Corridor 230-248

Warm Springs Corridor

Corridor Purpose and Rationale

The corridor was designated to follow the route of the proposed Palomar natural gas pipeline which was never built. 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. The corridor provides a for energy transport from private lands south of Portland across the Mt Hood National Forest. Input regarding alignment from PacifiCorp and the Western Utility Group during the WWEC PEIS suggested following this route. There are no major pending ROWs for transmission line or pipeline projects within the corridor at this time. The corridor has a reduced width where the corridor is confined by protected lands on each side.

Corridor location:

Oregon (Clackamas and Wasco Co.)

BLM: Cascades Field Office

USFS: Mt Hood NF

Regional Review Region: Region 6

Corridor width, length:

Width 145 - 3,500 ft 48 miles of designated corridor 48 miles of posted route, including gaps

Designated Use:

• corridor is multi-modal



Figure 1. Corridor 230-248

Corridor of concern (Y)

Critical habitat, NRHP, PCT, Clackamas WSR and other "eligible" segments under WSR Act, conflicts with Northwest Forest Plan critical habitat and latesuccessional/adaptive management reserves

Corridor history:

- Locally designated prior to 2009 (N)
- Existing infrastructure (Y)
- 2 hydroelectric power plants are within 5 mi.
- Energy potential near the corridor (Y)
- 3 substations are within 5 mi of the corridor.
- Corridor changes since 2009 (N)

