

Exhibit P3
County

Comment(s)

Response(s)

C1 **Board of Carbon County Commissioners**

Leo Chapman, Chairman
 John Espy, Vice Chairman
 Lindy Glode
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BOARD OF CARBON COUNTY COMMISSIONERS
 P.O. Box 6, 415 West Pine Street
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May 20, 2014

Tamara J. Gertsch, National Project Manager
 BLM Wyoming State Office
 5353 Yellowstone Road
 Cheyenne, WY 82009
tgertsch@blm.gov

Amanda Pryor-O'Conner
 EPG
 208 East 800 South
 Salt Lake City, UT 84111
aconner@epgz.com

RE: Comments regarding the Gateway South Transmission Line Project – Draft Environmental Impact Statement and Land Use Plan Amendments

Dear Ms. Gertsch and Ms. Pryor-O'Conner:

Carbon County would like to thank the BLM and EPG for the opportunity to comment on the Gateway South Transmission Line Project – Draft Environmental Impact Statement and Land Use Plan Amendments (DEIS-LUPA). The following are Carbon County comments regarding the DEIS-LUPA:

Carbon County Preferred Alternative Route: Carbon County's preferred Alternative Route for the Gateway South Transmission line is Alternative WYCO-B, and is the same routing, through Carbon County, as that preferred by the Applicant and Agency. (Alternative WYCO-B on Map 2-2a on Page 2-105 of the DEIS-LUPA). This Alternative is supported by joint resolution by Carbon, Moffat and Sweetwater Counties, and is also supported by the Wyoming Governor's office. The Carbon County Comprehensive Plan encourages development of transmission lines with the least environmental impact. As they are applied to Wyoming, the slight variations between the BLM and the Applicant Preferred Routes, (WYCO-B and WYCO-B2), described on Page 2-109 – Section 2.5.2.1 of the DEIS-LUPA, are acceptable to Carbon County.

Carbon County remains strongly opposed to Alternative WYCO-D. That Alternative would cross Highway 789 twice and would be routed on the east side of the highway for a considerable distance. This would cause severe visual impact along the highway for both residents and visitors to the Little Snake River Valley. Alternative WYCO-D would also cause serious environmental concerns regarding its impact on the native species in that routing area.

Page -1-

C1a

C1a **Comment and route preference noted.**

Comment(s)

Response(s)

C1 Board of Carbon County Commissioners (cont.)

Alternative WYCO-F, as proposed, is also not supported by Carbon County. That proposed routing would have more visual impact, affect more raptor and sage-grouse habitat, and require more historic trail crossings than proposed Alternative WYCO-B. Carbon County also does not support Alternative WYCO-C, primarily due to its proximity to the Adobe Town area.

C1b

Carbon County Comprehensive Land Use Plan: In addition to the reference to the Carbon County Comprehensive Land Use Plan in Section 1.8.2.1, the County Comprehensive Land Use Plan, Chapter 9, Coordination with Federal Government, includes policies that promote local interests to ensure that the socioeconomic impact of public land use has a positive net benefit to the citizens of Carbon County. The County Plan encourages an intergovernmental framework that fully considers the local impact of proposed federal actions to the social, economic, physical and cultural environment as a part of the overall planning and decision making process.

C1c

Municipalities and Incorporated Communities: Within Carbon County, the municipalities that will potentially receive direct and cumulative socio-economic impacts from the project include the Towns of Medicine Bow, Hanna, Sinclair, Rawlins, and Baggs. Carbon County encourages the applicant, Gateway South, and both the BLM and the State of Wyoming to work with these communities to ensure that they have sufficient resources to address potential socio-economic impacts.

C1d

Cumulative Impacts: It is important to emphasize that Carbon County supports the Gateway South Project. To ensure that the project addresses the ability of our communities to benefit from the socio-economic impacts, Carbon County encourages Gateway South, the BLM and the State of Wyoming to carefully account for the socio-economic impacts of all the industrial projects that are planned during the construction phase of the Gateway South Project. Potential projects that may begin during the Gateway South construction phase include: Gateway West and the TransWest Transmission Line Projects; Chokeycherry/Sierra Madre Wind Energy Project; and multiple oil and gas expansion projects including the Atlantic Rim and Continental Divide-Creston Natural Gas Development Projects. Although the number of concurrent projects is uncertain, it is essential for all involved to carefully monitor the cumulative socio-economic impacts of these projects and be prepared to implement a plan that has the financial backing to address any potential community impacts. Impacts that are of concern to Carbon County include fire protection, law enforcement, housing, medical services, schools, roadways and similar community services.

C1e

Additional Social and Economic Mitigation Measures: To encourage consistency between the TransWest and Gateway South NEPA documents and to ensure that socio-economic impacts are comprehensively addressed, Carbon County requests that BLM add to the Social and Economic Conditions Section of Chapter 3 of the Gateway South EIS-LUPA a section entitled **Additional Mitigation**. This Section would contain the same or similar stipulations that are listed on pages 3.17-23 and 3.17-24 of the TransWest DEIS. These Additional Mitigation measures, found in the TransWest DEIS, include: 1) Developing a proactive housing plan in conjunction with the Wyoming Industrial Siting Council and local officials; 2) Encouraging contractors to support local sales and use taxes by purchasing supplies locally and delivering freight FOB within the counties where it will be utilized; and 3) Conducting annual coordination meetings to ensure that local needs and services are addressed. Carbon County believes that these measures, if implemented by Gateway South, Gateway West and TransWest, will help address potential socio-economic impacts to our community.

C1b

Comment noted. The Bureau of Land Management (BLM) appreciates the participation of Carbon County as a cooperating agency in preparation of the Environmental Impact Statement (EIS) for the Energy Gateway South Transmission Project (Project).

In accordance with National Environmental Policy Act (NEPA), the potential impacts of a federal action on a particular resource or resource use are analyzed and reported similarly for all jurisdictions.

C1c

See response to Comment C1b. Recommendations to mitigate impacts related to the availability of resources, purchase of local goods and service, and workforce impacts on housing and communities in specific locations and towns will be addressed during the county and/or state permitting phase of the project (e.g., the Wyoming Industrial Siting Permits). Additionally, PacifiCorp doing business as Rocky Mountain Power (Applicant) employs Customer and Community Managers to coordinate with local communities about these types of requirements, concerns, and recommendations.

C1d

See responses to Comments C1b and C1c.

C1e

Mitigation recommendations related to the purchase of local goods and services and workforce impacts on housing and communities in specific locations and towns will be addressed during the county and/or state permitting phase of the project (e.g., the Wyoming Industrial Siting Permits). Additionally, the Applicant employs Customer and Community Managers to coordinate with local communities about these types of requirements, concerns, and recommendations.

Comment(s)

Response(s)

C1 Board of Carbon County Commissioners (cont.)

C1f **Transportation Planning:** To limit the amount of vegetation and ground disturbance, Carbon County encourages Gateway South to work with public and private land managers to coordinate transportation routes, construction yards and material storage areas with other neighboring and simultaneously occurring projects. For example, if the TransWest Project finalizes construction within the same time frame as the startup of the Gateway South project, it may be feasible for Gateway South to utilize some of the same construction yards and transportation routes utilized by TransWest. This would not only limit the amount of new disturbance, but it could also foster the coordination of reclamation efforts.

C1g **Wildlife:** Carbon County supports the State of Wyoming Sage Grouse Core Area Program and appreciates efforts by the applicant to comply with this program.

C1h **Permitting on Private and Public Lands:** The proposed transmission line will cross many miles of public and private checkerboard ownership within Carbon County. Carbon County encourages the BLM to support Federal, State, and County governments in applying their permitting processes to the entire project area, including both public and private checkerboard lands. This will ensure that federal, state, and county regulations are applied in a uniform manner across ownership, eliminating confusion in the permitting process. If there are questions regarding Carbon County permitting requirements, please contact Sid Fox, Planning & Development Director, at 307-328-2651 for land use issues, and Bill Nation, Carbon County Road & Bridge Department Superintendent, for county road and transportation issues, at 307-324-9555.

Again, thank you for providing the opportunity to comment on the Gateway South Transmission Line Project DEIS-LUPA. We want to convey our continued support for this project but want to emphasize that the project should have a positive net benefit to the citizens of Carbon County. If you have questions concerning this letter, please feel free to contact me at 307-710-2265.

Sincerely,


Leo Chapman, Chairman
 Carbon County Board of County Commissioners

- cc: Jerimiah Rieman, Natural Resource Advisor, Governor’s Office
- Colin McKee, Policy Analyst, Governor’s Office
- Don Simpson, BLM, Wyoming State Director
- Sharon Knowlton, BLM, Project Manager, TransWest
- Dennis Carpenter, Manager, BLM Rawlins Field Office
- Sweetwater County Board of County Commissioners
- Mark Kot, Sweetwater County
- Bill Nation, Carbon County Road & Bridge Superintendent
- Sid Fox, Carbon County Planning & Development Director
- Mike Kelly, Carbon County Attorney’s Office

C1f The BLM believes these topics are most appropriately addressed during the county and/or state permitting phase of the Project rather than the EIS to support federal decisions on whether or not to grant right-of-way for the Project. Also, the Applicant employs Community and Customer Managers to coordinate with local communities about such requirements, concerns, and recommendations.

C1g Comment noted.

C1h See responses to Comments C1b and C1c.

Comment(s)

Response(s)

C2

Coalition of Local Governments



COALITION OF LOCAL GOVERNMENTS

925 SAGE AVENUE, SUITE 302
KEMMERER, WY 83101

COUNTY COMMISSIONS AND CONSERVATION DISTRICTS FOR LINCOLN,
SWEETWATER, UINTA, AND SUBLETTE - WYOMING

May 22, 2014

Via GatewaySouth_WYMail@blm.gov

Tamara Gertsch, National Project Manager
Energy Gateway South Project
Bureau of Land Management
P.O. Box 21150
Cheyenne, WY82003

RE: Gateway South Transmission Line Project – Draft Environmental Impact
Statement and Draft Land Use Plan Amendments

Ms. Gertsch:

The Coalition of Local Governments (“Coalition” or “CLG”), on behalf of participating members, appreciates the opportunity to comment on the Gateway South Transmission Line Project DEIS. The Coalition incorporates by reference those comments submitted by Sweetwater County.

Statement of Interest

Initially, it is important to understand that the Coalition and members of the Coalition are not merely members of the public. The Coalition provides the technical guidance for local government cooperating agencies in writing comments and identifying issues. The Coalition is a voluntary association of local governments organized under the laws of the State of Wyoming to educate, guide, and develop public land policy in the affected counties. Wyo. Stat. §§11-16-103, 11-16-122. Coalition members include Lincoln County, Sweetwater County, Uinta County, Sublette County, Lincoln County Conservation District, Sweetwater Conservation District, Uinta County Conservation District, Sublette County Conservation District, and Little Snake River Conservation District. The Coalition serves many purposes for its members, including the promotion of policies and land management that protect vested rights of individuals and industries dependent on utilizing and conserving existing resources and public lands, the promotes and supports habitat improvement, supports and finds scientific studies addressing federal land use plans and projects, and providing comments on behalf of members for the educational benefit of those proposing federal land use plans and land use projects.

Comment(s)

Response(s)

C2

Coalition of Local Governments (cont.)

Gertsch, Tamara
Gateway South Transmission Line Project
2

Both county and conservation district members of the Coalition have authority to protect the public health and welfare of Wyoming citizens while promoting and protecting public lands and natural resources. Wyo. Stat. §§18-5-102; Wyo. Stat. §§11-16-122. Given this broad statutory charge and wealth of experience in public land and natural resource matters, the Coalition has coordinated efforts with WDEQ, Bureau of Land Management, Bureau of Reclamation, U.S. Fish and Wildlife Service, U.S. Forest Service, and other federal, state, and local entities.

Thank you for addressing our specific and varied comments attached to this letter.

