



CONFEDERATED TRIBES  
of the  
*Umatilla Indian Reservation*

DEPARTMENT OF SCIENCE AND ENGINEERING

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Fax submittal: 202 586-1472

Subject : Comments West-wide Energy Corridor

Dear Julia:

Please find attached preliminary comments on Notice of Intent to prepare the West-wide Energy Corridor Programmatic EIS. If you have any questions please feel free to contact me.

Sincerely

Thomas Bailor  
Project Specialist  
Department of Science and Engineering

## **Comments on Notice of Intent to prepare the West-wide Energy Corridor Programmatic EIS**

**Prepared by:**  
**Thomas Bailor: Project Specialist**  
**CTUIR Department of Science and Engineering**

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) are located within several existing energy corridors that stem from the Columbia River Hydro system. The homelands including the physical reservation of the CTUIR are bisected by several energy corridors. The CTUIR have tremendous time and interests invested in the management of cultural including archaeological and natural resources in the Columbia Basin. The Tribes are more than stakeholders. Tribes are not the public and the federal agencies involved have a fiduciary responsibility to ensure they are consulted with and involved in the project.

To protect CTUIR interests the CTUIR needs to become more intimately involved in this "corridor designation" process. The CTUIR will be culturally and socioeconomically impacted by this effort and perhaps more so from future growth from this effort. A project like this will have both positive and negative influences that need to be fully considered. The Tribes need to be informed from the earliest stages possible.

Implementing this project has clearly been moving forward with limited public involvement. The report to congress states that agencies already have proposed designated corridors. Western states have legislatively been told to designate not identify energy corridors. No discussion of this has occurred with the public. Simply asking people to modify corridors in limited public meetings is inadequate. The ink on the long awaited energy bill is still fresh and this project is moving very fast compared to others.

This scoping approach limited to corridor designation does not allow the public to tailor a full discussion that involves larger regional consideration of environmental and human health issues, transportation, conservation/efficiency, energy diversification, renewable energy, water allocation, and more. By limiting the conversation to the corridor alone we are limiting all the concerns necessary to determine the best alternatives.

Most people are familiar with their local utility corridors and are familiar with the need to manage and distribute energy and energy resources optimally however no discussion regionally nationally or locally has occurred. The identification of these corridors is similar to the railroad. Whole tracks potentially will be set aside with certain lands set aside for the convenience of industry.

The Tribes are not members of the public and should have been initially consulted on a government to government level and in appropriate cases asked to be cooperating agencies. Very little information about this project has been disseminated amongst Tribes and many federally recognized Tribes located are within all the western states involved.

The brief list of the proposed action and alternatives in the Federal Register are too preliminary to warrant comment in detail. The report to congress identifies existing corridors but does very little to convey some depth required in the alternatives. The information oversimplifies many very important details involved in this effort.

Such corridor designation can be an important and necessary part of the solutions to pollution and other environmental issues in the Columbia Basin. The discussion seems focused on energy needs without how this effort might provide solutions to other existing problems or perhaps how this corridor will create new and different challenges. Comments are being limited to the identification of corridors while the subsequent impacts are passed down the line to project developers basically fragmenting the overall impact of this effort.

The public might, and it seems highly unlikely, see energy costs go down they will also pay a price for natural and cultural resources and land may be permanently inaccessible and the future costs from projects developed as the result of this effort.

There are limited maps available to the public on current energy distribution corridors or alternatives and other factors related to this issue. They are not readily available to people who were not able to attend the meetings.

There is mention of fossil fuel, hydrogen, and electricity and identification of the need to upgrade the Nation's existing energy infrastructure but there is very little discussion on incorporating renewable energy such as wind into this equation or developing an infrastructure around renewable energy alternatives.

It seems difficult to imagine that one alternative will be a fix for all eleven States involved. There are too many different regions. It seems likely that regional variability should affect the development of alternatives

Most of the people involved in energy management know that we need action, that we have to employ a combination of upgrading existing infrastructure, increase capacity where possible and build some new corridors including into "wind" rich areas

The identification of these preliminary alternatives fall short of where the conversation on energy corridors needs to really begin and that is with the flurry of regional options under the Optimization Criteria Alternative that are likely to evolve from this effort. The solutions will be combination of new corridors and improvement to existing ones.