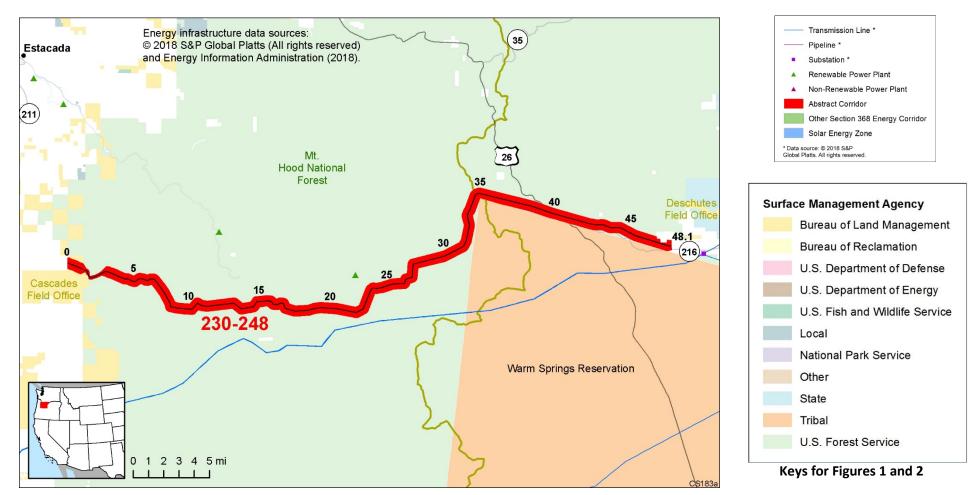


Figure 2. Corridor 230-248 and nearby electric transmission lines and pipelines

Conflict Map Analysis

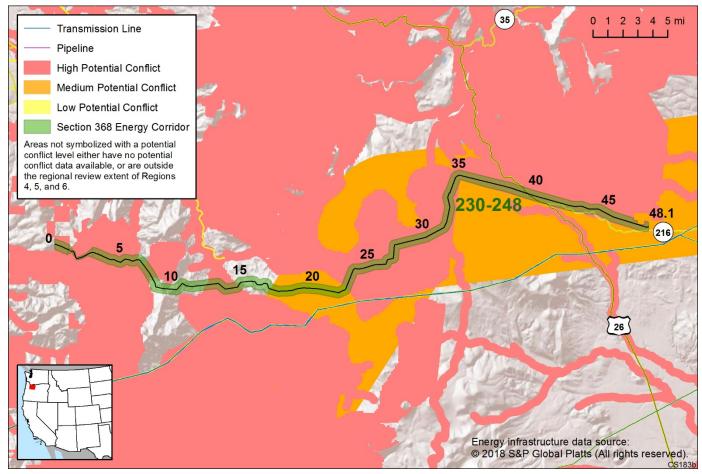


Figure 3. Map of Conflict Areas in Vicinity of Corridor 230-248

Figure 3 reflects a comprehensive resource conflict assessment developed to enable the Agencies and stakeholders to visualize a corridor's proximity to environmentally sensitive areas and to evaluate options for routes with lower potential conflict. The potential conflict assessment (low, medium, high) shown in the figure is based on criteria found on the WWEC Information Center at www.corridoreis.anl.gov. To meet the intent of the Energy Policy Act and the Settlement Agreement siting principles, corridors may be located in areas where there is potentially high resource conflict; however, where feasible, opportunity for corridor revisions should be identified in

Visit the 368 Mapper for a full view of the potential conflict map (https://bogi.evs.anl.gov/section368/portal/)

areas with potentially lower conflict.

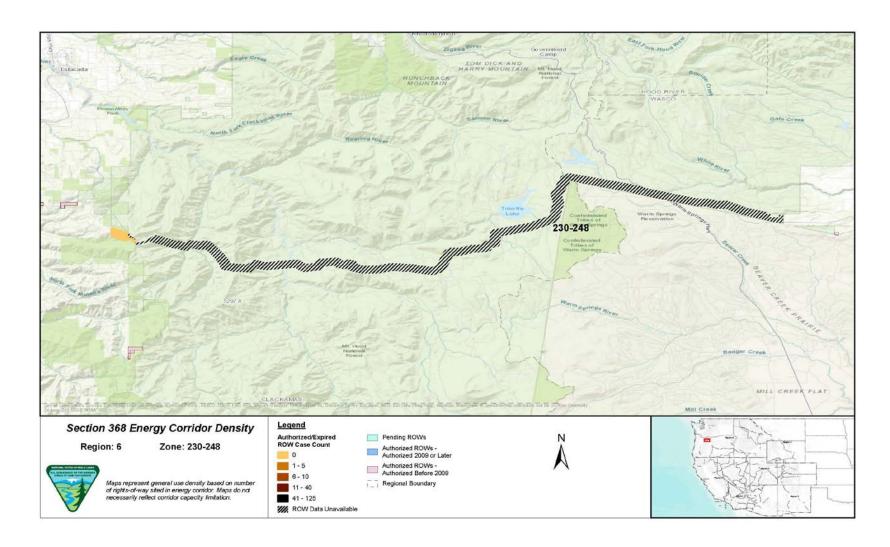


Figure 4. Corridor 230-248, Corridor Density Map

Figure 4 shows the density of energy use to assist in evaluating corridor utility. ROWs granted prior to the corridor designation (2009) are shown in pink; ROWs granted after corridor designation are shown in blue; and pending ROWs under current review for approval are shown in turquoise. Note the ROW density shown for the corridor is only a snapshot that does not fully illustrate remaining corridor capacity. Not all ROWs have GIS data at the time this abstract was developed. BLM and USFS are currently improving their ROW GIS databases and anticipate more complete data in the near future.

Corridor Review Table

Designated energy corridors are areas of land prioritized for energy transmission infrastructure and are intended to be predominantly managed for multiple energy transmission infrastructure lines. Other compatible uses are allowable as specified or practicable. Resource management goals and objectives should be compatible with the desired future conditions (i.e., responsible linear infrastructure development of the corridor with minimal impacts) of the energy transmission corridor. Land management objectives that do not align with desired future conditions should be avoided. The table below identifies serious concerns or issues and presents potential resolution options to better meet corridor siting principles.

The preliminary information below is provided to facilitate further discussion and input prior to developing potential revisions, deletions, or additions.