Sincerely,

/s/ Kent Connelly, Chairman
Coalition of Local Governments

- cc: Wyoming Governor's Office
- Wyoming Department of Agriculture
- Wyoming Game and Fish
- Wyoming Association of Conservation Districts
- Wyoming County Commissioners Association
- Wyoming State Lands
- Wyoming Congressional Delegation
- Carbon County Commissioners
- Moffat County Commissioners

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

Energy Gateway South Transmission Line Project Draft EIS–February 2014				
Comment Number	Section	Page Number	Commenter	Comment or Text Revision
1.	All	All	Coalition	Gateway West, TransWest Transmission Line, Chokeycherry/Sierra Madre, Normally Pressurized Lance, Moxa Arch, Hiawatha, Continental Divide, and multiple other projects will interact with the Gateway South Project to produce cumulative socioeconomic impacts that must be fully analyzed and disclosed and carefully monitored as more projects are authorized.
2.	All	All	Coalition	The DEIS does not analyze and disclose the impacts the project will have on Greater Sage-Grouse habitat disturbance caps as delineated in the SG-9 Plan. The fact that disturbance caps as outlined in the SG-9 Plan have not been implemented does not save the BLM from analyzing the full range of possibilities here. Whether BLM implements a 3% disturbance cap or a 5% disturbance cap, the BLM will be forced to disclose how the Gateway South project interacts with any disturbance cap listed in another plan.
3.	2.4.8 Environmental Design Features of the Proposed Action	2-35 – 2-39	Coalition	Following completion of construction, the disturbed areas must be “immediately reclaimed.” Noxious weeds spread quickly and prevent valuable habitat and native species from reestablishing themselves. If the reclamation is implemented immediately, then site stabilization and intermediate reclamation should be used to ensure final reclamation success. The appropriate seed mixture used during reclamation efforts should be a mixture of native and sterile nonnative plant seeds. Sterile nonnative plant seeds have been successfully used in the area to restore vegetation cover and hold the soil until native plant species reestablish themselves. Experience shows that drought, soil types, and slow germination of native species alone will often lead to reclamation failure.
4.	3.2.2.1.3 Mineral Resources	3-61	Coalition	NEPA and FLPMA serve as the primary legislation requiring assessment and mitigation of potential impacts on mineral resources when considering proposals for major actions on federally administered land. Those mineral resources include Rare Earths and the BLM must analyze and disclose the presence of rare earth resources within the right-of-way corridor and adjacent to the corridor.

- C2a These projects are included in the analysis of potential cumulative effects presented in Chapter 4 of the EIS.
- C2b The BLM is not required to evaluate potential restrictions contained in the alternatives considered in the federal sage-grouse management planning process in the EIS for the Project. The analysis contained in the Final EIS for the Project is based on BLM and other cooperating agency policies and plans pertaining to sage-grouse management that are in effect at the time the analysis was prepared. If an action alternative is selected, BLM’s decision on the Project would comply with all relevant sage-grouse stipulations in applicable BLM Resource Management Plans (RMP) at the time the decision is issued.
- C2c The Plan of Development (POD) will include a Noxious Weed Management Plan (to be developed in coordination with cooperating agencies and finalized for the selected route before construction may proceed) that includes noxious weed control measures in accordance with existing regulations and BLM and U.S. Forest Service (USFS) requirements. Control measures will be based on species-specific and site-specific conditions (e.g., proximity to water or riparian areas, agricultural areas, and season) and will be coordinated with the BLM or USFS Authorized Officer or his/her designated representative, Project Managers, the Compliance Inspection Contractor, and the Construction Contractor’s weed management specialist. Further, the Noxious Weed Management Plan will be based on the principles and procedures outlined in the BLM Integrated Weed Management Manual 9015 and Forest Service Noxious Weed Management Manual 2080.
- C2d No rare earth mines are present in the Project area; and the BLM is not aware of any data indicating areas of rare earths in Wyoming. Because the chance of the Project affecting rare earths was extremely low, the BLM determined additional analysis was not warranted.

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

C2e

Energy Gateway South Transmission Line Project Draft EIS–February 2014				
Comment Number	Section	Page Number	Commenter	Comment or Text Revision
5.	3.2.2.4.2 Impact Assessment and Mitigation Planning (Earth Resources)	3-63 – 3-71	Coalition	<p>The BLM may not assume that the power line will “span” any production facilities (3-70,71) since it appears that the power lines may cross wells, other transmission lines, and other structures with varying heights. See Appendix B at 2-1 – 2-7; 4-1. For example, the wire zone on a Mono-pole structure (Appendix B, 2-5) is substantially different than that of a Lattice Steel Structure (Appendix B, 2-2). Thus, some existing structures may fit under one transmission structure but not another exposing the flaw of BLM’s generalization. Instead, the BLM must closely analyze and disclose which structures will be used under what circumstances to minimize the conflict between existing and future energy projects and the Gateway South transmission line. The same is true for the right-of-way corridor that expands or decreases depending on the transmission structure. See Appendix B at 3-1.</p> <p>Finally, the DEIS also omits any discussion on who has priority over the right-of-way when an existing mining claim or oil and gas lease is located within the transmission line right-of-way. BLM unequivocally states that vegetation will be cleared from under the transmission line (3-225) but does not make a similar conclusion with regards to other manmade structures. Does the transmission line have to be relocated, does the lessee lose some portion of its lease that is bisected by the line, or does the power company compensate the lessee for having to do more expensive directional drilling to avoid conflicts? The TransWest Express DEIS states a major assumption is that “mineral entry can take precedence over other land uses and that the granting of a utility right-of-way does not overrule mineral owners’ rights to develop and extract minerals.” This assumption should also be adopted by the Energy Gateway South Transmission Line Project.</p>

C2e

The BLM would issue a 250-foot-wide right-of-way grant across the lands it administers that is consistent with applicable regulations, recognizing that the Applicant must acquire all access permissions for lands outside of their jurisdiction. It is expected the Applicant would resolve conflicts with regard to mineral ownership and access along the selected alternative route, including any compensation for economic impacts to leaseholders, etc., through fee mineral and landowner agreements and permissions. For example, it is the responsibility of the right-of-way grantee to conduct proper due diligence to ensure that legally valid mining claims are respected and agreements are made with claim owners. In general, the BLM expects that the likelihood and potential for such conflict are low and the effect small. With the availability of current technology, mining and oil and gas recovery still could occur in proximity to transmission lines.

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

Energy Gateway South Transmission Line Project Draft EIS—February 2014				
Comment Number	Section	Page Number	Commenter	Comment or Text Revision
6.	3.2.5.5.4 500kv Transmission Line Components – Alternatives WYCO – Affected Environment	3-232—336	Coalition	<p>Alternatives WYCO-D and WYCO-F would impact 2.0 and 1.9 miles respectively of riparian and wetland habitat. This is mostly from where the proposed rights-of-way would cross the Muddy Creek Wetlands.</p> <p>First, it is unclear whether ROW construction will degrade the wetlands by access roads or otherwise. The EIS must disclose these impacts.</p> <p>Tens of thousands of migrating water fowl, shorebirds, and numerous other avian species utilize the Muddy Creek Wetlands. The Wyoming Audubon lists this area as an Important Bird Area (IBA) and over 120 species of birds have been identified as utilizing the wetlands and the associated migration corridor. Several of these species are species of concern, including several with NSS1 status and on BLM's 6840 list. The proximity of any transmission line to the wetlands significantly increases the potential for collision and death of migrating birds. The DEIS does not disclose nor discuss the impact or expected loss of avian wildlife due to collision with transmission lines in this area. The DEIS does not even identify or discuss the IBA anywhere in the document. BLM must provide in the Vegetation or Wildlife Section discussion on the Muddy Creek Wetlands IBA and address the potential impacts from the proposed transmission line.</p> <p>The Wildlife Section did identify as a concern the impacts on migratory birds, including waterfowl, and the potential of mortality due to collision and electrocution. DEIS at 3-336. Unless BLM plans to conduct an extensive analysis of the impacts to avian collision in this highly sensitive area, Alternative WYCO-B should be selected to avoid this area and negate the need for additional analysis.</p>

C2f

C2f

Comment and route preference noted. The impact assessment methodology and types of potential impacts on wetlands are discussed in Section 3.2.4 of the Final EIS. Any wetlands or waterways crossed by the Project would be delineated before construction and any impacts on U.S. Army Corps of Engineers jurisdictional features would be subject to Section 404 of the Clean Water Act (refer to Water Resources Regulatory Framework, Section 3.2.4.1.1). Additionally, under Design Feature 33, surface-disturbing activities within 328 feet (100 meters) of riparian areas (including wetlands, stream banks, and shores of ponds or lakes) in Utah or Colorado would be required to meet exception criteria as defined by the BLM. In Wyoming, surface-disturbing activities within 500 feet of all wetlands and waterways would also be required to meet exception criteria in association with the BLM Rawlins Field Office RMP (BLM 2008). The analysis of potential effects on migratory birds has been updated in Section 3.2.9 of the Final EIS. The revised analysis discloses potential impacts on important bird areas, including the Muddy Creek Wetlands Important Bird Area.

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

Energy Gateway South Transmission Line Project Draft EIS–February 2014				
Comment Number	Section	Page Number	Commenter	Comment or Text Revision
7.	3.2.7.5.4 500kV Transmission Line Components – Alternatives WYCO – Affected Environment (Wildlife)	3-347	Coalition	<p>Alternative WYCO-B will have less impact on Mule Deer winter range in the Baggs area and decrease the impacts on the east-to-west migration corridor for the Baggs Mule Deer herd. See DEIS at Table 3-83. Alternative WYCO-B moves the transmission lines farther west where the migration corridor is much broader and significantly less impacted by other uses, such as oil and gas development.</p> <p>Alternatives WYCO-D and WYCO-F will further constrain and negatively impact the Baggs Mule Deer migration corridor at its most constricted point near the five mile point where only two tunnels under the highway (1.5 miles apart) provide for migration. Additional infrastructure and human activity associated with transmission lines in this area may negate or severely impede the use of this narrow corridor for Mule Deer migration.</p> <p>The DEIS needs to analyze these impacts in greater detail and propose mitigation.</p>
8.	3.2.10.5.2 Impact Assessment and Mitigation Planning (Land Uses)	3-379–381	Coalition	<p>A potential environmental effect of the project is loss of rangeland for livestock associated with clearing, pulling and tensioning sights, staging areas, access roads, tower sites, and a batch plant. DEIS at 3-680. The project would also impact active lambing and/or calving areas. <i>Id.</i> The DEIS even goes so far as to imply that grazing could be entirely prohibited during “construction and reclamation.” <i>Id.</i> The DEIS, however, concludes that the impact to grazing would be low and that no mitigation is required. <i>Id.</i> The DEIS, therefore, appears inconsistent in its analysis and conclusions drawn.</p> <p>The DEIS does state that construction activities would not occur during lambing and calving, and that the timing stipulations would be addressed in the plan of development. <i>Id.</i> at 3-680-81. Also, that loss of vegetation could be minimized by soil and vegetation reclamation practices. <i>Id.</i> at 2-741.</p> <p>These mitigation measures do not adequately address the potential impacts the project could have on livestock grazing. The DEIS must analyze and disclose the extent the number of lambing and calving acres that will be impacted or foreclosed to livestock operators as well as the impacts to acres in all the relevant allotments and the seasons those allotments will be impacted. Similarly, BLM’s veiled implication that livestock grazing would resume “after construction and reclamation” needs to be explained by acres, length of time, and reasoning.</p>

C2g Comment and route preference noted. Additional information about the migration corridors and potential effects has been added to the analysis of impacts on mule deer winter range and migration corridors in the Baggs area in Section 3.2.7.5.4 under the heading Wyoming to Colorado – Aeolus to U.S. Highway 40 (WYCO). Design features and selective mitigation measures would be applied to reduce impacts on big game habitat. These are listed in Table 3-80 and described in Section 3.2.7.4.3, under the heading Mitigation Planning and Effectiveness.

C2h These types of potential effects are discussed in Section 3.2.11.5. Per Design Feature 22 of the Proposed Action (refer to Table 2-8), calving and lambing areas would be avoided to the extent possible. While for the purposes of analysis short-term impacts are assumed to persist for up to 5 years, the agencies do not anticipate that the short-term effects of construction would preclude grazing activities for the duration of a 5-year period. The only situation that may preclude grazing activities is where stabilization of vegetation may be required by agencies or landowners to mitigate the effects of temporary disturbance for some temporary period. It is for these reasons the agencies anticipate the potential impacts on grazing to be low.

In response to the comment, text has been added to the footnotes of the grazing tables in Section 3.2.11.5 to clarify that low initial impacts are anticipated, considering application of design features of the Proposed Action for environmental protection (refer to Section 2.4.8).

