 3.18-4. Prime Farmland Affected by Construction and Operations in Segment 9

Route	County	Prime Farmland Acres Affected	
		Construction	Operations
Revised Proposed Route	Ada	228	13
	Cassia	29	2
	Elmore	266	20
	Owyhee	635	69
	Twin Falls	373	37
	Total	1,531	140
FEIS Proposed 9	Cassia	38	2
	Elmore	22	1
	Owyhee	560	57
	Twin Falls	405	39
	Total	1,024	99

Table 3.18-4. Prime Farmland Affected by Construction and Operations in Segment 9 (continued)

Route	County	Prime Farmland Acres Affected	
		Construction	Operations
Route 9K	Cassia	29	2
	Elmore	10	1
	Owvhee	551	71
	Twin Falls	373	37
	Total	964	110
Existing 138-kV Line Removal	Ada	23	-
	Elmore	14	-
	Owyhee	2	--
	Total	39	--
Revised Proposed Route - Comparison portion for Toana Road Variations 1/1-A	Owvhee	-	-
	Twin Falls	-	-
Toana Road Variation 1	Owvhee	-	-
	Twin Falls	-	-
Toana Road Variation 1-A	Owvhee	-	-
	Twin Falls	-	-

Acres are based on GIS; numbers are not exact and may not sum due to rounding.

Livestock Grazing

Construction of the Revised Proposed Route would disturb an estimated 2,910 acres of rangeland and pasture, with an estimated 299 acres permanently disturbed (Table 3.18-5). The majority of the existing 138-kV line that would be removed as part of the Revised Proposed Action would be located on rangeland (Table 3.17-19). FEIS Proposed 9 would disturb an estimated 2,801 acres of rangeland and pasture during construction, with an estimated 312 acres permanently disturbed. Route 9K would disturb an estimated 3,084 acres of rangeland and pasture during construction, with an estimated 365 acres permanently disturbed.

Table 3.18-5. Agricultural Land Disturbed during Construction and Operations in Segment 9

Route	Acres Disturbed by Route		
	Rangeland and Pasture	Irrigated Cropland	Dryland Farming
Construction			
Revised Proposed Route	2,910	142	2
FEIS Proposed 9	2,801	397	111
Route 9K	3,084	121	--
Operations			
Revised Proposed Route	299	9	<1
FEIS Proposed 9	312	34	t11
Route 9K	365	8	--

Acres are rounded to nearest acre.
t/"t" indicates values <0.1

Crop Production

Approximately 142 acres of irrigated cropland would be disturbed during construction of the Revised Proposed Route, with 9 acres permanently disturbed (Table 3.18-4). Construction of FEIS Proposed 9 would disturb approximately 397 acres of irrigated cropland, with 34 acres expected to be permanently disturbed. Construction of 9K would disturb approximately 121 acres of irrigated cropland, with 8 acres expected to be permanently disturbed. The Revised Proposed Route would also disturb about 2 acres of dryland farming (Table 3.18-3).

Gateway West Transmission Line Draft SE/S

CRP Lands

As discussed with respect to Segment 8, the amount of CRP lands that could be removed from the CRP is not known and the Proponents would address this issue by consulting with the FSA and landowners to determine if construction would affect the CRP status of the land (see EPM AGRI-1 below).

Dairy Farms

The Revised Proposed Route, FEIS Proposed 9, and 9K do not cross any CAFOs. However, based on the indicative route used for this analysis, the Revised Proposed Route would pass within 300 feet of three CAFOs, FEIS Proposed 9 would pass within 300 feet of two, and 9K would pass within 300 feet of five (Table D.17-1).

Toana Road Variations 1 and 1-A and the Comparison Portion of the Segment 9 Revised Proposed Route

Toana Road Variation 1 to the Segment 9 Revised Proposed Route was recommended by the BLM Jarbidge Field Office archaeologist to avoid paralleling the Toana Freight Wagon Road, an NRHP site. The Revised Proposed Route parallels within 0.25 mile of the Toana Road between MP 38.2 and 40.6, and parallels within 1 mile of the road through Blue Gulch between MP 40.6 and 43.5. Variation 1 is approximately 8.5 miles in length. Approximately 0.3 mile of the route crosses state land, with the remainder on land managed by the BLM. The Toana Road Variation 1-A to the Revised Proposed Route was recommended by the BLM to minimize visual impacts to the Toana Freight Wagon Road, and was also intended to utilize existing roads in order to minimize new road construction in the area. Variation 1-A is approximately 8.9 miles long. Approximately 1 mile of the route crosses state land, with the remainder on land managed by the BLM.

Neither of the two Toana Road Variations would affect irrigated farmland. Both would cross similar amounts of rangeland as the comparison portion of the Revised Proposed Route. Construction of Toana Road Variations 1 and 1-A would each affect approximately 150 acres of rangeland, while the comparison portion of the Revised Proposed Route would affect an estimated 161 acres. Based on the indicative route used for this analysis, Toana Road Variation 1-A would come within 100 feet of a CAFO. Siting and construction of the transmission line in this area would require county approval.

3.18.2.4 Direct and Indirect Effects of the Alternatives

This section assesses the potential impacts of the seven BLM action alternatives, which are summarized in Tables 3.18-6 and 3.18-7. The alternatives are visually displayed in Figures A-2 through A-8.

Table 3.18-6. Prime Farmland Affected by Construction and Operations of the Seven Action Alternatives

Alternative		Construction	Operations
1	Proposed Action	2,064	190
2	Revised Proposed 8 and FEIS Proposed 9	1,557	149
3	Revised Proposed 8 and the 9K Route	1,497	160
4	The 8G Route and FEIS Proposed 9	1,713	185
5	The 8G and 9K Routes	1,653	196
6	The SH Route and FEIS Proposed 9	2,187	215
7	The SH and 9K Routes	2,127	226

Table 3.18-7. Agricultural Land Disturbed during Construction and Operations of the Seven Action Alternatives

Alternative		Acres Disturbed by Alternative		
		Rangeland and Pasture	Irrigated Cropland	Dryland Farming
Construction				
1	Proposed Action	4,899	330	2
2	Revised Proposed 8 and FEIS Proposed 9	4,790	585	0
3	Revised Proposed 8 and the 9K Route	5,073	309	0
4	The 8G Route and FEIS Proposed 9	5,250	560	0
5	The 8G and 9K Routes	5,533	284	0
6	The 8H Route and FEIS Proposed 9	5,043	581	2
7	The 8H and 9K Routes	5,326	305	2
Operation				
1	Proposed Action	493	24	0
2	Revised Proposed 8 and FEIS Proposed 9	507	49	0
3	Revised Proposed 8 and the 9K Route	559	23	0
4	The 8G Route and FEIS Proposed 9	593	46	0
5	The 8G and 9K Routes	645	20	0
6	The SH Route and FEIS Proposed 9	533	48	0
7	The 8H and 9K Routes	585	22	0

Alternative 1 - Proposed Action (the Revised Proposed Routes for Segments 8 and 9)

Alternative 1 consists of the Revised Proposed Routes for Segments 8 and 9; therefore, the impacts associated with this alternative correspond to those described for those routes (Section 3.18.2.2). Construction of Alternative 1 would disturb approximately 2,064 acres of prime farmland, with 190 acres expected to be permanently disturbed (Table 3.18-6). Alternative 1 would disturb approximately 4,899 acres of rangeland and pasture during construction, with an estimated 493 acres expected to be permanently disturbed (Table 3.18-7). Construction of Alternative 1 would also disturb approximately 330 acres of irrigated cropland, with 24 acres expected to be permanently disturbed (Table 3.18-7). Alternative 1 would cross one CAFO, pass within 100 feet of another CAFO, and within 300 feet of 11 more.

Alternative 2 - Revised Proposed 8 and FEIS Proposed 9

Alternative 2 consists of the Revised Proposed Route for Segment 8 and FEIS Proposed 9; therefore, the impacts associated with this alternative correspond to those described above for these two routes combined (see Section 3.18.2.3). Construction of

Gateway West Transmission Line Draft SEIS

Alternative 2 would disturb approximately 1,557 acres of prime farmland, with 149 acres expected to be permanently disturbed (Table 3.18-6). Alternative 2 would disturb approximately 4,790 acres of rangeland and pasture during construction, with an estimated 507 acres expected to be permanently disturbed (Table 3.18-7). Construction of Alternative 2 would also disturb approximately 585 acres of irrigated cropland, with 49 acres expected to be permanently disturbed (Table 3.18-7). Alternative 2 would cross one CAFO, pass within 100 feet of another CAFO, and within 300 feet of 10 more.

Alternative 3 - Revised Proposed B and the 9K Route

Alternative 3 consists of the Revised Proposed Route for Segment 8 and Route 9K; therefore, the impacts associated with this alternative correspond to those described above for the these two routes combined (see Section 3.18.2.3). Construction of Alternative 3 would disturb approximately 1,497 acres of prime farmland, with 160 acres expected to be permanently disturbed (Table 3.18-6). Alternative 3 would disturb approximately 5,073 acres of rangeland and pasture during construction, with an estimated 559 acres expected to be permanently disturbed (Table 3.18-7). Construction of Alternative 3 would also disturb approximately 309 acres of irrigated cropland, with 23 acres expected to be permanently disturbed (Table 3.18-7). Alternative 3 would cross one CAFO, pass within 100 feet of another CAFO, and within 300 feet of 13 more.

Alternative 4 - The BG Route and FEIS Proposed 9

Alternative 4 consists of the Route BG and FEIS Proposed 9; therefore, the impacts associated with this alternative correspond to those described above for these two routes combined (see Section 3.18.2.3). Construction of Alternative 4 would disturb approximately 1,713 acres of prime farmland, with 185 acres expected to be permanently disturbed (Table 3.18-6). Alternative 4 would disturb approximately 5,250 acres of rangeland and pasture during construction, with an estimated 593 acres expected to be permanently disturbed (Table 3.18-7). Construction of Alternative 4 would also disturb approximately 560 acres of irrigated cropland, with 46 acres expected to be permanently disturbed (Table 3.18-7). Alternative 4 would not cross any CAFOs, but would pass within 20 feet of one CAFO, and within 300 feet of seven more.

Alternative 5 - The BG and 9K Routes

Alternative 5 consists of Routes BG and 9K; therefore, the impacts associated with this alternative correspond to those described above for these two routes combined (see Section 3.18.2.3). Construction of Alternative 5 would disturb approximately 1,653 acres of prime farmland, with 196 acres expected to be permanently disturbed (Table 3.18-6). Alternative 5 would disturb approximately 5,533 acres of rangeland and pasture during construction, with an estimated 645 acres expected to be permanently disturbed (Table 3.18-7). Construction of Alternative 5 would also disturb approximately 284 acres of irrigated cropland, with 20 acres expected to be permanently disturbed (Table 3.18-7). Alternative 5 would not cross any CAFOs, but would pass within 20 feet of one CAFO, and within 300 feet of 10 more.

Alternative 6 - The 8H Route and FEIS Proposed 9

Alternative 6 consists of Route 8H and FEIS Proposed 9; therefore, the impacts associated with this alternative correspond to those described above for these two routes combined (see Section 3.18.2.3). Construction of Alternative 6 would disturb approximately 2,187 acres of prime farmland, with 215 acres expected to be permanently disturbed (Table 3.18-6). Alternative 6 would disturb approximately 5,043 acres of rangeland and pasture during construction, with an estimated 533 acres expected to be permanently disturbed (Table 3.18-7). Construction of Alternative 6 would also disturb approximately 581 acres of irrigated cropland, with 48 acres expected to be permanently disturbed (Table 3.18-7). Alternative 6 would not cross any CAFOs, but would pass within 300 feet of three CAFOs.

Alternative 7 - The 8H and 9K Routes

Alternative 7 consists of Routes 8H and 9K; therefore, the impacts associated with this alternative correspond to those described above for these two routes combined (see Section 3.18.2.3). Construction of Alternative 7 would disturb approximately 2,127 acres of prime farmland, with 226 acres expected to be permanently disturbed (Table 3.18-6). Alternative 7 would disturb approximately 5,326 acres of rangeland and pasture during construction, with an estimated 585 acres expected to be permanently disturbed (Table 3.18-7). Construction of Alternative 7 would also disturb approximately 305 acres of irrigated cropland, with 22 acres expected to be permanently disturbed (Table 3.18-7). Alternative 7 would not cross any CAFOs, but would pass within 300 feet of six CAFOs.

3.18.2.5 Proponent-Proposed Design Features and Measures

This section discusses the general measures that would be implemented to avoid or minimize Project-related impacts, as well as additional measures proposed by the Project Proponents specifically for the SRBOP.

Environmental Protection Measures

The Proponents have committed to Project design features and EPMS to minimize or avoid impacts on environmental resources. These measures, the areas where they would be applicable (e.g., private, state, or federal-managed lands), as well as the details of each measure are provided in Table 2.7-1 of the FEIS. The following measure identified in Table 2.7-1 of the FEIS directly relates to agriculture and would be applicable to Segments 8 and 9:

- AGRI-1 Consult with the Farm Service Agency and landowners to determine how construction may *affect* the CRP status of the land currently enrolled in CRP.

In addition, many of the other measures identified in Table 2.7-1 that were not developed to specifically protect agricultural resources would have the effect of helping to avoid or minimize effects to agriculture. These include measures related to operations and maintenance, reclamation, vegetation, weeds, soils, water quality, transportation, and fire (see Table 2.7-1 of the FEIS).

Gateway West Transmission Line Draft SEIS

Proponent-Proposed MEP and Potential Effects of the MEP within the SRBOP

The Proponents have developed an MEP that contains design features specific to the SRBOP. This plan was developed to mitigate the effects of Project-related impacts within the SRBOP, as well as comply with the SRBOP's enabling statute (P.L. 103-64) which requires enhancement of resources within the SRBOP. The Proponents' plan contains two forms of mitigation: "compensation mitigation" and "enhancement." For this analysis, mitigation is defined as avoidance, minimization, and compensation measures aimed at offsetting adverse impacts of the Project; enhancement is defined as additional mitigation measures that are required in order to enhance the objectives and values for which the SRBOP was established.

The Proponents' MEP offers a portfolio that contains five types of mitigation/enhancement proposals, including 1) habitat restoration, 2) purchasing of private properties, 3) enhanced law enforcement, 4) visitor enhancement, and 5) line and substation removal.

The following discusses the benefit and/or impact that these proposed mitigation/enhancement proposals could have to agricultural resources. Note that only the proposal to purchase private lands around or near the SRBOP could have a direct effect on agricultural resources.

Habitat Restoration

The goal for the Proponents' habitat restoration proposal is to convert "non-native grasslands to native perennial plant communities" as well as to conduct "noxious weed control." Proposed funding to restore habitats within the SRBOP would have no effect on agricultural resources. Habitat restoration could occur in areas currently used as rangeland and pasture, but this potential reduction in rangeland and pasture would likely only affect a very small share of this type of land in the Analysis Area.

Purchase of Private Inholdings

There are private lands within the SRBOP that could contain important cultural and natural resources. The Proponents have proposed (as part of the MEP) to purchase a portion of these lands and deed them to the U.S. government, to be managed by the BLM. The Proponents have indicated that the selection of the parcels that would be purchased and deeded to the BLM would be determined by the Oversight Committee. However, the composition and exact membership of the individuals and agencies within the proposed Oversight Committee have not been identified to date.

No specific parcels or willing landowners have been identified to date; however, it is possible that some of the private lands that would be purchased could consist at least partially of areas currently used for agriculture. Therefore, this proposal could reduce the extent of privately held agricultural land in the region. The likelihood of this, as well as the extent that the purchased properties would consist of agricultural areas, cannot be determined at this time, until the location of the parcels that would be purchased has been identified by the Oversight Committee. Although the amount of land to be acquired is unknown, it would represent a very small share of total private lands in the affected county or counties, depending on the location of the transferred parcels. Assuming an average value of \$3,000 per acre, for example, a total expenditure of,

\$320,000 (as proposed by the Proponents) would allow the acquisition of approximately 106 acres of inholdings.

Law Enforcement

The Proponents' MEP contains a proposal for the funding of increased law enforcement within the SRBOP for a period of 10 years. The goal of this increased funding is to change adverse behaviors in the SRBOP by aiding law enforcement in their coverage and ability to manage public induced damage to resource. Proposed funding to enhance law enforcement resources within SRBOP would have little to no effect on agricultural resources.

Visitor Enhancement

The MEP contains a proposal to fund programs meant to enhance the experiences of visitors to the SRBOP. Proposed funding to enhance the experience of visitors to the SRBOP would have no effect on agricultural resources.

Line and Substation Removal

The Proponents have identified portions of two existing transmission lines and an existing substation within the SRBOP that could be removed. Removal would also require some reconstruction of existing lines and a short length of new line (see the Supplemental POD in Appendix 8). Table 3.18-8 identifies the acres of agricultural land that would be affected by county during construction. The vast majority of the affected area is rangeland and pasture (53 acres), with less than 2 acres of irrigated farming potentially affected. More than two-thirds of the affected acres (39 acres) are considered prime farmland (Table 3.18-8).

Table 3.18-8. Agricultural Land Potentially Disturbed as Part of MEP Line and Substation Removal (acres)

County	Drvland Farming	Irrigated Farming	Rangeland and Pasture	Grand Total	Prime Farmland
Ada	-	1	34	35	35
Canyon	-	1	<1	1	2
Elmore	-	-	19	19	2
Total	-	2	53	55	39

Acres are based on GIS; numbers are not exact and may not sum due to rounding.

Short-term impacts associated with removal, reconstruction, and removal would be similar to those described above in Section 3.18.2.2. In areas where facilities would be removed, once reclamation is complete, areas would be restored to their prior condition.

3.18.2.6 BLM Compensatory Mitigation Measures

This section describes the process that would be followed to determine if additional mitigation is required and how it would be implemented to address any impacts that remain once all the existing avoidance, minimization, and existing compensatory mitigation is implemented.

Summary of Remaining Impacts

After implementation of the EPMs and MEP discussed above, some Project-related impacts would likely remain. The impact assessment found in Sections 3.18.2.2,

Gateway West Transmission Line Draft EIS

3.18.2.3, and 3.18.2.4 incorporates the avoidance and minimization contributions of the EPMs in the impact analysis; as a result, Sections 3.18.2.2, 3.18.2.3, and 3.18.2.4 take these measures and their impact offsets into consideration. The design features outlined in the Proponents' MEP (discussed above) may reduce the magnitude of these impacts to some degree (thereby reducing the need for additional compensatory mitigation); however, the extent of this reduction cannot be fully quantified at this time (as discussed in detail above).

Note that Sections 3.18.2.2, 3.18.2.3, and 3.18.2.4 outline the current extent of known impacts that would occur Project-wide

BLM Compensatory Mitigation Categories

In addition to the above design features and EPMs meant to avoid and minimize impacts, the Gateway West POD (Appendix B to the ROD [SLM 2013b]) includes a Framework Agriculture Protection Plan. Mitigation for Project impacts to agriculture would be under the authority of the Counties and may be required under the County permitting process.

3.18 AGRICULTURE

This section addresses potential impacts from the Preferred Route, Proposed Route, and Route Alternatives during construction, operation, and decommissioning. This section analyzes the potential impacts the Project's activities could have on prime farmland; livestock grazing; crop production; lands enrolled in the Conservation Reserve Program (CRP), Grassland Reserve Program (GRP), and Wetlands Reserve Program (WRP); and dairy farms. Electrical effects on agricultural operations are summarized here and described in more detail in Section 3.21 - Electrical Environment.

The BLM's Preferred Routes for each segment of the Project are listed below. Where applicable, the preferred route identified by another federal agency or a county or state government is also noted. The BLM's Preferred Routes only apply to federal lands. If approved, the BLM's Preferred Routes could affect private lands adjacent to or between federal areas; however, decisions on siting and construction requirements for non-federal lands are under the authority of state and local governments (see Table 1.4-1 for permits that would be required and Section 3.17.1.3 for a description of the regulatory requirements).

- **Segment 1W:** The BLM's Preferred Route is the Proposed Route (Figure A-2). This route is also the State of Wyoming's preferred route.
- **Segment 2:** The BLM's Preferred Route is the Proposed Route (Figure A-3). This route is also the State of Wyoming's preferred route.
- **Segment 3:** The BLM's Preferred Route is the Proposed Route, including 3A (Figure A-4). This route is also the State of Wyoming's preferred route.
- **Segment 4:** The BLM's Preferred Route is the Proposed Route (Figures A-5 and A-6) except within the Caribou-Targhee NF. The portion of this route in Wyoming is also the State of Wyoming's preferred route. The Forest Service's preferred route is the Proposed Route within the NF incorporating Alternative 4G (Figure A-6).
- **Segment 5:** The BLM's Preferred Route is the Proposed Route incorporating Alternatives 5B and 5E, assuming that WECC reliability issues associated with 5E are resolved (Figure A-7). Power County's preferred route is the Proposed Route incorporating Alternatives SC and 5E (Figure A-7).
- **Segment 6:** The BLM's Preferred Route is the proposal to upgrade the line voltage from 345 kV to 500 kV (Figure A-8).
- **Segment 7:** The BLM's Preferred Route is the Proposed Route incorporating Alternatives 7B, 7C, 7D, and 7G (Figure A-9). The Proposed Route in the East Hills and Alternative 7G will be microsited to avoid sage-grouse PPH. Power and Cassia Counties' preferred route is Alternative 7K (Figure A-9).
- **Segment 8:** The BLM's Preferred Route is the Proposed Route incorporating Alternative 8B (Figure A-10). This is also IDANG's preferred route.

Gateway West Transmission Line Final EIS

- **Segment 9:** The BLM's Preferred Route is the Proposed Route incorporating Alternative 9E, which was revised to avoid PPH and the community of Murphy (Figure A-11). Owyhee County's preferred route is Alternative 90 (Figure A-11).
- **Segment 10:** The BLM's Preferred Route is the Proposed Route (Figure A-12).

3.18.1 Affected Environment

This section discusses those aspects of the environment that could be affected by the Project. It starts with a discussion of the Analysis Area considered, identifies the issues that have driven the analysis, and characterizes the existing conditions within the Analysis Area¹.

The Project would be located across a landscape where land is primarily used for rangeland and pasture and other agricultural purposes, with an occasional town, city, or other urbanized or developed area. The eastern portion of the Project (Segments 1W, 2, and 3) would be located in lands generally characterized by open rangeland and pasture. Moving west, the Project would cross steeper terrain with more forested lands (Segments 4, 5, and 7). Farther west (Segments 6 through 10), the Project would cross the Snake River Plain, which is characterized by agricultural crop production, as well as areas of urban development. Figure 3.17-1 shows generalized land use in the areas that would be crossed by the Preferred Route, Proposed Route, and Route Alternatives.

Land in farms accounted for almost half of the total land area in Wyoming in 2007 and 22 percent of Idaho (Table 3.4-8). In Wyoming counties, land in farms as a share of total land area ranged from 13 percent (Lincoln County) to 87 percent (Converse County). In Idaho, this share ranged from 15 percent (Lincoln County) to 74 percent (Owyhee County; Table 3.4-8). Average farm sizes ranged from 110 acres in Canyon County, Idaho, to 7,570 acres in Carbon County, Wyoming.

3.18.1.1 Analysis Area

The Analysis Area for impacts on agriculture consists of an area 250 feet on each side of the Proposed Route and Route Alternatives and 25 feet on each side of the centerline for access roads that extend outside this area, and includes the areas needed for new or expanded substations as well as temporary facilities such as multi-purpose yards and fly yards. The majority of this Analysis Area, about 83 percent, is rangeland and pasture, with land used for crop production (irrigated or dryland farming) accounting for another 10 percent of the total Analysis Area (Table 3.17-4)

Agricultural land use within the Analysis Area for Segments 1W, 2, and 3 is almost entirely rangeland and pasture. Rangeland and pasture is also the dominant land use in the Analysis Area segments in Idaho (Segments 4 [part], 5, 7, 8, 9, and 10), but land along these segments is also cultivated for crops (Table 3.18-1).

Segment 4 is approximately 88 percent rangeland and 4 percent cropland. The Analysis Area for Segment 5 consists of approximately 61 percent rangeland and 24 percent cropland.

¹ The Project no longer has a route in Nevada.

