

Overview: 2007-08 West-Wide Energy Transmission Corridors

Introduction

In November 2007, pursuant to the National Environmental Policy Act (NEPA), the Departments of Energy, Interior and the U.S. Forest Service released the draft environmental impact statement (DEIS) for proposed energy transmission corridors on public lands in the 11 western United States. Pursuant to section 368 of the 2005 Energy Policy Act, the agencies are designating the West-wide corridors for the transport of electricity, natural gas, oil and hydrogen, although electricity transmission is the main driver for most of the corridors. Extending over **6,000 miles in length** and encompassing **3 million acres of public lands**, these corridors will have significant lands and wildlife impacts in the region.

How to Get Involved: Comments due by February 14, 2008

Tell the agencies that corridors must avoid our most sensitive landscapes and wildlife habitat, be limited in number and scope and facilitate renewable energy sources connecting to the power grid.

Send in comments (see side-bar) or attend a public hearing in your state (see attached summary of public meetings).

Ask the Agencies to improve the DEIS by:

(1) Designating “Smart Corridors”

Join Western Resource Advocates in asking the agencies to designate “smart corridors.” A corridor is “smart,” when it:

- (a) is truly needed. Ask the agencies to study an alternative that focuses on meeting growing energy demands through increased energy efficiency and local power sources like rooftop solar, thereby lessening the need for long-distance transmission. In addition, ask for an alternative that maximizes the use of the existing power grid through technology upgrades before turning to wider and brand-new corridors on our public lands.
- (b) links up clean, renewable energy resources. If our public lands are going to be impacted by energy transmission corridors, they should advance the region towards a forward-thinking energy policy. Ask the agencies to ensure that corridors link up wind, solar and geothermal sources instead of new coal plants. *See attached maps overlaying corridors, coal plants and renewable energy sources.*
- (c) ensures long-lasting protection for sensitive public lands and wildlife resources. Corridors, even for renewable energy sources, must be located in places that are acceptable for the impacts associated with future right-of-way activities that will likely occur within their boundaries. While the DEIS has made great strides in protecting our public lands compared to the 2006 draft maps, there are still sensitive public lands in play in several states, including the Sevilleta National Wildlife Refuge (NM), the Havasu Wildlife Refuge (AZ), Grand Staircase-Escalante National Monument (UT), numerous historic trails, roadless areas and citizen proposed Wilderness areas.

Comment by February 14, 2008:

Electronically:

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

By mail or fax:

West-wide Energy Corridor DEIS
Argonne National Laboratory
9700 S. Cass Avenue
Building 900, Mail Stop 4
Argonne, IL 60439
Fax: (866) 542-5904

For more information, see The Wilderness Society’s analysis of lands impacts and maps:

www.wilderness.org/OurIssues/BLM/actioncenter/westwide.cfm?TopLevel=BLMAActionCenter

and Western Resource Advocates’ summaries for seven interior West states:

www.westernresourceadvocates.org/energy/xmission.php

(2) Evaluating More than One Alternative

The one action alternative in the DEIS is inadequate. NEPA requires federal agencies to “rigorously explore” and “evaluate all reasonable alternatives” when considering a proposal. Ask the agencies to improve the final EIS for corridors by analyzing the following types of alternatives: (a) reducing demand in population centers by utilizing energy efficiency and the use of local power sources; (b) focusing corridors that will primarily link clean and renewable sources to the power grid; (c) maximizing the use of the existing power lines and substations through technology upgrades before designating new corridors.

(3) Analyzing Environmental Impacts Now

While the agencies are correct that the designation of corridors is itself an action that does not create impacts, this is an improper justification to delay the bulk of environmental analysis until right-of-way applications are received in the future. The agencies admit that there are a host of incentives for the energy industry to locate future projects within corridors. This reality creates an opportunity to assess and minimize impacts to known wildlife, water, cultural, scenic and historic values in the present study to better inform the final location of these corridors. Ask the agencies to perform this analysis now, in addition to proper surveys pursuant to the National Historic Preservation Act and consultation with the U.S. Fish and Wildlife Service pursuant to the Endangered Species Act.

(4) Fully Assessing Cumulative Impacts

The DEIS can be improved by properly analyzing cumulative impacts and connected actions. These corridors are being driven by the electric utility industry and will obviously connect to power plants and other generation sources. NEPA requires the agencies to assess and analyze these types of connected actions – ask the agencies to study the impacts to air quality and climate change if the corridors are targeted for more coal plants in the region. In addition, the impacts to private, state and tribal lands need to be studied under cumulative impacts. We cannot pretend that a corridor “ending” on a public land boundary and arriving at the doorstep of the Navajo Reservation, as one example, will not have a reasonable likelihood of continuation, thereby setting the stage for similar impacts to the contiguous lands and natural resources.

(5) Setting Emission Limits – “Know Your EBCs”

Agencies have the ability to set reasonable conditions of approval for rights-of-way on public lands. Ask the agencies to consider conditioning future right-of-way approvals within corridors such that each new connecting power source does not exceed the CO₂ and other emissions of a combined-cycle natural gas plant (roughly 1,100 pds. of CO₂ per megawatt-hour of produced energy). Emissions-based corridors (EBCs) will go a long way towards ensuring that America’s public lands are being used to support a forward-thinking energy policy and are furthering climate change solutions. Fuel-neutral, EBCs are an appropriate condition for the use of the country’s public lands and allow the public assurances that support for a particular corridor will not result in future actions connecting polluting and carbon-heavy power sources to the electric grid.

(6) Placing Future Projects within section 368 Corridors

After all the effort to find the best locations for energy corridors, it is frustrating that future right-of-way projects will not be required to be within corridor boundaries. To maximize the full benefit of corridor designations, while still allowing appropriate flexibility, future transmission projects should be required to be within designated corridors “to the maximum extent practicable.” Otherwise, we’ll end up with many duplicative corridors and a “spaghetti map” of power lines in the region that the process set out to avoid.