C2i See response to Comment C2h. No selective mitigation measures were determined necessary for reducing impacts on grazing, considering the application of Design Features 1, 2, 5, 17, 18, 22, 26, 27, 32, and 39 (refer to Section 2.4.8 and Table 2-8). BLM believes the level of analysis included in the Draft EIS is adequate for the scope of the Project. The methodology for analyzing impacts on other land uses was developed in coordination with the cooperating agencies assisting the BLM in preparation of the EIS.

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

Energy Gateway South Transmission Line Project Draft EIS–February 2014				
Comment Number	Section	Page Number	Commenter	Comment or Text Revision
C2j				Moreover, the DEIS completely ignores the fact that livestock mortality may result from increased traffic, livestock improvements may be damaged, and operators cannot be left with the burden of each. Put simply, the construction area is not limited to just the right-of-way and the full range of impacts extends beyond the corridor. BLM must look to the synergistic relationship between all of the elements of the project.
C2k				The Coalition does not agree with the DEIS's analysis or conclusion of minimal impacts. The entire project area in Wyoming has grazing allotments on it and grazing is one of the primary uses of the private, state, and federal lands. The TransWest Express DEIS has concluded that its project could impact grazing because of the potential spread of noxious and invasive species, the fragmentation of grazing allotments, interference with livestock management during all seasons of use, potential impacts to lambing areas, impacts to private lands in the Checkerboard, increased mortality of livestock from increased traffic, and the loss of access and damage to range improvements. Because of the direct and indirect impacts, the TransWest Express EIS adopted the following mitigation measures: coordination with BLM and USFS concerning the affected grazing allotments during all seasons of use, placing no roads or ancillary facilities within 200 meters of range improvements, measures adopted to avoid damage to fences, gates and cattleguards, mitigation for loss of livestock during construction, operation, and decommissioning activities, and avoidance of lambing areas. Frequent consultation and coordination with private landowners, state lessees, and federal grazing permittees will substantially increase the success of these mitigation measures.
C2l				The TransWest Express project will occur in virtually the same area and will have the same types of impacts as this project. The Coalition recommends that this DEIS fully disclose the potentially significant impacts that the project may have to livestock grazing and adopt similar mitigation measures as the TransWest Express DEIS. Livestock grazing is a primary land uses for Sweetwater and Carbon County, and is a major source of income for private landowners in the Counties. These effects also transcend county boundaries that must be analyzed and disclosed. The DEIS cannot dismiss the importance of livestock grazing and how it will be impacted by the project. If the proponent has not proposed such measures, then it falls upon the BLM to ensure those measures are considered and should be included as a stipulation in the ROD.

C2j The indirect effects of Project, including impacts outside of the Project right-of-way are, disclosed in the analysis. Specifically, Section 3.2.11.5.2 identifies increased mortality of livestock from increased traffic as a potential short-term indirect impact resulting from temporary construction disturbance. Further, Design Feature 22 (discussed in the same section) states that fences, gates, and/or walls would be replaced, repaired, or reclaimed to original condition in the event the are removed or damaged during construction.

The BLM will issue a 250-foot-wide right-of-way grant across the lands it administers that is consistent with applicable regulations, recognizing the Applicant must acquire all access permissions for lands outside of their jurisdiction. The Applicant must also establish agreements with other permittees to resolve conflicts with other permitted uses on BLM-administered lands along the selected route, which could include compensation for economic impacts or losses.

C2k The Final EIS (refer to Section 3.2.11.5.2) includes discussion of grazing as a primary land use in the Project area and that it is a major source of income in Wyoming. It also includes a reference to the socioeconomic section discussion of impacts on grazing (Section 3.2.22) In response to the comment, additional discussion of the importance of livestock grazing and a more detailed description of how grazing may be impacted by the Project has been included in the Final EIS. Also, additional analysis of the following types of potential effects is included in Section 3.2.11.5.2 and Section 3.2.11.4: potential spread of noxious and invasive species, interference with livestock management, interference of access to livestock operations, and mortality of livestock from increased traffic. The fragmentation of grazing allotments was not considered an impact due to the anticipation that grazing could resume in most cases after construction. Refer also to the response to Comment C2h.

Regarding private lands, the impact on property rights will be carefully considered by the Applicant during micro-siting. The Applicant will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated. The project will be built in compliance with the National Electrical Safety Code, the Applicant's standards, and industry best practices with regards to line clearances to vegetation and other structures. The mitigation measures noted (i.e., considered for the TransWest Express transmission project) are considered as design features of the Proposed Action for environmental protection in the Draft EIS; specifically Design Features 1, 2, 5, 17, 18, 22, 26, 27, 32, and 39 (refer to Table 2-8).

C2l See response to Comment C2k.

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

Energy Gateway South Transmission Line Project Draft EIS–February 2014				
Comment Number	Section	Page Number	Commenter	Comment or Text Revision
C2m				Mitigation measures should include control of noxious and invasive weeds during the entire period of construction beginning with site stabilization, immediately followed by interim reclamation and final reclamation to control erosion and limit invasive species, mandatory monitoring of reclamation success, avoidance of calving and lambing areas and livestock use during all seasons, and compensation to livestock operators suffering loss of range improvements or livestock losses.
C2n	9. 3.2.12.1 Introduction and Regulatory Framework (Transportation and Access)	5-810	Coalition	The beginning of the Transportation and Access Section only states that a detailed access plan for the project will be outlined in the plan of development. DEIS at 3-810. Development of the plan must include heavy consultation and coordination with private land owners, state land lessees, federal livestock grazing permittees, and local governments.
C2o	10. 3.2.12.5.2 Impacts Common to All Alternatives (Roadways)	3-818 –819	Coalition	<p>The DEIS concludes that all impacts to transportation and access would be low and provides little discussion as to the potential impacts. See DEIS 3-818 – 3-819.</p> <p>The DEIS fails to address the specific impacts on each type of road within each region of the project area, including anticipated volume of traffic correlated to the time of year. In some areas, such as in Wyoming, local roads are more prevalent than highways and interstates, and carry most of the local traffic. These roads are often private, state, and BLM roads. Thus, there needs to be a transportation plan developed with each of these stakeholders at the table during its formulation at the earliest possible stage.</p> <p>These local roads are commonly narrower and may be unpaved, and are therefore more susceptible to adverse impacts from increased construction and operational traffic in the project area. This impact is magnified when taken into consideration with the current congestion issues caused by energy development in the area.</p> <p>Wildlife mitigation measures limit most development to late spring and summer, and road congestion is common during this time. This time period coincides with livestock trailing, which can add to the congestion. The DEIS needs to disclose these facts and when possible mitigate.</p> <p>The DEIS cannot assume that each State, private, and local transportation system will be similarly impacted from the construction and operation of the proposed transmission line. The impacts to transportation and access must be addressed specifically as to the region and type of road involved. The BLM must also address the need to rerouting existing roads to accommodate larger equipment.</p>
C2p				
C2q				

C2m See responses to Comments C2c and C2e.

C2n The Transportation and Access Plan will be part of the POD, to be developed in coordination with cooperating agencies. Also, BLM understands the Applicant is committed to working closely with federal, state, local, and private landowners when determining access to the project for construction, operation, and maintenance of the line.

C2o Refer to Chapter 3, Section 3.2.13.1. Discussions of potential impacts on transportation routes, including a discussion of anticipated construction volume increases, are discussed in regions associated with the likely construction spreads. See also response to Comment C2n.

C2p Refer to 3.2.11.5.2 for discussion of potential impacts on livestock operations. Additionally, Design Feature 22 addresses trailing areas. The Applicant would coordinate with the applicable land-management agency or private landowner to avoid areas used for calving, lambing, and trailing during construction. Further, anticipated volume of traffic and timing during construction is discussed in Section 3.2.13.1.

C2q See responses to Comments C2n and C2o.

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

Energy Gateway South Transmission Line Project Draft EIS–February 2014					
Comment Number	Section	Page Number	Commenter	Comment or Text Revision	
C2r	11.	3.2.14.1 Introduction and Regulatory Framework (Wilderness)	3-882	Coalition	While, BLM has the authority to conduct inventories regarding the presence or absence of wilderness characteristics, it lacks legal authority to change management of these lands to preserve the alleged wilderness. The plain language of FLPMA provides no authority for BLM to manage areas for lands with wilderness characteristics (LWCs) and more recently the expenditure of funds to change management of such lands violates the congressional appropriations restrictions. Dep't of Defense & Full-Year Continuing Appropriations Act, 2011, Pub. L. 112-10, Sec. 1769 (Apr. 5, 2011); Consolidated Appropriations Act, 2012, Pub. L. 112-74, Sec. 125 (Dec. 23, 2011); Continuing Appropriations Act, 2013, Pub. L. 112-175, Sec. 101(a)(7) (Sept. 18, 2012). It is also inconsistent with the Rawlins RMP. 43 C.F.R. §1610.5-3.
C2s	12.	3.2.16.5 Results - 500kV Transmission Line Components (Visual Resources – WYCO Alternatives)	3-1003 – 1131	Coalition	The DEIS states that all of the alternatives, with the exception of WYCO-D, cross the Cherokee Trail in a location that is a largely intact natural landscape setting. A largely intact natural setting is not the same as largely intact trail segments. The DEIS needs to accurately disclose the condition of the trail segments. If obliterated or overdriven by modern vehicles, then VRM Class III is correctly assigned. These are expansion era roads continually used since the early 1800's.
C2t					If transmissions lines are not in compliance with the VRM Class III objectives, then proper mitigation should occur so they are in compliance. Alternatively, the Rawlins RMP must be revised to change the VRM to Class IV. Regardless, the proper procedures for revising the VRMs in the RMP must be followed. Other projects involving oil and gas operations and ranching have had to incur significant costs to ensure compliance with the objectives, so this project should not be treated any differently.
C2u	13.	3.2.18.2.1 Wyoming to Colorado (Cultural Resources – Issues Identified for Analysis)	3-1188	Coalition	The Coalition appreciates the sentence in this section regarding the sections of the Cherokee Trail being no longer visible or having many remnants destroyed. Invisible trail segments are not eligible for protection. This should also be mentioned in the National Trails System Section (Chapter 3.2.17) where the project impacts to the trail are more fully discussed.

C2r Under BLM Manual 6310 and 6320, the BLM is required to inventory federal lands for non-wilderness study area lands with wilderness characteristics. Only certain units inventoried may be incorporated into a RMP, typically through a plan amendment. These units must possess wilderness characteristics that could allow for the unit to be considered for a wilderness designation. Units that were inventoried but were not adopted into a RMP may have certain uses and development occur in the boundary of the unit. For example, the BLM can restrict mineral development in a unit.

C2s The Key Observation Point (KOP) descriptions in Chapter 3 associated with the Cherokee and Overland historic trails have been modified to include both the level of landscape setting intactness and whether the trail segments are contributing or non-contributing to paint a complete picture for determining compliance.

C2t In locations where the Project could not be brought into compliance with Visual Resource Management (VRM) Class objectives through mitigation, plan amendments were proposed as presented in Chapter 5.

C2u Please note this statement is included in Section 3.2.19.3.4 where the Cherokee Historic Trail is discussed in more detail.

Comment(s)

Response(s)

C2 Coalition of Local Governments (cont.)

Energy Gateway South Transmission Line Project Draft EIS–February 2014				
Comment Number	Section	Page Number	Commenter	Comment or Text Revision
C2v	14. 4.3.2.3.1 Results WYCO Alternative Routes (Cumulative Effects Earth Resources)	4-40 – 4-49	Coalition	The cumulative effects for mineral operations must clearly display the impacts to minerals. The DEIS should discuss oil and gas resources and mining separately as well as the impacts on the Checkerboard. Then the discussion should be further separated into producing and non-producing oil and gas leases and mining claims. For example, Table 4-9 only discloses the impact to oil and gas leases but there is no distinction as to whether these leases are producing or non-producing. Table 4-10 discloses the impacts to potential mineral resource acres but does not identify or distinguish the types of mineral resources included.
C2w				The tables in this section also merely show the acreages impacted without any discussion on the actual impacts that will occur. The only discussion of the impacts is in one sentence at the beginning of the Earth Resource section where it states that potential direct effects include ground disturbance and conflicts with the development of mineral resources. DEIS at 4-41. The DEIS must disclose the actual impacts to each type of mineral resource and provide more discussion of such impacts under each alternative.
C2x				The DEIS must also provide a discussion on the reasonably foreseeable future actions for mineral potential of unleased lands. The BLM should provide visual aid of these lands.