Table 3.18-1. Agricultural Land Use in the Analysis Area

Segment	Analysis Area Total (Acres)	Total Agricultural Use		Rangeland and Pasture		Irrigated Farming		Dryland Farming	
		Acres	Percent of Analysis Area	Acres	Percent of Analysis Area	Acres	Percent of Analysis Area	Acres	Percent of Analysis Area
1W	3,687	3,364	91	3,364	91	1	1	-	-
2	4,690	4,494	96	4,494	96	-	-	-	-
3	1,955	1,880	96	1,880	96	-	-	-	-
4	14,594	13,325	91	12,788	88	244	2	293	2
5	6,857	5,809	85	4,158	61	322	5	1,329	19
6	73	51	70	51	70	-	-	-	-
7	13,808	12,614	91	9,857	71	849	6	1,908	14
8	9,928	9,619	97	8,177	82	1,442	15	-	-
9	14,317	14,040	98	12,870	90	1,155	8	15	<1
10	1,358	1,291	95	669	49	622	46	<1	1
Total	71,267	66,488	93	58,308	82	4,635	7	3,545	5

Acres are rounded to the nearest acre.
t - Value less than 0.1
Source: GIS vegetation coverage

The Analysis Area for Segment 7 consists of approximately 71 percent rangeland and 20 percent cropland. The irrigated cropland in Segment 7 occurs predominantly south of Burley and at scattered locations east and west of the Deep Creek Mountains. Burley is located in the Mini-Cassia area, which consists of Minidoka and Cassia Counties, and includes some of the best agricultural land in the region.

The Analysis Area for Segment 8 is primarily rangeland (82 percent) with irrigated cropland accounting for an additional 15 percent. Irrigated agriculture is found mostly in the first 40 miles from the Midpoint Substation and the last 25 miles before Hemingway Substation.

The Analysis Area for Segment 9 is mainly rangeland (90 percent) with approximately 8 percent used for crop production. There are three areas of extensive agriculture in this segment, near the proposed Cedar Hill Substation, west of Castleford, and between Grandview and Bruneau.

The Analysis Area for Segment 10 is approximately 49 percent rangeland and 46 percent cropland. In the vicinity of Jerome and from Eden south to the Cedar Hill Substation, the entire Analysis Area is irrigated agricultural lands with scattered farms and residences. From Jerome north, the area is mostly rangeland with some crop production.

3.18.1.2 Issues Related to Agriculture

The following agriculture-related issues were brought up by the public during public scoping (Tetra Tech 2009) and comments on the Draft EIS, raised by federal and state agencies during scoping and agency discussions, or are issues that must be considered as stipulated in law or regulation:

- How much agricultural land would be impacted, and what the effects would be;
- What the effects on livestock grazing would be from construction and operations of the transmission line;

Gateway West Transmission Line Final EIS

- Whether there would be a loss of prime farmland;
- What the impacts would be to agricultural production including equipment operation and aerial spraying;
- Whether there would be a disruption to dairy operations and other types of CAFOs;
- How the transmission line would interfere with crop dusting; and
- Whether the transmission line would cause electronic interference with agricultural equipment.

3.18.1.3 Regulatory Framework

Prime farmland - Prime farmland is a land use classification used by the USDA (7 CFR Part 657.5) for lands that contain soils with the best physical and chemical characteristics for production of food, feed, forage, fiber, and oilseed crops. In addition to the FLPMA and the CWA, federal legislative acts addressing the management and protection of prime farmland include the Farmland Protection Policy Act (1984); EO 11752 (1973); EO 11988 (1973); Secretary of Agriculture Memorandum 1827; and Department Regulation 9500-3 for prime farmland, rangeland, and forest land.

Livestock grazing - Grazing on public lands is subject to the guidelines included in the various RMPs, MFPs, and Forest Plans that these lands are managed under. Grazing allotments are managed under grazing Allotment Management Plans, which are agreements developed between the rancher and the agency. Each Allotment Management Plan determines how many head of livestock may graze on the land, where they can go, how often, and for how long. Grazing allotments typically contain a mix of public, private, and state lands, which are grazed as a single unit, and can vary considerably in size. Grazing allotments in the SLM Kemmerer FO planning area, for example, range from 7 acres to 470,680 acres, with an average size of 10,149 acres (SLM 2008c).

In Wyoming, OSLI maintains a Farm Loan program that was established by the State Legislature in 1921 to provide long-term real estate loans to Wyoming's agricultural operators and includes loans to livestock owners to enhance and restore livestock numbers within the state.

Crop production - In Idaho, the Idaho Department of Agriculture has crop regulations related to seed quality and standards. None of these regulations relate to transmission lines and their facilities or land use related to cropland.

Crop spraying - Aviation is regulated by the Federal Aviation Administration (FAA). Crop dusting is exempt from FAA aviation requirements regarding ground clearance. Aerial application of pesticides and herbicides in the Analysis Area is regulated by Idaho and Wyoming. None of these regulations apply to transmission lines or their facilities, except requirements for towers over 200 feet to be lit at night. None of the Gateway West structures would be that tall.

USDA Conservation Programs - The USDA is authorized to provide monetary and technical support to private landowners who reserve agricultural lands for protection of

3.18.2.2 Effects Common to All Action Alternatives

Construction

Short-term disruption of farming activities along the ROW could occur locally during construction. However, with implementation of the EPMs identified below in the section pertaining to agricultural protection plans, impacts are expected to be minimal. Viewed in terms of agricultural operations in the potentially affected counties, the total estimated Project-related construction disturbance represents a small share of the 15 million acres of land in farms in the 19 potentially affected counties and is unlikely to noticeably affect overall agricultural production and employment in any of the affected counties. The Proponents do, however, recognize that construction of the proposed Project could have detrimental impacts on farms and have stated that they would negotiate damage-related issues, such as temporary reductions in the acreage available for cultivation, with affected farmers during the easement acquisition process.

Prime Farmland

Direct impacts to prime farmland would primarily result from construction-related soil disturbance expected to occur at tower locations, work areas, multipurpose yards, wire-pulling/splicing sites, substation sites, regeneration sites, and access roads. Potential soil impacts to prime farmland from transmission line construction include soil erosion, disruption of drainage patterns, mixing of topsoil and subsoil, potential loss of topsoil, and soil compaction. Acres of prime farmland soils that would be disturbed during construction are identified in Table D.15-1 in Appendix D. The reclamation measures presented in the Framework Reclamation Plan (see Appendix B) would be used to keep prime farmland soil losses to a minimum. Areas not also used for operations would be reclaimed as soon as possible following construction.

Most prime farmland in the Analysis Area is privately owned and actively cultivated. Potential impacts to cropland common to all action alternatives are discussed below under crop production.

Livestock Grazing

Construction could affect livestock grazing by temporarily reducing forage and displacing livestock. In addition, increased dust in areas adjacent to construction sites could reduce forage palatability. Dust has also been known to cause livestock health impacts. Construction using helicopters may displace livestock where it occurs. Construction may affect livestock control and distribution if a gate is left open or a fence is damaged. Vehicular access during construction would increase the likelihood of livestock injury or death from collisions. However, construction crews would be required to repair any damaged fences or gates immediately to ensure livestock are adequately controlled.

Transmission line construction is linear in nature with periods of intense activity separated by relatively long intervals of little or no activity. Disturbance in any one area would, however, generally last for most of one construction season, given that there are several sequential steps required. In some situations, disturbance may begin in one season and, due to weather or timing restrictions, not be completed until the next year. During intense construction periods some areas currently used for livestock grazing

Gateway West Transmission Line Final EIS

would be temporarily off limits. These sites would be identified in advance of construction, and any needed restrictions and the method of restriction (e.g., fencing, gates) would be coordinated with the respective landowner or land-managing agency.

Potential impacts to livestock grazing from construction are presented below for the Proposed Route and Route Alternatives in terms of temporary reductions of forage and expressed in acres. In all cases, the potentially affected acres represent a small share of the total acres used for livestock grazing within the Analysis Area and surrounding area, and would result in relatively small temporary reductions in the area available for grazing. The BLM Rawlins FO has indicated, however, that for the Echo Springs and North Laclede grazing allotments, disturbance from the Project could push these areas close to the 10 percent disturbance threshold and thus represent a more substantial impact.

Certain state and federal programs provide financial assistance to agricultural operations as incentives to promote agriculture. The Wyoming OSLI has indicated that if some lands become off-limits to grazing during construction they may need to change scheduled payments to agricultural lessees (Parks 2010). The Wyoming OSLI has also indicated that, prior to construction, a surface impact consideration shall be negotiated between the OSLI, the Proponents, and existing grazing lessees. Other potential economic impacts related to livestock grazing are discussed in Section 3.4 - Socioeconomics.

Crop Production

Construction could affect crop production by temporarily reducing the area available for cultivation. Construction-related impacts would depend on the type of crop, the season, and whether the land was in use or fallow. Without proper coordination between the Proponents and farm operators, impacts associated with ingress and egress to the ROW, damage to irrigation systems, timing notification, segregation and protection of topsoil, and compaction could be potentially significant.

The effects to farming operations could also result in impacts outside the areas where soil would be disturbed as part of construction activities. These effects could include damage to or loss of crops, decreases in crop yield, restrictions to farm vehicle access or aerial spraying operations, and disruption of drainage and irrigation systems. These types of potential effects are difficult to quantify and would likely be determined through negotiation with landowners. As a result, the affected acres analyzed in this section refer to areas where the soil would be directly disturbed by the Project, and do not include other areas that might be indirectly affected. These types of additional potential impacts are assumed for the purposes of analysis to be proportional to the direct estimated impacts based on surface disturbance. Potential economic impacts related to cropland are discussed in Section 3.4 - Socioeconomics and in Appendix K (for Power and Cassia Counties, Idaho).

Crop Spraying

Construction of the transmission line could reduce the area of crops that could be treated by aerial spraying. Transmission towers or construction cranes could interfere with the flight paths of aerial applications. This potential effect would vary, depending

Table 2: Annual Costs per Tower

Irrigated						
	Potatoes	Sugar Beets	Wheat	Weighted Average	Tower Footprint	
					Middle (0.193 ac)	Edge (0.165 ac)
Ownership Costs	1270	709	353	777/acre	142	121
Lost Profit	(-108)	123	(-33)	(-6)/acre	(-1)	(-1)
Duplication of Operations (see Table 3)					\$839	\$195
Weed Control (3 times/yr)	labor 1.5 hrs @ \$16 = \$24 x 3 = \$72					
	equip 1.5 hrs @ \$10 = \$15 x 3 = \$45					
	chemical @ \$5 = \$5 x 3 = \$15					
	Total = \$132				132	132
Total Annual Cost Per Tower					\$1,112	\$447
Dry Land						
	Safflower	White Wheat	Middle Safflower	Middle White Wheat	Edge Safflower	Edge White Wheat
Ownership Costs	70	60	11	10	10	8
Lost Profit	(-6)	20	(-1)	3	(-1)	3
Duplication of Operations (see Table 3)			133	91	30	22
Weed Control (Same as Irrigated)			132	132	132	132
Total Annual Cost Per Tower			\$275	\$236	\$171	\$165

Table 3 displays the annual costs per tower for the duplication of operations caused by the need to go around the tower to get full coverage that also results in some overlap, depending on the equipment width. Although there would be no overlap on potatoes and sugar beets for the planting tillage, and harvest operations, an estimated cost was included for these operations to account for the additional time to maneuver all of the large equipment used in the operations including trucks for harvesting plus idle time at the storage shed (Stoker 2011; Patterson, R. 2011). The information shown in Table 3 was inserted into Table 2 to include in the annual costs. The crop loss for the edge towers is significantly less than for the middle of the field towers because the middle tower includes one complete encircling of the tower that is not possible on the field edge. Table 4 include the price and yields used in the analysis.

Table 3: Duplication of Operations

Annual Cost Per Tower in Middle of Field						
	Irrigated				Dryland	
	Potatoes	Sugar Beets	Wheat	Weighted Average	Safflower	White Wheat
Planting	15	15	6	12	7	4
Fertilizer	334	115	72	174	30	8
Chemical	128	48	44	73	24	20
Tillage	65	30	4	33	2	2
Harvest	45	34	9	29	6	4
Crop Loss	942	422	189	518	64	53
Totals	\$1,529	\$664	\$324	\$839	\$133	\$91

Annual Cost Per Tower on Field Ed2e						
	Irrigated				Dryland	
	Potatoes	Sugar Beets	Wheat	Weighted Average	Safflower	White Wheat
Planting	15	15	4	11	3	2
Fertilizer	92	33	20	48	7	6
Chemical	13	6	5	8	3	2
Tillage	65	30	3	33	2	2
Harvest	45	34	5	28	7	3
Crop Loss	122	55	25	67	8	7
Totals	\$314	\$173	\$62	\$195	\$30	\$22

Table 4: Price and Yields Used in Analysis

	Irrigated			Dry Land		
	Potatoes	Sugar Beets	Wheat	Safflower ¹¹	White Wheat	Pasture
Price	\$7.75 <i>cwt</i> ¹¹	\$50 ton	\$5.90 <i>bu</i> ¹¹	\$0.25 <i>lb</i> ¹¹	\$7.00 <i>bu</i> ¹¹	\$20 <i>AUM</i> ¹¹
Yield	475	33	125	1,000	30	0.5

1/ Meadows 2011

2/ Cwt: hundred weight (100 pounds); bu: bushels; lb: pound; AUM: Animal Unit Month

Sprinkler Irrigation

The placement of towers in an irrigated field will cause problems that would have to be addressed and tolerated indefinitely. Where pivots are used they would be unable to traverse the entire circle and, consequently, adjustments would have to be made in the irrigation system to accommodate the tower. The adjustment would vary considerably based on the location of the tower in relation to the pivot center, One option would be to retrofit the existing pivot with an extra set of wheel assembly on each pivot tower, plus replace the existing tires with taller ones to increase the pivot's efficiency in reversing its direction if the schedule requires the pivot to return to its starting point. Local experience indicates that this would require an investment of about \$28,000 (Leslie, L; West, T.) which *would* result in an annual cost of \$20 per pivot acre

per year for depreciation and interest on the investment. A pie shaped wedge will result from the tower obstruction that will either not be irrigated at a cost of \$921 per acre for ownership costs lost profit and weed control with no crop being produced or depending on the size of the wedge either hand lines, a solid set or a wheel line could be utilized to cover the area in the wedge. This would require an additional investment in irrigation equipment and possibly a mainline. Solid sets require an investment of about \$2,200 per acre (Butler 2011), which would cost about \$200 per acre per year within the wedge area for depreciation, interest on the added investment, and labor for setting out and retrieving the line. Moving hand lines daily would require considerably less investment but more labor than a solid set system. If enough acreage existed in the wedge a wheel line could possibly be feasible. A full length wheel line costs about \$13 000 (Butler 2011) with shorter ones costing less according to their length which would add about \$60 per acre per year within the wedge area for depreciation and interest on the added investment. So, additional costs for labor and vehicles would be incurred which would vary depending on the size of the wedge.

Extra labor and vehicle expense for disconnecting and reconnecting existing wheel line systems would be required to maneuver around tower structures during the entire irrigation period. Based on an informal grower survey (Task Force 2012) it is estimated that the additional labor and vehicle expense for moving wheel lines around a tower obstruction on the edge of the field would result in an additional \$1,300 cost per tower per year for the wheel line system, if the tower is located anywhere in the middle of the field or on the edge where the mainline supplies the wheel line, it becomes impractical and too cumbersome to move the wheel line from one side of the tower to the other. This would require the addition of another wheel line to cover the remainder of the field, or the remainder of the field would not be irrigated, depending on the acreage involved.

Another option would be to install a corner arm to the existing pivot that would be utilized to traverse around the tower. This would minimize the acreage that could not be irrigated with the pivot. The corner arm would be limited to those situations where the power line tower is located within 280 feet (Lindsay Manufacturing) of the outer edge of the pivot. This would require an investment of about \$50,000 (Jensen 2012) which would result in about \$30 per pivot acre per year for depreciation and interest on the added investment.

Adding a half pivot may be considered by some landowners. This would result in two half pivots being used instead of one full pivot. This would require an investment of \$80,000 to \$100,000 for the pivot, plus ancillary items that would add about \$50 to \$65 per pivot acre per year for depreciation and interest on the added investment. Increased repairs would add another \$5 to \$10 per pivot acre per year approximately.

Articulated pivots could be utilized to traverse around obstructions in the pivot area. This system requires a considerable investment and would increase the time required to complete the irrigation cycle, which could pose a significant problem in providing timely water to the potato crop during hot weather every third year in the rotation and thus may not be feasible.

Delivering water to potatoes would be the most crucial phase in the crop rotation due to their sensitivity to moisture stress during certain periods of the growth cycle. Increasing the water delivery interval between irrigations can be detrimental depending on the duration of the increased interval particularly if a pivot must reverse directions to return to its starting point (Kruckeberg 2012). There would be a potential risk of moisture stress where the reverse pivot

traverses in excess of 80 percent of the entire circle, with the potential stress increasing as the pivot area coverage increases.

Considerable research has been done by the University of Idaho related to potato production with limited water supply (King et al. 2004). Several scenarios were studied, and the one that most closely approximates a scenario where a reverse pivot traverses 98 percent of the circle resulted in a 4 percent reduction in yield of Russet Burbank potatoes. Interpolating the data would indicate that crops with pivots traversing between 80 and 98 percent would suffer between a 1 and 4 percent yield reduction. This would result in a potato crop value loss of about \$12 to \$50 per pivot acre per year based on a three year rotation. There was considerable variance among varieties, so operators would need to study closely which varieties might work best for them if there are concerns about adequate water deliveries.

It would be too cumbersome to include specific economic data in this report for each of the countless scenarios that could exist regarding irrigating around power line towers including the location of the tower in the field, the size of the wedge area, available labor, type of crop(s), soil type, type of existing irrigation system, potato varieties, producer management techniques, etc. Each individual operation would have to be considered on its own merits and a corresponding water delivery system designed by a qualified irrigation specialist in the most efficient manner to accommodate the situation created by the tower obstruction.

Land Other than Tower Footprint and Roadways Removed from Production

Land outside the tower footprint or roadway areas may be removed from production with the installation of a power line. An example would be land that could be unreachably for irrigation within a center pivot system due to tower interference. Added annual costs **per acre** on irrigated ground for this situation would include:

Ownership costs	\$777
Lost profit	(-6)
Weed control	<u>150⁴</u>
Total per acre annual cost	\$921

Soil Compaction

In addition to the annual cost per tower, a **per acre** cost on potatoes may be incurred on potatoes for substituting ground spraying near power lines where aerial spraying may be limited. A survey of five aerial applicators indicated that a buffer zone of up to 100 feet on each side of a power line is adequate for pilot safety (Parker 2011; Hubler 2011; Driscoll 2011; Shamblin 2011; Bybee 2011). This means that up to a 200-foot-wide strip for towers located in the middle of a field and a 100-foot-wide strip for those located on the field edge would have to be ground sprayed, where feasible.

Research at the University of Idaho Parma Research Station (Thornton 2011) showed a yield reduction of 11.4 hundred weight (cwt) of potatoes per acre from soil compaction as a result of ground spraying four times per season.

- Labor and equipment costs are the same for weed control whether the area is the tower footprint or a full acre. The increase in cost of spraying a full acre (\$150 versus \$132) is from the extra chemical required, estimated at \$18.00.

Additional Cost Estimate Due to Compaction

11.4 cwt \$7.75 = \$88.35 loss per acre
4 fungicide applications required at a cost of \$113

$\$88.35 + 113 = \201.35 additional cost of ground spraying plus yield reduction

On a 3-year rotation the annual cost of ground spraying potatoes would be 1/3 of 201.35 or \$67.12 per acre sprayed. This amount would be an added annual per acre cost associated with only the additional acreage required to be ground sprayed within the 100 to 200 foot power line corridor.

Dryland Pasture

Reliable economic information pertaining to dry land pasture is scarce. Various sources for animal unit month (AUM) rates vary from \$1.35 to \$35.00. The County Task Force members and report author agreed upon a \$20/AUM and 0.5/acre/AUM. Nearby pasture is often difficult to secure, which would often necessitate replacing lost feed with hay. Land disturbed with the construction of a tower would remove pasture from production for two years, one for construction and one for re-establishing a forage crop.

One-Time Cost Estimate

Pasture yield of 0.5 AUM per acre
One cow consumes 900 lbs of feed per month
One acre produces 450 lbs of forage

Replacement hay @ \$120 per ton = 27 to replace feed lost from one acre

2 years lost production = \$54/acre (2 x \$27)
Re-vegetation cost @ \$75/acre

Ownership costs would be less than the dry land farming budget, but were not determined for this report.

Annual Cost

Annual costs would at least include ownership costs, \$27/acre for lost feed and \$150 per acre weed control. Roadway maintenance, erosion control and drainage costs could be very significant on pastureland because of the steeper and rougher terrain that exists in those areas. These would have to be addressed on an individual basis.

Roadways

Where permanent access roadways are needed annual maintenance may be required. Every one half mile of roadway that is 16.5 feet wide will equal one acre. Per acre costs are estimated as follows from Table 2):

	Irrigated	Dry land (average of safflower and wheat)
Ownership Costs	77	65
Lost Profit	(-6)	7
Weed Control	<u>150</u>	<u>150</u>
Total	\$921	\$222

Grading and other maintenance costs may occur. Not all roads needed for tower construction would be permanent. Generally permanent access roads would not be needed in flat agricultural land because the utility company would be able to quickly reestablish access across the field to reach a tower in the event repairs are needed.

Conservation Reserve Program (CRP)

CRP programs on affected acres will require special attention. Every situation will require individual scrutiny. Possible costs could include all rental payments plus interest, all cost share payments plus interest, CRP-Signing Incentive Payment (SIP) plus interest, Practice Incentive Payment (PIP) plus interest, CP23 Wetland Restoration, one time WRI payment, plus interest and liquidated damages if applicable, according to paragraph 577 of 2- PR. The total impact could be substantial and each contract would be handled on an individual basis (Yokom 2011; USDA 2010-2011).

Insurance

One comment surfaced during the Gateway West Dradt EIS public comment period stating that farm insurance premiums would increase with the installation of a power line on their property. Three insurance agencies were contacted and none has ever heard of that happening. Power company representatives also reported that they had never heard of such an event occurring (Carpenter 2011; Dalton 2011; Kimball 2011; Ybarguen 2011).

Soil Erosion

The placement of towers and the construction of access roadways on farmland could create an erosion hazard that would necessitate an investment in various types of erosion control structures to minimize damage. Re-vegetation may also be required. This will vary greatly depending on the terrain and type of vegetation on the site and will need to be handled on an individual basis.

Intangibles

There are many potential scenarios that could occur regarding the possible impact on the various crops produced in the area but calculating the actual damages is problematic due to the variance in nature and frequency of the occurrence. Most of these situations involve some type of either a plant disease, such as late blight on potatoes stripe rust on wheat, or an insect outbreak, and can be very destructive. The placement of a tower in a field will affect aerial applications which may be necessary to combat various problems such as presented in the soil compaction section. Ground spraying would be considered in lieu of aerial spraying but may not be possible on short notice due to the field being too wet, particularly under wheel line systems. Tillage such as disking specific isolated areas of an infected crop may be considered in some extreme situations.

These types of occurrences will vary within the project area and would have to be handled individually (Povey 2011; Gehring 2011; Mathews 2011; Meadows 2011).

SUMMARY This summary is excellent. We encourage you to read it in its entirety:

Construction of power lines in agricultural areas causes a tremendous amount of disruption to producers on whose property the lines are constructed. The tangent single-circuit 500 k-V lattice steel towers proposed for this project pose particular problems due to the 41 ft x 46 ft base. This creates a lot of inconvenience and loss of efficiency, particularly by requiring maneuvering around the towers for the large row crop equipment common in the study area. Towers located in the field interior are much more disruptive, and thus more costly, than those on the field edge.

This report presents an analysis of the agricultural economic impact that would be created by the installation of a high voltage power line in Segment 7 of the Project. Both one-time and recurring annual costs were included in the analysis to reflect the total economic long-term consequences resulting from the construction of such a line. This analysis is general in nature. Individuals may present differing information but should have the proper records to substantiate their claim. The addition of another power line to the existing matrix would compound the problems landowners already face. This would particularly be true with aerial spraying which would be very significant in some cases. Also irrigation systems will have to be modified on an individual basis to accommodate additional field obstructions. If installed great care should be taken to place the towers to minimize these negative impacts as much as possible.

The costs and returns associated with this analysis were estimated in December 2011. It should be noted that costs and returns are constantly changing and their future levels cannot be accurately predicted. Consequently any economic considerations made in the future that refer to the economic data in this report should be carefully scrutinized and then adjusted accordingly using the proper indexes published by the National Agricultural Statistics Service to reflect changes that occur during the intervening period.