| CORRIDOR 230-248 REVIEW | | | | |
|---|-------------------------------|--|--|--|
| POTENTIAL COMPATIBILITY ISSUES or CONCERNS TO EXAMINE | MILEPOST (MP) ¹ | STAKEHOLDER INPUT and OTHER RELEVANT INFORMATION | POTENTIAL RESOLUTIONS BASED ON SITING PRINCIPLE ANALYSIS ² | |
| BLM Jurisdiction: Salem Cascades Field Office | (IVII) | IN ONVALION | TRINGII EL ANALISIS | |
| Agency Land Use Plan: Northwestern and Coastal O | regon ROD/RMP (2010 | 5) | | |
| Soosap Meadows ACEC intersects and is adjacent to the corridor – The RMP includes ACECs (including RNAs and Outstanding Natural Areas) as ROW avoidance areas. The ACEC is designated for the meadows which are the only large, undisturbed expanse of natural Cascadian subalpine meadows in the Salem District. | MP 1 to MP 2 | | ROW avoidance areas are not compatible with the corridor's purpose as a preferred location for infrastructure. The corridor only slightly intersects the ACEC and the corridor boundaries could be modified to avoid the ACEC. Between MP 1 and MP 2, the corridor encompasses a very narrow area (145 ft) between the ACEC and a Wilderness Area creating a pinch point. | |
| Northern Spotted Owl (ESA-listed threatened) critical habitat and the corridor intersect - Manage habitat for species that are ESA-listed, or are candidates for listing, consistent with recovery plans, conservation agreements, and designated critical habitat. | MP 1 to MP 2 | The USFS/BLM Final Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl was issued in 1994 but does not address utility corridors. The USFWS final rule for Northern Spotted Owl critical habitat was issued in 1992 and revised in 2012. The Revised Recovery Plan for the Northern Spotted Owl (2011) does not discuss conflicts between utility corridors and critical habitat. Reasonable and prudent measures identified by the USFWS during | The Northern Spotted Owl critical habitat encompasses broad area north and south of most of the length of the corridor, and may not be compatible with future development in an area without existing infrastructure. There is no utility infrastructure within the corridor. The nearest infrastructure to the corridor is a 500-kV west-to-east transmission line located from 2 to 10 miles south of the corridor. Existing IOPs would be required, including consultation with the USFWS. | |

| CORRIDOR 230-248 REVIEW | | | | |
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| POTENTIAL COMPATIBILITY ISSUES or CONCERNS TO EXAMINE | MILEPOST (MP) ¹ | STAKEHOLDER INPUT and OTHER RELEVANT INFORMATION | POTENTIAL RESOLUTIONS BASED ON SITING PRINCIPLE ANALYSIS 2 | |
| | | consultation will be incorporated in project plans to minimize habitat fragmentation. | | |
| | | RFI comment: consult with USFWS to avoid adverse modification to Northern Spotted Owl designated critical habitat. | | |
| | | Comment on abstract: 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. Comment on abstract: delete corridor. | | |
| USFS Jurisdiction: Mt Hood National Forest Agency Land Use Plan: Mt. Hood NF LMP (1990) and | l Plan Amendments | | | |
| Clackamas Wilderness is adjacent to the corridor - The LMP does not reference Clackamas Wilderness and does not have specific guidance or objectives. | MP 1 to MP 3 | The Clackamas Wilderness was created by the Omnibus Public Land Management Act of 2009. | The corridor is adjacent to the Clackamas Wilderness. Between MP 1 and MP 2, the corridor encompasses a very narrow area between the ACEC and a Wilderness Area creating a pinch point. The corridor width has been reduced to avoid these protected areas. The WSA overlap identified by a stakeholder may be a GIS accuracy issue and | |

| CORRIDOR 230-248 REVIEW | | | |
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| | | Comment on abstract: Clackamas Wilderness overlaps 0.2 acres of the corridor at MP 2. Comment on abstract: delete corridor. | cannot be validated at this time. This level of detail will be addressed during future land use planning. |
| Northern Spotted Owl (ESA listed threatened) critical habitat and the corridor intersect - The land use plan pre-dates the listing of this species and does not have specific guidance or objectives. | MP 1 to MP 8, MP 12 to MP 14, and MP 22 to MP 48 | The USFS/BLM Final Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl was issued in 1994 but does not address utility corridors. The USFWS final rule for Northern Spotted Owl critical habitat was issued in 1992 and revised in 2012. The Revised Recovery Plan for the Northern Spotted Owl (2011) does not discuss conflicts between utility corridors and critical habitat. Reasonable and prudent measures identified by the USFWS during consultation will be incorporated in project plans to minimize habitat fragmentation. RFI comment: consult with USFWS to avoid adverse modification to Northern Spotted Owl designated | The Northern Spotted Owl critical habitat encompasses broad area north and south of most of the length of the corridor, and may not be compatible with future development in an area without existing infrastructure. There is no utility infrastructure within the corridor. The nearest infrastructure to the corridor is a 500-kV west-to-east transmission line located from 2 to 10 miles south of the corridor. Existing IOPs would be required, including consultation with the USFWS. |
| ROS Roaded Modified and the corridor intersect – For this ROS class, vegetative and landform alterations typically dominate the landscape. There | MP 1 to MP 12, MP 13 to MP 30, MP 31 to MP 33, MP 34 to MP 48 | critical habitat. | The corridor appears to best meet the siting principles. The corridor cannot be readily shifted to avoid ROS Roaded Natural areas. |

