

**From:** [corridoreiswebmaster@anl.gov](mailto:corridoreiswebmaster@anl.gov)  
**To:** [Corridoreisarchives;](#)  
**CC:**  
**Subject:** Energy Corridor Programmatic EIS Comment 80080  
**Date:** Monday, November 28, 2005 6:44:42 PM  
**Attachments:** [Garkane\\_Energy\\_Corridor\\_Comment\\_Letter\\_80080.doc](#)

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Thank you for your comment, Carl Albrecht.

The comment tracking number that has been assigned to your comment is 80080. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 06:44:40PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80080

First Name: Carl

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

Attachment: C:\0Files\Energy Corridors\Garkane Energy Corridor Comment Letter.doc

Comment Submitted:

Attached is a comment letter and proposed corridor map from Garkane Energy Cooperative

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



23 November 2005

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

RE West-wide Energy Corridor Programmatic EIS

Dear Sirs:

Garkane Energy is eager to provide comments for the process of creating federally designated utility corridors in response to the mandate within the Energy Policy Act of 2005. We provide service to nearly 11,000 member-customers spread across 16,000 square miles and have the distinction of providing service to more National Parks and Monuments than any other utility in the United States. Our unique service territory and customer base makes this corridor siting effort an important activity for us.

Our service territory contains many areas completely surrounded by public land where we provide electric service to private in holdings. This means that our lines frequently cross federal lands, and new projects are subject to expensive environmental permitting costs and approval delays. Our existing lines cross a National Monument managed by the Bureau of Land Management (BLM), USDA Forest Service, and National Park Service. As a rural utility, we have limited financial resources and our customer base consists of farmers and ranchers, often with limited financial capacity to deal with cost increases. We are often frustrated with the process of engaging the federal agencies particularly when utility needs appear to be overlooked. In addition, the maintenance and operation of existing lines becomes more complicated and

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expensive as environmental pressures become more acute and more restrictive regulations are implemented.

We believe that designation of a federal corridor in our area will assist in management of our electrical system and provide cost effective and reliable service to the public. We have included a specific recommendation which is derived from planning activities currently underway with the BLM, National Park Service and USDA Forest Service. The preliminary route originates in Tropic, Utah and extends across the Grand Staircase Escalante National Monument, Dixie National Forest, and BLM Kanab Field Office to Hatch, Utah then continuing on across Dixie National Forest and BLM Kanab Field Office lands to Duck Creek, Utah. Part of this proposed corridor follows existing transmission lines or other linear infrastructure. The route is depicted in a map included as Exhibit A.

We would also like you to consider the establishment of energy corridors along the existing transmission lines from Glen Canyon Dam to Fredonia, Arizona and from Buckskin, Utah to Boulder, Utah.

In addition to the specific corridor designation, we urge the project team to create corridors with the following features:

1. Provide a corridor sufficiently wide enough to allow site specific siting and tower placement for a proposed line and all ancillary facilities.
2. Corridors along existing facilities should be made sufficiently wide to allow for new upgraded lines to be constructed beside the existing lines without conflict or interference between the facilities.
3. Access from established public access roads and highways to the corridor should be provided at reasonable intervals for construction and maintenance purposes.
4. Prevent incompatible uses that would displace or conflict with the intended use.
5. Prevent competing interests from locking out a legitimate user.
6. Provide a simple approval process that will address minor corridor modifications in response to specific proposals.
7. Implement review and approval timeframes.
8. Sufficiently examine resources within corridors to ensure that NEPA compliance for specific proposals will be accomplished as a categorical exclusion or environmental assessment.
9. Allow modifications to facilities within corridors as categorical exclusions or without federal action.
10. Allow perpetual entitlements once approved.

Our utility has been offering electric service to our customers for 67 years and we are partners with the federal agencies in the management of public lands. We are mindful of, and value this

environment and the surrounding public lands. However, we must find a place within those lands, where energy infrastructure is appropriate and adequately serves the public need.

We hope that you will engage us directly regarding our recommendation and work with us to implement these necessary corridors and not ignore our request for the establishment of these energy corridors as the BLM and FS Management Plan development processes have in the past.

Sincerely,

/s/ Carl Albrecht

Carl Albrecht  
General Manager/CEO

INSERT EXHIBIT A – Map of Proposed Energy Corridor

