

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 4:09 PM
To: Corridor EIS Archives
Subject: Preliminary Draft Corridor Map Comment M0107

Attachments: Section_368_Corridor_Map_-_EEI_final_Comments_7-10-06_M0107.doc



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or_Map_-_EEI...

Thank you for your comment, Richard Loughery.

The comment tracking number that has been assigned to your comment is M0107. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 04:08:40PM CDT

Preliminary Draft Corridor Map Comment: M0107

First Name: Richard

Middle Initial: M

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

Attachment: D:\My Documents\2006\Section 368 Corridor Map - EEI final Comments 7-10-06.doc

Comment Submitted:

Thank you very much for the opportunity to provide comments on the preliminary draft energy corridors map. Please see attached .

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



July 10, 2006

Ms. Julia Souder
Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

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

Re: Comments on Preliminary Draft Energy Corridor Map, EPAct Section 368

Dear Ms. Souder:

The Edison Electric Institute ("EEI") appreciates the opportunity to provide comments on the "Preliminary Draft Map of Potential Energy Corridors" that the Department of Energy, the Bureau of Land Management in the Department of the Interior, the U.S. Forest Service in the Department of Agriculture, and the Department of Defense ("the Departments") have prepared and made available to the public on June 9, 2006. The Departments have prepared the map as part of implementing section 368 of the Energy Policy Act of 2005, Public Law 109-58, 119 Stat. 594 (2005) ("EPAct").

EEI is the association of United States shareholder-owned electric companies, international affiliates, and industry associates worldwide. EEI members serve 71 percent of all electric utility ultimate customers in the nation and generate almost 60 percent of the electricity produced by U.S. electric utilities. In providing this electricity to their customers, EEI members depend on and need a well-integrated transmission and distribution system to ensure that the electricity can be provided from a diverse portfolio of generation resources to the customers reliably, efficiently, and economically.

EEI's western member companies have a significant need to build new transmission facilities and to upgrade existing facilities in the Western United States in order to meet growing demand for electricity and to assure access to sufficient and diversified fuel resources. This need cannot be met in a timely fashion without the designation of energy corridors on federal lands in the eleven western states as called for in EPAct section 368.

EPAAct section 368 requires the Departments, by August 7, 2007, to designate corridors for electric transmission and distribution facilities and other energy facilities on federal lands in the Western United States, to perform any environmental reviews that may be required to complete such designations, and to incorporate the designated corridors into relevant agency land use and resource management plans or equivalent documents. The Departments are to undertake this work in consultation with affected industries like ours, as well as the Federal Energy Regulatory Commission, states, tribes, and others.

To fulfill these responsibilities, the Departments have assembled a team that is in the process of preparing a programmatic environmental impact statement ("PEIS") for proposed Western energy corridors. The map will be the foundation of the PEIS and the ensuing corridor designations. So it is vitally important that the Departments prepare a sufficiently comprehensive and inclusive map.

EEl's comments on the proposed map focus on four points and supplement comments that we already have submitted to the Departments at earlier stages of the EPAAct section 368 process:

- Additional corridors need to be designated on the map and addressed in the Draft PEIS,
- Existing designated corridors also need to be indicated on the map,
- Corridor widths must be wide enough to accommodate multiple facilities in a manner that facilitates safe and reliable operation, and
- There is a need for a clear and understandable definition of energy corridors.

Each of these four issues is discussed below.

More Corridors Must Be Included in the Draft EIS

EEl and its members appreciate the efforts of the interagency PEIS team to make the preliminary draft maps available on the regional and state levels. We are pleased with the corridors that have been designated in the preliminary draft maps.

However, EEl and our members are concerned that many of the corridors requested by EEl member companies during the PEIS scoping process have not been included in the maps. While the corridors identified in the draft maps will be beneficial, they are not adequate to meet the needs in the western states for new transmission to reliably serve load centers. The identified corridors also are not sufficient to bring renewable, clean coal generated, and other electricity from source to market.

EEl strongly recommends that the PEIS interagency team reconsider and include in the Draft PEIS all of the corridors that individual utilities either already have submitted to be included on the map or submit in response to the request for comments on the preliminary map. A number of the recommendations of individual utilities will be critical for relieving congestion, improving reliability, or meeting demand for additional electricity from a broad west-wide perspective. Others will be crucial for relieving congestion and improving reliability from a sub-regional or local perspective. The routes selected for inclusion in the PEIS should recognize these sub-regional and local needs as well as west-wide needs. In all three settings, federal lands may be needed to help provide facilities to address important underlying needs, and the section 368 map and corridor designation process should reflect this.

Going forward, we also encourage the PEIS team to make the map available to individual utilities directly, or at least to make the portions of the map relevant to each company available to the company.

Existing Designated Corridors Need to be Indicated on the Map

The preliminary draft map does not appear to include existing designated corridors as corridors to be carried forward. It is not clear if that is intended to imply that those corridors will not be re-designated or whether they will remain in place and the corridors on the map are additional corridors. The Departments need to carry forward on the map and in federal land use and resource plans and other such documents all of the existing corridors already recognized by the agencies or included in such documents. In retaining these existing corridors, the Departments need to ensure that there is no loss of width or other characteristics that already have been defined or put in place for the existing corridors. Beyond this, the PEIS should focus on addressing *additional* utility corridors that need to be added to the plans, and expansions of widths and other characteristics for existing corridors if insufficient as described below.