In assessing the total economic impact on a specific property all of the following components need to be included:

1. One-time costs **per disturbed/impacted acre**, including roadway and the actual transmission line construction area. These costs would include ownership operating and lost profit as detailed in Table 1.
2. Annual costs including the ownership, lost profit and weed control in the tower footprint area plus the duplication of operations for the extra costs of farming around the tower(s). These are listed in Tables 2 and 3 on a **per tower** basis.
3. Annual **per acre** costs including ownership, lost profit and weed control on roadways and other areas such as the wedge created in center pivots.
4. Soil compaction costs for spraying and yield loss on a **per acre** basis in the area requiring ground spraying only within the power line corridor.
5. All costs associated with the disruption of CRP programs where applicable.
6. The costs of reorganizing irrigation systems including the added investment and extra labor. These would be on a **per pivot acre** basis and possibly **per wedge acre** where the wedge would continue to be irrigated with an additional system.

7. Soil erosion and various intangibles may occur on a sporadic basis and each situation would have to be handled individually.

APPENDIX

Overlap example: Making one entire trip around the circumference of the tower with a 60-foot fertilizer spreader calculates to 0.59 of an acre actually applied, while maintaining a 10-foot buffer strip around the tower base. The crop budget for irrigated wheat calls for a fertilizer cost of \$123/acre; multiplying \$123 by 0.59 of an acre results in an approximate \$72 per tower overlap cost for fertilizer, as shown in Table 3. This process is repeated for all of the operations performed on that particular crop, and then they are added together to arrive at the total duplication cost per tower. The amount of land duplicated for each crop is dependent on the width of the equipment utilization in each operation. This same process is followed for each crop and each type of tower location.

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Comment : Sage Grouse

December 9, 2015 RAC meeting @
the BDO BLM 11:30 agenda:
Sage-Grouse Presented by Brent
Ralston ID State BLM.

We learned that the geography
is divided into four subregions.
Idaho is the subregion with the
most habitat and the most sage-
grouse.

He explained that if we lost
10% of bird or habitat that that
would cause the agency to pause
to discern the etiology of said
loss. If we loose 20% of bird
or habit the Agency will shut
the land down.

Between the Murphy Complex
fire the Soda fire and the
miles and miles required to install
pipelines that may very well
hit the 20% hard trigger. Once
the land is shut down we will
not be allowed to graze cows
This choke us with fuel load
and everything in Eastern Owyhee
County will be cremated! Incidentally
fire is the number 1 threat to
sage-grouse.

This cannot / will not be tolerated.
This is insane!

**Record of Decision and
Approved Resource Management Plan
Amendments for the Great Basin Region,
Including the Greater Sage-Grouse Sub-Regions
of**

**Idaho and Southwestern Montana
Nevada and Northeastern California
Oregon
Utah**

Prepared by:
US Department of the Interior
Bureau of Land Management
Washington, DC

September 2015

SUMMARY

This Record of Decision (ROD) is the culmination of an unprecedented effort to conserve Greater Sage-Grouse (GRSG) habitat on public lands administered by the Bureau of Land Management (BLM). It is consistent with the BLM's multiple-use and sustained yield mission and the joint objective established by Federal and State leadership through the GRSG Task Force to conserve GRSG habitat on Federal, State, and private land such that additional protections under the Endangered Species Act may be avoided.

In response to a 2010 determination by the US Fish and Wildlife Service (FWS) that the listing of the GRSG under the Endangered Species Act was "warranted, but precluded" by other priorities, the BLM, in coordination with the US Department of Agriculture Forest Service, developed a landscape-level management strategy, based on the best available science, that was targeted, multi-tiered, coordinated, and collaborative. This strategy offers the highest level of protection for GRSG in the most important habitat areas. It addresses the specific threats identified in the 2010 FWS "warranted, but precluded" decision and the FWS 2013 Conservation Objectives Team (COD Report).

This ROD and Approved Management Plan Amendments (ARMPAs) are for the Great Basin Region GRSG Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah. The ARMPAs include GRSG habitat management direction that avoids and minimizes additional disturbance in GRSG habitat management areas. Moreover, they target restoration of and improvements to the most important areas of habitat. Management under the ARMPAs is directed through land use allocations that apply to GRSG habitat. These allocations accomplish the following:

- Eliminate most new surface disturbance in the most highly valued sagebrush ecosystem areas identified as Sagebrush Focal Areas
- Avoid or limit new surface disturbance in Priority Habitat Management Areas, of which Sagebrush Focal Areas are a subset
- Minimize surface disturbance in General Habitat Management Areas

In addition to protective land use allocations in habitat management areas, the ARMPAs include a suite of management actions, such as establishing disturbance limits, GRSG habitat objectives, mitigation

From: mail_corridoreiswebmaster
To: mail_corridoreiswebmaster; mail_corridoreisarchives
Subject: Regions 4, 5, and 6 Report Input [10090] - Webmaster Receipt
Date: Wednesday, February 3, 2021 5:47:51 PM
Attachments: [ID_10090_RobynThompsonCommentreducedsizepdf_Part3.pdf](#)

Thank you for your input, Robyn Thompson.

The tracking number that has been assigned to your input is **10090**. Please refer to the tracking number in all correspondence relating to your input.

Date: February 03, 2021 17:47:34 CST

First Name: Robyn
Last Name: Thompson
Email: ocnrkdir@aol.com

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

Input

I am submitting this comment for Robyn Thompson of 16033 Bates Creek Road, Oreana, Idaho who does not have computer capability.

She had originally attempted to have the document submitted prior to January 31, 2021 however it may not have uploaded due to its size of 22.4 MB.

I have split the document into three parts for upload and will do a separate upload for each part in order to remain under the 10MB limit for each document.

This is Robyn Thompson Comment Part 3.

James Desmond

Attachments

Robyn Thompson Comment reduced size pdf_Part3.pdf

Questions? Contact us at: corridoreiswebmaster@anl.gov

Table I-2
Threats to GRSG in the Great Basin Region as identified by the COT

Population	Unit Number	Isolated Small Size	Sagebrush Elimination	Agriculture Conversion	Fire	Conifers	Weeds/Annual Grasses	Energy	Mining	Infrastructure	Improper Grazing	Free-Roaming Equids	Recreation	Urbanization	EIS/Plan
Rich-Morgan-Summit (Utah)	9b				Y	Y	Y	Y		Y			Y	Y	Utah
Uintah (Utah)	9c				Y	Y	Y	L	Y	Y			Y	Y	Utah
Strawberry Valley (Utah)	10a	Y			Y	Y	Y	Y		Y			Y		Utah
Carbon (Utah)	10b	Y			Y		Y	Y	Y	Y			Y		Utah
Sheeprock Mountains (Utah)	11	Y			Y	L	L	Y	Y	L		Y	L		Utah
Emery (Utah)	12	Y			Y	Y	Y	Y	Y	Y			Y		Utah
Greater Parker Mountain (Utah)	13a				Y	Y	Y			Y			Y		Utah
Panguitch (Utah)	13b			Y	Y	Y	Y	Y	L	Y			Y	L	Utah
Bald Hills (Utah)	13c	Y		Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Utah
Ibapah (Utah)	15a	Y			Y	Y	Y	Y	Y	Y		Y	Y		Utah
Hamlin Valley (Utah)	15b	Y			Y	Y	Y			Y		Y	Y		Utah
Box Elder (Utah)	26b			Y	Y	Y	Y	L	Y	Y			Y		Utah
N. Great Basin (Oregon, Idaho, Nevada)	26a		L	L	Y	Y	Y	L	L	Y	Y	L	Y	Y	Idaho/SW Montana, Oregon, Nevada/California
Baker (Oregon)	17	Y	Y	Y	Y	L	Y	L	Y	L	U		L	L	Oregon
Central Oregon (Oregon)	28		L	L	Y	Y	Y	L	Y	L	Y	U	L	L	Oregon
W. Great Basin (Oregon, California, Nevada)	31		L	L	Y	Y	Y	L	L	L	Y	Y	U		Oregon, Nevada/California
Klamath (California)	29	Y	U	U	Y	Y	Y	L		U	U	U	U	U	Nevada/California
Northwest Interior (Nevada)	14	Y			Y		Y	U	Y	Y	Y	Y	Y		Nevada/California
Southern Great Basin (Nevada)	15c	L	L	L	Y	Y	Y	L	L	Y	Y	Y	Y		Nevada/California
Quinn Canyon Range (Nevada)	16	Y			Y	Y	Y			Y	Y	Y	Y		Nevada/California

Table 1-2
Threats to **GRSG** In the **Great Basin Region** as Identified by the COT

Population	Unit Number	Isolated Small Size	Sagebrush Elimination	Agriculture Conversion	Fire	Conifers	Weeds/Annual Grasses	Energy	Mining	Infrastructure	Improper Grazing	Free-Roaming Equids	Recreation	Urbanization	EIS/Plan
Warm Springs Valley (Nevada)	30	Y		Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Nevada/California
East Central (Idaho)	18	Y	L	Y	L	Y	L	Y		Y	Y		L		Idaho/SW Montana
Snake-Salmon-Beaverhead (Idaho)	23		L	L	Y	L	Y	Y		L	Y	Y	L		Idaho/SW Montana
Weiser (Idaho)	25	Y	L	L	L	L	Y	Y		L	Y		L	L	Idaho/SW Montana
Sawtooth (Idaho)	27	Y	L		L	U	L			Y	Y		L		Idaho/SW Montana
Southwest Montana (Montana)	19-22		L		L	L	Y	L	L	L	Y		L	L	Idaho/SW Montana

Source: FWS 2013
Threats are characterized as Y = threat is present and widespread, L = threat present but localized, and U = unknown.

The planning associated with the National GRSG Conservation Strategy has been coordinated under two administrative planning regions: the Rocky Mountain Region and the Great Basin Region. The regions were drawn roughly to correspond with the threats identified by the FWS in Its 20 IO listing decision, along with the WAFWA MZs framework (Stiver et al. 2006). Due to differences in the ecological characteristics of sagebrush across the range of the GRSG, WAFWA delineated MZs I through VII, based primarily on floristic provinces. Vegetation found in an MZ is similar, and GRSG and their habitats in these areas are likely to respond similarly to environmental factors and management actions.

The Great Basin Region is composed of plan amendments in California, Nevada, Oregon, Idaho, and portions of Utah and Montana. This region falls in WAFWA MZs III (Southern Great Basin), IV (Snake River Plain), and V (Northern Great Basin). The Rocky Mountain Region is composed of BLM planning in Montana, North Dakota, South Dakota, Wyoming, Colorado, and portions of Utah. (This includes plan revisions and plan amendments.) That region falls within WAFWA MZs I (Great Plains), II (Wyoming Basin), and a portion of VII (Colorado Plateau).

Both the Rocky Mountain and Great Basin regions are further divided into sub-regions. The BLM initiated 15 sub-regional planning efforts and associated EISs to analyze the alternatives developed for

Table 1-4
Key Responses from the Great Basin Region GRSG ARMPAs that Address the COT Report Threats

Threats to GRSG and its Habitat (from COT Report)	Key Management Responses from the Great Basin Region GRSG ARMPAs
Free-roaming equid (horses and burros) management	<ul style="list-style-type: none"> • Prioritize gathers in SFAs, followed by other PHMAs. • Manage herd management areas in GRSG habitat within established appropriate management level (AML) ranges to achieve and maintain GRSG habitat objectives. • Prioritize rangeland health assessment, gathers, and population growth suppression techniques, monitoring, and review and adjust AMLs and preparation of herd management area plans in GRSG habitat.
Range management structures	<ul style="list-style-type: none"> • Allow range improvements that do not impact GRSG or that provide a conservation benefit to GRSG, such as fences for protecting important seasonal habitats. • Remove livestock ponds built in perennial channels that are negatively impacting riparian habitats. Do not permit new ones to be built in these areas.
Recreation	<ul style="list-style-type: none"> • PHMAs and IHMAs—Do not construct new recreation facilities unless required for health and safety purposes or if the construction will result in a net conservation gain to the species. • Allow special recreation permits only if their effects on GRSG and its habitat are neutral or result in a net conservation gain. • PHMAs and GHMAs—Off-highway vehicle (OHV) use limited to existing routes (routes to be designated through future travel management planning). The Utah ARMPA does retain two areas as open to OHV use in PHMAs.
Fire	<ul style="list-style-type: none"> • Identify and prioritize areas that are vulnerable to wildfires and prescribe actions important for GRSG protection. • Restrict the use of prescribed fire for fuel treatments. • Prioritize post-fire treatments in SFAs, other PHMAs, IHMAs, and GHMAs.
Nonnative, invasive plant species	<ul style="list-style-type: none"> • Improve GRSG habitat by treating annual grasses. • Treat sites in PHMAs, IHMAs, and GHMAs that contain invasive species infestations through an integrated pest management approach.
Sagebrush removal	<ul style="list-style-type: none"> • PHMAs—Maintain all lands capable of producing sagebrush (but no less than 70 percent), with a minimum of 15 percent sagebrush canopy cover, consistent with specific ecological site conditions. • Ensure that all BLM use authorizations contain terms and conditions regarding the actions needed to meet or progress toward meeting the habitat objectives for GRSG.
Pinyon and juniper expansion	<ul style="list-style-type: none"> • Remove conifers encroaching into sagebrush habitats, prioritizing occupied GRSG habitat, in a manner that considers tribal cultural values.
Agricultural conversion and exurban development	<ul style="list-style-type: none"> • Retain GRSG habitat in Federal management, unless disposal (including exchanges) of the lands would provide a net conservation gain to GRSG or disposal (including exchanges) of the lands would have no direct or indirect adverse impact on conservation of GRSG.

Table 1-4
Key Responses from the Great Basin Region GRSG ARMPAs that Address the
COT Report Threat

Threats to GRSG and its Habitat (from COT Report)	Key Management Responses from the Great Basin Region GRSG ARMPAs
	<ul style="list-style-type: none"> • IHMAs-Avoidance area (may be available for wind energy development with special stipulations; applicable to Idaho only). • GHMAs-Avoidance area (may be available for wind energy development with special stipulations, except in Utah and Idaho, where these areas are open to wind energy development).
Energy development-solar energy	<ul style="list-style-type: none"> • PHMAs-Exclusion area (not available for solar energy development under any conditions, except in southeastern counties in Oregon, where portions of PHMAs are avoidance areas). • IHMAs-Avoidance area (may be available for solar energy development with special stipulations: applicable to Idaho only). • GHMAs-Exclusion area (not available for solar energy development under any conditions, except in Oregon and Montana, where these areas are avoidance areas for solar energy development, and Idaho, where these areas are open to solar energy development).
Infrastructure – major rights-of-way (ROWs)	<ul style="list-style-type: none"> • PHMAs-Avoidance area (may be available for major ROWs with special stipulations). • IHMAs-Avoidance area (may be available for major ROWs with special stipulations). • GHMAs-Avoidance area (may be available for major ROWs with special stipulations, except in Utah, where GHMAs are open).
Infrastructure-minor ROWs	<ul style="list-style-type: none"> • PHMAs-Avoidance area (may be available for minor ROWs with special stipulations). • IHMAs-Avoidance area (may be available for minor ROWs with special stipulations; applicable to Idaho only).
Mining-locatable minerals	<ul style="list-style-type: none"> • SFAs-Recommend withdrawal from the Mining Law of 1872.
Mining-nonenergy leasable minerals	<ul style="list-style-type: none"> • PHMAs-Closed area (not available for nonenergy leasable minerals; however, expansion of existing operations could be considered if the disturbance is within the cap and subject to compensatory mitigation).
Mining-salable minerals	<ul style="list-style-type: none"> • PHMAs-Closed area (not available for salable minerals), with a limited exception (may remain open to free use permits and expansion of existing active pits if criteria are met).
Improper livestock grazing	<ul style="list-style-type: none"> • Prioritize the review and processing of grazing permits and leases in SFAs, followed by PHMAs. • Ensure that the NEPA analysis for renewals and modifications of grazing permits and leases includes specific management thresholds, based on the GRSG habitat objectives table, land health standards, and ecological site potential, to allow adjustments to grazing that have already been subjected to NEPA analysis. • Prioritize field checks in SFAs, followed by PHMAs, to ensure compliance with the terms and conditions of grazing permits.

I. Introduction

action would not have direct, indirect, or cumulative effects on GRSG or its habitat or if the action is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and it would provide a clear conservation gain to GRSG. This is fully consistent with guidance in the NTT Report, which states, "**Do not allow new surface occupancy on federal lands within priority habitats**" (NTT 2011, p. 23).

Similarly, PHMAs are closed to nonenergy and salable mineral development but does not apply to locatable minerals governed under the 1872 Mining **Law**). An exception may be granted for free-use permits and the expansion of active pits for salable minerals and expansion of nonenergy leasable development under certain conditions. This exception is included because of the importance of these materials to local communities and their limited disturbance, which would be offset by the mitigation requirements.

Because there is no potential for coal development in the Great Basin Region outside of Utah, only the Utah **ARMPA** addresses the potential disturbance threat from coal development. In Utah, at the time an application for a new coal lease or lease modification is submitted to the BLM, the BLM will determine whether the lease application area is deemed unsuitable for all or certain coal mining methods, pursuant to 43 CFR 3461.5. PHMAs are essential habitat for maintaining GRSG for the purposes of suitability criteria set forth at 43 CFR 3461.5(o)(1).

All PHMAs will be managed as exclusion areas for commercial renewable energy development (solar and wind), with the exception of areas outside of SFAs in three counties in southeastern Oregon. The three counties in Oregon will be managed as avoidance areas, with priority placed on locating commercial-scale wind and solar energy development in nonhabitat areas first, that is, outside of PHMAs and GHMAs, before development in PHMAs is approved. **New ROWs and development for transmission lines, pipelines, and related infrastructure would be avoided by restricting land use authorizations.** In avoidance areas, exceptions would be granted only if it can be demonstrated that adverse impacts would be avoided or that residual impacts would be mitigated.

High voltage transmission lines will generally be avoided in PHMAs. A limited number of priority transmission lines, such as Transwest Express and portions that are collocated with Transwest Express, including Gateway South, Gateway West, and Boardman to Hemingway, have been proposed to expand access to renewable sources of energy and to improve the reliability of the western grid. These projects **have been underway for several years and are currently being analyzed under NEPA.** As part of the decision-making process for those projects, conservation measures for GRSG are being analyzed in the project-specific NEPA processes, which should achieve a net conservation benefit for GRSG.

New recreation facilities would not be authorized in PHMAs, unless the development results in a net conservation gain to the GRSG or its habitat or unless required for health and safety purposes.

In PHMAs, travel is limited to existing routes until new routes are designated through the implementation travel management planning process. Travel management plans, including route inventories, NEPA analysis, and route designation will be completed in a subsequent public planning process.

A 3 percent human disturbance cap in PHMAs has been established in accordance with the recommendations contained in the NTT Report and peer-reviewed literature from the Great Basin

1.6 KEY COMPONENTS OF THE BLM GRSG CONSERVATION STRATEGY

The ARMPAs were developed to meet the purpose and need to conserve, enhance, and restore GRSG habitat by eliminating or minimizing threats to their habitat identified in the 2010 listing decision and highlighted in the Background and Purpose Section of the COT Report (FWS 2013). Consequently, consistent with guidance contained in the COT and NTT Reports, four essential components of the GRSG conservation strategy were identified, as follows:

- Avoiding or minimizing new and additional surface disturbances
- Improving habitat conditions
- Reducing threats of rangeland fire to GRSG and sagebrush habitat in the Great Basin
- Monitoring and evaluating the effectiveness of conservation measures and implementing adaptive management as needed.

The land allocations and management actions included in the ARMPAs incorporate these components and are summarized below.

1.6.1 Avoid and Minimize Surface Disturbance

Land Use Allocations and Management Actions in SFAs, PHMAs, and GHMAs

The four Great Basin ARMPAs build on the designated habitat management areas described in Section 1.5 by applying management actions to these areas to avoid and minimize disturbance associated with proposed projects, as described below and shown in Table 1-4. Land use plan allocations specify locations within the Planning Area that are available or unavailable for certain uses and also prioritize conservation and restoration management actions applied to habitat management areas.

The COT Report states that "maintenance of the integrity of PACs . . . is the essential foundation for sage-grouse conservation" (FWS 2013, p. 36). Areas of PHMAs largely coincide with areas identified as PACs in the COT Report. While surface disturbance associated with development in the Great Basin is not as significant a threat to GRSG and its habitat as rangeland fire and invasive species, the BLM ARMPAs include land allocations and management actions that avoid and minimize surface disturbance in PHMAs for identified threats (e.g., energy, mining, infrastructure, improper grazing, free-roaming horses and burros, recreation and urbanization). These land allocations and management actions are necessary because the location and extent of habitat loss to rangeland fire is difficult to predict, and much of the habitat, due to low precipitation in the Great Basin, is difficult to restore once lost; further, even a small amount of development in the wrong place could have an outsized impact in these landscapes.

SFAs—The most restrictive allocations include requirements to avoid and minimize additional disturbance in SFAs, which are a subset of lands within PHMAs, with the highest habitat value for GRSG. Surface disturbance from fluid mineral development is avoided by imposing NSOs, without waiver, modification, or exception. In addition, these areas will be recommended for withdrawal from mineral entry under the Mining Law of 1872, subject to valid existing rights, to address the risk of disturbance due to mining.

PHMAs—In PHMAs outside of SFAs new fluid mineral leasing would be subject to NSOs, with no waivers or modifications. Exceptions would be granted only under two circumstances: If the proposed

Idaho and Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendment

Attachment I

From the USDI 2015 Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region Including the Greater Sage-Grouse Sub-Regions of: Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah

Prepared by
US Department of the Interior
Bureau of Land Management
Idaho State Office

September 2015



I. Introduction

and conservation objectives provided in the 2013 Conservation Objectives Team (COI) Report for sage-grouse" (FWS 2014b).

Grazing, which is the most widespread use of the sagebrush ecosystem, will continue in a manner consistent with the objective of conserving the GRSG. Land health standards will incorporate GRSG habitat objectives and vegetative management objectives consistent with the ecological potential of the landscape as recommended by the COT to "... conduct grazing management for all ungulates in a manner consistent with local ecological conditions that maintains or restores healthy sagebrush shrub and native perennial grass and forb communities and conserves the essential habitat components for GRSG (e.g., shrub cover, nesting cover)" (FWS 2013).

The **ARMPAs** also address the adverse impacts of free-roaming WHBs on GRSG habitat by prioritizing gathers and removing WHBs to achieve AMLs in SFAs, PHMAs, and GHMAs (in that order). The BLM has been working with the National Academy of Sciences to conduct new research of methods to reduce WHB reproduction rates. Through a combination of targeted gathers and the development of an effective agent for controlling future free-roaming WHB reproductive rates, over time, this threat to GRSG may be effectively managed.

Since the interaction of fire and invasive species represents the primary threat to GRSG survival in the Great Basin region, the **ARMPAs** provide specific guidance for improving efforts to reduce the risk of GRSG habitat loss to wildfire, including fire prevention and the restoration of habitats impacted by fire. The Department of the Interior took a series of actions over 2014 and 2015 to develop a more complete and comprehensive strategy for dealing with this threat. This led to Secretarial Order 3336 and the subsequent report, An Integrated Rangeland Fire Management Strategy: Final Report to the Secretary of the Interior (US Department of the Interior 2015).

In accordance with Secretarial Order 3336 and subsequent rangeland fire management strategy, substantial changes in policy and management direction have been made and will continue to be made to enhance BLM's ability to manage the threat of rangeland fire. These will affect all aspects of the rangeland fire management program; they will range from better coordination between resource managers and fire management officers to the identification and prioritization of prevention, suppression, and restoration in SFAs, PHMAs, and GHMA; to the commitment of additional equipment and crews for rangeland firefighting; to additional funding and policy direction to improve post-fire restoration, to the completion of an initiative to collect, store, and better utilize native seed and sagebrush in post-fire restoration of sagebrush steppe ecosystems. This and the Initiative to fight the spread of nonnative invasive species that contribute to higher rangeland fire risk (e.g., cheatgrass) discussed below have fundamentally changed how rangeland fire is managed to benefit sagebrush ecosystems and GRSG habitat.