C2v Comment noted. An assumption for analysis inherent in the approach for analysis of potential impact on oil and gas and other mineral resources is that all leases are (or would become) producing wells. BLM believes that a description of the types of mineral uses in the study corridors in the regional setting and affected environment sections is adequate to characterize the impacts without disclosing impacts by resource category. The types of mineral uses in the study corridors are defined in the regional setting and affected environment section of Section 3.2.2.

C2w See response to Comment C2v.
In accordance with NEPA, the potential impacts of a federal action on a particular resource or resource use are analyzed and reported similarly for all jurisdictions.
In general, BLM expects that the likelihood and potential for such conflict are low and the effect small. With the availability of current technology, mining and oil and gas recovery still could occur in proximity to transmission lines. Discussion is included in Section 3.2.2.5 that acknowledges the potential for isolated conflicts with future mineral development, noting the BLM’s expectation that the Applicant would obtain permissions and agreements that resolve conflicts with regard to mineral ownership and access along the selected route prior to construction.

C2x See response to Comment C2v.
The reasonably foreseeable future actions considered in the analysis, including mining and oil and gas development areas, are displayed in MV-25a in the Map Volume (MV) of the Draft EIS and MV-27a in the Map Volume of the Final EIS.

Comment(s)

Response(s)

C3 **Central Utah Water Conservancy District**



Central Utah Water Conservancy District

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May 13, 2014

Gateway South Project
 BLM Wyoming State Office
 Attn: Tamara Gertsch
 P.O. Box 21150
 Cheyenne, WY 82003

Subject: Gateway South Project

Dear Ms. Gertsch:

The Central Utah Water Conservancy District (CUWCD) appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) and acknowledge that our comments are being submitted a few days after the deadline. We recognize the extensive amount of time and effort that goes into an EIS. We appreciate your coordination with our agency as well as the Bureau of Reclamation – Provo Area Office and the Utah Reclamation Mitigation and Conservation Commission.

We support the Agency Preferred Alternative. The alignment of this alternative avoids the area surrounding Starvation Reservoir and Soldier Creek Dam which is federal lands reserved strictly for reservoir operations.

Thank you for your consideration of these comments. Please contact me at 801-226-7147 or sarah@cuwcd.com if you have any questions.

Sincerely,

Sarah Johnson
 Environmental Programs Manager

BOARD OF TRUSTEES

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C3a **Comment and route preference noted.**

C3a

Comment(s)

Response(s)

C4 **Duchesne County Commission**

DUCHESNE COUNTY COMMISSION

Ronald Winterton, Chairman; Kirk J. Wood, Member; Kent R. Peatross, Member
 P.O. Box 270
 Duchesne, Utah 84021-0270
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Ms. Tamara Gertsch, National Project Manager
 Wyoming State BLM Office
 PO Box 21150
 Cheyenne, WY 82003

RE: Energy Gateway South Transmission Project Draft EIS Comments

Dear Ms. Gertsch:

Duchesne County appreciates the opportunity to participate in the NEPA process associated with this project as a Cooperating Agency. We have reviewed the Draft EIS and have made several technical comments as set forth in the enclosed comment tracking table.

Duchesne County would recommend that either of the COUT-BAX B or C routes be selected as they have the least impact on private lands in Utah and maximize the amount of miles of the transmission line on BLM lands, according to Table S-4 of the DEIS. Only 58.7 miles of private land would be crossed by these COUT-BAX alternatives as compared to 105.8 miles for COUT-A through central Duchesne County; 69.0 miles for the agency-preferred route and 68.4 miles for the applicant's preferred route.

C4a

These two COUT-BAX routes; although higher in mileage and construction costs, are a good choice for numerous reasons. These two routes avoid crossing tribal lands. The DEIS shows, in Chapter 6, that the tribes have been largely unwilling to participate in the NEPA process and may be unwilling to allow the transmission line to cross their lands on reasonable terms.

C4b

The COUT-BAX B or C routes would also avoid a sage grouse management area in SW Duchesne and North Carbon County and a group of vacation home owners in the Argyle Canyon area, who have already hired legal counsel in an effort to prevent the TransWest Express or Energy Gateway South transmission lines from being constructed in their area. In that same vicinity, the Church of Jesus Christ of Latter-day Saints operates Camp Timberlane. Some of the route variations cross this church property, which the church has objected to.

C4c

Duchesne County is not willing to consider a transmission line following the COUT-A route due to the impact on private land owners, residents and farmers-ranchers in our county, who have already been impacted by the presence of the 345kV Bonanza transmission line. Duchesne County is the second-fastest growing county in the nation according to recent reports and the number of residents along the COUT-A route is increasing steadily. According to Table S-4, there are 214 residences within a ¼ mile of this alternative route, compared to 106 along the COUT-BAX B or C routes. COUT-B slightly lessens the impact in Duchesne County to 199 residences, but does cross 7.8 miles of tribal lands, which again could prove unfeasible.

C4a

The BLM and USFS met in government-to-government consultation with the Ute Business Committee of the Ute Tribe of the Uintah Ouray Indian Reservation in August 2014. At the meeting, BLM provided an update to the Ute Business Committee on the status of the Project. The Applicant also attended the meeting. The agencies and the Applicant received input from the Ute Business Committee on how to move forward with the Project.

C4b

To establish the resource database for analysis for the EIS, the EIS team gathered, compiled, and analyzed existing data provided by federal, state, and local agencies and other credible public sources of information. If data indicated the presence of a camp, the facility was avoided to the extent practicable and/or located in such a way that activities at the facility are not affected (visually or physically). However, in some cases, data received did not indicate the presence of recreational uses, particularly on private land where specific uses may not be evident in the public data. Such is the case with Camp Timberlane and other camps administered by the Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-day Saints (CPB).

C4c

Comment and route preference noted.

Comment(s)

Response(s)

C4 **Duchesne County Commission (cont.)**

Energy Gateway South
 Draft EIS Comments
 May 12, 2014
 Page 2 of 2

C4d The COUT-BAX B or C routes would have less of an impact on soil resources. COUT-A would cut across some of the best farm land in Duchesne County. Table S-3a indicates that the COUT-BAX B and C routes would have some of the smallest impacts on soils (only 2.5 and 1.9 miles of moderate impact after mitigation) while the impacts from COUT-A would be about four times higher (8.6 miles) and even higher with COUT-B (11.1 miles).

C4d Comment and route preference noted.

C4e The COUT-BAX B or C routes would be subject to fewer miles of potential damage from geologic hazards. Table S-3a indicates that the COUT-BAX B and C routes would have 15.5 miles of moderate impact from geologic hazards (after mitigation) while the impacts for COUT-A would be over 23.2 miles, 25.5 miles for the agency preferred alternative and 21.0 miles for the applicant's preferred alternative.

C4e Comment and route preference noted.

C4f The COUT-BAX B or C routes would have much less of an impact on special status wildlife species. Table S 3b indicates that there would be 11.8 miles of high impacts, even after mitigation, over those routes, as compared to 55.6 miles for route COUT-A through central Duchesne County and 46.6 and 42.7 miles over the agency-preferred and applicant's preferred routes respectively.

C4f Comment and route preference noted.

C4g Duchesne County believes that since the EGS project serves regional rather than local interests, the project should be located within utility corridors on federal lands to the greatest degree possible. The COUT-BAX B or C routes contain approximately 130 miles of transmission line within BLM or Forest Service designated corridors (see Table S-3c). COUT-A through central Duchesne County contains only 17.3 miles within designated federal utility corridors and there are only 21.1 and 19.4 such miles in the agency-preferred and applicant's preferred alternatives respectively.

C4g The first two criteria considered by the Applicant when identifying preliminary alternative routes during their initial feasibility studies conducted by the Applicant were (1) presence of designated or proposed utility corridors and (2) presence of other existing linear facilities. During their review of the alternative routes, the BLM and USFS have endeavored to maintain the use of federally designated utility corridors and the use of federal lands to the extent possible (i.e., where suitable when reviewing for environmental, geographic, or engineering/electric system reliability concerns). However, federal land is not contiguous. Ultimately, the BLM and USFS selection of the preferred alternative must be based on resource sensitivities and resource issues.

Based on the findings above, we urge the BLM to reconsider the agency-preferred alternative and recommend the selection of either COUT-BAX B or C as the most feasible routes given the environmental and socio-economic circumstances present in the area.

If you have any questions regarding this letter, please contact us. Thank you for the opportunity to comment.

Sincerely,

DUCHESNE COUNTY COMMISSION

Mike Hyde, MCP
 Community Development Director

Enclosure

Comment(s)

Response(s)

C4	Duchesne County Commission (cont.)
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Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
Summary- Special Status Wildlife	Last line on page	S-24	Mike Hyde	...potential pygmy rabbit potential habitat.
1.3 Decisions to be Made	End of Section	1-7	Mike Hyde	This section outlines the process for gaining permission to cross federal and tribal lands. At the end of this section, it should note that portions of the line will cross state and private lands. The process for gaining access over such non-federal and non-tribal lands should be mentioned here.
Table 1.1		1-16	Mike Hyde	“What are the impacts of Project construction activities on paleontological resources?” This question appears twice in the Table.
2.4.2.6		2-22	Mike Hyde	“The CIC and the BLM or USFS would be notified in advance of any required blasting so the area can be cleared.” Local law enforcement and emergency management officials and nearby property owners should also be notified. Will the CIC be responsible for doing this?
2.4.7.1		2-34	Mike Hyde	“In the event of an emergency, the Applicant would notify the federal land-managing-agency Authorized Officer and respond as quickly as possible to restore power.” If the emergency occurs on private, state or tribal lands, would the applicant also notify the property owner or appropriate state or tribal official?
Table 2-8		2-45	Mike Hyde	“Calving, lambing, and trailing areas (pathways over which livestock are moved to facilitate proper grazing management) would be avoided in the Project right-of-way and ancillary facilities. Calving season generally occurs between December and February. Lambing season generally occurs between March and June. Trailing areas (areas where livestock producers move livestock across lands to facilitate proper grazing management)” No need to define “trailing areas” twice in this cell.
Table 2-8		2-47	Mike Hyde	“All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials would be removed to a disposal facility authorized to accept such materials within one week of Project completion.” This seems to conflict with the solid waste handling standards in Section 2.4.6.2, which indicate weekly removal of waste.
Table 2-8		2-48	Mike Hyde	“Should construction activities prevent use of a watering facility while <u>livestock are</u> grazing in that area, then the Applicant would provide alternate sources of water and/or alternate sources of forage where water is available.”
Table 2-8		2-50	Mike Hyde	To minimize vehicle collisions with wildlife <u>or livestock</u> , a speed limit of 15 miles per hour would be employed on overland access routes.

Comment(s)

Response(s)

C4 **Duchesne County Commission (cont.)**

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
Section 2.6.1.3		2-124	Mike Hyde	Additional transmission capacity of the existing transmission paths in the EIS Project area EISs does not exist.
Map 322		3-15	Mike Hyde	The location of the Fruitland AQ monitoring station is incorrect on this map. Fruitland is located on Highway 40 near the Wasatch County line.
Section 3.2.2.1.1		3-60	Mike Hyde	“The protection of transmission lines from landslides, unstable soils, flooding, and other hazards is regulated by 49 CFR 192.317, which states “The operator must take all practicable steps to protect each transmission line or main from washouts, floods, unstable soil, landslides, or other hazards that may cause the <u>pipeline transmission line</u> to move or to sustain abnormal loads.”
		3-101	Mike Hyde	“Route Variation COUT-C-1 in Utah crosses 1.8 miles more of soils highly susceptible to water erosion. Route Variations COUT-C-2 and COUT-C-4 in Utah cross 1.6 miles more of soils highly susceptible to water erosion.” What were the results for COUT-C-3 and COUT-C-5?
		3-128	Mike Hyde	“In Wyoming, Route Variations WYCO-C-1, WYCO-C-2, and WYCO-C-3 would be anticipated to have similar impacts on paleontological resources as Alternative WYCO-B [should this be WYCO-C]? with minor variations in the extent of the areas with high or moderate sensitivity (Table 3-34).”
		3-128	Mike Hyde	“In Colorado, Route Variations WYCO-C-1, WYCO-C-2, WYCO-C-3 would have similar impacts on paleontological resources as Alternative WYCO-B [should this be WYCO-C]? with minor variations in the extent of the areas with high or moderate sensitivity (Table 3-34).”
3.2.4.1.1		3-144	Mike Hyde	“3.2.3.1.1 Regulatory Framework” (should be 3.2.4.1.1)
3.2.4.1.1		3-146	Mike Hyde	“National Flood Insurance Program. The National Flood Insurance Program is administered by Federal Emergency Management Area (FEMA), a component of the U.S. Department of Homeland Security. In support of the National Flood Insurance Program, FEMA identifies flood hazard areas throughout the United States, including Special Flood Hazard Areas, which are defined as areas of land that would be inundated by a flood having a 1 percent chance of occurring in any given year (previously referred to as the base flood or 100-year flood). Development may take place within Special Flood Hazard Areas, provided development complies with local floodplain management ordinances, which must meet the minimum federal requirements.” It may be good to note here that not all jurisdictions along the alternative routes have been mapped for flood zones under the NFIP. Duchesne County is one such jurisdiction that has yet to receive flood zone mapping.