| CORRIDOR 230-248 REVIEW | | | | |
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| POTENTIAL COMPATIBILITY ISSUES or CONCERNS TO EXAMINE | MILEPOST (MP) ¹ | STAKEHOLDER INPUT and OTHER RELEVANT INFORMATION | POTENTIAL RESOLUTIONS BASED ON SITING PRINCIPLE ANALYSIS ² | |
| is little on-site control of users except for gated roads. | - | | | |
| VQO Modification and the corridor intersect — Under this VQO class, activities may visually dominate the original characteristic landscape. Activities which are predominately the introduction of facilities should have visual characteristics that are compatible with the natural surroundings. | MP 1 to MP 33 and MP 41 to MP 48 | | The corridor appears to best meet the siting principles. The corridor cannot be readily shifted to avoid VQO Modification areas. | |
| Steelhead Salmon critical habitat and the corridor intersect - The land use plan pre-dates the designation of Steelhead salmon critical habitat (2005) and does not have specific guidance or objectives. | MP 4 to MP 5 and MP 13 | The USFWS designated critical habitat for Steelhead salmon in 2005 and NMFS published the Recovery Plan for Lower Columbia River Steelhead in 2013. The plan does not reference utility corridors. Reasonable and prudent measures identified by the USFWS during consultation will be incorporated in project plans to minimize habitat fragmentation. RFI comment: re-route to avoid critical habitat. Comment on abstract: re-route to avoid Steelhead salmon critical habitat. | The Steelhead Salmon critical habitat runs from north to south perpendicular to the corridor, and cannot be avoided in most cases without moving the corridor further south. In addition, there are other resources located along the corridor route resulting in limited opportunity to shift the corridor without impacting other resources. The corridor appears to meet the siting principles because the corridor intersects the critical habitat at a perpendicular angle (minimizing disturbance to critical habitat), and there is an absence of more preferable alternatives. Existing IOPs would be required, including consultation with the USFWS. | |
| ROS Roaded Natural and the corridor intersect – Areas under this ROS class may have resource modification and utilization practices evident, but harmonized with the natural environment. Conventional motorized use is provided for in construction standards and design of facilities. | MP 5, MP 12 to MP 13, MP 30 to MP 31, MP 33, MP 36, MP 39 to MP 45 | ROS Roaded Natural settings are described in Landscape Aesthetics A Handbook for Scenery Management (1995) | In most areas, the corridor appears to best meet the siting principles as the corridor is perpendicular to the ROS Roaded Natural Areas. There may be an opportunity at MP 5 and MP 40 to MP 45 to slightly shift the corridor to avoid the ROS Roaded Natural areas. | |
| Coho Salmon (ESA Listed Threatened) critical habitat and the corridor intersect - The land use | MP 5 and MP 13 | The USFWS designated Coho Salmon critical habitat in 2016 and NMFS | The Coho Salmon critical habitat runs from north to south perpendicular to the corridor, and cannot be avoided in | |