The COT Report and other more recent research and analysis amplify concern for the contribution of cheatgrass and other invasive annual species to the loss of GRSG habitat associated with increased fire frequency and intensity. Work initiated by the WAFWA and based on recent research by Chambers et al. (2014) led to the development of the FIAT and a subsequent assessment that identified areas of resistance and resilience to fire in SFAs, PHMAs, and GHMAs. Through use of the FIAT Assessment Tool, land managers can more efficiently allocate and use fire resources at initial attack, to stop fire early and prevent catastrophic habitat loss, and to target restoration at those areas important to the species

Table 2. Relationship between the 18 threats and the three habitat disturbance measures for monitoring.

Note: Data availability may preclude specific analysis of individual layers. See the detailed methodology for more information.

USFWS Listing Decision Threat	Sagebrush Availability	Habitat Degradation	Energy and Mining Density
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

Soft Triggers Response:

Soft triggers require immediate monitoring and surveillance to determine causal factors and may require curtailment of activities in the short- or long-term as allowed by law. The project level adaptive management strategies will identify appropriate response where the project activities are identified as the causal factor. The BLM and the adaptive management group will implement an appropriate response strategy to address causal factors not addressed by specific project adaptive management strategies, not attributable to a specific project, or to make adjustments at a larger regional or state-wide level.

Hard Triggers:

Hard triggers are indicators that management is not achieving desired conservation results. Hard triggers would be considered an indicator that the species is not responding to conservation action, or that a larger-scale impact is having a negative effect.

Hard triggers are focused on three metrics: 1) number of active leks, 2) acres of available habitat, and 3) population trends based on annual lek counts.

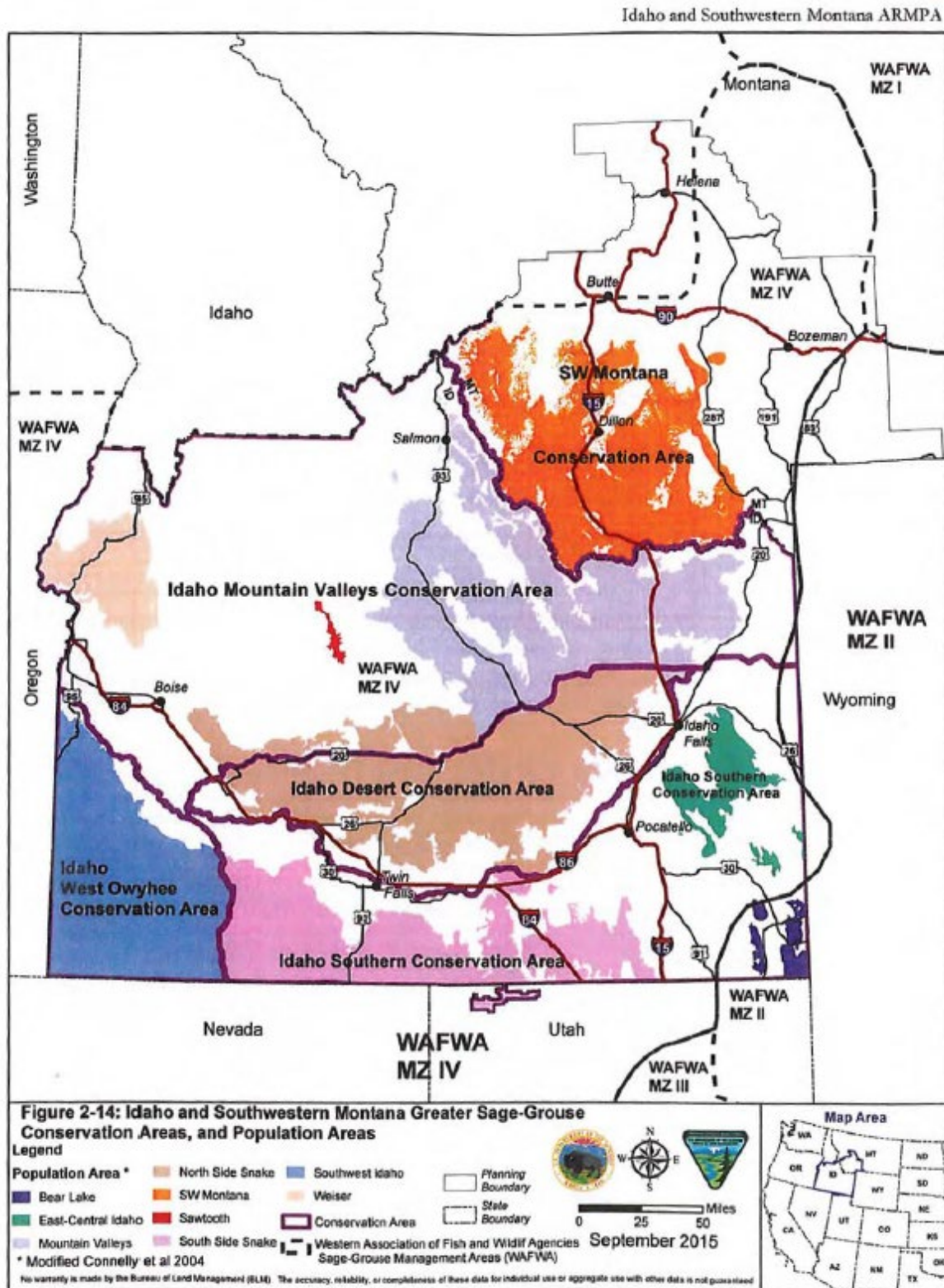
Within the context of normal population variables, hard triggers shall be determined to take effect when two of the three metrics exceed 60% of normal variability for the B U in a single year, or when any of the three metrics exceed 40% of normal variability for a three-year time period within a five-year range of analysis. A minimum of three years is used to determine trends, with a five-year period preferred to allow determination of three actual time periods (Y1-2-3, Y2-3-4, Y3-4-5). Baseline population estimates are established by pre-disturbance surveys, reference surveys and account for regional and statewide trends in population levels.

Population count data in Montana are maintained by Montana Fish, Wildlife, and Parks (FWP). Estimates of population are determined based upon survey protocols determined by FWP, and are implemented consistently throughout the state. Population counts are tracked for individual leks and are then summarized for each Priority Habitat Management Area (PHMA).

Hard Trigger Response:

Hard triggers represent a threshold indicating that immediate action is necessary to stop a severe deviation from GRSG conservation objectives set forth in the BLM plans. As such, the Proposed Plan/Final EIS includes a "hard-wired" plan-level response; that is, it provides that, upon reaching the trigger, a more restrictive alternative, or an appropriate component of a more restrictive alternative analyzed in the EIS will be implemented without further action by the BLM. Specific "hard-wired" changes in management are identified in **Table E-8**, Specific Management Responses.

In addition to the specific changes identified in Table 2-3 the BLM will review available and pertinent data, in coordination with GRSG biologists and managers from multiple agencies including the SFWS, RCS, and the State of Montana, to determine the causal factor(s)



Idaho and Southwestern Montana Greater Sage-Grouse Approved RMP Amendment

B. Buffers

Applying Lek Buffer-Distances When Approving Actions

- *Buffer Distances and Evaluation of Impacts to Leaks*

Evaluate impacts to leaks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. state wildlife agency plans), the BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the US Report *Colmroolio11B1rffer Distance Estimates for Greater Sage-Grouse- /A Review* ([Open file Report 2014-1239](#)). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

- o linear feature (roads) within 3.1 miles of leaks
- o infrastructure related to energy development within 3.1 miles of lek .
- o tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of lek .
- o low structures (e.g., fences, rangeland structures) within 1.2 miles of leaks.
- o surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of lek.
- o noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leaks.

Justifiable departures to decrease or increase from the default distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impact . The USGS report recognized "that because of variation in population , habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range". The USGS report also states that "various protection measures have been developed and implemented ... [which have] the ability (alone or in concert with others) to protect important habitat , sustain populations, and support multiple-use demands for public lands". All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

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MD LR 9: New ROW applications for water facilities (ditches, canals, pipelines), or amendments to existing water facilities which include additional structures to improve fish passage or benefits to fisheries (new diversions, fish screens) will be allowed on a case-by-case basis subject to RDFs to reduce Impacts on GRSG habitat and mitigation requirements regarding GRSG habitat loss as needed.

MD LR 10: When a ROW grant expires and is not requested to be renewed, is relinquished, or terminated, the lease holder will be required to reclaim the site by removing overhead lines and other infrastructure and to eliminate avian predator nesting opportunities provided by anthropogenic development on public lands associated with the now void ROW grant (e.g., remove power line and communication facilities no longer In service).

MD LR 11: As opportunities and priorities Indicate work with existing ROW holders to retrofit existing towers and structures consistent with RDFs described In **Appendix C**.

MD LR 12: PHMA (Idaho and Montana) and IHMA (Idaho), and GHMA (Montana only) are designated as avoidance areas for high voltage transmission line and large pipeline ROWs, except for Gateway West and Boardman to Hemingway Transmission Projects. All authorizations In these areas, other than the following Identified projects, must comply with the conservation measures outlined In this proposed plan, including the RDFs and avoidance criteria presented in MD SSS 29 and MD SSS 30 of this document. The BLM Is currently processing an application for Gateway West and Boardman to Hemingway Transmission Projects and the NEPA review for this project is well underway. Conservation measures for GRSG are being analyzed through the project's NEPA review process, which should achieve a net conservation benefit for the GRSG.

MD LR 13: Consider the likelihood of development of not-yet-constructed surface disturbing activities - as defined in Table 2 of the Monitoring Framework (**Appendix D**) - under valid existing rights.

Land Tenure

MD LR 14: Lands classified as PHMA, IHMA. and GHMA for GRSG will be retained in federal management unless: (1) the agency can demonstrate that disposal of the lands, including land exchanges, will provide a net conservation gain to the GRSG or (2) the agency can demonstrate that the disposal, including land exchanges, of the lands will have no direct or indirect adverse Impact on conservation of the GRSG. Land tenure adjustments will be subject to the following disposal, exchange, and acquisition criteria, which include retaining lands with GRSG habitat. Retention of areas with GRSG will reduce the likelihood of habitat conversion to agriculture, urbanization, or other uses that will remove sagebrush habitat and potentially Impact sensitive plants. Criteria:

- a. Acquire habitat within PHMA and IHMA. when possible (i.e. willing landowner), and retain ownership of habitat within all Areas, except if disposal will allow for additional or more contiguous federal ownership patterns.
- b. Lands within PHMA, IHMA and GHMA will be retained unless disposal of those lands will increase the extent or provide for connectivity of PHMA, IHMA or GHMA.
- c. Evaluate potential land exchanges containing historically low-quality GRSG habitat that may be too costly to restore In exchange for lands of higher quality habitat, lands that connect seasonal GRSG habitats or lands providing for threatened and endangered species. These potential exchanges should lead to an increase in the extent or continuity of or provide for

Conservation measures. Undertakings to conserve, enhance, or restore GRSG habitat by reducing, eliminating, or minimizing threats.

Controlled surface use. This is a category of moderate constraint stipulations that allows some use and occupancy of public land, while protecting identified resources or values and is applicable to fluid mineral leasing and all activities associated with fluid mineral leasing. CSU areas are open to fluid mineral leasing, but the stipulation allows the BLM to require special operational constraints, or the activity can be shifted more than 656 feet to protect the specified resource or value.

Cooperating agency. Assists the lead federal agency in developing an environmental assessment or environmental impact statement. This can be any agency with jurisdiction by law or special expertise for proposals covered by NEPA (40 CFR, Part 1501.6). Any tribe or federal, state, or local government jurisdiction with such qualifications may become a cooperating agency by agreement with the lead agency.

Council on Environmental Quality. An advisory council to the president, established by NEPA. It reviews federal programs to analyze and interpret environmental trends and information.

Cultural resources. Locations of human activity, occupation, or use. Cultural resources are archaeological, historical, or architectural sites, structures, or places with important public and scientific uses and locations of traditional cultural or religious importance to specified social or cultural groups.

Cumulative effects. The direct and indirect effects of a proposed project alternative's incremental impacts when they are added to other past, present, and reasonably foreseeable actions, regardless of who carries out the action.

Decision area. Lands and federal mineral estate within the planning area that are administered by the BLM.

Designated roads and trails. Specific roads and trails identified by the BLM where some type of motorized/nonmotorized use is appropriate and allowed, either seasonally or year-long (H-160 1-1, BLM Land Use Planning Handbook).

Ecological site. A distinctive kind of land with specific physical characteristics that differs from other lands in its ability to produce a distinctive kind and amount of vegetation.

Endangered species. Any species that is in danger of extinction throughout all or a significant portion of its range and is so designated by the Secretary of Interior, in accordance with the 1973 Endangered Species Act.

Enhance. Improve habitat by increasing missing or modifying unsatisfactory components or attributes of the habitat (e.g., road commissioning) to meet GRSG objectives.

Environmental Impact statement. A detailed written statement required by NEPA when an agency proposes a major federal action significantly affecting the quality of the human environment.

Exception (minerals). A case-by-case exemption from a lease stipulation. The stipulation continues to apply to all other sites within the leasehold to which the restrictive criteria apply. The BLM Authorized

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- All BLM use authorizations will contain terms and conditions regarding the actions needed to meet or progress toward meeting the habitat objectives. If monitoring data show the habitat objectives have not been met nor progress being made towards meeting them, there will be an evaluation and a determination made as to the cause. If it is determined that the authorized use is a cause, the use will be adjusted by the response specified in the instrument that authorized the use.

Greater Sage-Grouse *Management Areas*

Objective 555 3: Maintain a resilient population of GRSG in Idaho and Southwestern Montana.

Objective 555 4: Designate GRSG management areas and associated management to maintain a resilient population and to designate strategically located adjacent areas to provide a buffer from unpredictable habitat loss such as wildfire to the resilient population areas.

Objective 555 5: Identify and strategically protect larger intact sagebrush areas and areas of lower fragmentation to maintain GRSG population persistence.

Management Decisions (MD)

MD 555-1: Designate five GRSG Conservation Areas (see Glossary) within the subregion to form the geographic basis for achieving population objectives; evaluating the disturbance density and adaptive regulatory triggers; and tailor adaptive management responses. **These conservation areas are depicted in Figure 2-13.** These areas are referred to as Mountain Valleys, Desert, **West Owyhee**, Southern and Southwestern Montana Conservation Areas.

Conservation Area Description

Mountain Valleys Conservation Area - generally located north of the Snake River Plain, including GRSG habitat in the Salmon and Challis areas, and habitat in west-central population area. It extends west from Rexburg, north and west of Highway 33 to Howe, north and west of Highway 33/22 to Arco, north and west of Highway 26/20/93 to Carey, north and west of Highway 20 west to Hill City, north and west of Highway 20 to the Dylan Karaus Road, west to Canyon Creek. Canyon Creek to the confluence with the Snake River form the western boundary.

Desert Conservation Area - located north of the Snake River and south of the Mountain Valleys Conservation Area. It extends from the confluence of Canyon Creek and the Snake River, eastward to Idaho Falls. The Snake River and Henry's Fork form the eastern boundary.

West Owyhee Conservation Area - located south of the Snake River and west of the Bruneau River

Southern Conservation Area - located south of the Snake River and east of the Bruneau River, including East Idaho uplands and Bear Lake Plateau, and the Utah portion of the Sawtooth National Forest in Box Elder County.

Southwestern Montana - located in southwestern Montana - encompassing the Dillon Butte BLM Field Office and Beaverhead-Deerlodge National Forest boundaries (the Butte RMP is not being amended and since there are limited GRSG federal GHMA. management actions do not apply in the Butte Field Office).

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In general, GRSG habitats in the Desert and West Owyhee CAs are relatively contiguous while those in the Mountain Valleys and Southern CAs tend to be more fragmented due to more complex topography, and elevational differences and/or effects from wildfires, agriculture, urbanization or other factors.

MD SSS 2: Within each Conservation Area designate GRSG Habitat Management Areas: Priority, Important and General Habitat Management Areas (Figure 2-1). **Priority Habitat Management Areas (PHMA)** focus on conserving the two key meta-populations in the subregion. PHMA encompasses areas with the highest conservation value to GRSG, based on the presence of larger leks, habitat extent, important movement and connectivity corridors and winter habitat. PHMA include adequate area to accommodate continuation of existing land uses and landowner activities. **Important Habitat Management Areas (IHMA)** contain additional habitat and populations that provide a management buffer for the PHMA and to connect patches of PHMA. IHMA encompasses areas of generally moderate to high conservation value habitat and/or populations and In some Conservation Areas includes areas beyond those identified by USFWS as necessary to maintain redundant, representative and resilient populations (Priority Areas for Conservation (PACs)). IHMA are typically adjacent to PHMA but generally reflect somewhat lower GRSG population status and/or reduced habitat value due to disturbance, habitat fragmentation or other factors. There are no IHMA designated within the Southwestern Montana Conservation Area. **General Habitat Management Areas (GHMA)** encompass habitat that is outside of PHMA or IHMA. GHMA contain approximately 10 percent of the occupied leks that are also of relatively low male attendance compared to leks in PHMA or IHMA. GHMA are generally characterized by lower quality disturbed or patchy habitat of low lek connectivity.

MD SSS 3: In Idaho, designate PHMA and IHMA to encompass 90 percent of the breeding males in Idaho. In Montana, designate PHMA to encompass Montana Fish, Wildlife, and Parks 2009 Greater Sage Grouse Core Area designations.

MD SSS 4: Annually prioritize Conservation Areas at the state scale considering results of the annual adaptive regulatory trigger evaluations relative to implementation of restoration and mitigation activities.

MD 555 5: Prioritize activities and mitigation to conserve, enhance and restore GRSG habitats (i.e., fire suppression activities, fuels management activities, vegetation treatments, invasive species treatments etc.) first by Conservation Area. If appropriate (Conservation Area under adaptive management or at risk of meeting an adaptive management soft or hard trigger), followed by PHMA, then IHMA then GHMA within the Conservation Area. local priority areas within these areas will be further refined as a result of completing the GRSG Wildfire and Invasive Species Habitat Assessments as described in Appendix H. This can include projects outside GRSG habitat when those projects will provide a benefit to GRSG habitat.

MD SSS 6: The management area map and Biologically Significant Unit (BSU) baseline map will be re-evaluated in conjunction with plan evaluation processes (i.e. approximately every 5 years) This re-evaluation can indicate the need to adjust PHMA, IHMA or GHMA or the habitat baseline. These adjustments can occur upon completion of the appropriate analysis and process (e.g., plan amendment) to review the allocation decisions based on the map. Results from the Wildfire and Invasive Species Assessments, such as identified focal or emphasis areas will also be used to help inform mapping adjustments during this evaluation.

2. Approved Resource Management Plan Amendment

MD 555 7: GRSG habitat within the project area will be assessed during project-level NEPA analysis within the management area designations (PHMA, IHMA, GHMA). Project proposals and their effects will be evaluated based on the habitat and values affected.

MD SSS 8: Idaho BLM will annually update the Key Habitat map, in order to reflect habitat changes resulting from wildfire, succession, and vegetation treatments that occurred or were observed since the last update. Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year. This map also identifies potential restoration areas (perennial grassland annual grasslands, conifer encroachment and recent burns). This map a broad scale current vegetation map that changes as habitat is lost or restored. The Key Habitat Map Is not an allocation decision such as PHMA, IHMA, and GHMA. Updates to the map will also occur if it is determined that mapping errors or omissions have occurred, or that radio-telemetry studies indicate that GRSG are consistently utilizing an area. Updates are also intended to capture recommendations by the field offices, GRSG Local Working Groups, or agency partners in GRSG conservation. Project-level evaluations of GRSG habitat during the NEPA process can also be used to inform the annual update.

MD SSS 9: Areas of habitat outside of delineated habitat management areas identified during the Key habitat update process will be evaluated during site specific NEPA for project level activities and GRSG required design features (**Appendix C**) and buffers (**Appendix B**) will be included as part of project design. These areas will be further evaluated during plan evaluation and the 5-year update to the management areas, to determine whether they should be included as PHMA, IHMA, or GHMA.

MD SSS I 0: Designate Sagebrush Focal Areas (SFA) as shown on **Figure 1-2**. SFA will be managed as PHMA, with the following additional management:

- Recommended for withdrawal from the General Mining Act of 1872, as amended, subject to valid existing rights.
- Managed as NSO, without waiver, exception, or modification, for fluid mineral leasing.
- Prioritized for vegetation management and conservation actions in these areas, including, but not limited to land health assessments, wild horse and burro management actions, review of livestock grazing permits/leases, and habitat restoration (see specific management sections).

Adaptive Management

MD 555 11: Idaho. Use hard and soft population and habitat triggers to determine an appropriate management response as described in MD SSS 16 to MD SSS 26. Hard and soft triggers responses are applied at the Conservation Area (MD SSS-1) scale (**Appendix E**).

MD SSS 12: Utilize monitoring information collected through the Monitoring Framework (**Appendix D**) to determine when adaptive regulatory triggers have been met.

MD 555 13: Idaho: BLM will maintain GRSG habitat information, through use of the Key Habitat map or latest sagebrush/vegetation map, which will be used to track and identify habitat changes to assess the habitat trigger in the adaptive management approach. Key habitat map updates are made each winter by BLM in coordination with the Forest Service and IDFG, using the process described in Appendix F of the FEIS.

2. Approved Resource Management Plan Amendment

HD 555 14: Idaho: BLM will coordinate with the IDFG regarding population information collected and maintained by the IDFG to track and identify population changes to assess the population trigger in the adaptive management approach.

MD 555 15: Idaho: The hard and soft trigger data will be analyzed as soon as it becomes available after the signing of the ROD, and twice each year thereafter the applicable monitoring information will be reviewed to determine if any adaptive management triggers have been met. Montana: The hard and soft trigger data will be analyzed as soon as it becomes available after the signing of the ROD and then at a minimum, analyzed annually thereafter.

MD 555 16: Idaho: Adaptive habitat triggers will be individually calculated across all ownerships within the BSUs (Appendix E). The BSU is defined as the IDFG modeled nesting and wintering habitat (IDFG 2013, unpublished data) within PHMA and IHMA within a Conservation Area. The sagebrush component of the BSU is represented by the Key habitat within the BSU present during the 2011 baseline and as mapped during subsequent annual Key habitat map updates. Key habitat is defined as areas of generally intact sagebrush that provide GRS habitat during some portion of the year (ISAC 2006).

MD 555 17: Habitat Hard Triggers are defined as:

- A 20 percent loss of Key Habitat within the BSU of the PHMA of a Conservation Area when compared to the 2011 baseline, inclusive of all land ownerships or
- A 20 percent loss of Key Habitat within the BSU of the IHMA of a Conservation Area when compared to the 2011 baseline.

MD 555 18: Habitat Soft Triggers are defined as:

- A 10 percent loss of Key Habitat within the BSU of the PHMA of a Conservation Area when compared to the 2011 baseline; or
- A 10 percent loss of Key Habitat within the BSU of the IHMA of a Conservation Area when compared to the 2011 baseline.

MD 555 19: Population Hard Triggers are defined as:

- A 20 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change ($>$) significantly below 1.0 within PHMA within a Conservation Area over the same 3-year period; or
- A 20 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change ($>$) significantly below 1.0 within IHMA within a Conservation Area over the same 3-year period
- Significance is defined by the 90 percent confidence interval around the current 3-year finite rate of change. If the 90 percent confidence interval is less than, and does not include 1.0, then the finite rate of change is considered significant. The finite rate of change and variance will be calculated following Garton et al. (2011).

2. Approved Resource Management Plan Amendment

MO 555 20: Population Soft Triggers are defined as:

- A 10 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change below 1.0 within PHMA within a Conservation Area over the same 3-year period; or
- A 10 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change below 1.0 within IHMA within a Conservation Area over the same 3-year period.

MO 555 21: When any of the Criteria for Soft Triggers have been met the Implementation Team will evaluate causal factors and recommend additional potential implementation level activities (Appendix E).

MO 555 22: When any of the Criteria for Hard Triggers have been met then all PHMA management actions will be applied to the PHMA within that Conservation Area and the implementation Team will evaluate causal factors and recommend additional potential implementation level activities.

MO SSS 23: If an adaptive regulatory trigger is tripped and livestock grazing is identified as a probable limiting factor then adjustments will follow the Adaptive Grazing Management Response described in Appendix E.

MD SSS 24: Remove any adaptive management response when the habitat or maximum male population count (i.e., 3-year average) returns to or exceeds the 2011 baseline levels within the associated Conservation Area in accordance with the Adaptive Management Strategy (Appendix E). In such a case, changes in management allocations resulting from a tripped trigger will revert back to the original allocation (MD SSS 22).