C4h The referenced map has been corrected.

C4i Section 3.2.2.5.1 was corrected as requested.

C4j Text added as recommended.

Comment(s)

Response(s)

C4 **Duchesne County Commission (cont.)**

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
Table 3-42		3-170	Mike Hyde	Leers Canyon should be Lears Canyon
	3	3-307, 3-311	Mike Hyde	"the floodplain of the Green River in Grand County" I believe that the Green River crossing in COUT A and COUT B will be in Uintah County, not Grand County.
	Mid-page	3-364	Mike Hyde	"Slight variations also occur in the estimated area of disturbance to big game crucial habitat between Alternative WYCO-C and Alternative WYCO-C (Table 3-85)." The second WYCO-C should perhaps be WYCO-B?
	Bottom of Page	3-378	Mike Hyde	The USFS evaluated whether implementation of Alternative COUT BAX-C would be in conformance with standards, guidelines, and management objectives pertaining to wildlife resources contained in the applicable USFS LRMPs. The results of these analyses are presented in the Wildlife Specialist Report which is available for review and download from the Project website. The analysis found that Alternative COUT BAX-B COUT-BAX-C could be approved in compliance with standards, guidelines, and management objectives pertaining to wildlife resources contained in applicable USFS LRMPs.
	Top of Page	3-404	Mike Hyde	"The USFS evaluated whether implementation of Alternative COUT-I COUT-H would be in conformance with standards, guidelines, and management objectives pertaining to wildlife resources contained in the applicable USFS LRMPs. The results of these analyses are presented in the Wildlife Specialist Report which is available for review and download from the Project website. The analysis found that Alternative COUT-H could be approved in compliance with standards, guidelines, and management objectives pertaining to wildlife resources contained in applicable USFS LRMPs."
		3-423	Mike Hyde	"In Wyoming and Colorado, recreational hunting of sage-grouse occurs in populations crossed by the Project but is not legal in sage-grouse populations crossed by the Project in Utah." Please double check this. My understanding is that the Greater Sage Grouse is still hunted on a limited basis in Utah but the Gunnison Sage Grouse is not.
		3-428 (Last pgh), 3-437 (Table 3-101) and bottom of page 3-438	Mike Hyde	"Disruption of Sage-grouse Nesting and Breeding Activities and Sage-grouse Avoidance of Habitat Due to Human Presence Resulting from Public Public Use of New Access Routes"

C4k Text has been edited.

C4l Recreational hunting of sage-grouse is legal in parts of Utah (maps and descriptions of locations are available in the Utah Division of Wildlife Resources 2013-2014 Upland Game and Turkey Guidebook at http://wildlife.utah.gov/guidebooks/2013_pdfs/2013-14_upland-turkey.pdf) but not in the populations crossed by the Project. The Diamond/Blue Mountain hunting areas in Uintah county are located in the Project area, but the Diamond Mountain sage-grouse population is not crossed by any of the alternative routes considered for the Project.

Comment(s)

Response(s)

C4 Duchesne County Commission (cont.)

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
	Bottom of Page	3-438	Mike Hyde	“Effects on sage-grouse and sage-grouse habitat use associated with vehicle noise and increased human presence resulting from public public use of new access routes would be similar to the direct effects of construction on sage-grouse habitat use and nesting and breeding activities.”
		3-475	Mike Hyde	Potential mountain plover habitat is relatively abundant in areas crossed by Alternative WYCO-B (should this be WYCO-C?) in Wyoming, and despite the implementation of temporal and spatial avoidance selective mitigation measures, some disturbance to mountain plovers and their habitats could occur (Table 3-109).
		3-476	Mike Hyde	The average number of male sage-grouse that have been counted on leks located within 4 miles of Alternative WYCO-B (should this be WYCO-C?) during the past 5 years, and percentage of the average Wyoming statewide sage-grouse male lek counts that this represents, are presented in Table 3-110.
		3-476	Mike Hyde	Due to the disperse nature of prairie dog towns, the area in the Shirley Basin black-footed ferret management area potentially affected by Alternative WYCO-B (should this be WYCO-C?) is unlikely to support black-footed ferret.
		3-477	Mike Hyde	Potential mountain plover habitat occurs throughout the majority of the length of Alternative WYCO-B (should this be WYCO-D?) , and route variations in Wyoming, with exception of the portion of Alternative WYCO-D that heads south at Wamsutter and the area just north of Baggs (MV-11a).
		3-479	Mike Hyde	The average number of male sage-grouse that have been counted on leks located within 4 miles of Alternative WYCO-B (should this be WYCO-D?) during the past 5 years, and percentage of the average Wyoming statewide sage-grouse male lek counts that this represents, are presented in Table 3-110.
		3-482	Mike Hyde	(i.e., the Wolf Creek Creek reintroduction management area)
		3-487	Mike Hyde	Alternative WYCO-F would result in a loss of more potential yellow-billed cuckoo habitat than Alternative WYCO-C but less than Alternative WYCO-F (should this be WYCO-B?) , and considerably less than Alternative WYCO-D in Wyoming (Table 3-109).
		3-487	Mike Hyde	The estimated area of sage-grouse core areas, as well as the estimated area of sage-grouse habitat affected within 4 miles of leks in Wyoming by Alternative WYCO-B (should this be WYCO-F?) , is presented in Table 3-105.

Comment(s)

Response(s)

C4	Duchesne County Commission (cont.)
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Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
		3-488	Mike Hyde	The magnitude of effects of Alternative WYCO-B (should this be WYCO-F?) on white-tailed prairie dog potential colonies and pygmy rabbit habitat could be less, relative to areas where development structures are absent, in areas where the alternative would be adjacent to the existing human development and infrastructure.
	Top of page	3-532	Mike Hyde	Large expanses of sagebrush were removed with herbicides and smooth brome was planted to facilitate historic livestock grazing .
		3-548	Mike Hyde	Alternative COUT-B is crossed by yellow-billed cuckoo potential habitat along intersections of the White River, Duchesne River tributaries, and Starvation Reservoir tributaries in the U.S. Highway 40 and transmission line corridor (MV-11b). Potential Mountain plover habitat occurs throughout the majority of the length of Alternative COUT-B in Utah from the Utah/Colorado border to the Starvation Reservoir area (MV-11b). Alternative COUT-B veers to the southwest before reaching the Starvation Reservoir area and tributaries.
		3-552	Mike Hyde	Some loss of riparian vegetation along the White River, Duchesne River tributaries, and <i>Starvation Reservoir tributaries</i> that may provide suitable habitat for yellow-billed cuckoos could occur despite the implementation of temporal and spatial avoidance mitigation measures. If yellow-billed cuckoos use riparian habitats affected by Alternative COUT-B, loss of riparian vegetation could result in a decrease in habitat connectivity and a potential decrease in the number of effective yellow-billed cuckoo territories along intersections of the White River, Duchesne River tributaries, and <i>Starvation Reservoir tributaries</i> in Duchesne and Uintah counties. Alternative COUT-B would result in the same loss of potential yellow-billed cuckoo habitat as Alternative COUT-A and more than Alternatives COUT-C, COUT-H, and COUT-I in Utah (Table 3-124). Potential mountain plover habitat is relatively abundant in areas crossed by Alternative COUT-B in Utah from the Utah/Colorado border to the <i>Starvation Reservoir area</i> , and despite the implementation of temporal and spatial avoidance mitigation measures, some disturbance to mountain plovers and their habitats could occur (Table 3-124). Alternative COUT-B veers to the southwest before reaching the Starvation Reservoir area and tributaries.
	Top of page	3-556	Mike Hyde	Potential mountain plover habitat is relatively abundant in areas crossed by Alternative COUT-A (should be COUT-C?) in Colorado from Massadona to the Colorado/Utah border; however, mountain plovers are not known to currently use these habitats.

Comment(s)

Response(s)

C4 **Duchesne County Commission (cont.)**

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
		3-557	Mike Hyde	Mountain plover potential habitat occurs throughout the majority of the length of Alternative COUT-C and its route variations in Utah from the Utah/Colorado border to the <i>Starvation Reservoir area</i> (MV-11b). Alternative COUT-C is nowhere near the Starvation Reservoir area.
		3-559	Mike Hyde	Alternative COUT-B (should be COUT-C?) would result in modification of less potential Mexican spotted owl habitat than COUT-1, and more than Alternatives COUT-A and COUT-B in Utah (Table 3-124).
		3-562	Mike Hyde	Mountain plover potential habitat occurs throughout the majority of the length of Alternative COUT-H in Utah from the Utah/Colorado border to the <i>Starvation Reservoir area</i> (MV-11b). Alternative COUT-C is nowhere near the Starvation Reservoir area.
		3-563	Mike Hyde	Alternative COUT-C (should be COUT-H?) would have the least high residual impacts compared to most other COUT alternative routes and similar moderate residual impacts compared to other COUT routes in Utah (Table 3-123).
		3-564	Mike Hyde	The estimated area of sage-grouse occupied habitat, affected statewide by Alternative COUT-A (should be COUT-H?) is presented in Table 3-120 and the extent of habitat affected in each Utah population crossed in presented in Table 3-126.
		3-568	Mike Hyde	Some of the impacts on sage-grouse associated with Alternative COUT-H (should be COUT-I?) in Utah would occur in areas where the alternative is parallel to an existing high-voltage transmission line (345kV steel-lattice structure) that has degraded the existing quality of sage-grouse habitats.
		3-568	Mike Hyde	The estimated area of sage-grouse occupied habitat, affected statewide by Alternative COUT-A (should be COUT-I?) is presented in Table 3-120 and the extent of habitat affected in each Utah population crossed in presented in Table 3-126.
		3-585	Mike Hyde	Additionally, bluehead sucker (<i>Castostomus discobolus</i>), flannelmouth sucker (<i>C. latipinnis</i>), and roundtail chub (<i>Gila robusta</i>) have existing conservation <i>easements</i> (should be agreements?) in Utah and are listed sensitive species.
		3-604	Mike Hyde	Route Variation WYCO-F-1 in Wyoming shares the same route alignment as Alternative WYCO-F in Wyoming and could affect the same fish and aquatic resources. (What about WYCO-F-2 and WYCO-F-3?)
C4m	Table 3-148	3-649	Mike Hyde	Golden Eagle Subdivision, 9 40-acre lots, one existing residence; located approximately 24 miles west of Duchesne. This subdivision is much closer to Duchesne, approx.. 6 miles

C4m Comment noted. The distance description for the Golden Eagle Subdivision has been changed from 24 miles to 6 miles in the Final EIS.

Comment(s)

Response(s)

C4 Duchesne County Commission (cont.)