| CORRIDOR 230-248 REVIEW | | | |
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| POTENTIAL COMPATIBILITY ISSUES or CONCERNS TO EXAMINE | MILEPOST (MP) ¹ | STAKEHOLDER INPUT and OTHER RELEVANT INFORMATION | POTENTIAL RESOLUTIONS BASED ON SITING PRINCIPLE ANALYSIS ² |
| plan pre-dates the designation of Coho Salmon critical habitat (2016) and does not have specific guidance or objectives. | (IVIF) | published the Recovery Plan for Lower Columbia River Coho Salmon in 2013. The plan does not reference utility corridors. Reasonable and prudent measures identified by the USFWS during consultation will be incorporated in project plans to minimize habitat fragmentation. RFI comment: re-route to avoid critical habitat. Comment on abstract: delete corridor. Comment on abstract: re-route to avoid Coho salmon critical habitat. | most cases without moving the corridor further south. In addition, there are other resources located along the corridor route resulting in limited opportunity to shift the corridor without impacting other resources. The corridor appears to meet the siting principles because the corridor intersects the critical habitat at a perpendicular angle (minimizing disturbance to critical habitat), and there is an absence of more preferable alternatives. Existing IOPs would be required, including consultation with the USFWS and NMFS. |
| Fish Creek Oregon National Wild and Scenic River and the corridor intersect - Fish Creek is classified as a recreational river. The LMP states that recreational river segments shall provide ROS Roaded Natural settings as described in Landscape Aesthetics Handbook (1995). The LMP states that the construction of new utility and or transmission lines should not be permitted in any river segment corridor and applications would be recommended for denial. VQO Retention and the corridor intersect – Under this VQO class, management activities are not | MP 5 to MP 6, MP 13, and MP 30 | RFI comment: re-route to avoid WSR. Comment on abstract: the Fish Creek watershed has the greatest potential for landslides compared to other watersheds on the Mt. Hood National Forest. If it cannot be re-routed to avoid the Fish Creek watershed, it should be deleted. | The WSR runs from north to south perpendicular to the corridor, and cannot be avoided without moving the corridor much further south. Based on the LMP management prescriptions for the WSR, the presence of the WSR within the corridor may not be compatible with future development in an area without existing infrastructure. The addition of utility infrastructure, particularly transmission lines, would not impede the river's free-flowing condition. Existing IOPs address issues related to steep slopes and stream channel crossings. The VQO Retention areas could be avoided by judicial placement of energy infrastructure within the corridor or |
| visually evident. Clackamas River National Wild and Scenic River and the corridor intersect – Clackamas River is | to MP 31 MP 12 to MP 13 | ROS Roaded Natural settings are described in Landscape Aesthetics A | by slight shifts in the corridor to avoid these areas. The WSR runs from north to south perpendicular to the corridor, and cannot be avoided. In addition, there are |

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| classified as a recreational river. The LMP states that recreational river segments shall provide ROS Roaded Natural settings as described in Landscape Aesthetics Handbook (1995). The LMP states that the construction of new utility and or transmission lines should not be permitted in any river segment corridor and applications will be recommended for denial. | | Handbook for Scenery Management (1995) RFI comment: re-route to avoid WSR Comment on abstract: the Clackamas River provides the municipal drinking water supply for nine municipalities and hundreds of thousands of people. Consider the risks associated with the transport of oil along this corridor, nor does it preclude oil pipeline development. Comment on abstract: if it cannot be rerouted delete corridor. | other resources located along the corridor route resulting in limited opportunity to shift the corridor without impacting other resources. Based on the LMP management prescriptions for the WSR, the presence of the WSR within the corridor may not be compatible with future development in an area without existing infrastructure. The addition of utility infrastructure, particularly transmission lines, would not impede the river's free-flowing condition. No oil pipelines occur or are proposed in the region, so an oil pipeline crossing any streams or rivers along the corridor is extremely unlikely. |
| Riverside National Recreation Trail and the corridor intersect – The LMP states that National Recreation Trails are Sensitivity Level I, and shall have prescribed VQOs of Retention, Partial Retention, and Modification in near foreground, far foreground, and middleground distance zones, respectively. For Retention, management practices should not be evident to the casual observer. For Partial Retention management practices should remain visually subordinate to the characteristic landscape. For Modification, management practices may dominate the landscape but activities should appear as natural occurrences in the fore- and middle-ground. | MP 12 to MP 13 | Comment on abstract: re-route. | The recreation trail runs from north to south perpendicular to the corridor, and cannot be avoided. In addition, there are other resources located along the corridor route resulting in limited opportunity to shift the corridor without impacting them. Based on the LMP VQO prescriptions for the trail, the presence of the trail within the corridor may not be compatible with future development in an area without existing infrastructure. |
| West Cascades National Scenic Byway and the corridor intersect - The LMP does not address conflicts between National Scenic Byways and utility corridors. | MP 13 | | The Scenic Byway runs from north to south perpendicular to the corridor. While the corridor cannot be re-routed to avoid the scenic byway, the corridor crosses the byway perpendicularly (minimizing impacts). |
| Chinook Salmon (ESA Listed Threatened) critical habitat and the corridor intersect - The land use | MP 13 | The USFWS issued the Final Critical Habitat Rule for Chinook Salmon in | The Chinook Salmon critical habitat runs from north to south perpendicular to the corridor, and cannot be avoided |