MD 55S 25: Montana: Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and USFWS experts (Appendix E).

MD 55S 26: Idaho and Montana: When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation Team will convene to determine the causal factor, put project-level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response.

Anthropogenic Disturbance

MD 55S 27: For Idaho and Montana, if the 3 percent anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG PHMA (or IHMA in Idaho) Habitat Management Areas in any given BSU, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the General Mining Law of 1872, as amended, valid existing rights, etc.) will be permitted by BLM within GRSG PHMA and IHMA in any given BSU until the disturbance has been reduced to less than the cap, as measured according to the Disturbance and Adaptive Management Appendix (Appendix E) for the intermediate scale.

2. Approved Resource Management Plan Amendment

For Idaho, if the 3 percent disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area (**Appendix E**) in a PHMA (or IHMA in Idaho), then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to applicable laws and regulations, such as the General Mining Law of 1872, as amended, valid existing rights, etc.)

For Montana, if the 3 percent disturbance cap is exceeded on lands (regardless of land ownership) or if anthropogenic disturbance and habitat loss associated with conversion to agricultural tillage or fire exceed 5% within a project analysis area in PHMA, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.) will be permitted by BLM within PHMA in a project analysis area until the disturbance has been reduced to less than the cap. If the BLM determines that the State of Montana has adopted a GRSG Habitat Conservation Program that contains comparable components to those found in the State of Wyoming's Core Area Strategy including an all lands approach for calculating anthropogenic disturbances, a clear methodology for measuring the density of operations, and a fully operational Density Disturbance Calculation Tool, the 3% disturbance cap will be converted to a 5% cap for all sources of habitat alteration within a project analysis area.

In both Idaho and Montana, within existing designated utility corridors, the 3% disturbance cap may be exceeded at the project scale if the site specific NEPA analysis indicates that a net conservation gain to the species will be achieved. This exception is limited to projects which fulfill the use for which the corridors were designated (ex., transmission lines, pipelines) and the designated width of a corridor will not be exceeded as a result of any project co-location.

For Idaho the BSU (**Figure 2-2**) is defined as the currently mapped nesting and wintering habitat within PHMA and IHMA within a Conservation Area, inclusive of all ownerships. For Montana the BSU is defined as the PHMA in Montana. Anthropogenic disturbance excludes habitat disturbance from wildfire and fuels management activities and includes the following developments (see **Appendix E** for further details):

- Oil and Gas Wells and Development Facilities
- Coal Mines
- Wind Towers
- Solar Fields
- Geothermal Development Facilities
- Mining (Active Locatable, Non-Energy Leasable and Saleable Developments)
- Roads
- Railroads
- Power lines
- Communication Towers
- Other Vertical Structures
- Coal bed Methane Ponds

2. Approved Resource Management Plan Amendment

Management Decisions (MD)

Utility Corridors and Communication Sites

MD LR 1: Existing designated corridors, including Section 368 Corridors, will remain Open In all habitat management areas (subject to the ongoing settlement agreement).

Also see **MD LR IO** and **MD 555 31**

Land Use Authorizations

MD LR 2: PHMA: Designate and manage PHMA as ROW avoidance areas, consistent with MD SSS 29 and subject to RDFs and buffers (Appendices Band C). IHMA: Designate and manage IHMA as ROW avoidance areas, consistent with MD SSS 30 and subject to RDFs and buffers. GHMA (**Idaho and Montana**): Designate and manage GHMA as open with proposals subject to RDFs and buffers.

MD LR 3: PHMA: Development of commercial service airports and facilities (as defined by FAA 2014 - publically owned airports that have at least 2,500 passenger boardings each calendar year and receive scheduled passenger service) will not be allowed within PHMA. IHMA and GHMA are Avoidance and Open respectively for these types of ROW applications as described In MD LR 2.

MD LR 4: PHMA: Development of new or expansion of existing landfills will not be allowed within PHMA. IHMA and GHMA are Avoidance and Open respectively for these types of ROW applications as described In MD LR 2.

MD LR 5: Consistent with MD LR 3, MD LR 4, and MD RE 1, Rights-of-way for development of new or amended ROWs and land use authorizations (including permits and leases) in PHMA will only be considered when consistent with the Anthropogenic Disturbance Screening Criteria (MD SSS 29): Rights-of-way for development of new or amended ROWs and land use authorizations (including permits and leases) in IHMA can be considered consistent with the IHMA Anthropogenic Disturbance Development Criteria (MD SSS 30). GHMA: New ROW and land use authorizations can be considered.

MD LR 6: In PHMA. if a higher voltage transmission line is required adjacent to an existing line (i.e. the project is an incremental upgrade/capacity increase of existing development (i.e. power line capacity upgrade):

- the existing transmission line must be removed and area rehabilitated within a specified amount of time after the new line is installed and energized; and
- the new line must be constructed in the same alignment as the existing line unless an alternate route will benefit GRSG or GRSG habitat.

MD LR 7: Process unauthorized use. if the unauthorized use is subsequently authorized, it will be authorized consistent with direction from this plan including RDFs and buffers. If the use is not subsequently authorized the site will be reclaimed by removing these unauthorized (trespass) features and rehabilitating the habitat.

MD LR 8: Land use authorizations that are temporary (less than 3 years) in nature and are not otherwise excluded or restricted will be subject to seasonal or timing restrictions (**Appendix C**) and mitigation requirements regarding habitat loss as needed.

2. Approved Resource Management Plan Amendment

meeting desired habitat conditions or the project will provide a benefit to habitat areas that are functioning in a limited way as habitat);

- d. The development cannot be reasonably accomplished outside of the PHMA; or can be either: 1) developed pursuant to a valid existing authorization; or 2) is co-located within the footprint of existing infrastructure (proposed actions will not increase the 2011 authorized footprint and associated impacts more than 50 percent, depending on industry practice).
- e. Development will be implemented adhering to the required design features (RDF) described in **Appendix C**:
- f. The project will not exceed the disturbance cap (MD SSS 27)
- g. The project has been reviewed by the State Implementation Team and recommended for consideration by the Idaho Governor.

MD SSS 30 : The following Anthropogenic Disturbance Development Criteria must be met in the screening and assessment process for proposals in PHMA and IHMA to discourage additional disturbance in PHMA and IHMA (as described in MD LR 2 and MD RE 1; applies to Idaho only):

- a. Through coordination with the USFWS and State of Idaho (as described in MD CC 1), it is determined that the project cannot be achieved, technically or economically, outside of this management area; and
- b. The project siting and/or design should best reduce cumulative impacts and/or impacts on GRSG and other high value natural, cultural, or societal resources; this may include co-location within the footprint for **existing** infrastructure, to the extent practicable: and
- c. The project results in a net conservation gain to GRSG Key habitat or with beneficial mitigation actions reduces habitat fragmentation or other threats within the Conservation Area; and
- d. The project design mitigates unavoidable impacts through appropriate compensatory mitigation; and
- e. Development will be implemented adhering to the RDFs described in **Appendix C**.
- f. The project will not exceed the disturbance cap (MD SSS 27).

In Montana, the BLM will apply the project/action screen and mitigation process (**Appendix J**)

MD SSS 31: Co-locating new infrastructure within existing ROWs and maintaining and upgrading ROWs is preferred over the creation of new ROWs or the construction of new facilities in all management area. Colocation for various activities is defined as:

- Communication Sites - The Installation of new equipment/facilities on or within or adjacent to existing authorized equipment facilities or within a communication site boundary as designated in the Communication Site Plan.
- Electrical Lines - Installation of new ROWs adjacent to current ROWs boundaries, not necessarily placed on the same power poles.

Comment : Settlement Agreement,
July 3, 2012,

We mentioned this lawsuit in the chapter on history.

We have submitted thousands and thousands of comments in an attempt to help you understand that we feel that 36-228 and 29-36 will wipe us out economically, agriculturally, (ranching and farming)

We have been steadfast in comments and meeting attendance that we cannot and will not tolerate 36-228 or 29-36. These proposals are an invasion to our history, culture and life style.

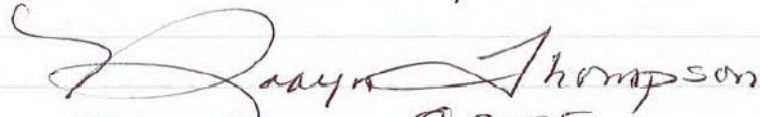
Owyhee County is very rare and unique. We aim to protect her. There is no where else we can go.

The 9th District Court understands us and they only had to consider the law. Their decision for a county such as ours : move the corridor or delete it. We vehemently oppose 36-228 and 29-36 and have since February 26, 2009. We already have an energy corridor.

That corridor is the SRBOP
That is where the infrastructure
is. That would be compliant
with the settlement agreement.


26-228 and 29-36 are
inconsistent land use.

The SRBOP would suffer
the least with this impact.


secretary OCTF



Robyn Thompson
16033 Bates Creek Rd.
Murphy ID 83650


OCTF member

Audubon California | Audubon Rockies | Bark | California Wilderness Coalition

Center for Biological Diversity | Defenders of Wildlife

Friends of Nevada Wilderness | Friends of the Inyo | Idaho Conservation League

KS Wild | National Audubon Society | Natural Resources Defense Council

Oregon Natural Desert Association | Soda Mountain Wilderness Council

The Wilderness Society | The Wildlands Conservancy

Wyoming Wilderness Association

January 29, 2021

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Submitted electronically via email at blm_wo_368corridors@blm.gov and online at <https://corridoreis.anl.gov/involve/report-input/>

Re: Comments on Section 368 Energy Corridor Review Regions 4, 5, and 6 Report

Dear Mr. Douglas, Mr. Smith and Ms. Pauley:

Please accept the following comments from Audubon California, Audubon Rockies, Bark, California Wilderness Coalition, Center for Biological Diversity, Defenders of Wildlife, Friends of Nevada Wilderness, Friends of the Inyo, Idaho Conservation League, KS Wild, National Audubon Society, Natural Resources Defense Council, Oregon Natural Desert Association, Soda Mountain Wilderness Council, The Wilderness Society, The Wildlands Conservancy, and Wyoming Wilderness Association on the draft Energy Policy Act Section 368 Energy Corridor Review- Regions 4, 5 and 6

(“Report”)¹ released by the Bureau of Land Management (“BLM”), U.S. Forest Service (“USFS”) and the Department of Energy (“DOE”) (collectively the “Agencies”) on November 2, 2020.

Defenders of Wildlife is dedicated to protecting native animals and plants in their natural communities. Founded in 1947, Defenders is a national conservation organization that represents approximately 1.8 million members and supporters in the United States and around the world who are concerned with wildlife and habitat conservation, including on public lands in the West.

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. Bark represents over 30,000 people who support our mission.

The California Wilderness Coalition (CalWild) protects and restores the state’s wildest natural landscapes and watersheds on public lands. These important wild places provide clean air and water, refuges for wildlife, mitigation against the effects of climate change, and outstanding opportunities for recreation and spiritual renewal for people. CalWild is the only statewide organization dedicated solely to protecting and restoring the wild places and native biodiversity of California’s public lands.

The Center for Biological Diversity 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.

Friends of Nevada Wilderness is dedicated to preserving all qualified Nevada public lands as wilderness, protecting all present and potential wilderness from ongoing threats, educating the public about the values of and need for wilderness, and improving the management and restoration of wild lands.

Friends of the Inyo is a 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 1,000 members, FOI is an active partner with federal land management agencies including the USFS and BLM.

Since 1973, Idaho Conservation League (ICL) has worked to protect and enhance Idaho’s clean water, wilderness, and quality of life through citizen action, public education, and professional advocacy. Idaho Conservation League has a long history of involvement with both habitat protection and statewide energy issues. As Idaho’s largest statewide conservation organization, ICL represents over 30,000 supporters who want to ensure that energy development and infrastructure is consistent with natural resource protection.

KS Wild's mission is to protect and restore wild nature in the Klamath-Siskiyou region of southwest Oregon and northwest California. We envision a Klamath-Siskiyou region where local communities

¹ Energy Policy Act of 2005 Section 368 Energy Corridor Review, Regions 4, 5, and 6. Available at https://corridoreis.anl.gov/documents/docs/Regions_4-5-6_Draft_Report.pdf The Report includes “Corridor Summaries” and “Appendices,” also available at <https://corridoreis.anl.gov/regional-reviews/regions-4-5-6/>

enjoy healthy wildlands, where clean rivers are teeming with native salmon, and where connected plant and wildlife populations are prepared for climate change.

The National Audubon Society, Audubon California, and Audubon Rockies protect birds and the places they need, today and tomorrow. We work throughout the Americas using science, advocacy, education, and on-the-ground conservation. Audubon California and Audubon Rockies are regional offices of the National Audubon Society for California and Colorado, Wyoming, and Utah. State programs, nature centers, chapters, and partners give Audubon an unparalleled wingspan that reaches millions of people each year to inform, inspire, and unite diverse communities in conservation action.

The Natural Resources Defense Council is an international nonprofit environmental organization with more than 3 million members and online activists. Since 1970, our lawyers, scientists, and other environmental specialists have worked to protect the world's natural resources, public health, and the environment.

Oregon Natural Desert Association is dedicated to protecting, defending and restoring eight million acres of public lands in Oregon's high desert. Maintaining offices in Bend and Portland, Oregon, ONDA represents more than 5,000 members nationwide.

Formed in 1984, the Soda Mountain Wilderness Council works in SW Oregon and NW California to rewild the important biological corridor between the Siskiyou Mountains, globally significant for their botanical diversity, and the southern Cascade Range. Formerly called the Soda Mountain area, this region is now better known as the Cascade-Siskiyou National Monument area after the Monument was established in 2000 and expanded in 2017 to its current size of ~114,000 federal public land acres. Cascade-Siskiyou is the only national monument explicitly set apart to protect biodiversity.

Since 1935, The Wilderness Society has been dedicated to protecting America's wild places for current and future generations. We are also committed to smart and sensible regulation and management of our public lands to ensure that where energy development does occur it is done in a safe and responsible manner. We are working to ensure that our public lands are managed to help address climate change, including by supporting responsible renewable energy development.

Founded in 1995, The Wildlands Conservancy (TWC) is dedicated to preserving the beauty and biodiversity of the earth and to providing programs so that children may know the wonder and joy of nature. In working to achieve this mission, TWC has established the largest nonprofit nature preserve system in California, comprised of nineteen preserves encompassing 156,000 acres of diverse mountain, valley, desert, river, and oceanfront landscapes. These preserves are open to the public free of charge for passive recreation, including camping, hiking, picnicking, birding, and host more free outdoor education programs for youth than any other nonprofit in California.

The mission of the Wyoming Wilderness Association is to protect Wyoming public wildlands. Our three operational pillars of advocacy, education, and stewardship ensure these lands remain intact and untrammled for the enjoyment of the public now and into the future.

A. Introduction

Our organizations have a long history of engagement in the Section 368 West-wide Energy Corridors (WWECs) planning process. In 2012, several of our groups were part of the settlement agreement² in which the Agencies and other stakeholders agreed to, among other things, reevaluate energy corridor designations on public lands in the west and undertake periodic reviews of those corridors. Since then, our organizations have provided extensive comments in 2014, 2016, 2018 and 2019 as part of these reviews.

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 conservation objectives on public lands. The planning process also provides the BLM an important opportunity to support its Solar Energy Program and the Wind and Solar Leasing Rule by identifying new corridors and modifying existing corridors to incentivize transmission and development in lower-conflict areas. Without transmission, many of the solar energy zones (SEZs) that BLM identified and designated in the Solar Energy Program Programmatic Environmental Impact Statement will fail to attract development interest.

While we continue to support the planning process for energy corridors, specifically transmission corridors that would facilitate renewable energy development in the west, we also have some concerns and recommendations on both the WWEC regional review process as well as specific designated corridors within Regions 4, 5, and 6.

B. 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 numerous data layers as listed on the Appendix G of the Report.

However, 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.⁵ However, quite often many of these fields are without any information.⁶ We recommend that the BLM provide complete metadata for each ACEC, especially information on 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.

² Wilderness Soc’y et al. v. U.S. Dep’t of Interior, No. 3:09-cv-03048 JW (N.D. Cal.) (July 3, 2012).

³ Available at <https://bogi.evs.anl.gov/section368/portal/>

⁴ Energy Policy Act of 2005, 42 U.S.C. § 15926 (a)(1).

⁵ See Little Mountain ACEC, Greater Sand Dunes ACEC, and Greater Red Creek ACEC in Wyoming as examples.

⁶ See Donkey Hills ACEC in Montana, Timbered Crater ACEC or Mount Dome ACEC in California, and Buffalo Creeks Canyon in Nevada as examples.

In addition, we encourage the Agencies to add a data layer for National Recreation Trails (NRT) based on the information at <http://www.nrtdatabase.org/>. NRTs are designated by the Secretaries of Interior or Agriculture to recognize exemplary trails of local and regional significance. The database and a nation-wide map of NRTs is maintained by American Trails, in partnership with the National Park Service. We think addition of the data layer will add to the robustness of the Section 368 Corridor Mapping Tool.

II. Stakeholder Engagement

We appreciate the 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. As we requested previously through our comment letters, we appreciate that the Agencies will make the public comments provided during the regional review available on the WWEC Information Center website. We believe this will increase transparency in addition to allowing for better coordination among stakeholders and the Agencies for more effective and efficient planning.

III. Interagency Operating Procedures (IOPs)

The Report proposes adding new IOPs for ecological resources, specifically a new IOP related to greater sage-grouse (“GRSG”) habitat that addresses predation issues, in addition to the potential new IOPs previously identified in draft reports for Regions 1 and 2 and 3.⁷ We support the addition of these IOPs and provide following comments and recommendations for IOPs.

a. IOP for GRSG

We support the recommendation to add an IOP related to GRSG habitat but this IOP should be focused on preventing visual disturbance to GRSG from transmission structures and seasonal disturbance from construction, operations, and maintenance of transmission infrastructure, in addition to addressing the potential to increased predation along Section 368 corridors. This is needed to minimize impacts to GRSG from infrastructure development both within and beyond corridors and ensure that the impacts on sage-grouse are addressed consistently across federally managed lands. As noted in the Greater Sage-Grouse Habitat Implementation Guide,⁸ “Habitat management areas should not be confused with seasonal habitats,” and this is why a special IOP for GRSG is warranted in addition to avoidance of Management Areas (see below).

Transmission lines have both direct and indirect effects on GRSG, as noted by the BLM and US Fish and Wildlife Service (USFWS) in the following two passages:⁹

“Besides the physical footprint of a power line that permanently alters sage-grouse habitat, power lines also can cause long-term direct effects to sage-grouse by posing collision and electrocution hazards (Braun 1998; Connelly et al. 2000a; Schroeder 2010) and can have long-term indirect effects by decreasing lek recruitment (Braun et al. 2002; Schroeder 2010), increasing predation (Connelly et al. 2004; Gibson et al. 2013a), facilitating the invasion of nonnative invasive annual plants that degrade habitat (Knick et al. 2003; Connelly et al. 2004), causing behavioral avoidance (Gillan et al. 2013; Dinkins et al. 2014b), and acting as a potential barrier to movement (Pruett et al. 2009; WHCWG 2010;

⁷ Report, Pg. 40.

⁸ Greater Sage Grouse Habitat Implementation Guide. Available at https://www.fs.usda.gov/sites/default/files/media_wysiwyg/habitat_implementation_guide_v1_0.pdf

⁹ U.S. Fish and Wildlife Service and Bureau of Land Management. 2015. *Assessing indirect effects of transmission lines on greater sage-grouse for the Gateway West Interstate Transmission Line Project.*

Shirk et al. 2015). The indirect influence, or ecological footprint, of a power line extends out further than the physical footprint of the infrastructure (Knick et al. 2011).”

“In west-central Idaho, a spatial analysis of sage-grouse locations showed a significant avoidance of power lines by 600-m (Gillan et al. 2013). In a study of sage-grouse scat (i.e., pellets) locations in the Wyoming Basins Ecoregional Assessment areas, presence of anthropogenic features (e.g., power lines) negatively affected sage-grouse occurrence, as indicated by significantly lower number of sage-grouse pellet piles within 500-m of power lines (Hanser et al. 2011). Similarly, models developed in Washington state demonstrated that power lines affect sage-grouse movement, gene flow, and lek activity to distances greater than 500-m (WHCWG 2012; Shirk et al. 2015). These studies indicate that while avoidance-related indirect impacts will be greater during sage-grouse breeding season and within breeding habitat, these indirect impacts also will occur during other periods of the year and in all sage-grouse habitats. Avoided habitats may otherwise exhibit vegetative characteristics equal to highly suitable habitat (Hall and Haney 1997; Braun 1998).”

As the Agencies develop the IOP, we recommend that the following provisions be added avoid and minimize impacts to sage-grouse during siting, construction, operation, and maintenance of transmission lines:

- Consult state wildlife agencies and/or federal agencies for known leks (breeding areas), nesting areas, brood-rearing habitat, Winter Concentration Areas or identified winter ranges, and known/identified migratory corridors/routes and any other areas where disturbance from tall structures could impact greater sage-grouse (APLIC 2015)¹⁰
- Maximize avoidance when siting new overhead transmission lines, particularly for PHMA as specified in the 2015 plans currently in effect. When complete avoidance isn’t possible, ensure net conservation gain as specified in the 2015 plans.
- Avoid suitable sage-grouse habitat to ensure habitats remain intact. When not possible, minimize effects on sage-grouse populations by siting transmission lines beyond 3.1 km (2 mi) from occupied leks (LeBeau et al. 2019).¹¹
- Comply with other requirements of the existing plans in effect.
- Incorporate cumulative impacts of developing multiple corridors and of the impacts of corridor development combined with other existing and planned disturbance.
- Post-siting, disturbance to nesting areas, late summer brood rearing, and winter ranges should also be avoided during periods of activity. As noted by Manier et al. (2014)¹², “for some populations, the minimum distance inferred here (5 km [3.1 mi]) from leks may be insufficient to protect nesting and other seasonal habitats.” Ensure that all late summer brood-rearing habitat and all crucial winter range are also protected from disturbance. Minimize impacts by implementing seasonal stipulations/restrictions for specific dates and times. Federal land use plans and state sage-grouse conservation plans/agencies should be consulted. In the absence of

¹⁰ Avian Power Line Interaction Committee (APLIC). 2015 Best Management Practices for Electric Utilities in Sage-Grouse Habitat. Edison Electric Institute and APLIC. Washington, DC.

¹¹ LeBeau, C.W., K.T. Smith, M.J. Holloran, J.L. Beck, M.E. Kauffman, and G.D. Johnson. Greater sage-grouse habitat function relative to 230-kV transmission lines. *Journal of Wildlife Management* 83(8):1773–1786.

¹² Manier, D.J., Bowen, Z.H., Brooks, M.L., Casazza, M.L., Coates, P.S., Deibert, P.A., Hanser, S.E., and Johnson, D.H., 2014, Conservation buffer distance estimates for Greater Sage-Grouse—A review: U.S. Geological Survey Open-File Report 2014–1239, 14 p., Available at <https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf>, p 2.

specific dates and times, APLIC's Best Management Practices for Electric Utilities in Sage-Grouse Habitat¹³ should be referred to.

- As noted by APLIC in this GRSG best management practices document, special care is needed when restoring vegetation in rights-of way after disturbance to prevent establishment of cheatgrass and other invasive exotic grass and conifer species. We strongly recommend adherence to these guidelines, which emphasize interagency coordination to fine-tune vegetation restoration and management to local conditions.

In addition, we recommend a separate IOP for Bi-State sage-grouse (BSSG) as it relates to corridor 18-23 which cuts through proposed critical habitat for BSSG.

b. IOP Related to Habitat Connectivity and Wildlife Migration

The Report states that “for the potential new IOP related to habitat connectivity, the Agencies should consider adding language that provides for addressing wildlife corridors and migration patterns at the project level more consistently.”¹⁴ We agree. Many Section 368 energy corridors in Regions 4, 5, and 6 go through wildlife migration corridors and habitat for wildlife, including species listed under the Endangered Species Act, such as Canada Lynx (*Lynx canadensis*), Sierra Nevada Yellow-legged Frog (*Rana sierrae*), Northern spotted owl (*Strix occidentalis caurina*), and Sierra Nevada Bighorn Sheep (*Ovis canadensis sierrae*). The construction and operation of electric transmission lines and natural gas pipelines within these corridors could fragment habitat and affect movement of these species, introduce and facilitate invasive species into the project area, or facilitate unlawful species take.