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014					
	Section	Line Number	Page Number	Commenter	Comment or Text Revision
C4n	Table 3-153		3-662	Mike Hyde	The Zephyr transmission line is not mentioned as a future project in this table.
C4o	Table 3-153		3-663	Mike Hyde	The Uintah Basin Railroad is not mentioned as a future project in this table (it would be crossed by COUT-B, COUT-C, COUT-H and COUT-I)
C4p			3-665	Mike Hyde	Duchesne County has also incorporated provisions for the Uintah Basin Energy Zone in its land use plan
C4q			3-696 and elsewhere	Mike Hyde	Preliminary and final plats generally pertain to subdivisions but not to utility projects
			3-703	Mike Hyde	Alternative WYCO-F crosses grazing allotments, flood-control facility, pipeline and pipeline pump station, transmission line, and vacant/undeveloped land. Alternative WYCO-B (should be WYCO F?) crosses the following authorized projects:
C4r			3-738 and elsewhere	Mike Hyde	Land zoned for agriculture in Duchesne County is not limited to agricultural use; it also allows residential use and commercial use with permission of the Planning Commission. This may be true in other jurisdictions. This may increase the level of impact of the transmission line above the low level in some locations.
			3-789	Mike Hyde	Visual impacts from Alternative COUT BAX-C (should be COUT BAX E?) crossing the SRMAs are discussed in Section 3.2.16.
			3-814	Mike Hyde	Railroads An inventory of railroads crossed by the reference centerlines for the alternative routes and route variations were identified using the Federal Railroad Authority database (Federal Railroad Authority 2008). These include railroads operated by the Union Pacific Railroad in Wyoming, Colorado, and Utah; WFUX in Colorado and Utah; and the Utah Railway Company in Utah. The number of railroad crossings identified are provided in 3-197 through 3-199. Would this be a good place to mention the proposed Uintah Basin Railroad, which is currently being studied?
C4s	Table 3-193		3-815	Mike Hyde	The table does not mention the Thunder Ridge Airpark airstrip in the Bandanna Ranch northwest of Fruitland in Duchesne County. It is close to being within the two mile corridor of COUT- A near segment U-426
			3-834	Mike Hyde	Alternative COUT-H (should be COUT-I?) in Utah crosses railroads northeast of Bonanza, Utah (Link U242), southwest of Wellington, Utah (Link U494), and north or Nephi, Utah (Link U650).
	3.2.13.1		3-838	Mike Hyde	"Special designations are created to protect values and land uses unique to an area, which typically require a more intensive management emphasis than is applied to surrounding public land." This sentence is repetitious of text in the same paragraph.

- C4n Because the Zephyr transmission project does not have an active right-of-way application with the BLM or USFS, that project is not considered reasonably foreseeable and is not included in the analysis.
- C4o The Uintah Basin Railroad project will not be added because the project does not meet the definition for a reasonably foreseeable future action, which is a proposed project or action that has either applied for a permit from local, state, or federal authorities or which is publicly known. Because the Uintah Basin Railroad project is only in the feasibility stage and does not have an active right-of-way application with the BLM or USFS, it will not be added to the cumulative impacts analysis at this time.
- C4p Duchesne County has been added to the Energy Zones discussion in Section 3.2.11 under the Zoning and General Plan Management Direction subsection.
- C4q The development status codes (e.g., preliminary and final plat) were used for all authorized and future projects as a way to generalize the status of the varying projects being analyzed in the EIS. The development status code was used to aid in the determination of the level of initial and residual impacts.
- C4r Based on comments received, the analysis of zoning and general plan management direction is modified in the Final EIS. That is, instead of analyzing the zoning and general plan zones/areas using impacts, the Final EIS discloses mileages of all zones crossed and conducts a preliminary compliance review for all zones based on the code for each jurisdiction. Final permitting decisions will be handled by the Applicant and determined by the jurisdiction crossed.
- C4s The Thunder Ridge Airpark airstrip northwest of Fruitland is approximately 2.7 miles north of the reference centerline and 1.6 miles outside of the 2-mile-wide study corridor. Projects outside of the 2-mile-wide corridor are not included in the analysis.

Comment(s)

Response(s)

C4 **Duchesne County Commission (cont.)**

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
3.2.15.1.1		3-910	Mike Hyde	“The Roadless Area Conservation Rule (RACR) or RACR of 2001 (36 CFR Part 294) was adopted by the USDA to “establish prohibitions on road construction, road reconstruction, and timber harvesting in IRAs on National Forest System lands” (USFS 2001). The rule established criteria for identifying IRAs and prescribed management for road construction and timber harvesting. Pursuant to the Roadless Area Review and Evaluation (RARE) II of 1979, the USFS identified IRAs in national forests across the nation, which were incorporated into the RACR, to prevent the fragmentation of pristine, sensitive, and roadless areas due to road construction or timber harvesting (USFS 2001).” Suggest that you add the following wording or something similar: Ironically, many of these so-called roadless areas contain existing roads on the ground which have been created by historic use without forest service authorization. These roads may serve to provide access to the transmission line without needing to construct new roads in an IRA.
IRA 0401010 (Ashley National Forest)		3-926	Mike Hyde	The area contains modifications including the existing 138kV transmission line and associated cleared right-of-way, livestock grazing and range improvements, vegetation treatments, existing unauthorized roads and boundary and cherry-stemmed roads.
IRA 0401011 (Ashley National Forest)		3-926	Mike Hyde	The area contains modifications include the existing 138kV transmission line and associated cleared right-of-way, livestock grazing and range improvements, vegetation treatments, existing unauthorized roads and boundary and cherry-stemmed roads.
IRA 0401013 (Ashley National Forest)		3-927	Mike Hyde	The area contains modifications including grazing/range improvements, vegetation treatments, existing unauthorized roads and cherry-stemmed roads into the IRA.
IRA 0401012 (Ashley National Forest)		3-927	Mike Hyde	The area contains modifications including grazing/range improvements, vegetation treatments, existing unauthorized roads and cherry-stemmed roads into the IRA.
Cottonwood Unroaded/Undeveloped Area (Ashley National Forest)		3-927	Mike Hyde	The area’s modifications include the existing 138kV transmission line and associated cleared right-of-way, livestock grazing and range improvements, vegetation treatments, existing unauthorized roads and boundary and cherry-stemmed roads.
Sowers Canyon East Unroaded/Undeveloped Area (Ashley National Forest)		3-927	Mike Hyde	The area’s modifications include the existing 138kV transmission line and associated cleared right-of-way, livestock grazing and range improvements, vegetation treatments, existing unauthorized roads and boundary and cherry-stemmed roads.

Comment(s)

Response(s)

C4 **Duchesne County Commission (cont.)**

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
Right Fork Indian Canyon Unroaded/Undeveloped Area (Ashley National Forest)		3-928	Mike Hyde	The area contains modifications including grazing/range improvements, vegetation treatments, <u>existing unauthorized roads</u> and cherry-stemmed roads into the unroaded/undeveloped area.
3.2.16.1.1		3-934	Mike Hyde	“VRI Classes” (should this be VRM?)
		3-936	Mike Hyde	As part of the development of LRMPs, <u>Visual Quality Objectives (VQOs)</u> are assigned for all USFS-administered lands to set an acceptable level of alteration from the natural landscape.
		3-993	Mike Hyde	...low clinical forms... (Should this be low Cylindrical forms)?
		3-1079	Mike Hyde	The Project would cross Argyle Canyon at the top of the canyon through an area of summer homes and a summer camp owned by the Church of Jesus Christ of Latter-day Saints , with dense subalpine vegetation on moderate-to-steep slopes. <i>Please include the affects of the project on the various church camps along the routes in the analysis as the church has filed a formal objection to the alternatives in this area (TransWest Express and EGS).</i>
		3-1086	Mike Hyde	Recreation Areas Impacts associated with the Green River and dispersed recreation are similar to Alternative COUT-A. <i>Please include the affects of the project on the LDS church camps in the analysis as the church has filed a formal objection to the alternatives in this area (TransWest Express and EGS).</i>
		3-1091	Mike Hyde	Effects on BLM SQRUs would be similar <u>to</u> Alternative COUT-A
Table 3-255		3-1224	Mike Hyde	Alternative COUT-B and Route Variations (This heading is repeated in the table; the second one should be COUT-C)
		3-1280	Mike Hyde	The southern boundary of the ACEC (within the Vernal BLM Field Office) coincides with the Duchesne-Carbon county line,... [This distinction needs to be made since the ACEC extends south of the county line in the portion of the ACEC within the Price Field Office]
		3-1336	Mike Hyde	According to Utah Travel Industry, there are 29 RV parks <u>in</u> the Vernal, Roosevelt, and Duchesne, Utah region as well as 29 hotels and motels (Utah Travel Industry 2013).
		3-1354	Mike Hyde	Housing resources are expected to be more prevalent in the relatively larger communities of Rawlins, Wyoming, Craig, Fruita, and Grand Junction, Colorado, and Vernal, Roosevelt, and Price, Utah as well as in the Wasatch Front. However, housing tends to be scarce and costly in areas such as the Uintah Basin during energy boom periods.

C4t

C4t

Based on comments received on the Draft EIS, the Applicant coordinated with some representatives of the Argyle Wilderness Protection Corporation to identify alternative route refinements and variations in this area that would avoid or reduce potential impacts on existing and planned land uses in the area (e.g., seasonal-use homes) and sensitive environmental resources. These route variations have been analyzed for the Final EIS and are addressed in Appendix F.
See also the response to Comment C4b.

Comment(s)

Response(s)

C4 Duchesne County Commission (cont.)

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
C4u	Chapter 4	Various	Mike Hyde	Cumulative Effects (Chapter 4) Is the Zephyr Transmission line too premature to include in this section? How about the Tesoro Pipeline, called the Uinta Express, from Duchesne County NW to Salt Lake? Another pipeline project now being planned is from Myton to Wellington (roughly following the Questar pipeline route, transporting upgraded crude to the rail line). This chapter does not mention oil shale and tar sands projects in Uintah County.
	Table 4-34	4-68	Mike Hyde	Alternative WYCO-B and Route Variations (This heading is repeated three times in the table – should be replaced with WYCO-C, WYCO-D, and WYCO-F)
	Last pgh.	4-103	Mike Hyde	The loss of wetland vegetation communities under Alternatives WYCO-B, WYCO-C, WYCO-D, and WYCO-F would contribute to the cumulative loss of water wetland vegetation communities in the CIAA. The extent of cumulative development on water wetland vegetation communities for all relevant alternative routes is summarized in Table 4-51.
C4v		4-221	Mike Hyde	"... Elk Tracks at Golden Eagle, Silver Moon, Vista Valley, Vonsville, Golden Eagle, Great Basin Estates I, and Cedar Mountain No. 8 and No. 9 in Duchesne County residential developments." None of these are located in an Industrial area.
	Table 4-116	4-232	Mike Hyde	Labyrinth Canyon SRMA BLM Price Field Office All COUT BAX alternative routes <i>34,240</i> 23 3 2 28 <i>37,175</i> How can the remaining available resource be more than the total available resource? 0.005
C4w				
C4x	Table 4-118	Beginning on 4-247	Mike Hyde	For the Red Rim-Daley Wildlife Habitat Management Area (WHMA), the remaining available resource exceeds the total available resource. For the Adobe Town Wild Horse Herd Management Area, the calculated acreage of the remaining available resource does not seem correct. For the Deerlodge Road entrance to Dinosaur National Monument, the calculated acreage of the remaining available resource does not seem correct.
	Table 4-119	Beginning on 4-252	Mike Hyde	For the North Moroni Conservation Easement, the Gordon Creek WMA and the Salt Creek WMA, the calculated acreages of the remaining available resource does not seem correct.
C4y				

Because the Zephyr transmission project does not have an active right-of-way application with the BLM or USFS, that project is not considered reasonably foreseeable and is not included in the analysis.

The Tesoro Pipeline project has been added to reasonably foreseeable future actions and is analyzed as part of the cumulative effects analysis in the Final EIS.

The Myton to Wellington pipeline project data was requested, but no response has been received as of September 9, 2014. To proceed with preparation of the EIS, this project will not be included as part of the analysis. However, it will be noted as a potential project in the reasonably foreseeable future actions table in Chapter 4.

Major oil shale and tar sands projects in Uintah County that have been documented and incorporated into the Draft EIS analysis include, but are not limited to, Red Leaf, Enefit American Oil, and TomCo. Other oil shale and tar sand project information is captured in the lease data and other projects identified in Tables 4-1 and 4-2. These projects are discussed where applicable in Section 3.2.11 and throughout Chapter 4.

Uintah County was contacted to identify any additional major oil shale and tar sands projects, but no response has been received as of September 9, 2014. To proceed with preparation of the EIS, no additional projects will be included in the analysis.

C4u

C4v

C4w

C4x

C4y

References to these residential developments have been removed from this section.

The numbers have been corrected in the Final EIS.

See response to comment C4w.

See response to comment C4w.

