The Nature Conservancy
SAVING THE LAST GREAT PLACES ON EARTH

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November 28, 2005

Ms. Julie Souder
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability
1000 Independence Avenue, SW
Washington, DC 20585

RE: Scoping Comments, Management Concerns and Environmental Issues for the Programmatic Environmental Impact Statement for Designation of Energy Corridors on Federal Land in the 11 Western States

Dear Ms. Souder:

The Nature Conservancy respectfully submits these scoping comments for consideration in the Programmatic Environmental Impact Statement (PEIS) for Designation of Energy Corridors on Federal Land in the 11 Western States. The Nature Conservancy is an international conservation organization dedicated to preserving the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. The Nature Conservancy has a commitment to working with partners to accomplish this mission in a science-based, collaborative manner. We believe that these comments highlight additional available information and issues that can enhance the PEIS team's ability to make balanced resource management decisions that will protect areas of high biological importance while allowing for future energy transmission needs.

1. Management Concern: Avoid or minimize potential impacts to areas of high biological importance from new or expanded energy corridors.

Working with partners to take a proactive, science-based approach to conservation planning, The Nature Conservancy has completed assessments of the biological resources of most of the United States through a series of ecoregional assessments. Please note that assessments for the Cascade Mountains and western coast of Washington, Oregon, and California, are underway now and are scheduled for completion by September 2006. Ecoregional assessments identify species and habitats that are important regionally, nationally and globally. With the input of the best available data and knowledge from State Natural Heritage Programs, and a range of private, academic, state and federal scientists and land managers, these assessments identify priority species and plant communities within each region that warrant special attention.

This special attention is warranted because these species, plant communities and systems are documented to be endemic, vulnerable, declining and/or imperiled. These analyses support the importance of the species that the U.S. Fish and Wildlife Service has identified as threatened, endangered, proposed, or candidates for listing, or as Birds of Conservation Concern; that the Bureau of Land Management and USDA Forest Service have listed as Sensitive Species; and species and plant communities that State Natural Heritage programs have identified as having global or state importance.

In addition to identifying species and habitats of concern, our analyses have identified a network or "portfolio" of geographic areas that optimize inclusion and coverage of the largest number of these biologically important species and habitats for conservation. If managed appropriately, this network or "portfolio" should conserve a full range of rare, threatened and endangered species and habitats within each ecoregion. Avoiding or minimizing the impact of energy corridors to these areas, at a minimum, would help to ensure conservation of a large array of biologically significant species and habitats. The attached map depicts the overlap of these "portfolios" of conservation areas for completed ecoregional assessments with National Forest System land, BLM-managed public land, National Wildlife Refuges managed by the U.S. Fish and Wildlife Service, and land managed by the Department of Defense.

We would welcome the opportunity to work with your planning team to provide a more thorough explanation of how these analyses were conducted and how they might assist in your selection of potential corridor locations and your deliberation of effects from various energy corridor alternatives.

2. Additional Environmental Issues:

Although this project will not authorize specific projects, designating corridors does establish energy distribution as the most appropriate use of these areas and pre-determines in what areas future development for energy transmission will likely occur. Because of this likelihood, it is important at this stage to consider a full range of environmental issues and resources that are likely to be affected by future corridor development. The location of this future infrastructure can be expected to have a significant impact on the wildlife populations and habitats in the chosen areas. Careful selection of these corridors can reduce the potential future impacts by avoiding rare habitats, concentrations of species of biological importance, and important migratory corridors.

In addition to the preliminary list of environmental issues identified in the Federal Register Notice (September 28, 2005), the following issues should be analyzed in each alternative within the PEIS:

a. The potential impacts of corridors on areas of high biological importance (particularly those that are identified in the attached portfolio map).
b. The identification of important wildlife migratory corridors and the potential impacts of corridor locations to migratory wildlife, including Birds of Conservation Concern (USFWS 2003) and large mammals. The construction, operation and maintenance of pipelines, transmission lines, roads, railroads, buildings, compressors and other energy distribution facilities can significantly disturb or alter animal behavior and migration patterns (National Research Council 2003).
c. The potential impacts to raptors and their prey from transmission lines. Above-ground transmission lines can provide perches from which raptors may hunt but can also provide hazards to raptor survival. New transmission lines, if not properly designed, can increase the risk of electrocution to raptors. New transmission lines located in areas without trees or other natural perches may result in an increase in the hunting pressure on raptor prey species, including species that are rare or declining.
d. Potential impacts to candidate species for Federal listing: Greater sage-grouse (Washington state), Gunnison sage-grouse, and Lesser Prairie-Chicken populations; their habitats; and their migratory patterns. The cumulative loss and fragmentation of sagebrush, shrub-steppe and grassland habitats have contributed to the decline of these species and are a major limiting factor to their successful recovery (BLM 1994; USDI 2004; WAFWA 2004)
e. Potential fragmentation and other impacts of corridors on white-tailed and black-tailed prairie dog town complexes.
f. Potential impacts of corridors on rare plant communities (as mapped by State Natural Heritage programs).
g. The potential to increase the introduction and spread of invasive species along proposed energy corridors due to future development and site disturbance.
h. The potential to increase disturbance (e.g. erosion, trampling, taking, increased fire frequency, etc.) of natural habitats and sensitive species by recreational vehicle use, hunting and other increased access to remote sites through development of corridor access.

3. Recommended Management Guidelines and Mitigation Measures:

While this project will not authorize specific projects, it can and should develop a package of management guidelines to which all future specific projects must adhere, in order to minimize environmental impacts to resources of concern. Management guidelines should include provisions for:

a. Project siting that avoids or minimizes impacts to areas of biological importance (such as those identified in ecoregional assessments).
b. Future restoration of any disturbed areas within the energy corridors with native plant species and communities.
c. Ensuring intact migration corridors are available for migratory species (e.g. large mammals, upland game species, raptors, songbirds, etc.).

d. Preventing, managing and controlling the spread of alien invasive species.
e. Limiting recreational and other secondary uses of access roads.
f. Mitigation measures that emphasize on-site avoidance or mitigation and use off-site mitigation only where other alternatives to protect habitat do not exist.

Thank you for the opportunity to comment on this significant project. Please let me know if you have any questions or if we can provide additional information to assist you in your analysis.

Sincerely,

Michael Powelson
Agency Relations Director
Pacific North American & Rocky Mountain Conservation Regions
The Nature Conservancy

Enclosures:

1. References
2. Overlay of areas of high biological importance on federal land managed by the Bureau of Land Management, USDA Forest Service, U.S. Fish and Wildlife Service, and Department of Defense

References

Bureau of Land Management. 1994. Roswell Resource Area Draft Resource Management Plan/Environmental Impact Statement. Roswell District Office. Roswell, NM.

National Research Council. 2003. Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope. 288 pp. The National Academies Press. Washington, DC.

U.S. Department of the Interior. 2004. Bureau of Land Management National Sage Grouse Conservation Strategy. 25 pp. Washington, DC.

U.S. Fish and Wildlife Service. 2003. Birds of Conservation Concern 2002. Federal Register: February 6, 2003. Volume 68, Number 25. Page 6179.

Western Association of Fish and Wildlife Agencies. 2004. Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats.

Areas of High Biological Importance on Federal Land