We applaud the recognition of the need to minimize impacts to wildlife habitat connectivity. Protection of connectivity is one of the most broadly recognized strategies to help species adapt and survive the impacts of climate change. The idea is that connectivity gives wildlife species the ability to shift their ranges in response to changing climate. However, the long term protection of wildlife habitat connectivity relies not only on identification and protection of connectivity as it exists today but also the expectation that connectivity needs must be regularly assessed in coming years as the needs of wildlife change in the face of a changing climate.

The proposed language seems to suggest that wildlife habitat connectivity will be addressed solely on this current “snapshot in time” of how connectivity exists today. Land and wildlife managers must be able to regularly assess the wildlife habitat connectivity needs as they evolve over time, particularly in the face of climate change, and take action to adjust the management and use of corridors to reflect these inevitable changes in wildlife habitat connectivity. Connectivity needs based solely on current conditions may not allow species to adapt to a changing climate and shifting future connectivity needs. Managers need to spell out what efforts they will take to assess wildlife habitat connectivity as it is changed by a changing climate in the coming years in the affected landscapes.

As the Agencies develop the IOP, we recommend adding the following specific IOPs on wildlife migration corridor and habitat.

- Activities within wildlife corridors/linkages for special status species that may have a negative impact on connectivity will require further evaluation in environmental document(s) of the

¹³ Avian Power Line Interaction Committee (APLIC). 2015 Best Management Practices for Electric Utilities in Sage-Grouse Habitat. Edison Electric Institute and APLIC. Washington, DC.

¹⁴ Report, Pg. 41.

effects on long-term population viability. The analysis will consider the extent of suitable habitat, including areas required for climate adaptation, needed to ensure viability within each linkage given local population density, long-term demographic and genetic needs, degree of existing habitat disturbance/impacts, current causes of mortality, and the latest population viability modeling. Activities that would compromise the long-term viability of a corridor/linkage population or the function of the linkage, as determined by the lead Agencies, in coordination with the U.S. Fish and Wildlife Service and state wildlife agency, are prohibited and will require reconfiguration or re-siting.

While this Report does not reference Secretarial Order 3362,¹⁵ the draft report for Regions 2 and 3 recognized the need to adhere to Secretarial Order 3362, particularly, Section 3(d) that calls for “[r]eview and use the best available science to inform development of specific guidelines for the Department’s lands and waters related to planning and developing energy, transmission, or other relevant projects to avoid or minimize potential negative impacts on wildlife”) when developing the new IOP as we recommended in April 2019 during the regional review process for Regions 4, 5 and 6. We appreciate the Agencies for recognizing the need to adhere to the Secretarial Order. In addition, we encourage the Agencies to identify specific actions for working with states in context of the corridor review process and explain how the state wildlife action plans (SWAP)¹⁶ will be consulted. We have attached a map in Appendix 1, which depicts big game winter habitat areas identified in SWAPs for reference.

In addition, we request the Agencies to add data layers for big game migration corridors in states where data is currently available to the Section 368 Energy Corridor Mapping Tool.

c. IOP for Minimizing Avian Collision through Siting

We recommend adding an IOP under ecological resources to minimize the potential for avian collision. Specifically, the IOP should require that applicants:

- Identify any locations where overhead lines would bisect avian movements between important bird use areas, particularly when flight heights put birds at risk for transmission line collision. As noted by Heck¹⁷, “Power lines that are situated in areas that are attractive to birds, such as wetlands, conservation areas, agricultural fields, and industrial lands will pose a risk for collisions (APLIC 1994). Wetlands often support significant numbers of waterfowl and other water birds and power lines located in close proximity will have a significant influence on collision risk. Conservation areas are often attractive to birds because there is less disturbance and more natural wetlands and vegetation (APLIC 1994). Cranes, waterfowl, and blackbirds feed in grain fields that are close to wetlands thus agricultural fields are attractive; collision problems often develop when birds must cross power lines to make daily, low-altitude flights to and from croplands. Industrial lands may also increase the chance of collisions if, for example, there is a landfill in the area attracting scavenging birds such as gulls (APLIC 1994).

¹⁵ Secretarial Order 3362. (2018) Available at https://www.doi.gov/sites/doi.gov/files/uploads/so_3362_migration.pdf.

¹⁶ Available at <https://www.nfwf.org/westernmigrations/Pages/state-action-plans.aspx>

¹⁷ Heck, N. N. (2007). A landscape-scale model to predict the risk of bird collisions with electric power transmission lines in Alberta (Unpublished master's thesis). University of Calgary, Calgary, AB. Available by request at <https://prism.ucalgary.ca/handle/1880/102483>

- Not site overhead transmission lines within corridors in locations that bisect important use areas as described above, focusing on species vulnerable to mortality and crippling from collisions with overhead lines such as ducks, geese, cranes, and herons.

d. IOP for Wilderness-quality Lands

Several corridors in Regions 4, 5, and 6 as well as in other WWEC regions intersect both BLM and USFS wilderness-quality lands. Therefore, to address the impacts on wilderness-quality lands, we recommend adding an IOP for wilderness-quality lands. Specifically, we recommend the following as they related to BLM and USFS wilderness-quality lands, respectively:

- 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.
- 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.

e. IOP for Surface Water

We also support revising the existing IOP on Surface Water to provide for consideration of reducing the corridor width at wild and scenic river crossings. Reducing corridors widths at wild and scenic river crossings will ensure that impacts of infrastructures on aquatic resources and on the rivers themselves are reduced due to smaller footprint.

f. IOP for Access Roads

We recommend adding an IOP for access roads with following provisions:

- Construction of new roads and/or routes will be avoided to the maximum extent practicable within special status species habitat, including corridors/linkages, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern.
- Any new road considered within special status species habitat, including corridors/linkages, will not be paved and will be designed and sited to minimize the effect to the function of identified linkages or special status species populations and shall have a maximum speed limit of 25 miles per hour.
- All roads within rights of way for individual projects authorized for construction and maintenance will be closed to motorized vehicle use by the general public.

g. IOP for Important Bird Areas (IBAs)

Coordinated by BirdLife International, the Important Bird Areas (IBA) Program is a global initiative which aims at identifying and conserving the most important places for bird populations. The foundation of the Important Bird Areas Program is its emphasis on science-based identification, assessment, and conservation of birds and the habitats they need to survive¹⁸. IBAs are peer-reviewed designations that identify the most important habitat for birds. Audubon maintains information regarding the reasons for designation of each IBA and provides mapping information, as well¹⁹. Note that IBAs are formally recognized in the BLM's interim strategic plan,²⁰ as well as attached to its guidance on protecting migratory birds subject to a Memorandum of Understanding with the U.S. Fish & Wildlife Service²¹ as a trigger for areas to protect.

We recommend an IOP that provides for:

- Identification of IBAs in the footprint of potential siting.
- Evaluation of measures to avoid, minimize and mitigate impacts to birds identified in the IBAs related to avoiding collisions and restricting construction operation and maintenance during key seasons in nesting and breeding habitat.

h. IOP for Agency Coordination

The Agencies have an IOP for Agency Coordination which requires Right-of-Way (ROW) applicants to coordinate with federal agencies such as the Department of Defense, National Park Service, Federal Aviation Administration and State Historic Preservation Offices etc. during project planning. We recommend that the agencies add an IOP to require consultation and coordination with the federal Department of Transportation and/or the state departments of transportation during project planning to coordinate and consolidate transportation corridors with WWEC corridors. Coordinating energy corridors with transportation corridors can reduce and mitigate environmental and ecological impacts of both energy and transportation corridors and improve habitat connectivity and migration corridors.

IV. Buffer for GRSG

We note that the Agencies have recommended shifting corridor 50-203 to avoid multiple leks within 2 miles of the corridor.²² The Agencies have specified a buffer of 2 miles for PHMAs, 1.2 miles for IHMAs, and 0.6 miles for GHMAs. This is the only corridor where the Agencies have recommended shifting the designation to avoid leks. We recognize and appreciate that in some instances, the Agencies have recommended shifting corridors due to GRSG concerns but corridor 50-203 is the only corridor where we've noticed the Agencies actually doing so. We recommend that the Agencies identify other corridors where similar adjustments are necessary and re-route corridors as necessary to avoid leks.

¹⁸ https://rockies.audubon.org/sites/default/files/iba_fact_sheet.pdf

¹⁹ <https://www.audubon.org/important-bird-areas>.

²⁰ https://www.blm.gov/sites/blm.gov/files/uploads/IM2013-119_att1.pdf

²¹ <https://www.blm.gov/policy/im-2013-119>

²² Section 368 Energy Corridor Review Volume 2- Regions 4, 5, and 6 Appendices: Supporting Information. p. C-9. Available at https://corridoreis.anl.gov/documents/docs/Regions_4-5-6_Appendices.pdf

The Greater Sage-Grouse Habitat Implementation Guide²³ emphasizes the varying processes by which different sage-grouse Management Areas were defined for each state; and that in some states within Regions 4, 5, and 6 management areas contain areas of non-habitat (Nevada), others have a unique habitat to capture connectivity (IHMA in Idaho), some lump connectivity habitat into PHMA (Wyoming), and that PHMA can be further subdivided into the higher category of Sagebrush Focal Area, described as a stronghold used by the species. These are the differences and nuances that make it necessary to develop a detailed IOP for GRSG to ensure important habitat and use areas are ultimately avoided where new infrastructure may impact the species. However, we also support programmatically avoiding and minimizing intersection with Management Areas whenever possible, and support Management Area buffers as specified for 50-203 above for all corridors with similar conflicts.

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 report²⁴ 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.

V. Bi-State Sage-grouse Population

The BSSG, which is found in and near the Mono Basin in Eastern California and Western Nevada, is continuing to decline and the protections provided to this Distinct Population Segment (DPS) must be sufficient to prevent further decline of this species which is designated as both a BLM special status species and a Forest Service sensitive species. This may require deletion or modification of Corridor 18-23 (see below). In addition, there is currently a legal challenge to the USFWS decision to withdraw the listing proposal for the BSSG Distinct Population Segment (DPS) under the ESA because it was not based on the best available science including data that show significant population declines in this DPS and increasing extinction risk.

Corridor alignment remains inconsistent regarding the analysis of BSSG habitat. The proposed path of the 18-23 corridor goes directly through proposed critical habitat including known lek and breeding locations. Transmission lines adversely impact BSSG populations by reducing nesting and brooding success in areas within 2.8 km of the transmission line. Current corridor adjustments do not reflect locations at least 2.8 km away from any active BSSG leks to mitigate impacts on breeding success. The draft report also does not indicate any consultation or recommendations from USFWS, Nevada Department of Wildlife and California Department of Fish and Wildlife to avoid adversely impacting BSSG populations in the area. Best Management Practices are for development to have a 3.1-mile buffer around leks, yet the current alignment of 18-23 does not provide for this.

The BSSG population as a whole has been declining since 2011. The corridor cuts through at least three of the Population Management Units (PMUs)—Mount Grant, Bodie Hills, and South Mono.

²³ Greater Sage Grouse Habitat Implementation Guide. Available at https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwieprfmi5DuAhUoIDQIHUDaDFMQFjABegQIBhAC&url=https%3A%2F%2Fwww.fs.fed.us%2Fsites%2Fdefault%2Ffiles%2Fmedia_wysiwyg%2Fhabitat_implementation_guide_v1_0.pdf&usq=AOvVaw2kvN4cE6hlKuKR-ZIaTNrF

²⁴ Conservation Buffer Distance Estimates for Greater Sage-grouse- A Review (2014). Available at <https://pubs.usgs.gov/of/2014/1239/pdf/ofr2014-1239.pdf>

Scientific data shows the Bodie Hills PMU as stable or slightly increasing in stark contrast to most other PMUs that are in consistent decline.

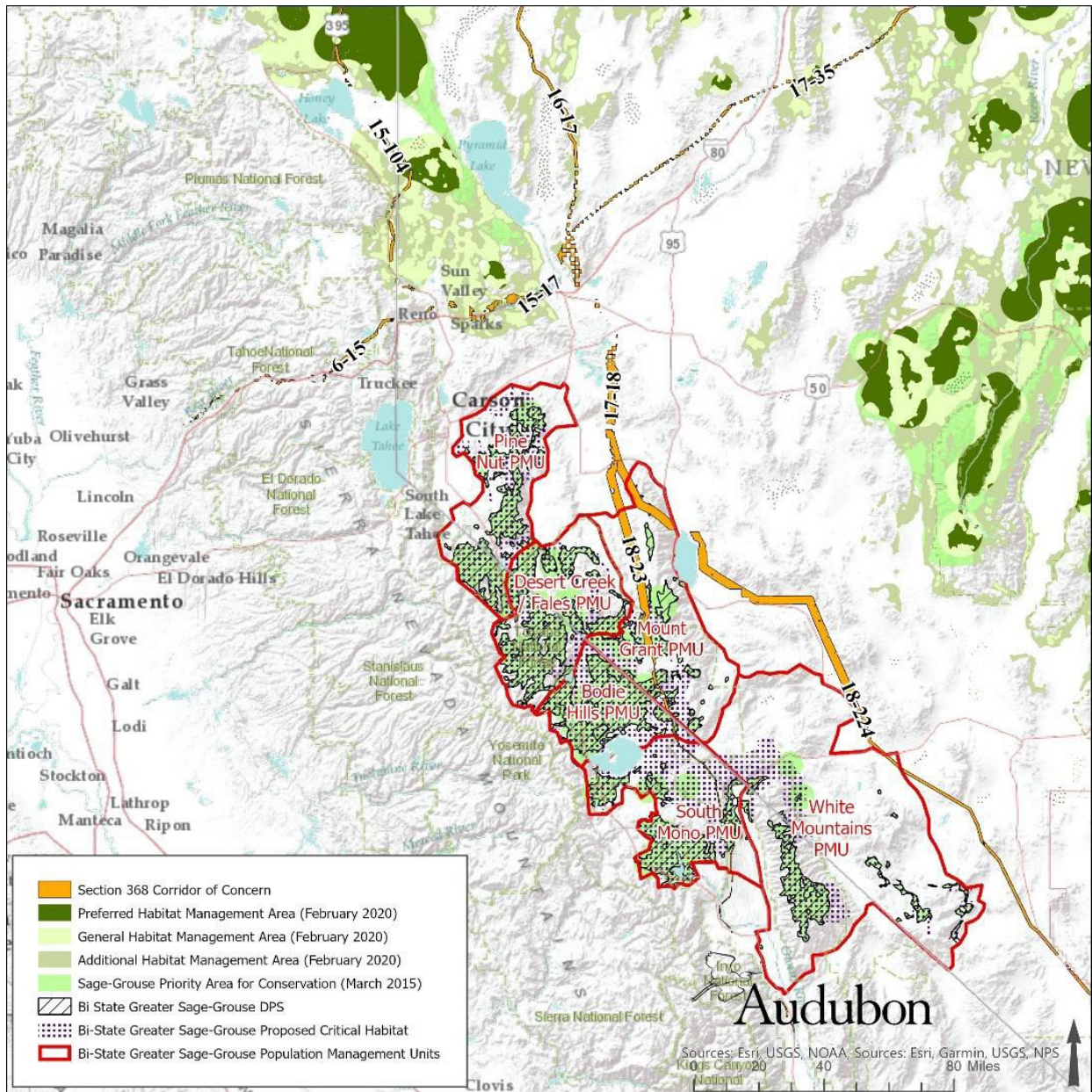


Figure 1: WVEC corridors intersection with BSSG DPS

VI. Areas of Critical Environmental Concerns (ACECs)

As mentioned in our previous comment letters, we continue to contend that ACECs should be avoided in corridor designations and at a minimum ACECs should be classified as “high potential conflict areas.”

ACECs are areas “where special management attention is required.... to protect and prevent irreparable damage to important historical, cultural, or scenic values, fish and wildlife resources, or

other natural systems or processes...”²⁵ Section 202(c)(3) of the Federal Land Policy and Management Act (FLPMA) of 1976²⁶ requires BLM in land use planning to “[g]ive priority to the designation and protection of areas of critical environmental concern.” Allowing development, including new development such as pipelines or transmission lines, in ACECs is likely to impact ACECs and the values for which they were recognized and designated. Based on federal law and policy and the purpose of the current planning effort, the Agencies should avoid designating corridors in ACECs and identify them as “high potential conflict areas,” requiring any projects be sited, designed, constructed and operated in a manner that produces no net loss of habitat and populations of special status and other species in the ACEC.

Appendix 2 shows the overlap of the Agencies’ proposed additions or changes to corridors in Regions 4, 5 and 6 (at least those revisions which were included in the GIS data provided by the Agencies) and ACECs and the potential acreage affected by the intersection that the Agencies should look to avoid.

VII. Research Natural Areas (RNAs) and Outstanding Natural Areas (ONAs)

Both the USFS and the BLM designate Research Natural Areas (RNAs) on public lands under their jurisdiction. RNAs are established to preserve outstanding, unique or representative natural habitats or features for both conservation and research purposes.²⁷ They often protect native plant communities and can also be important for protecting threatened or endangered species.²⁸ Similarly, administratively designated ONAs are areas with high scenic values that have been little altered by human impact. Under current BLM policy, RNAs must meet the relevance and importance criteria of ACECs.²⁹ As of 2017, BLM managed 207 RNAs totaling more than 1.5 million acres³⁰ and the USFS managed more than 450 RNAs encompassing more than 570,000 acres.³¹

We recommend that the Agencies identify RNAs and ONAs intersected by Section 368 corridors and add a data layer for RNAs and ONAs to the online corridor mapping tool.³² In addition, we recommend that the RNAs and ONAs be avoided in corridor designations where possible and at a minimum be classified as “high potential conflict areas.”

VIII. Lands with Wilderness Characteristics (LWC)

BLM lands with wilderness characteristics (LWC) are addressed many times in the Report. These areas—which are large roadless natural areas that provide opportunities for solitude or primitive and unconfined recreation —need to be fully protected from infrastructure that could destroy their wilderness values. In some of the corridors the Agencies have plans to avoid these areas, which we support, but in a number of areas there would remain conflicts with intersected LWC, which we recommend avoiding, or at least mitigating through IOP. While in many cases the BLM may not have

²⁵ 43 CFR §1601.0–5.

²⁶ 43 U.S.C. 1702.

²⁷ 43 CFR §§ 8223.0-5, 8223.1.

²⁸ 43 CFR § 8223.0-5.

²⁹ 43 CFR § 1610.7-2.

³⁰ BLM Public Land Statistics 2017, p. 229.

³¹ “Research Natural Areas” (webpage), <https://www.fs.usda.gov/detail/r1/specialplaces/?cid=stelprdb5172218>. Accessed July 21, 2019.

³² A current list of BLM-designated ACECs, including RNAs and ONAs are available at <https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/accce>. Similarly, a current list of USFS-designated RNAs is available at <https://www.fs.fed.us/psw/rna/description.shtml>.

made final management decisions in the governing Resource Management Plan (RMP) about how LWC in the area will be managed, the Agencies in designating the corridors should not contribute to decision-making that would degrade or even destroy LWC values. The option of protecting wilderness values in LWC must be preserved. This will have the benefit of giving BLM latitude to ensure these areas are fully protected in future RMP decision-making.

Appendix 2 to this letter shows the overlap of the Agencies' proposed additions or changes to corridors in Regions 4, 5 and 6 (at least those revisions which were included in the GIS data provided by the Agencies) and BLM LWCs, which the Agencies must seek to avoid in their corridor designations. The appendix shows where the overlaps between the LWC and the corridor occur as well as the acreage of the potential overlap. It also shows the mileposts where there should be a potential adjustment. We request the Agencies to consider this information for the final corridor designations.

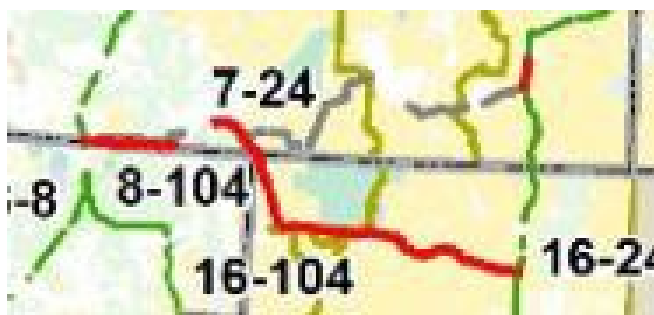
The Report mentions that the Report 1 report identified the need for new IOPs for BLM LWC. We support new IOPs for BLM LWC and support IOPs that are applicable to all corridors that may be intersecting or in close vicinity of LWC. In addition, the IOPs should help maximize the utility of the corridors and minimize impact on LWC. We recommend specific language for a BLM LWC IOP in Section III (d) of these comments.

IX. Wilderness Areas and Wilderness Study Areas (WSA)

Several corridors currently intersect with protected lands such as designated Wilderness Areas and Wilderness Study Areas where infrastructure development is prohibited by law; several proposed revisions also intersect with Wilderness Areas and Wilderness Study Areas. (Appendix 2 shows overlap with the Agencies' proposed corridor additions and revisions; our April 2019 comments show overlap with the existing corridors.) The Agencies must eliminate these intersections by adjusting or deleting these corridors. See, Manual 6340 – Management of Designated Wilderness Areas,³³ including Section 1.6.C.16.b (new rights of way are prohibited in Wilderness Areas); Manual 6330—Management of BLM Wilderness Study Areas,³⁴ 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).

X. Mapping Errors

There are two errors on the map presented as Figure 3-1 of the Report.³⁵ The map shows a new proposed corridor extending west from Corridor 16-24 in northern Nevada traversing south of Sheldon National Wildlife Refuge, and then connecting to corridor 7-24 in Oregon, which has been recommended for deletion (see Figure 2 below).



³³ Available at https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual6340.pdf

³⁴ Available at https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual6330.pdf

³⁵ Report, Pg. 27.

Figure 2: “Potential corridor revision/addition” in Nevada and Oregon on Figure 3-1 of the Report

Similarly, Figure 3-1 also shows another corridor starting from Corridor 79-216 and going southwest to connect with Corridor 121-221 (see Figure 3 below)



Figure 3: “Potential corridor revision/addition” in Wyoming on Figure 3-1 of the Report

Neither of these “potential corridor revision/addition” are identified in the Report, the corridor summaries or the corridor table (Table 3.1) of the Report. These mapping errors must be addressed in the final report.

C. Corridor Specific Comments and Recommendations

In addition to the issues and recommendations stated above, we offer the following comments and recommendations on potential corridors revisions, deletions and additions in Regions 4, 5 and 6. 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 Final Regional Review Report; and c) through future land use planning.

I. Corridors Revisions

a. 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. As stated in our 2019 comments, the Agencies, transmission developers and utilities should focus on increasing the capacity of the existing lines in corridor 229-254 before building additional lines. The Report does not emphasize upgrading existing transmission lines – the Agencies should emphasize this in the Final Report. 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.

b. 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. 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 GRSG- at least 3% of the state population. As stated in our 2019 comments, 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.

The Agencies are considering shifting the corridor from MP 10 to MP 11 to align the corridor with I-15 or existing transmission line in order to avoid the Lewis and Clark NHT and WSR Study River segment of the Beaverhead River. The Agencies are also considering shifting the corridor from MP 118 to MP 123 to avoid the Markely Lake Wildlife Management Area. We support these potential revisions and encourage the Agencies to find further ways to collocate corridors with existing infrastructure when it minimizes the impact to important resources.

In addition, the Agencies note that there are multiple GRSG leks within two miles of the corridor and that the corridor may have to be shifted to avoid these areas. We note that 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). The potential conflicts associated with development of this corridor highlight the need for the sage-grouse and IBA IOPs recommended above. We strongly recommend finding additional opportunities to shift the corridor to avoid GRSG leks, wherever possible.

c. Corridor 24-228

In Idaho, the Agencies are considering shifting the corridor from MP 82 to MP 85 to the edge of Hwy 95 or the existing transmission line to reduce conflicts. This shift would avoid the Blackstock Special Recreation Management Area (SRMA). The Agencies are also considering shifting the corridor from MP 90 to MP 95 west of the Squaw Creek RNA ACEC to avoid the ACEC, Squaw Creek Addition SRMA and the Owyhee Front SRMA. These revisions will have benefits of reducing impacts to important resources, but they will not address the broader need for the Agencies to delete this corridor.

