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CC:
Subject: Energy Corridor Programmatic EIS Comment 80011
Date: Tuesday, November 08, 2005 1:14:07 PM
Attachments: [Energy_Corridor_Des_80011.doc](#)

Thank you for your comment, John Robison.

The comment tracking number that has been assigned to your comment is 80011. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 8, 2005 01:13:59PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80011

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Attachment: /Volumes/Archive/Conservation Archive/DOE/Energy Corridor Des.doc

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

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

November 7, 2005

Re: Federal Energy Corridor PEIS

Dear Julia Souder:

Thank you for the opportunity to comment on the Federal Energy Corridor Designation PEIS. The Idaho Conservation League has a long history of involvement with both habitat protection and energy development. As Idaho's largest statewide conservation organization, we represent members who want to ensure that energy development and infrastructure is consistent with natural resource protection.

Investing in properly sited corridors for oil, gas, and hydrogen pipelines and electricity transmission systems can protect the environment, promote economic development, diversify the power system and keep the region economically competitive. However, the impact of these systems largely depends on the location of the project and the specific technologies employed in the final development. We are particularly concerned about construction of transmission facilities across unroaded areas and in sensitive wildlife habitat. We urge cooperating federal agencies to site any new facilities and structures in previously developed corridors and to restore and reclaim outdated corridors that are no longer needed.

Please keep us on the list to receive a hard copy of the Draft PEIS.

Sincerely,

John Robison
Conservation Associate

Idaho Conservation League scoping comments on Federal Energy Corridor Designation
PEIS

Habitat

Wildlife habitat has been severely fragmented and reduced through a variety of land management practices, including road construction and development of rights of way corridors. Cooperating federal agencies should minimize negative impacts by locating corridors along existing roadways and developed ROWs and avoid areas of critical habitat for species of concern. The DOE should direct agencies to avoid important range and migration corridors for big game, and establish siting criteria to minimize soil disturbance and erosion on steep slopes. Because the program may involve actions in wetlands, agencies should consider potential impacts to migratory birds and bats. When considering environmental effects, the first choice should be to entirely avoid negative effects, next to minimize these effects, and lastly to mitigate for unavoidable effects. Restoring previously developed and no longer functional roadways and ROWs should be an integral component of any new corridor design.

Visual Impacts

All proposed actions should conform to BLM and FS visual resource management guidelines, without exception. Cooperating agencies should also avoid significant historic and cultural resource sites and should mitigate conflicts with other uses of the public lands.

Roads and Right of Way Corridors

Previous management activities have resulted in excessive road and right-of-way densities throughout our public lands. This density compromises the ability to support wildlife and fish by promoting further human disturbance, fragmenting habitat, accelerating sedimentation, spreading noxious weeds, and encouraging Off Road Vehicle use. Furthermore, there is a positive correlation between roads, even temporary ones, and human-caused wildfire ignitions. As stated above, we recommend that cooperating agencies reevaluate the road systems in project areas and decommission unneeded roads and corridors.

Off Road Vehicle use

The devastating impacts of irresponsible Off Road Vehicle (ORV) use on forest, range, and riparian ecosystems are well established. Irresponsible ORV users degrade water quality, spread noxious weeds, fragment wildlife habitat, disturb wildlife, and displace non-motorized recreationists. Cooperating agencies need to monitor and control the use of ORVs in project areas. Management plans need to restrict all ORV use to designated roads, and roads should be considered closed unless marked open. In addition, currently existing user-created trails should be obliterated to discourage continued use.

The PEIS needs to analyze the impacts of ORV use along energy corridors and describe the ability for land management agencies to monitor and control ORV use. The DOE needs to ensure that all ORV use along or adjacent to corridors is managed consistently with the local regulations and that the Federal agencies have the means to enforce these regulations.

Noxious weeds

The most cost-effective way to deal with noxious weeds is to protect strongholds of native vegetation from activities which either spread noxious weeds directly or create suitable habitat by removing native vegetation and disturbing the soil. Project activities should limit road use and the exposure of mineral soils where weeds may become established. Roads, trails, ROWs, and rivers serve as the primary routes for noxious weed species expansion. Special care should be taken to safeguard ecologically intact areas that are not currently infested. Where vehicle access is allowed, the tires and undercarriage must be hosed down with pressurized water to dislodge seeds. The PEIS needs to analyze the effects of noxious weeds in energy corridors and describe BPA management of weeds in these areas.

Guarding Against Segmentation of Key Decisions and Related Issues

We are concerned that large-scale programs involving several agencies, such as that being proposed, have the potential to generate segmentation of key decisions or related issues. When carrying out their responsibilities under NEPA, agencies must be sure not to arbitrarily carve out or “segment” key decisions or issues that are “connected” or “related,” for separate NEPA analysis.¹ Moreover, when multiple proposals for related actions “that will have cumulative or synergistic environmental impact upon a region are pending concurrently before an agency, their environmental consequences must be considered together.”² Only through such “comprehensive consideration” can the agency properly evaluate alternative courses of action.³ Thus, “[p]roposals or parts of proposals, which are related to each other closely enough to be, in effect, a single course of action” shall be evaluated in the same NEPA document.”⁴ For example, a proposal for a transmission line linked to a new wind energy projection public land should be analyzed along with, and not separately from, the wind energy project.

Adopting the Increased Utilization Alternative

Where it is necessary to increase capacities for energy transmission, we strongly urge cooperating agencies to utilize and expand existing corridors to the greatest extent possible in order to avoid the adverse environmental impacts associated with the development of new corridors. The expansion of existing systems may include the use of underground cables. To this end, we encourage cooperating agencies to adopt the No Action Alternative or the Increased Utilization Alternative. We also encourage cooperating agencies to restore and reclaim outdated corridors that are no longer needed.

¹ Thomas v. Peterson, 753 F.2d 754, 758 (9th Cir. 1985); Town of Huntington v. Marsh, 859 F.2d 1134, 1142 (2d Cir. 1988); Sierra Club v. Watkins, 808 F. Supp. 852, 863 (D.D.C. 1991).

² Kleppe v. Sierra Club, 427 U.S. 390, 410 (1976).

³ Ibid.

⁴ 40 C.F.R. 1502.4(a).