Corridor Widths Must be Wide Enough to Guarantee Safe and Reliable Operation of Multiple Facilities

EEl member companies have expressed concern that the corridors identified in the preliminary draft maps are suboptimal from a reliability perspective and not wide enough to accommodate multiple facilities in general and transmission lines in particular. EEl understands the federal agencies participating in the PEIS have preliminarily proposed corridors with widths of only 3,500 feet. However, designated corridors are a land use planning tool, not the actual width of facilities or rights-of-way that may be located within the corridor. These proposed widths in many cases will be insufficient to enable later location of facilities and rights-of-

way in a manner that is most efficient, best comports with local topography, and minimizes environmental effects.

In testimony before the June 27, 2006 joint hearing of the House Subcommittee on Water and Power and the House Subcommittee on Forests and Forest Health, Mr. Robert Smith, Manager of Transmission Planning and Engineering for the Arizona Public Service Company, stated it is "critical that utility corridors be wide enough to provide the flexibility needed to avoid environmentally sensitive areas, address engineering, technical and vegetation management constraints, and allow lines to be built with sufficient separation to reduce the risk of simultaneous outages of multiple lines." He further stated the 3,500 foot width would be narrower than many previously designated corridors, and would not meet the criteria he listed above.

EI recommends the corridors to be included in the PEIS should be no less than one mile wide and preferably 2-5 miles wide. Justification for such a width was included in the BLM 1980 management plan for the California desert Conservation Area and mentioned in the 1993 *Western Regional Corridor Study* prepared by the Western Utility Group ("WUG") and endorsed by the then Chief of the U.S. Forest Service and the Director of the Bureau of Land Management. Again, as we have noted in prior comments, transmission lines should be located sufficiently far apart to minimize the risk of simultaneous outages resulting from weather, fire, or other events.

The Definition of Energy Corridors Must be Defined in a Clear and Understandable Manner

EI is concerned that many public officials and members of the public do not understand the difference between energy corridors and rights-of-way. This is evident in the print media articles that have been critical of the Section 368 western energy corridors designation effort. The point also was evident in comments by some Members of Congress at the June 27, 2006 hearing. Too many people confuse corridors with rights-of-way and see them as one and the same. As a result, they incorrectly envision the corridors to be a 3,500 foot wide swath devoid of any vegetation cover. The PEIS needs to clearly differentiate the corridor and rights-of-way definitions. Corridors are land use planning tools that facilitate the siting of one or more specific rights-of-way within the designated zone subject to environmental and engineering constraints.

WUG defined the term corridor in the 1993 *Western Regional Corridor Study* as follows:

A linear strip of land without width, but limited by technological, environmental and topographical factors, and containing one or more utility, communication, or transportation facilities. A corridor is a land use

designation, identified for the purpose of establishing policy direction as to the preferred location of compatible linear facilities and compatible and conflicting land uses. It does not imply entitlement of use. Appropriate environmental review and regulatory permitting must precede occupancy on a project-specific-basis.

The House passed version (Section 2029 – Energy Facility Rights-of-Way and Corridors on Federal Land) of what eventually became EPlAct contained the following definition of a corridor:

- (1) IN GENERAL- In this section and title V of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1761 et seq.), the term 'corridor' means--
- (A) a linear strip of land--
 - (i) with a width determined with consideration given to technological, environmental, and topographical factors; and
 - (ii) that contains, or may in the future contain, 1 or more utility, communication, or transportation facilities;
 - (B) a land use designation that is established--
 - (i) by law;
 - (ii) by Secretarial Order;
 - (iii) through the land use planning process; or
 - (iv) by other management decision; and
 - (C) a designation made for the purpose of establishing the preferred location of compatible linear facilities and land uses.
- (2) SPECIFICATIONS OF CORRIDOR- On designation of a corridor under this section, the centerline, width, and compatible uses of a corridor shall be specified."

The House language is based substantially on the WUG corridor definition. EEl recommends that the WUG corridor definition be used in the Draft PEIS.

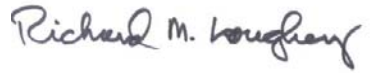
Conclusion

EEl applauds the efforts of the western energy corridors PEIS team. Much has been accomplished since the enactment of EPlAct in August 2005. As stated in our previous correspondence and statements on the subject, EEl is strongly supportive of the federal agencies' efforts to designate energy corridors as specified in EPlAct. We believe that doing so will not only enable future needed facilities to be sited in a more timely fashion but will allow siting to occur in a way that fully accommodates environmental and natural resource values.

EI Comments on Western Corridor Map
July 10, 2006
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We ask that our comments and those of our member companies be given serious consideration in the preparation of the draft PEIS.

Sincerely,

A handwritten signature in black ink that reads "Richard M. Loughery". The signature is written in a cursive style with a large initial 'R'.

Richard M. Loughery
Director, Environmental Activities
Edison Electric Institute