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| POTENTIAL COMPATIBILITY ISSUES or | MILEPOST | STAKEHOLDER INPUT and OTHER RELEVANT | POTENTIAL RESOLUTIONS BASED ON SITING |
| CONCERNS TO EXAMINE | (MP) ¹ | INFORMATION | PRINCIPLE ANALYSIS ² |
| plan pre-dates the designation of Chinook Salmon critical habitat and does not have specific guidance or objectives. | | 2000 and NMFS published the Recovery Plan for Lower Columbia River Chinook Salmon in 2013. The plan does not reference utility corridors. Reasonable and prudent measures identified by the USFWS during consultation will be incorporated in project plans to minimize habitat fragmentation. | in most cases without moving the corridor further south. In addition, there are other resources located along the corridor route resulting in limited opportunity to shift the corridor without impacting other resources. The corridor appears to meet the siting principles because the corridor intersects the critical habitat at a perpendicular angle (minimizing disturbance to critical habitat), and there is an absence of more preferable alternatives. Existing IOPs would be required, including consultation with the USFWS and NMFS. |
| | | RFI comment: re-route to avoid critical habitat. Comment on abstract: if it cannot be rerouted, delete corridor. | |
| VQO Partial Retention and the corridor intersect – | MP 28, MP 33 to | rerouted, delete corridor. | The VQO Partial Retention areas could be avoided by |
| Under this VQO class, management activities | MP 34, and MP 42 | | judicial placement of energy infrastructure within the |
| remain visually subordinate to the characteristic | to MP 43 | | corridor or by slight shifts in the corridor to avoid these |
| landscape. | | | areas. However, a slight shift at MP 42 to MP 43 could |
| | | | cause a conflict with a ROS Roaded Natural area. |
| Pacific Crest NST and the corridor intersect - The LMP states that the Pacific Crest NST is a Sensitivity | MP 30 to MP 31 | The Pacific Crest NST Comprehensive Management Plan was finalized in | The trail runs from north to south, perpendicular to the corridor, and cannot be avoided. While the corridor cannot |
| Level I trail. It shall have prescribed VQOs of | | 1982. The plan does not provide | be re-routed to avoid the NST, the corridor crosses the NST |
| Retention, Partial Retention, and Modification in | | guidance or recommendations on | perpendicularly (minimizing impacts). While collocation is a |
| near foreground, far foreground, and middle | | new transmission lines being | primary consideration in reducing resource impacts, |
| ground distance zones, respectively. The LMP | | constructed across the NST. | adjusting the corridor location to collocate with the |
| states that new utility ROWs for transmission lines | | | existing transmission lines could create a conflict as it |
| should be located and designed to blend with the natural landscape character where Retention and | | RFI comment: re-route to avoid the Pacific Crest NST. | would necessitate the crossing of tribal lands. |
| Partial Retention VQOs are prescribed. The VQO | | | Agencies could consider a new IOP for NSTs and NHTs to |
| for part of the area where the trail intersects the | | Comment on abstract: there are | enhance BMPs for proposed development within the |
| corridor is Retention. In areas under the Retention | | currently no utility lines would | energy corridor. |
| VQO, management practices should not be evident | | present a major disruption to the | |
| to the casual observer. | | Pacific Crest NST and surrounding | |