Comment(s)

Response(s)

C4 **Duchesne County Commission (cont.)**

C4z

C4z

C4aa

C4aa

Comment Tracking Table for Energy Gateway South Transmission Line Project Public Draft EIS – Spring 2014				
Section	Line Number	Page Number	Commenter	Comment or Text Revision
Table 4-120		Beginning on 4-256	Mike Hyde	For the North Moroni Conservation Easement, the Birdseye/Lake Fork WMA, the Dairy Fork WMA, the Fountain Green WMA, the Gordon Creek WMA, the Salt Creek WMA, the Spencer Fork WMA, the Starvation WMA and the Tabby Mountain WMA, the calculated acreages of the remaining available resource does not seem correct.
4.3.18	Top of page	4-311	Mike Hyde	In addition, prior development in the region has either degraded or resulted in the loss or discovery of some cultural resources.
4.3.19.1.2		4-314	Mike Hyde	"wildland-urban interface" (urban)
		4-322	Mike Hyde	Alternative COUT-A has the greatest number of residences located within 0.25 mile, located near Strawberry Reservoir, Fruitland, Duchesne, and Roosevelt, a total of 214 residences. (Because COUT-A crosses mostly private land in Duchesne County and would be located close to existing homes in many locations, this alternative is not acceptable to the County. The project provides a broad public benefit but little benefit to Duchesne County residents and property owners. Thus, the project should be located on public lands to the greatest extent possible).
		6-9, 6-10, 6-13	Mike Hyde	In addition, a request was made to assist in scheduling a meeting with the Energy & Minerals Department or a meeting with the <i>Business Council</i> to discuss the Project. The Ute Tribe calls their governing body the Business Committee; not the Business Council (see http://www.utetribe.com/BusinessCommittee.html)

See response to comment C4w.

Comment and route preference noted.

Comment(s)

Response(s)

C5

Medicine Bow Conservation District

Project Manager
Gateway South Transmission Line Project DEIS
Bureau of Land Management
PO Box 21150
Cheyenne, WY 82003
Email: GatewaySouth_WYMail@blm.gov

RE: COMMENTS FOR DRAFT EIS- GATEWAY SOUTH TRANSMISSION LINE PROJECT

Dear Project Manager:

The Medicine Bow Conservation District (MBCD) operates under and is guided by legislative declarations and policy of the Wyoming State Legislature W.S. 11-16-103 et al. The Board of Supervisors (BOS), held discussion concerning the Gateway West Transmission Line Project (GWT) EIS. The BOS, wishes to convey the following general policies concerning activities within the district's legal boundaries.

- A. The Medicine Bow Conservation District supports the "Multiple Use" concept of management of federal lands within the boundaries of the district. Multiple uses shall include but are not limited to the following:
 - a. Timber harvesting
 - b. Grazing
 - c. Recreation
 - d. Oil and Gas Development
 - e. Mineral Development
 - f. Wind Power Development
 - g. Hydro-Electric Development

The Medicine Bow Conservation District board of Supervisors reserves the right to appeal local, state, and federal decisions that adversely affect the Medicine Bow Conservation District Natural Resource and Land Use Plan.

Specific to the Gateway South Transmission Line Project DEIS, the BOS would like to submit the following comments. Note: MBCD is commenting exclusively on segments of the routes WYCO-B and WYCO-D that would pass through Medicine Bow Conservation District.

MBCD supports WYCO-B over WYCO-D for the below listed reasons, all of which are in agreement with our Resource Management Plan:

- WYCO-B impacts less water resources, particularly the wetlands and riparian areas because they are critical habitat for wildlife and important resources for livestock as well. WYCO-B also has less residual impact to water resources, thus less long-term effect on overall watershed health.
- WYCO-B impacts far less acres of mule deer and pronghorn winter range, year-long habitat, and migration corridors.

C5a Comment and route preference noted.

Comment(s)

Response(s)

C5

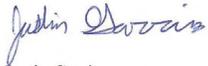
Medicine Bow Conservation District (cont.)

C5a

- WYCO-B impacts far less acres of Greater Sage Grouse habitat. With the decision on the listing of the bird coming up in 2015, disturbing less Greater Sage Grouse habitat is in everyone's best interest.

MBCD appreciates the opportunity to comment on this draft EIS for the Gateway South, thank you for your time in reviewing these comments.

On behalf of the Board of Supervisors,



Justin Garrison
Manager
Medicine Bow Conservation District
510 Utah Street
Medicine Bow, WY 82329
Phone: (307)379-2221
Email: justin@medbowed.org

Comment(s)

Response(s)

C6

Moffat County Commissioners

From: **Jeff Comstock** <jcomstock@moffatcounty.net>
Date: Tue, May 20, 2014 at 2:05 PM
Subject: Moffat Comments May 2014
To: tgertsch@blm.gov, gatewayssouth_wymail@blm.gov

Tamara,

Attached are Moffat County's Comments on the EGS DEIS. Please note page one of the Moffat County Commissioner's comments offers a position on the Tuttle Easment/Park Service Road situation.

Jeff Comstock, Director

Moffat County Natural Resources Dept.

221 W. Victory Way, Suite 130

Craig, Colorado 81625

Phone: (970) 826-3400

Comment(s)

Response(s)

C6 **Moffat County Commissioners (cont.)**



COMMISSIONERS

May 20, 2014

Tamara Gertsch, National Project Manager
 Email: gatewaysouth_wymail@blm.gov
 Energy Gateway South Project
 P.O. Box 21150
 Cheyenne, WY 82003

Moffat County appreciates the opportunity to comment on the Energy Gateway South Transmission Line Project Draft Environmental Impact Statement (EIS). Moffat County has participated in all the cooperating agency meetings to date and wishes to express our appreciation for BLM Wyoming attending several Moffat County Land Use Board Meetings throughout the project.

Moffat County Supports Applicant Proposed Route WYCO-B: Due to the confusion that may occur because of exhaustive alternative route proposals and local route variations in the EIS, we provide the following clarifications regarding our support of WYCO-B around the Deerlodge Road area of Moffat County. After several discussions between the Moffat County Commissioners and the Moffat County Land Use Board, Moffat County supports a route nearest the existing two power lines. Segments C171, C 172, C173 and C174 receive the Moffat County Commissioners support. The Moffat County Commissioners do not support power line route WCCO B-2, Agency Preferred Route (C 93) which runs on the north side of Highway 40. Moffat County also does not support a yet-to-be-drafted route crossing the Deerlodge Road through the State Land Board section of ground in T6N, 98W, Section 36. Moffat County commissioners take the above position on a long documented philosophy that linear disturbance such as pipelines and power lines should be placed in corridors through Moffat County. Placing linear disturbances in corridors minimize soil disturbance, wildlife impacts, and aesthetic impacts. We are not supportive of Segment C93, the Agency Alternative, because in addition to disturbing new ground outside an existing power line corridor, Route C93 offers the worst visual impact for travelers along State Highway 40 of any proposed route. We realize there will be added complications with keeping the proposed power lines in an existing corridor because of a recent conservation easement, however there are options available to find amicable solutions to this issue.

C6a

C6b

C6c

WYCO-B is consistent with the July 5, 2011 Joint Resolution between Moffat County, Carbon County, and Sweetwater County.

Corridor Routes: Moffat County has commented through a formal letter (August 9, 2011) as well as repeatedly through cooperating agency meetings that we value pre-planning to assure that Trans West, Gateway South, and other power lines stay within the same 2 mile corridor. It still appears Gateway South, TransWest, and the BLM have NOT collaborated to promote the same

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John S. Kinkaid
 District 1

Charles G. Grobe
 District 2

Thomas J. Mathers
 District 3

C6a Comment and route preference noted.

C6b Comment noted.

Between preparation of the Draft EIS and the Final EIS, the BLM asked the Applicant to make further refinements based on comments received on the Draft EIS. PacifiCorp/Rocky Mountain Power refined the alignment and incorporated some localized alternative routing variations. Refinements included coordination with the applicant for the TransWest Express transmission project to identify opportunities for colocation of the two projects through several priority areas, including the Seven Mile Ridge area. The refined alignment along the agency-preferred alternative route and the other alternative routes are analyzed in the Final EIS.

C6c In addition, in 2013, the Western Electricity Coordinating Council (WECC) revised its guidelines regarding separation distance between high-voltage transmission lines to be a minimum of 250 feet. The alternative routes and route variations for the Project were analyzed in the Draft EIS assuming a greater separation distance of 1,500 feet, based on earlier 2008 WECC guidance. Considering the revised WECC guidance, in early 2014, the BLM asked the Applicant to adjust the transmission line alignment along the Agency Preferred Alternative to be approximately 250 feet from existing linear facilities and 300 feet from other proposed transmission line alignments, where applicable. The BLM's intent is to reduce the amount of potential impacts and avoid potential proliferation of transmission lines across the landscape in accordance with the Federal Land Policy and Management Act of 1976. The alternative routes and route variations for the Project are analyzed in the Final EIS assuming a separation distance of 250 to 300 feet from the TransWest Express transmission project.

Comment(s)

Response(s)

C6 **Moffat County Commissioners (cont.)**

C6d The BLM would issue a 250-foot-wide right-of-way grant across the lands it administers that is consistent with applicable regulations. No utility corridor modification or designation on BLM-administered lands is proposed as part of this Project along the agency-preferred alternative in Moffat County. See response to Comment C6c.

C6e The BLM is not required to evaluate potential restrictions contained in the alternatives considered in the federal sage-grouse management planning process in the EIS for the Project. The analysis contained in the Final EIS for the Project is based on BLM and other cooperating agency policies and plans pertaining to sage-grouse management that are in effect at the time the analysis was prepared. If an action alternative is selected, the BLM’s decision on the Project would comply with all relevant sage-grouse stipulations in applicable BLM RMPs at the time the decision is issued.

C6f BLM is aware of the ongoing development of the Colorado Sage-grouse Habitat Credit Exchange Program. However, the exchange is not fully operational at this time and analysis of potential effects of the Project on the value of potential conservation actions undertaken by private landowners is beyond the scope of BLM’s EIS. As described in Appendix K of the EIS, the Applicant is preparing a voluntary sage-grouse mitigation plan to compensate for potential effects on sage-grouse and meet current management objectives. Implementation of the mitigation plan is expected to result in funding and implementation of actions that improve sage-grouse habitats. BLM, the Applicant, and the agencies participating in the preparation of the sage-grouse mitigation plan have established an objective of implementing conservation actions as close as reasonably possible to the effect being mitigated. Therefore, BLM anticipates that the Project may further incentivize and provide financial support for sage-grouse conservation in areas crossed by the Project.

C6g Comments noted. The BLM understands Moffat County is participating in the Habitat Equivalency Analysis (HEA) [Technical Working Group] that includes sage-grouse biologists from the BLM, U.S. Fish and Wildlife Service, state wildlife agencies, and other cooperating agencies. The Technical Working group was convened by the Applicant to provide input and guidance for developing the Applicant’s HEA. The HEA that will be used is a replicable method for determining project-related permanent and interim habitat losses. The HEA will be used to quantify impacts on sage-grouse and mitigation needed to meet management standards.

In accordance with agency policies pertaining to offsite mitigation, the BLM, cooperating agencies, and Applicant are working collaboratively to develop appropriate offsite mitigation that could be implemented to facilitate reasonable development of the Project consistent with applicable agency plans and policies pertaining to sage-grouse.

C6c corridor through Moffat County. We strongly believe the same corridor for all lines should be evaluated in this EIS.

The Trans West Transmission Project corridor and the Gateway South project corridor do not line up exactly in various portions of the Seven Mile Ridge route across Moffat County. The Moffat County Commissioners agree with the proposed corridor of 2 miles in width to provide for future transmission lines. Incongruencies between both proposed 2 mile corridors (TransWest and Gateway South) must be rectified in order to minimize surface disturbance and provide one corridor for any currently proposed transmission lines, as well as future transmission lines.

C6d Moffat County requests BLM identify the transmission line corridor as a one-time allocation, and commit that foreseeable future lines will stay within the 2 mile corridor. BLM must also commit that width expansions (beyond 2 miles) of the corridor to accommodate other needs is not anticipated in the foreseeable future. Of particular concern is the ability for additional power lines within the proposed corridor to be kept in the corridor, and that there is room within the corridor for these expansions. BLM has not assured this because TransWest and Gateway South have deviated routes from each other.

C6e **Disturbance Caps:** The DEIS does not mention the effect on sage grouse habitat disturbance caps (probable in the Sage Grouse EIS) that the corridor will create. Although Moffat County is aware there has been discussions of not counting the power line corridor against the surface disturbance cap of sage grouse habitat, Moffat County strongly opposes this concept as it pedestals one land use above others by giving power lines a ‘free pass’ regarding sage grouse. Moffat County requests full discussion and impact analysis occur regarding impacts of the Gateway South EIS on sage grouse disturbance caps proposed in the BLM Sage Grouse EIS. It is plausible that BLM may take the position that since disturbance caps are not yet adopted because the Sage Grouse EIS is still in draft form, that BLM cannot analyze impacts. This would be a short-sighted position since it is known that the disturbance cap concept is in BLM’s preferred alternative and will very likely be implemented.