The continuation of this corridor into Oregon includes serious conflicts with GRSG PHMA, GHMA and IHMA, BLM LWC, and citizen-proposed wilderness areas, and has the potential to affect pygmy rabbit habitat. The corridor cuts through the Soldier Creek Priority Area for Conservation (“PAC”) for sage-grouse. The Soldier Creek PAC sage-grouse population declined by 51% from 2019 to 2020,³⁶ tripping a hard trigger to revise management under the Oregon Approved Resource Management Plan Amendment (ARMPA). Hard triggers represent the most concerning threshold for sage-grouse population loss, requiring immediate and more restrictive plan-level action to address sage-grouse conservation objectives. This corridor would require significant modifications to avoid sage-grouse habitat and wilderness resources which may not be possible. In addition, the Agencies have already identified corridor 7-24 to which this corridor connects and therefore this corridor may not be feasible to provide an east-west pathway from Idaho to Oregon. Corridor 16-24 which also connects to

³⁶ See https://www.dfv.state.or.us/wildlife/sagegrouse/docs/ODFW_2020_Sage-Grouse_Population_Report_Final.pdf

this corridor has significant challenges as we discuss below and warrants deletion. For all these reasons, the Agencies should delete corridor 24-228, as we've previously requested.

d. Corridor 36-226

This corridor parallels an existing transmission for much of its length. As stated in our 2019 comments, the Agencies should consider adjusting the corridor to follow the existing transmission line, unless doing so would increase impacts from development. The Agencies are considering potentially shifting the corridor west to follow the existing transmission line from MP 64.9 to MP 40. The Agencies are also considering shifting the corridor to follow the route for the recently authorized Gateway West transmission line from MP 40 to MP 0 and connecting to corridor 36-228 at MP 8 of that corridor. This potential revision would conflict with the Salmon Falls Creek Canyon ACEC from around MP 36 to MP 33. Instead of shifting west to follow the Gateway West transmission line at MP 40, the Agencies should shift the corridor west starting at MP 28, just north of the northern end of the Salmon Falls Creek ACEC's northern boundary, to avoid impacting the ACEC.

e. Corridor 50-51

The Agencies are considering shifting the corridor to the west of the Interstate Highway and into the area between two transmission lines. Impacts to wildlife connectivity are a concern in this area and should be addressed through the mitigation hierarchy. That said, moving the corridor to collocate with the two existing transmission lines would reduce impacts compared to the existing alignment, and we support the revision.

f. 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. While the Agencies acknowledge impacts to the Black Rock Desert/High Rock Canyon NCA, and intersection with the California NHT, they fail to acknowledge conflicts with the historic Lassen-Applegate trail and visual impacts to the old historic water tower in Gerlach. In addition, in Oregon corridor 16-24 has conflicts with priority and general sage-grouse habitat, pygmy rabbit habitat, BLM LWC and citizen-proposed wilderness areas. The corridor traverses a large part of a Sagebrush Focal Area, one of only two designated Sagebrush Focal Areas in the country. Sagebrush Focal Areas are designated as exclusion areas for wind and solar energy development, and avoidance areas for ROW location under the Oregon ARMPA. Because of the conflicts with this corridor, the Agencies should delete it in both Nevada and Oregon.

Despite these conflicts, the Agencies do not recommend deleting this corridor in the Report. The Agencies are considering shifting the corridor to run along an existing transmission line from MP 0 to MP 12. However, this shift doesn't address the conflicts described above, and it creates some new conflicts. The suggested change conflicts with the Selenite Mountains WSA at roughly MP 4. The Agencies are also considering shifting the corridor from MP 44 to MP 56, MP 115 to MP 130, and MP 154 to MP 160 to follow existing transmission lines, which may reduce some impacts through

collocation, but do not address the issues regarding the corridor along the southern edge of the NCA. Again, the Agencies should delete the corridor.

g. Corridor 18-224

As stated in our 2019 comment letter, corridor 18-224 intersects with numerous BLM LWC inventory units, and the Agencies must address these conflicts, as detailed in Section III of our 2019 comment letter. The Agencies do not note the intersection of corridor 18-224 with BLM LWC inventory units or recommend adjustments to avoid them, though they do recommend an IOP on inventorying for wilderness characteristics. One area of particular concern is where the corridor intersects several high-quality LWC units east of Silver Peak in the Montezuma Range, as well as additional LWC units farther to the southeast. The Agencies should adjust the corridor to turn east at MP 106 and follow Hwy 95 on past Tonopah and Goldfield, rejoining the existing alignment at MP 165. This adjustment would avoid the high quality LWC and other wildland values currently threatened by the current alignment between MP 106 and MP 165. Alternatively, the Agencies should adjust the corridor to turn east at MP 85.5 to follow the existing transmission line through the Monte Cristo Valley and on to the southeast into the Big Smoky Valley and then following Hwy 95 to the east and south past Tonopah and Goldfield. Both of these adjustments would also have the benefit of providing true access to the Millers SEZ to facilitate solar development there, as well as the opportunity to collocate solar development in lower-impact lands between the existing Crescent Dunes solar project and the Millers SEZ, which the current alignment does not.

The Agencies must work together with Nevada Department of Transportation (NDOT) to coordinate the siting of corridor 18-224 with the siting of the proposed Interstate 11(I-11) northern half (alternatives B) and southern half (alternative A1), including analysis of cumulative impacts and consideration of possible co-location of corridor 18-224 with I-11 to consolidate the environmental impacts to a single corridor.

In the Report the Agencies propose shifting the corridor 1 to 5 miles west from MP 163 to MP 225. While the Corridor Summaries document states that this revision might help avoid Desert Tortoise connectivity habitat, this new route would cut through two BLM-identified LWCs (BLM Unique ID# NV-050-352A: Stonewall Pass, and BLM Unique ID# NV-050-03R-15: Tokop) and would run for 20 miles across two Citizen-Identified LWC units in the Sarcobatus Flat. The Agencies should not make this shift into largely undeveloped habitat. Instead, the Agencies should keep the original route until MP 193 and then turn south, following existing disturbances, including the existing transmission line, previously installed for the Air Force Tolicha Peak Facility, and then down around the town of Beatty on the west side. This alignment will also keep this section of the corridor within the alignment of I-11 and allow for comprehensive planning with NDOT to provide for wildlife migration corridors, biological connectivity, and minimize habitat disruption. This existing transmission line runs alongside Hwy 95 before it deviates and runs parallel to the Hwy 95. By placing the corridor adjacent to an existing transmission line, the Agencies could avoid important Desert Tortoise connectivity habitat, as well as several LWC units south of Hwy 95. In order to limit impacts of future infrastructure development to the community of the town of Beatty, we recommend that the Agencies work closely together with community members and representatives to ensure the just siting of 18-224 around the town.

Alternatively, the Agencies should keep the existing alignment along Hwy 95 from MP 163 to about MP 190 (narrowed where needed to avoid LWC), and then turn due south, connecting up with the

revision proposed in the Report just north of the Bullfrog Hills and following it from there on to the southeast to Beatty and beyond.

h. 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 GRSG 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 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. Beyond the unacceptable impacts that pipeline development would have in this landscape, the fact that major portions of corridor 126-218 south of the Wyoming/Colorado Border were undesignated through an RMP revision makes it completely unclear what the purpose and value of having the corridor on the Wyoming side of the border. As stated in our 2019 comments, it is imperative the Agencies delete this corridor in order to avoid these impacts, and we reiterate this recommendation.

Despite these issues, the Agencies do not recommend deleting this corridor altogether in the Report. The Agencies are considering deleting the corridor from MP 62 to MP 109 and re-routing the corridor along either an existing pipeline or an existing transmission line to the east. Although the Agencies should delete corridor 126-218 altogether, the proposed revision in the Report would reduce impacts in important ways. That said, these potential revisions still conflict with ACECs and LWC, specifically, the Greater Red Creek ACEC, the Red Creek Watershed ACEC, Clay Basin Camp LWC, and Sage Creek LWC. One impact of particular concern is sedimentation in waterways for the ACECs and trout fisheries. These impacts, if they cannot be avoided, must be mitigated.

Of the two revision options identified in the Report, the option to re-route the corridor further east along the existing highway and pipeline is the better option, because it would largely collocate with both an existing pipeline and Hwy 191, which would reduce impacts compared to following the existing transmission line. In addition, it is more logical to collocate with the existing pipeline than an existing transmission line because corridor 126-218 is underground only in this area. We also urge the Agencies

to keep the corridor restricted to underground only, especially as any above ground infrastructure raises concerns south of the Wyoming/Colorado border in Browns Park.

i. 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 PHMAs. This large expanse of relatively intact sagebrush habitat provides important breeding, foraging, nesting, wintering, or migratory stop-over habitat for GRSG. 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 Greater Sand Dunes (which support the Steamboat desert elk herd), 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 ACECs, 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.

The Agencies are considering shifting the corridor from MP 31 to the end. This suggested change conflicts with the South Pinnacles WSA and the Alkali Basin-East Sand Dunes WSA. Infrastructure development is prohibited by law in WSAs, and the agencies cannot designate corridors overlapping with WSAs. Thus, instead of slightly shifting the corridor and creating WSA conflicts, the Agencies should delete this corridor.

We also note that while the Agencies acknowledge some of the issues described above in the Report, they fail to acknowledge or address other important issues as detailed following; the Agencies must do so in the Final Report. The corridor conflicts with greater sage-grouse PHM areas from MP 0 to MP 21 and MP 28 to MP 60. While the Agencies are considering some changes that would avoid some of these areas, the Agencies do not acknowledge or address disruption from MP 15 to MP 21 or MP 28 to MP 31. While the Agencies are considering changes that would avoid the Greater Sand Dunes ACEC, Killpecker Sand Dunes SRMA, the Agencies do not acknowledge Boar's Tusk, North and South Table Mountain, Cedar Mountain, or White Mountain Petroglyph ACECs.

j. 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.

The Agencies are considering shifting the corridor to align with existing infrastructure from MP 103 to MP 125, MP 158 to MP 170, and MP 185 to MP 209. The Agencies' proposed change from MP 185 to MP 209 avoids an LWC unit – we support this change.

While the Agencies acknowledge intersection of the corridor with the GHMA and PHMA, the Agencies do not recommend shifting the corridor from MP 125-147 west to follow an existing transmission line and to reduce impacts to grouse habitat from overhead transmission lines, as we had recommend in our 2019 comments. Instead, the Agencies state that GRSG PHMA and GHMA encompass the entire area and cannot be avoided. We reiterate our recommendation that the Agencies shift the corridor west from MP 125-147 to collocate with the existing transmission line. In addition, we recommend that the corridor be shifted east from MP 249-255 to avoid the Bridger Sage-steppe IBA which supports the largest concentration of Greater Sage-grouse in south-central Montana and roughly 3% of the male grouse surveyed in the state.

k. Corridor 230-248

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. The Report notes that "...the corridor faces numerous challenges including river crossings, terrain and stability concerns, and it is not collocated with existing infrastructure"³⁷ and that several concerns were highlighted during the stakeholder workshops, including environmental concerns, tribal issues, complications due to terrain, river crossings, especially at Fish Creek etc. We continue to believe that the corridor should be deleted.

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. Since the corridor abstract for this corridor was updated in 2019, a large portion of the proposed route experienced a stand-replacing fire. These add to all the reasons set forth in the previous comments that strongly support deleting this corridor from the WWEC maps.

However, if deletion is not possible, we recommend that the corridor be collocated with the existing 500kV transmission line to the south of the corridor from MP 0 to 30. Alternatively, we recommend that the corridor be designated overhead only.

³⁷ Corridor Summaries. Pg. 170.

l. Corridor 101-263

We appreciate the commitment to co-locate the corridor from MP 14 to 18 and reiterate our previous recommendation to consult with USFWS to avoid, minimize, and compensate for impacts to Northern Spotted Owl and critical habitat designated for this species within the corridor.

m. Corridor 18-23

As noted by the Agencies “The corridor is located in an area of high biological, recreational, visual and cultural value,”³⁸ and there were many factors that led to its being designated a corridor of concern. This concern extends beyond conservation groups to Mono and Inyo counties (see their comments from 2014, 2016, 2019 and 2021). We continue to strongly recommend that this corridor be deleted. If the corridor is not deleted it must, at minimum, co-locate with the existing transmission line as proposed by the Agencies, not be widened as proposed in several locations, and be re-adjusted to avoid designated wilderness, WSAs, ACECs and critical habitat. Additional IOPs using the mitigation hierarchy should be developed for resources at risk.

The Report indicates there are several SEZs near corridor 18-224 in Nevada that could serve as areas for future renewable energy development. The Report cites a lack of transmission as being a challenge to transmitting power to load centers in southern California, and indicates that “Existing substations in the Bishop, California, area (near Corridor 18-23) are a preferred hub to move solar energy in and out of the area to load centers.”³⁹

Our organizations are deeply concerned about constructing new transmission lines to move power from western Nevada to southern California via Bishop and corridor 18-23, especially when corridor 18-224 is adjacent to the Millers SEZ and surrounding region. Power cannot be transmitted from western Nevada to Bishop and through the Owens Valley without significant impacts to environmental, cultural, and scenic values, some of which are documented in these comments. Transmission for projects in the Millers SEZ region should be focused on tying into adjacent corridor 18-224.

Bi-State Sage Grouse

Numerous sections of the 18-23 corridor within western Nevada and Mono County pass through proposed critical habitat for BSSG (see section V above). Although the Report recommends an IOP for GRSG habitat under Ecological Resources, the agency should consider an additional IOP for BSSG, based upon the distinct population segment (DPS) of this species and its ongoing litigation for listing under the Endangered Species Act (See 2019 comments for further background). The IOP developed for BSSG could be largely the same as those developed for the GRSG and should be subject to public input.

Sierra Nevada Bighorn Sheep

Although the corridor review document indicates that the alignment at MP 207 could be shifted east to avoid critical habitat, this is not reflected in the mapping tool. As currently presented, MP 207 is

³⁸ Report, Pg. 52.

³⁹ Report, Pg. 16.

still within Sierra Nevada Bighorn Sheep critical habitat. This particular area is a source population for reintroduction efforts to aid in the recovery of the species.

Desert Tortoise

The area between MP 222-239 is suitable habitat for Desert Tortoise. Recent sightings and sign (burrows) of tortoise in this area by BLM Ridgecrest Field Office staff and independent biologists may indicate the species is moving northward and up in elevation. As we have suggested above, IOPs should be developed for habitat connectivity to minimize impacts to both Desert Tortoise habitat and individuals. The opportunity for public input should be provided.

Migratory Birds

The alignment runs along the Pacific migratory bird flyway. Songbirds, shorebirds, and waterfowl pass through the Owens Valley and Rose Valley on their way to and from breeding grounds. The flyway has stopover riparian and wetland habitat in the Sierra Nevada canyons and at Little Lake, Owens Lake and Haiwee Reservoir. The corridor adjustment at MP 145-148 would go through the Baker Meadow. An ongoing Los Angeles Department of Water and Power (LADWP) mitigation project is attempting to restore what once was a Yellow-Billed Cuckoo nesting area. The corridor should be moved out of areas that are designated for habitat restoration and species recovery.

Walker River State Recreation Area (WRSRA)

The 18-23 corridor runs adjacent to the newly designated WRSRA between MPs 12-50, with the greatest potential impact occurring at MPs 23-30. Transmission construction in MPs 23-30 will impact recreation, cultural and scenic values at WRSRA. Furthermore, the online Mapping Tool has not been updated to reflect the State Recreation Area. WRSRA should appear as state land under the Surface Management Agency layer. We request Agencies consult with WRSRA to analyze potential impacts of the proposed corridor on park operations and adjust or delete this section as recommended by Park staff.

USFS Roadless Areas

The corridor along MP 83-85 is adjacent to three areas the Inyo National Forest has recommended for wilderness designation: Adobe Hills (10,354 acres) Huntoon (8,876 acres) and South Huntoon (5,898 acres). See INF Land Management Plan (LMP), 2019. The corridor also would impact portions of the Excelsior IRA at MP 66-79. This entire region provides habitat connectivity between the northern White Mountains and the eastern wild lands of the Bodie Hills. The Report needs to be updated to incorporate the new LMP's findings; the draft report still references the 1988 plan. The LMP directs that recommended wilderness areas be managed as wilderness and it identifies IRAs as Designated Areas pursuant to the Roadless Area Conservation Rule (36 CFR 294 subpart C). To understand the impacts of the corridor on recommended wilderness area and IRAs, additional analysis should be included in the final Report and as any part of future NEPA analyses.

Golden Trout Wilderness

According to our mapping, corridor 18-23 would adversely impact 423 acres of designated wilderness within the Golden Trout Wilderness managed by the Inyo National Forest at MP 208-211 (See Appendix 2). Since new ROWs are prohibited in designated wilderness, the corridor alignment must be adjusted by moving it outside the wilderness boundary.

Wilderness Study Areas (WSAs)

The revised corridor alignment poses direct conflicts with WSAs on the Volcanic Tablelands. The Volcanic Tablelands are part of the ancestral territory of the Owens Valley Paiute and Shoshone tribes, and all of the WSAs contain highly significant wilderness, cultural, wildlife/vegetation and geological values. The agencies propose to expand the width of the existing corridor between MP 110-116, which would adversely impact Casa Diablo WSA (503 acres), Chidago Canyon WSA (8 acres) and Fish Slough WSA (160 acres). The BLM's Manual for Management of BLM Wilderness Study Areas prohibits development of new rights of way and infrastructure in WSAs unless they can meet the agency's non-impairment standard (See Manual 6330—Management of BLM Wilderness Study Areas, including Section 1.6.D.4.ii). To get around this roadblock the agencies inappropriately recommend that the potentially impacted acreage within these WSAs be released from wilderness study by Congress so that development of new transmission or pipelines can proceed within these WSAs. The BLM has a duty to manage these WSAs for potential wilderness designation, not for potential release. In proposing that release be part of future legislative deal-making, the agencies are abrogating their duty and responsibility to protect the values of these fragile and sensitive WSAs until Congress acts. The agencies must eliminate its proposal to widen the corridor on the Volcanic Tablelands.

Our mapping also indicates that 56 acres in the Volcanic Tableland WSA (MP 117-124) would be impacted by the corridor. According to the Report, 18-23 is proposed to be co-located atop the existing transmission corridor on the Tablelands that is directly adjacent to Volcanic Tableland WSA. We support co-location but not widening of the corridor.

The agencies must consult with the Bishop Paiute Tribe and other tribes whose ancestral territories include the Volcanic Tablelands and include them in any agency-initiated deliberations about future land status or proposed development of additional transmission infrastructure on the Tablelands.

The proposed realignment at MP 153 would adversely impact 26 miles of Crater Mountain WSA. Crater Mountain WSA contains unique lava tubes and abundant tribal cultural resources. The alignment should be moved back to what was proposed in the 2018 corridor abstract and mapping tool so that these sensitive resources are not adversely impacted.

Areas of Critical Environmental Concern (ACEC)

The Fish Slough ACEC intersects the corridor between MP 112-113. 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 ACEC is an extensive system of springs and marshes cooperatively managed by multiple agencies. The restoration of native pupfish populations is a major undertaking in this area with infrastructure, vegetation control, and exotic fish removal. In addition, 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)). Allowing transmission development within these locations could adversely impact the values for which these areas were designated.

Although corridor width is greatly reduced, the corridor locations at MP 212-225, 232-235 are still within the Mohave Ground Squirrel (MGS) ACEC and California Desert National Conservation Lands identified in the Desert Renewable Energy Conservation Plan (DRECP, 2016). The ACEC was

established to protect the long-term survival of this species and ensure connectivity. 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.

We appreciate that the southern part of the 18-23 corridor width has been reduced to what appears to be the existing ROW. The reduction, however, negates the impacts to ACECs along this section of the corridor. The Sierra Canyons ACEC is located at MP 224-226, 229-239 and overlaps NCLs that have important cultural significance and history. 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 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 federal and state-listed threatened Desert tortoise and the East Monache mule deer herd. 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).

Impacts to the Rose Spring ACEC (and overlapping NCLs) still occur at MP 224-225 and could impact 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.⁴⁰

The same corridor width reduction continues further south as it enters the Fossil Falls ACEC. This ACEC was designated for wildlife values, significant prehistoric and historic cultural values, and unique geological formations. 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. 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.

Owens Lake

Owens Lake and its shoreline between MP 194-210 is very important to local tribes and contains a wealth of tribal cultural resources. Owens Lake has been nominated by the Native American Heritage Commission as a National Historic Landscape. Owens Lake and the surrounding shoreline should be characterized in the final report as an area of "high conflict." The corridor also overlaps with the Owens Lake Important Bird Area, and the IOPs for Minimizing Collision Through Siting and IBAs should be applied here.

We appreciate the Agencies' ongoing work to correct 18-23 corridor alignments and address conflicts based on public comment. However, the iconic scenic landscapes, world class tourism, and fragile biological, cultural and recreational resources make this corridor particularly problematic for the

⁴⁰ DRECP. Appendix A. Pg. 19-20.

development of future transmission infrastructure. We strongly recommend the Agencies remove the corridor all together in light of the numerous issues we and other stakeholders have raised.

II. Corridors Additions

a. Gateway West Corridor

We support the addition of this corridor that follows the path of the recently authorized Gateway West transmission line and provides an east-west pathway from Wyoming into Idaho. An existing 345-kV transmission line is located along this route, it contains a designated Executive Order two-mile wide transmission line corridor through sage-grouse core area, avoids Cokeville Meadows National Wildlife Refuge, and would likely have less impact on migrating raptors. However, because raptors utilize the entire north-south ridgeline of Commissary Ridge as a migration corridor, the siting of the transmission line in should avoid transecting any high elevation north-south ridgelines to reduce the risk to migrating raptors that commonly use such features throughout the West.⁴¹ We recommend that the IOPs for avian risk collision be developed as recommended and be made a part of the corridor management plan for this corridor.

b. Wagontire Mountain Corridor

The Report identifies a potential new energy corridor from Burns, Oregon, heading south/southwest along the existing 500-kV transmission line to connect to Corridor 7-11. This corridor is being added to replace the corridor 7-24 which is being considered for deletion. The Agencies note that the potential corridor addition would create a preferred route for potential future energy development, including wind energy development, while avoiding PHMAs to the greatest extent possible. However, the proposed corridor would run through Picture Rock Priority Conservation Area for Greater Sage-grouse, whose population has declined by half between 2019 and 2020 and 94 percent between 2003 and 2020.⁴² The Picture Rock PAC had already tripped a hard trigger under the Oregon ARMPA due to population decline. Hard triggers represent the most concerning threshold for sage-grouse population loss, requiring immediate and more restrictive plan-level action to address sage-grouse conservation objectives. Even though the corridor runs along an existing transmission line, further development in the corridor could jeopardize the GRSG population in the Picture Rock PAC. Furthermore, the new corridor would intersect BLM LWC and citizen proposed wilderness areas, state identified Conservation Opportunity Area,⁴³ and Elk and Mule Deer Crucial Winter Range. We recommend not designating this corridor due to the numerous conflicts mentioned above, especially when the corridor 7-11 connects with corridor 11-228.

c. Southern Idaho Corridor

The Agencies are considering a potential corridor addition in southern Idaho to “provide an east-west pathway through southern Idaho on federally administered land.” This potential new corridor intersects with the Granite Pass/Goose Creek Trail ACEC, the Little Goose Creek LWC, and the Sawtooth Forest-Black Pine Roadless Area. Further, the corridor addition conflicts with citizen-LWC

⁴¹ Goodrich, L. J. , and J. P. Smith. 2008. Raptor migration in North America. Pages 37–149 in Bildstein, K. L., J. P. Smith, E. Ruelas Inzunza, and R. R. Veit (Editors), *State of North America’s Birds of Prey*. Series in Ornithology 3. Nuttall Ornithological Club, Cambridge, MA, and American Ornithologist’s Union, Washington, DC.

⁴² Oregon Greater Sage-Grouse Population Monitoring: 2020 Annual Report. Pg. 33. Available at https://www.dfw.state.or.us/wildlife/sagegrouse/docs/ODFW_2020_Sage-Grouse_Population_Report_Final.pdf ⁴³ See <https://oregonconservationstrategy.org/conservation-opportunity-areas/>

and raises potential conflict with the viewshed of the City of Rocks Reserve. In addition, the Report states that “Both Cassia County and Power County oppose new Section 368 energy corridor development located where the corridor would traverse corridor gaps along agricultural lands.” We believe corridor 49-112 combined with corridor 112-226 provide the east-west pathway through southern Idaho and the new addition would be redundant. Due to these numerous concerns, we strongly recommend that the Agencies not designate this corridor.