| MILEPOST (MP) ¹ | STAKEHOLDER INPUT and OTHER RELEVANT INFORMATION | POTENTIAL RESOLUTIONS BASED ON SITING PRINCIPLE ANALYSIS ² |
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| (WIF) | landscapes. Would like to see alternative corridor routes, which would intersect the Pacific Crest NST in an already-impacted corridor, considered instead. For example, existing transmission lines cross the Pacific Crest NST within just a few miles to the south of the corridor. Collocation would go a long way towards protecting against scenery impacts. Comment on abstract: if an energy corridor simply must intersect the Pacific Crest NST at this location, it would be extremely challenging to meet VQOs. Comment on abstract: propose the following mitigation measures at the intersection: Narrowing of the corridor to the absolute minimum width within the trail's foreground or immediate foreground, an angular jog of the line to obscure from the observer the long length of the corridor, and an underground-only stipulation, with mandated vegetation management provision of visual screening such as tall shrubs within the intersection zone. We propose the following mitigation measures at other places along the Pacific Crest NST (besides the | PRINCIPLE ANALYSIS |
| | | INFORMATION landscapes. Would like to see alternative corridor routes, which would intersect the Pacific Crest NST in an already-impacted corridor, considered instead. For example, existing transmission lines cross the Pacific Crest NST within just a few miles to the south of the corridor. Collocation would go a long way towards protecting against scenery impacts. Comment on abstract: if an energy corridor simply must intersect the Pacific Crest NST at this location, it would be extremely challenging to meet VQOs. Comment on abstract: propose the following mitigation measures at the intersection: Narrowing of the corridor to the absolute minimum width within the trail's foreground or immediate foreground, an angular jog of the line to obscure from the observer the long length of the corridor, and an underground-only stipulation, with mandated vegetation management provision of visual screening such as tall shrubs within the intersection zone. We propose the following mitigation measures at other places along the |

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| | | the middleground: vary the shape and width of the corridor, and feather edges of the clearing, to blend in better with the forms and lines of the landscape. | | |
| | | Comment on abstract: delete corridor. | | |
| Clackamas Lake Ranger Station Historic District and the corridor intersect – The LMP does not reference the Clackamas Lake Ranger Station. | MP 31 | | The corridor boundaries could be modified to exclude the ranger station. There is no utility infrastructure within the corridor. | |

¹ Mileposts are rounded to the nearest mile.

Additional Compatibility Concerns

The issues and concerns listed below are not explicitly addressed through agency land use plans or are too general in nature to be addressed without further clarification. Although difficult to quantify, the concerns listed have potential to affect future use and/or development within this designated corridor. The Agencies have provided a preliminary general analysis. The information below is provided to facilitate further discussion during stakeholder review.

Tribal Concerns/Cultural Resources:

- Re-route to avoid NRHP property, conflicts with Northwest Forest Plan critical habitat and late-successional/ adaptive management reserves (RFI comment).
- NRHP, Clackamas Lake Ranger Station Historic District, intersects corridor at MP 31.
- Warm Springs Reservation is adjacent to corridor MP 35 to MP 43 and MP 47 to MP 48.
- Pinch points include: Confederated Tribes of Warm Springs lands to the south on a significant portion and recreational and cultural facilities east of Timothy Lake is a factor.

² Siting Principles include: Corridors are thoughtfully sited to provide maximum utility and minimum impact on the environment; Corridors promote efficient use of landscape for necessary development; Appropriate and acceptable uses are defined for specific corridors; and Corridors provide connectivity to renewable energy generation to the maximum extent possible, while also considering other generation, in order to balance the renewable sources and to ensure the safety and reliability of electricity transmission. Projects proposed in the corridor would be reviewed during their ROW application review process and would adhere to Federal laws, regulations, and policy.

Analysis: Section 106 of the NHPA requires federal agencies to consider the effects of an undertaking on cultural resources listed on the NRHP. Existing IOPs require tribal engagement early in the planning process for any proposed project in the corridor. Development within tribal lands would require proponent negotiations with the tribal governments and the BIA. Proponents would have to work with the tribal resolution consenting to the grant of ROWs (by BIA). BIA cannot grant ROWs without tribal consent. Existing IOPs specific to tribal consultation would be followed in connection with any proposed energy project in the corridor. There does not appear to be another route/modification that would eliminate potential land ownership issues entirely.