III. Corridors Deletions

a. Corridor 7-24

We appreciate that the Agencies have identified Corridor 7-24 for deletion. This was an original Corridor of Concern due to its location through Sage-grouse habitat, including Sagebrush Focal Area, pygmy rabbit habitat, and citizen-proposed wilderness area. This corridor would cross a large expanse of southeastern Oregon in Malheur, Harney and Lake counties, bisecting the ecologically and culturally vital region between Hart Mountain National Antelope Refuge and the Sheldon National Wildlife Refuge possibly affecting wildlife migration. In addition, the corridor would intersect Visual Resource Management (VRM) Class II area, is adjacent to VRM Class I area and could affect Alvord Desert Wilderness Study Area. We had previously recommended deleting this corridor due to the concerns identified above. We appreciate that the Agencies have noted that the corridor crosses GRSG SFAs and PHMAs along much of its length and that there is no foreseeable utility-scale east-west energy demand that this corridor could have supported. We commend the Agencies for deleting this corridor.

b. Corridor 16-104

The Agencies have identified to delete this original Corridor of Concern because of concerns on wilderness areas and GRSG habitat. The corridor would run through GHMA and PHMA from MP 11 to the end and there are GRSG lek sites present throughout the corridor. In addition, there is no reasonable alternate pathway to avoid GHMA or PHMA. In addition, as the Report notes that other corridors in the area can meet future energy demands. Therefore, the siting of this corridor does not meet the corridor siting principles. We commend the Agencies for identifying this corridor for deletion.

D. Conclusion

Thank you for this opportunity to provide comments on the Report. We commend the Agencies for the progress made to date on planning for energy corridors at a landscape scale and with consideration to renewable energy development and wildlife conservation. We look forward to continuing to work with the Agencies and other stakeholders in the process. Please direct any questions regarding our comments and recommendations to Rupak Thapaliya at rthapaliya@defenders.org.

Sincerely,

Mike Lynes
Audubon California

Daly Edmunds
Audubon Rockies

Brenna Bell
Bark

Linda Castro
California Wilderness Coalition

Lisa Belenky
Center for Biological Diversity

Rupak Thapaliya
Defenders of Wildlife

Shaaron Netherton
Friends of Nevada Wilderness

Jora Fogg
Friends of the Inyo

John Robison
Idaho Conservation League

George Sexton
KS Wild

Nada Culver
National Audubon Society

Helen O'Shea
Natural Resources Defense Council

Jeremy Austin
Oregon Natural Desert Association

Dave Willis, Chair
Soda Mountain Wilderness Council

Alex Daue
The Wilderness Society

John Trammell
The Wildlands Conservancy

Khale Century Reno
Wyoming Wilderness Association

Attachments:

Appendix 1: Priority Big Game Winter Range map

Appendix 2: Revisions and Additions to WWEC Reg 4, 5, and 6 - intersections with
Wilderness Areas, WSAs, ACECs, BLM LWC, NCAs, Roadless Areas

CC via email: Jeremy Bluma, BLM (jbluma@blm.gov)
Erica Pionke, BLM (epionke@blm.gov)
Reggie Woodruff, USFS (rwoodruff@fs.fed.us)

Appendix 1

Priority Big Game Winter Range map



**Appendix 2 - WWEC Revisions Reg 456 - intersections with Wilderness Areas,
WSAs, ACECs, BLM LWC, NCAs, Roadless Areas**

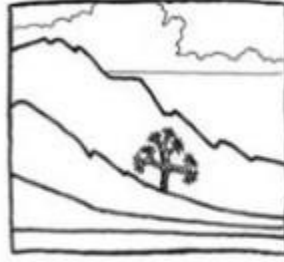
Corridor	Change	Region	Name of conflict/ Unit name	Type of conflict	Acres	Milepost (MP)	State
121-221	Addition	4	South Pinnacles	WSA	96	42	WY
121-221	Addition	4	Alkali Basin-East Sand Dunes	WSA	1	43	WY
126-218	Addition	4	Red Creek Watershed	ACEC	350	63	
126-218	Addition	4	Clay Basin Camp	LWC	358	66	
126-218	Addition	4	Sage Creek	LWC	1,571	63-108	
126-218	Addition	4	Greater Red Creek ACEC (Red Creek Watershed)	ACEC	4,070	69-85	
126-218	Addition	4	Greater Red Creek ACEC (Currant Creek Watershed)	ACEC	2,802	83-90	
126-218	Addition	4	Greater Red Creek ACEC (Sage Creek Watershed)	ACEC	5,616	87-100	
16-24	Addition	5	Selenite Mountains	WSA	127	4	NV
16-24	Addition	6	Bedground Reservoir	LWC	128	194	
16-24	Addition	6	Cherry Well	LWC	450	194	
16-24	Addition	6	Red Hills	LWC	130	194	
16-24	Addition	6	Alvord Desert	WSA	2,217	195	OR
16-24	Addition	6	Bowden Hills	WSA	256	195	OR
18-224	Addition	5	03R-15	LWC	501	169	
18-224	Addition	5	352A	LWC	1,389	164-167	
18-23	Addition	5	Chidago Canyon Wilderness Study Area	WSA	8	110	CA
18-23	Addition	5	Fish Slough	ACEC	91	112	
18-23	Addition	5	Crater Mountain Wilderness Study Area	WSA	26	153	CA
18-23	Addition	5	Owens Lake	ACEC	112	194	
18-23	Addition	5	Inyo Forest- South Sierra	Roadless	19	222	CA
18-23	Addition	5	Rose Spring	ACEC	0	224	
18-23	Addition	5	Sierra Canyons	ACEC	14	224	
18-23	Addition	5	Fossil Falls	ACEC	0	236	
18-23	Addition	5	Casa Diablo Wilderness Study Area	WSA	503	110-116	CA
18-23	Addition	5	Fish Slough Wilderness Study Area	WSA	160	114-116	CA
18-23	Addition	5	Volcanic Tablelands Wilderness Study Area	WSA	56	117-124	CA
18-23	Addition	5	Crater Mountain	ACEC	48	149-153	
18-23	Addition	5	Golden Trout Wilderness	Wilderness	423	208-211	CA

**Appendix 2 - WWEC Revisions Reg 456 - intersections with Wilderness Areas,
WSAs, ACECs, BLM LWC, NCAs, Roadless Areas**

Corridor	Change	Region	Name of conflict/ Unit name	Type of conflict	Acres	Milepost (MP)	State
18-23	Addition	5	Mohave Ground Squirrel	ACEC	903	216-224	
36-226	Addition	6	Salmon Falls Creek Canyon ACEC	ACEC	469	31-35	
36-228	Addition	6	Morley Nelson Snake River Birds of Prey National Conservation Area	NCA	5,289	88	ID
Southern Idaho Corridor Addition	Addition	6	Granite Pass/Goose Creek Trail ACEC	ACEC	294	no official mile post	
Southern Idaho Corridor Addition	Addition	6	Little Goose Creek	LWC	19	no official mile post	
Southern Idaho Corridor Addition	Addition	6	Sawtooth Forest- Black Pine	Roadless	327	no official mile post	ID
Wagontire Mountain Corridor Addition	Addition	6	Burma Rim	LWC	2,197	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Burma Rim	LWC	2,115	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Capehart Lake-Dusenberry Lake	LWC	25	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Capehart Lake-Murphy Lake	LWC	0	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Capehart Lake-Silver Lake	LWC	1,113	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Chase	LWC	100	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Dead Indian South	LWC	1,687	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Deadhorse	LWC	801	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Dog Leg South	LWC	1,708	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Fandango	LWC	796	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Goodrich Well South	LWC	1,250	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	none	LWC	3,143	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	None	LWC	415	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	OR-015-0000	LWC	15	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Palomino-	LWC	2,179	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Palomino-Grassy Butte	LWC	1,289	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Sheep Rock	LWC	3,414	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Sheep Rock	LWC	2,617	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Sheeplick Draw	LWC	4,932	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	Squaw Lake South	LWC	1,983	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	St. Patrick South	LWC	2,954	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	St. Patrick West	LWC	0	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-	LWC	1,032	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-1	LWC	2,298	no official mile post	
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-4	LWC	835	no official mile post	

**Appendix 2 - WWEC Revisions Reg 456 - intersections with Wilderness Areas,
WSAs, ACECs, BLM LWC, NCAs, Roadless Areas**

Corridor	Change	Region	Name of conflict/ Unit name	Type of conflict	Acres	Milepost (MP)	State
Wagontire Mountain Corridor Addition	Addition	6	West Warm Springs-5	LWC	70	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-022	LWC	249	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-023	LWC	1,242	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-029	LWC	411	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-031	LWC	226	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-033	LWC	192	no official mile post	
Wamsutter-Powder Rim Corridor Addition	Addition	4	CON-010-046	LWC	783	no official mile post	



Basin and Range Watch

January 29th, 2021

To:

Re: Comments on West Wide Energy Corridor – 18-224

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.

Basin and Range Watch requests that the section 18-224 Energy Corridor be abandoned. We believe that most of the energy that would be produced from this corridor would be exported to Southern California so we would ask that you consider alternatives of upgrading existing transmission that goes through Eastern California along Corridor 18-24.

We are concerned about the following impacts that would occur from building a large-scale transmission line in the area as well as the cumulative impacts of building solar projects in the region.

We will discuss the impacts by region which is why we oppose this corridor:

Walker Lake:

A transmission line at Walker Lake will create collision risks for raptors, waterbirds and impact bighorn sheep.

The Walker Lake is an Important Bird Area and is habitat for several raptors and waterfowl that pass through the area. Walker Lake provides habitat for Western Snowy Plover, Common Loon, Western, Clarks, and Eared Grebes, Double-crested Cormorant, White-faced Ibis, Tundra Swan, Snow Goose, Gadwall, Redhead, Ruddy Duck, Northern Shoveler, and American White Pelican.

Walker Lake is also wintering habitat for bald eagles. New transmission can cause collision hazards and cause Take of bald and golden eagles under the Bald and Golden Eagle Protection Act.

Federally Threatened Lahontan cut-throat trout live in Walker Lake. Construction of transmission can cause sediment to erode into the lake and impact water quality. Equally, new transmission could provide new perches for fish eating birds and this could be a subsidized predator issue.

The cliff and shores of Walker Lake are habitat for desert bighorn sheep. New transmission and construction will disrupt and disturb bighorn sheep.

A new transmission line will also disrupt military radar in this area.

Columbus Marsh Area, Excelsior Range:

A new transmission project will disrupt pronghorn migration and connectivity in this area. A new transmission line will also cause a big visual impact to this region.

Tonopah Region, Big Smokey Valley:

New transmission in this area will have impacts to pronghorn migration, bighorn sheep and many raptors and migratory birds.

The Big Smokey Valley is a broad valley that contains a population of pronghorn that would be disrupted by new transmission. The area also has herds of wild horses that would be impacted and disturbed by new transmission.

Several migratory and rare bird species have been documents at Miller's Rest Stop and this indicates there will be collision hazards from new transmission. Species that have been documented here are: waterbirds (herons and kingfishers), raptors (falcons, accipiters, harriers, buteos), Mexican species (Hepatic Tanager), Eastern species (Hooded Warbler, Least Flycatcher, Ovenbird), shorebirds (peeps of various types), montane species (Mountain Chickadee), non-native species (House Sparrow, European Starling, Eurasian Collared Dove), migrants (Yellow-breasted Chat, Lincoln Sparrow, Rufus Hummingbird, MacGillivray's Warbler), and even a few desert species (Western Kingbird, Say's Phoebe, Sage Thrasher, Black-throated Sparrow, and House Finch).

The Miller's Solar Energy Zone or Designated Lease Area is 16,000 acres. Bird mortality has been documented at solar projects and it is believed that they mimic lakes. Collisions happen at photovoltaic projects and solar power towers. If large-scale solar projects are built here, the lake effect will attract birds and cause collision and mortality. This will also attract birds which will collide with new transmission.

The Crescent Dunes Solar Project has been shut down for a couple years, but they hope to restart it. It has killed multiple birds with a solar flux. The same company at one time wanted to build 8 more of these towers. This could also create a cumulative avian impact associated with new transmission.

Info on avian lake effect: [Solar Farms Threaten Birds - Scientific American](#)

Goldfield/Sacrobatus Flat:

A new transmission line will disrupt pronghorn migration and breeding habitat in the Sacrobatus Flat area as well as the Lida Valley.

This is also some of the northern most habitat for the Western Joshua tree. New data suggests that the Joshua tree is threatened by drought and climate change. In California, the Fish and Game Commission is protecting the Joshua tree now: [California Grants Joshua Trees Temporary Endangered Species Protections : NPR](#)

New transmission will directly impact Western Joshua Trees and new solar projects will remove several thousand Joshua trees.

Transmission also causes greater risk for wildfire and as we know, Joshua trees are at great risk from fire. [Dome Fire - Mojave National Preserve \(U.S. National Park Service\) \(nps.gov\)](#)

Much of the region is a Visual Resource Management Class II designation with the BLM. The **VRM Class II Objective** is to retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

The VRM Class II areas are Stonewall Mountain, Lida Valley, Areas east of Oasis Valley, Bare Mountain in Amargosa Valley and others.

Some of the areas are VRM Class III with the objective of: To partially retain the existing character of the landscape. Allowed Level of Change: The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

New transmission in the area would disrupt both of these objectives.

If a new transmission line is built, the Gold Point Solar Energy Zone may be developed. Should this happen there will be impacts to:

- Pronghorn connectivity
- Western Joshua trees
- Visual resources
- Historic quality of Gold Point Ghost Town
- Limited groundwater resources in Lida Valley

New transmission will be visible from the historic town of Goldfield, Nevada.

Scotty's Junction/Sacrobatus Flat:

New transmission will impact:

- Pronghorn

Western Joshua trees

Northern most habitat for the Threatened desert tortoise

Visual Resources from Eastern Death Valley National Park

Residential properties and quality of life at Scotty's Junction.

Raptors

New transmission will also encourage a buildout of sprawling solar projects in Sacrobatus Flat.

Oasis Valley/Beatty:

New transmission will impact:

Amargosa river: It will have to go over the Amargosa River, The corridor will go right next to the Nature Conservancy owned preserve – the Flying L Ranch about 900 acres.

Transmission Construction will impact water quality and sensitive Amargosa River species:

Amargosa toad
Speckled dace
Oasis Valley Spring snail

Other species impacted would be
Bighorn sheep,
Mule deer
Pronghorn
Desert tortoise

Oasis Valley is an Important Bird Area.

“In Southern Nevada, the Oasis Valley is one of only two north/south oriented migration corridors - the other being Pahranaagat Valley. Theoretically, all land birds migrating into the Great Basin and other locales to the north, must pass through these two corridors. Although there are some areas of extensive tamarisk, the riparian areas throughout the Valley are to a large extent one of the healthiest examples throughout southern Nevada. With the Town of Beatty working hard to protect these areas, this site offers birds a reliable safe-haven to rest and refuel before continuing their migratory journey. Without such a site, major migration patterns would be interrupted and significant population declines could result.” [Oasis Valley | Audubon Important Bird Areas](#)

It is habitat for Threatened Least Bell's verio
Yellow billed cuckoo
Golden eagle and bald eagle.

[Wilson's Warbler](#), [MacGillivray's Warbler](#), [Northern Parula](#), [Yellow Warbler](#), [White-breasted Nuthatch](#), [Lincoln Sparrow](#), [Warbling Vireo](#), [Mourning Dove](#), and [Bullock's Orioles](#). [Vermilion Flycatchers](#) have been seen here. [Great Horned Owls](#) are resident.

Check the marshy areas for [Marsh Wrens](#), [Violet-green Swallows](#), [Tree Swallows](#), [Red-tailed Hawks](#), [Common Raven](#), [Killdeer](#), and [Lark Sparrows](#).

Oasis Valley now has been determined to have a large desert tortoise population (consult Fish and Wildlife Service).

New transmission will be visible from private property and may lower property values. New transmission may also cause life threatening wildfires along the thick vegetation near the Amargosa River.

Amargosa Valley:

New transmission will impact:

Raptors/Golden Eagles

Kit Fox/Burrowing owls (big populations there)

Pronghorn (many sightings now)

Migratory birds from Ash Meadows.

Over 300 species of birds use Ash Meadows National Wildlife Refuge and Amargosa Valley is a flyway between Ash Meadows and Oasis Valley.

[Ash Meadows Bird Checklist_web.pdf \(fws.gov\)](#)

The Federally Endangered Yuma clapper rail has been documented at Ash Meadows.

New transmission in Amargosa Valley will encourage a big solar buildout which will create more avian collision hazards as well as fugitive dust. This will also compromise the property values and quality of life for people living in the region.

A new transmission line will be highly visible from the scenic Lava Dune.

A big solar build out in Amargosa Valley will disrupt sand transport for the Big Dune. The Nevada Department of Wildlife recently found a population of Mojave fringe-toad lizards on Big Dune. Four endemic beetles have also been documented on Big Dune: [Three other sensitive beetle species can also be found at Big Dune: \(basinandrangewatch.org\)](#)

Pahrump Valley/Mercury:

New transmission will disrupt and impact:

Desert tortoise habitat and connectivity. It will destroy the habitat and create perches for ravens. It will create invasive weeds that will create wildfire risk.

It will encourage the build out of thousands of acres of new solar on tortoise habitat. Efforts to mow vegetation are just experimental and there is no peer reviewed evidence that this works for the desert tortoise.

There are several applications for large scale solar in the region which will be enabled by new transmission.

New transmission and solar will also remove habitat for Gila monster, Las Vegas bear poppy, burrowing owl and the rare Parish's club-cholla with only a limited range in this region in Nevada.

New transmission and solar will result in the removal of millions of Mojave yuccas and Eastern Joshua trees in this region.

New transmission will disrupt the historic quality of the Old Spanish National Historic Trail in this park of Nevada.

In conclusion,

We again would like to request that Corridor 18-224 be abandoned over impacts to wildlife, groundwater, visual resources, property values, quality of live and cumulative impacts.

Thank you for considering our comments

Sincerely,

Kevin Emmerich

Basin and Range Watch

P.P. Box 70

Beatty, NV 89003

January 29, 2021

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,

Thank you for reviewing these comments, which are focused on the Corridor Abstract for Corridor 230-248 in Region 6 of the Section 368 West-wide Energy Corridors (WWEC).

Cascadia Wildlands represents over 10,000 members who seek a wilder and healthier Cascadia. Our mission is to defend and restore Cascadia's wild ecosystems in the forests, in the courts, and in the streets. We envision vast old-growth forests, rivers full of wild salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion. Our members and staff live in, use, and enjoy the relevant planning area for Corridor 230-248.

As an initial matter, we echo the concerns of our colleagues at Bark, representing over 30,000 citizen advocates concerned with the protection and restoration of Mt. Hood National Forest and the surrounding ecoregion. In reference to the initial proposal for this pipeline, when it was called the Palomar Pipeline, Bark wrote:

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

The West-wide Energy Corridors (“WVEC”) EIS settlement agreement designated Corridor 230-248 a “Corridor of Concern” based on major environmental concerns including: effects to 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 protections in place for Northwest Forest Plan Late-Successional Reserves.²

We believe conflicts with these and other environmental, land-use, and legal designations are irreconcilable and that the only reasonable path is to delete Corridor 230-248 from the WVEC map, for the specific reasons given below.

A. In contrast to representations made in the abstract, this corridor is not intended for the transport of renewable energy, but would, if built as currently configured, transfer fracked gas across the Cascades for export. Our members are vocal advocates supporting the Power Past Fracked Gas campaign. We are opposed to any fossil fuel infrastructure that would lock in additional Pacific Northwest (or worldwide) greenhouse gas emissions.

B. We are extremely concerned regarding the potential for pipeline leaks and their impacts on fragile ecosystems. Pipelines leak, and in a high-fire risk zone like the one at issue, the potential for catastrophic impacts must be considered seriously. Additionally, the Clackamas River would potentially be impacted by any leak; it supplies drinking water to hundreds of thousands of downstream citizens.

C. The corridor would have an immediate and irreparable impact on the visual values of the Pacific Crest National Scenic Trail and upon a classified-“scenic” segment of the Wild and Scenic Clackamas River. The river has five categories determined “outstandingly remarkable”: recreation, fish, wildlife, historic, and vegetation. FERC may not permit projects that interfere with the river’s outstanding values or its scenic, recreational, fish or wildlife values. (Wild & Scenic Rivers Act, sec. 7.)

Additionally, the corridor as proposed (and any likely re-alignments) would cross the Fish Creek watershed at least once, if not many times. This is a geologically unstable, flood-prone, and landslide-prone watershed that is also habitat for several ESA-listed aquatic species such as salmon, trout, and eel, and in addition, is a Wild and Scenic River. Pipeline construction and operation in this watershed is unacceptable. It would also cross the Wild and Scenic Deschutes River. And, the pipeline route would also cross six Tier 1-designated watersheds, which under the Northwest Forest Plan, should be carefully conserved for habitat purposes.

D. Construction of the corridor and pipeline would have immediate and irreparable impacts on Northern Spotted Owl critical habitat. In addition, according to the NSO Revised Recovery Plan

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

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

(2011), older, moist forest stands should be preserved wherever they are located, regardless of land designation. Infrastructure development within MHNH is incompatible with Northern Spotted Owl recovery, for which every federal agency is responsible pursuant to the Endangered Species Act.

E. The corridor as proposed would require clearcutting 80+ year-old stands in portions of the Late-Successional Reserve in Mt. Hood National Forest. This is prohibited by the Northwest Forest Plan and related forest management planning documents.³ Additionally, the corridor construction would fail to comply with a long list of Northwest Forest Plan standards and guidelines, subject to specific determination by forest managers. At a minimum, the corridor construction would be out of compliance with forest standards and guidelines meant to prevent detrimental impacts to soil, riparian areas, aquatic habitat, and recreational uses.

F. Finally, wildfire hazard potential (WHP) is an index that depicts the relative potential for a wildfire that would be difficult for suppression resources to contain, based on wildfire simulation modeling. This dataset is produced by the USDA Forest Service, Fire Modeling Institute.⁴ It shows that much of the route of this corridor would be in the very highest category, "Very High" WHP. Indeed, much of the pipeline route was burned in 2020's Riverside Fire. This new information about the fire risk of this particular route must be seriously evaluated and suggests deletion of this corridor as the wise decision to protect lives and property. In addition, the pipeline construction itself, by clearing and drying out the forest, creates the conditions for higher fire risk.

Conclusion

In sum, this proposed pipeline corridor encompasses a wide range of unmitigable legal, ecological, environmental, climate, and health impacts that our members find unacceptable. Please strongly consider deleting Corridor 230-248 from the WVEC map.

Thank you for considering these comments, and please include us in future communications and decisions regarding this project.

Sincerely,



Rebecca White
Cascadia Wildlands
PO Box 10455
Eugene, Oregon 97440
rebecca@cascwild.org
541.434.1463

³ Northwest Forest Plan Standards & Guidelines, C-12.

⁴ <https://www.fs.usda.gov/rds/archive/Catalog/RDS-2015-0047-3>

November 16, 2020

U.S. Department of the Interior
Attn: Jane Childress, Project Lead
2550 North State Street, Suite 2
Ukiah, CA 95482

RE: BLM West-Wide Energy Corridor Review YD-12192018-05

Dear Ms. Childress:

Thank you for your project notification letter regarding cultural information on or near the proposed BLM West-Wide Energy Corridor Review. We appreciate your effort to contact us and wish to respond.

The Cultural Resources Department has reviewed the project and concluded that it is within the aboriginal territories of the Yocha Dehe Wintun Nation. Therefore, we have a cultural interest and authority in the proposed project area and would like to initiate a formal consultation with the lead agency. At the time of consultation, please provide our Cultural Resources Department with a project timeline, detailed project information and the latest cultural study for the proposed project.

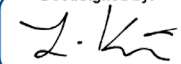
Please contact the following individual to coordinate a date and time for the consultation meeting:

Kristin Jensen, CRD Administrative Assistant
Yocha Dehe Wintun Nation
Office: (530) 796-0105
Email: kjensen@yochadehe-nsn.gov

Please refer to identification number YD-12192018-05 in any correspondence concerning this project.

Thank you for providing us the opportunity to comment.

Sincerely,

DocuSigned by:

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Tribal Historic Preservation Officer