Ecology:

• Delete corridor. For the first time in almost 70 years, there is an ESA-listed wolf pack in Mt. Hood National Forest, the "White River Pack." Their home range directly overlaps the corridor's path (comment on abstract).

Analysis: Mitigation measures will occur at the project-specific level pursuant to BLM and USFS policies. Section 7 consultation with USFWS would be commensurate with agency determination of potential affect to threatened or endangered species. Adherence to existing IOPs and BMPs would be required.

Military and Civilian Aviation:

• MTR – IR and the corridor intersect from MP 17 to MP 48.

Analysis: Adherence to existing IOP regarding coordination with DoD would be required. Agencies could consider a revision to the existing IOP to include height restrictions for corridors in the vicinity of DoD training routes.

Public Access and Recreation:

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

Analysis: Corridors are often collocated with existing infrastructure to minimize impacts on resources, including recreation. A number of IOPs must be adhered to regarding visual resources. Adherence to these will aid in landscape and scenery preservation

Land Use:

- This corridor passes through lands within the BLM Harvest Land Base, crisscrossed by riparian lands and District Designated Reserve. BLM lands within the corridor are designated Oregon and California Railroad Revested Lands, and contain actively managed timber stands covered by one Reciprocal Right-of-Way Agreement. No timber sales are currently scheduled within the corridor. Oregon and California Railroad Revested Lands intersect the corridor from MP 0 to MP 3, MP 4 to MP 5, and MP 7.
- The clearcut required to maintain the corridor conflicts with Late Successional Reserves and Tier 1 Key Watersheds designated by the NW Forest Plan. The abstract does not consider the conflicts with the NW Forest Plan or provide possible resolutions (comment on abstract).
- The corridor passes through Late Successional Reserves adjacent to the Clackamas River with forest stands that are clearly more than 80 years old. The loss of these forests would have lasting impacts to the ecosystem and undeniably degrade habitat in this watershed. Any corridor development would require a total loss of forest characteristics, including removal of all snags, downed woody debris and other integral decadent components to terrestrial

habitat. This degradation is yet another way that developing this corridor would be out of compliance with the Northwest Forest Plan (comment on abstract).

- If the corridor carried gas, any leaks this could increase the chance of igniting a wildland fire. The abstract should examine the very real conflicts that arise from pipeline leaks along this route (comment on abstract).
- 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 (comment on abstract).

Analysis: The BLM retains broad discretion regarding the multiple use management of its lands. Adherence to BMPs and mitigation measures would be required, but timber harvest and management of energy corridors are considered compatible uses. An existing IOP requires all project applications to reflect applicable findings, mitigation, and/or standards contained in regional land management plans such as the Northwest Forest Plan. Existing IOPs address fire management and the requirement for applicants to develop a comprehensive energy plan that considers the vulnerabilities of their energy system to all credible events, which would include fires and pipeline leaks. The appropriate agency, assisted by the applicant, must conduct a project-specific NEPA analyses for any utility projects (e.g., pipelines) proposed for the corridor.

Abstract Acronyms and Abbreviations

ACEC = area of critical environmental concern; BIA = Bureau of Indian Affairs; BLM = Bureau of Land Management; BMP = best management practice; DoD = Department of Defense; ESA = Endangered Species Act; FO = field office; GIS = geographic information system; IOP = interagency operating procedure; IR = instrument route; LMP = land management plan; MP = milepost; MTR = Military Training Route; NEPA = National Environmental Policy Act; NF = National Forest; NHPA = National Historic Preservation Act; NRHP = National Register of Historic Places; NHT = National Historic Trail; NMFS = National Marine Fisheries Service; NST = National Scenic Trail; ODFW = Oregon Department Fish and Wildlife; PEIS = Programmatic Environmental Impact Statement; RFI = request for information; RMP = resource management plan; RNA = Research Natural Area; ROS = recreational opportunity spectrum; ROW = right-of-way; USFS = U.S. Forest Service; USFWS = U.S. Fish and Wildlife Service; VQO = visual quality objective; WSR = Wild and Scenic River; WWEC = West-wide Energy Corridor.