C6f **Sage Grouse Habitat Credit Exchange System / Valuation of Easements :** The Habitat Credit Exchange system is not addressed in the EIS, yet should be studied and recognized as being a tool for additional compensation for landowners whose credit selling ability would be impacted by the power line corridor, as well as acknowledgment that the Habitat Credit Exchange Program offers a mechanism for power line corridors to be established. The Socio Economic Section would be an appropriate spot for this discussion. Impact analysis sections should consider the impacts to the agriculture and industry sectors that are likely to utilize this program to buy/sell sage grouse habitat credits on the open market. Moffat County requests that a description occur, centered around power line impacts of Sage Grouse Habitat Exchanges. Again BLM may consider the credit exchange program premature for EIS consideration, but considering the dramatic impacts on BLM’s analysis, Moffat County requests its consideration in the Gateway South EIS.

C6g **Greater Sage Grouse / Local Conservation Plans / Habitat Equivalency Analysis:** The Moffat County Commission generally supports the concepts of Habitat Equivalency Analysis, which are very similar to compensatory mitigation philosophies, however broad reaching

221 West Victory Way, Ste 130
 Craig, CO 81625
 (970) 824-5517
 (970) 824-9191 (fax)

John S. Kinkaid
 District 1

Charles G. Grobe
 District 2

Thomas J. Mathers
 District 3

Comment(s)

Response(s)

C6

Moffat County Commissioners (cont.)

C6g

concepts can sound good until the details have been discussed. Therefore, we look forward to discussions about how the details will be addressed. Distance from corridors that mitigation may occur are critical in these discussions. Moffat County generally does not support mitigating impacts in areas long distances from where the impacts occur. Local basin compensation, generally within the same watershed, is most favorably looked upon. Mitigation long distances from the effect can result in sacrificing one area in favor of another miles, counties, or states away, and is generally less favorably looked upon.

If you have any questions about Moffat County's Comments, you may contact Jeff Comstock, Moffat County Natural Resources Department at 970.826.3400 or any below listed Moffat County Commissioner.

Respectfully,



Tom Mathers, Chairman
Moffat County Commissioner

Charles G. Grobe, District 1
Moffat County Commissioner

John S. Kinkaid, District 2
Moffat County Commissioner

221 West Victory Way, Ste 130
Craig, CO 81625
(970) 824-5517
(970) 824-9191 (fax)

John S. Kinkaid
District 1

Charles G. Grobe
District 2

Thomas J. Mathers
District 3

Comment(s)

Response(s)

C7 Sanpete County Economic Development

On Mon, Feb 24, 2014 at 2:33 PM, Kevin Christensen <kevin@sanpete.com> wrote:

I support Rocky Mt. Powers Gateway South project. My comment is regarding the location of the transmission line in Salt Creek Canyon, east of Nephi, Utah.

Highway 132 in this canyon is the primary access to Sanpete Valley; which already has 2 transmission lines. The Gateway South project will be number 3. There are also 2 other proposed transmission lines for the canyon: TransWest <http://www.transwestexpress.net/> and Zephyr <http://www.datc11c.com/dtc-projects/zephyr/>

C7a

I am concerned about the visual/ scenic impact these lines will have on the canyon, as well as the entrance to our County.

Kevin Christensen

Sanpete County

Economic Development

435-835-4321

www.Sanpete.com



One of the criteria developed to site alternative routes for the proposed transmission line (2007 to 2008) was, and remains, to parallel existing linear facilities. As noted in the comment, the proposed transmission line follows the path of existing transmission lines—the Mona-to-Huntington 345-kilovolt (kV), Jerusalem-to-Nebo 138kV, and Mona-to-Bonanza 345kV transmission lines, thereby adhering to the criterion disclosed to the public during scoping and agreed-upon by the lead and cooperating agencies. Further limiting the location of the transmission line(s) are the surrounding rugged terrain and administrative-management constraints of surrounding jurisdictions; making the route through Salt Creek Canyon and along Highway 132 the only viable east-west route into central Utah (to the Clover Substation) without having to change the course of the transmission line excessively.

C7a

At the request of the BLM, between the Energy Gateway South Transmission Project Draft EIS and Final EIS, the applicants of the Energy Gateway South and TransWest Express transmission project refined their respective alignments along the Agency Preferred Alternative route to reduce the separation between the two proposed transmission lines to be approximately 250 feet from existing linear facilities and approximately 300 feet from one another (refer to Section 2.5.1.3 of the Final EIS). The two lines were collocated where possible to reduce the degree of effects (and reduce the width of the area viewed as a utility corridor) and avoid proliferation of lines across the landscape; however, and particularly in the Salt Creek Canyon area, the lines were sited with consideration of existing and planned land uses and other resource concerns. The Applicant has contacted or will be contacting landowners potentially affected by the Project for rights-of-entry, which is an opportunity for the landowner to discuss adjusting the placement of the transmission line on the landowner's property.

Comment(s)

Response(s)

C8 **Sanpete County Commissioners**

Sanpete County Courthouse
160 North Main
Manti, Utah



Auditor: Ilene B. Roth
Assessor: Kenneth Bench
Attorney: Brody L. Keisel
Clerk: Sandy Neill
Recorder: Reed D. Hatch
Sheriff: Brian Nielson
Treasurer: Earl D. Clark

Commissioners: Claudia Jarrett (Chair), Scott Bartholomew, Steve Frischknecht

April 15, 2014

Tamara Gertsch
National Project Manager
BLM Wyoming State Office
PO Box 21150
Cheyenne, WY 82003

RECEIVED
DOI-BLM
SHEPHERD WYOMING
2014 MAY 13 AM 10:01

Re: ENERGY GATEWAY SOUTH TRANSMISSION PROJECT DEIS

C8a

We strongly encourage the selection of the BLM/Agency Proposed Preferred Alternative route. The BLM/Agency Preferred Alternative route which runs near US 6 to Thistle and then to Salt Creek Canyon has less impact on the planned Narrows Reservoir, forest environment, wildlife, grazers, recreationists, private property owners, and local residents in the vicinity of this proposed preferred alternative route. We believe the BLM/Agency thorough review of this project has taken into consideration the most appropriate and relevant factors in determining their preferred alternative route.

C8a

Comment and route preference noted.

Our comments will particularly address the Applicant's Preferred Alternative route in the DEIS:

C8b

- The Sanpete Water Conservancy District (SWCD) has serious concern with the Applicant Preferred Alternative Route (COUT-H) for the Energy Gateway South Transmission Project. SWCD plans to construct a dam and reservoir project known as the Narrows Project. The US Bureau of Reclamation recently issued a Record of Decision which will allow a license agreement to be executed for construction of the dam on Reclamation-administered lands. The planned reservoir is located in Sections 24 and 25, T13S R5E and in Sections 19 and 30, T13S R6E, approximately 7 miles east of Fairview, Utah (see enclosed map). As shown on this map, the Applicant Preferred Alternative Route (COUT-H) passes through the planned Narrows Project recreation area on the northwest shore of the reservoir. This project includes recreation facilities of a camp-ground, picnic sites, and a boat ramp. The Applicant's Preferred route would create a major impact that would detract substantially from the quality of this planned recreation experience. The Bureau of Reclamation projected that the reservoir would receive high use for recreation with an estimated 47,000 visitor-days per year. Preserving the visual quality of this area is a high priority. We concur with SWCD and strongly opposed the corridor alignment through their project area.

C8b

The Narrows Project is considered a past/present project in the cumulative effects analysis in the Final EIS (rather than a reasonably foreseeable future action). This project is discussed in the Authorized Projects portion of Section 3.2.11. Also, the Narrows Project recreation area is discussed in Section 3.2.12.

C8c

- The Narrows Reservoir setting is a highly scenic area, adjacent to the Huntington-Eccles Scenic Byway. Pursuant to 23 US Code Sec. 162 and Utah Code 72-4-303, Highway 31 in Fairview Canyon is designated a National Scenic Byway. A National Scenic Byway deserves protection because of the outstanding scenic, natural, historic, and cultural qualities of the highway. This protection extends to the highway and to adjacent areas. If the Applicant's Preferred route is approved, certainly the intent, letter, and spirit of the National Scenic Byway law will be seriously violated.

C8c

Due to the sensitivity of views from this and other scenic byways, all of these roads were included in the assessment of high concern viewers along with all residences. In regard to the views from the Energy Loop Scenic Byway both in Fairview Canyon and atop the Wasatch Plateau, which are largely intact with few visible modifications, the Project would result in a high level of visual impacts. Based upon these impacts, and other resource effects, this alternative route was not selected as the Agency Preferred Alternative.

Phone 435-835-2141 • Sanpete County Commission • P O Box 100 • Manti, Utah 84642

Comment(s)

Response(s)

C8 Sanpete County Commissioners (cont.)

Energy Gateway South Transmission Project DEIS Comments 2

- C8c

• There is significant pollution of at least two types that would come as a result of the Applicant’s Preferred Alternative route. One is visual pollution: these large towers would become the most prominent feature of our little valley and the sight of them would not be avoidable for miles around. The second is EMF pollution: this effect will be stronger the closer one comes within the range of the lines. Additionally, there will be an effect on all who live in the power line corridor. In a 1984 Supreme Court opinion regarding cell phone towers, Justice Stevens wrote, “The character of the environment affects the quality of life and the value of property in both residential and commercial areas.” These huge transmission lines will certainly destroy the outstanding beauty of Fairview Canyon, the planned Narrows Reservoir, the value of the private property, and the quality of life of those in its path.
- C8d
- C8e

• The Applicant’s Preferred Alternative route progresses down Fairview Canyon an area where it is very rugged and steep. Any construction to erect and support large towers would have a major negative impact on the soil, public access by ATV riders, grazing rights for stockmen, and on the visual beauty of Skyline Drive and Fairview Canyon.
- C8f

• The Applicant’s Preferred Alternative route will have significant impact on the wildlife in this area. We have an abundance of rare and protected species that dwell here such as the spotted frog wildlife preserve which is directly in the path of this project. The Utah Division of Natural Resources has an easement close to the Sanpitch River to protect the spotted frogs. The Applicant’s Preferred Alternative route would cross wet lands close to the Sanpitch River and this easement. Also, the path of migration of other species such as Canadian geese and bald eagles will be impacted or obstructed by this route. Our population of elk and deer that roam and graze in the power lines path will be negatively impacted as well.
- C8g

We wholly support the BLM/Agency Preferred Alternative route. We believe that the BLM and other affected agencies, ie., the Manti-LaSal Forest and Utah Division of Wildlife, have properly evaluated the impacts of all the alternatives. Their Preferred Alternative route would have the least impact on the environment, the affected land owners, our public, and the Narrows Reservoir.

Please consider the great damage the Applicant’s Preferred Alternative route will cause to our way of life in this pristine farming community of Sanpete County.

Sincerely,


Claudia Jarrett


Steve Frischknecht


Scott Bartholomew

Pc BLM State Director Juan Palma
Senator Ralph Okerlund
Representative Jon Cox
Representative Kay McIff

Phone 435-835-2141 • Sanpete County Commission • P O Box 100 • Manti, Utah 84642

- C8d

See responses to Comments C8b and C8c. The Applicant is aware of concerns regarding possible health risks from electromagnetic fields (EMF); however no adverse health effects of EMF are conclusively or consistently identified by scientists. As identified in design features of the Proposed Action for environmental protection (specifically, Design Feature 11; refer to Table 2-8), the Applicant will continue to follow studies performed on EMF research. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization and the International Commission for Non-Ionizing Radiation Protection, for guidance and guidelines regarding EMF. The potential effects of EMF are discussed in greater detail in Section 3.2.23. Potential impacts to visual resources and scenery are discussed in Section 3.2.18. Socioeconomic conditions are discussed in Section 3.2.22.
- C8e

See response to C8c.
- C8f

The two conservation easements located near the Sanpitch River (the Nuttall Farms and Crawford Farms conservation easements) have been incorporated into the Final EIS (refer to Section 3.2.15). Potential impacts on the biological resources that may occur in these conservation easements are discussed in Sections 3.2.7 and 3.2.8.
- C8g

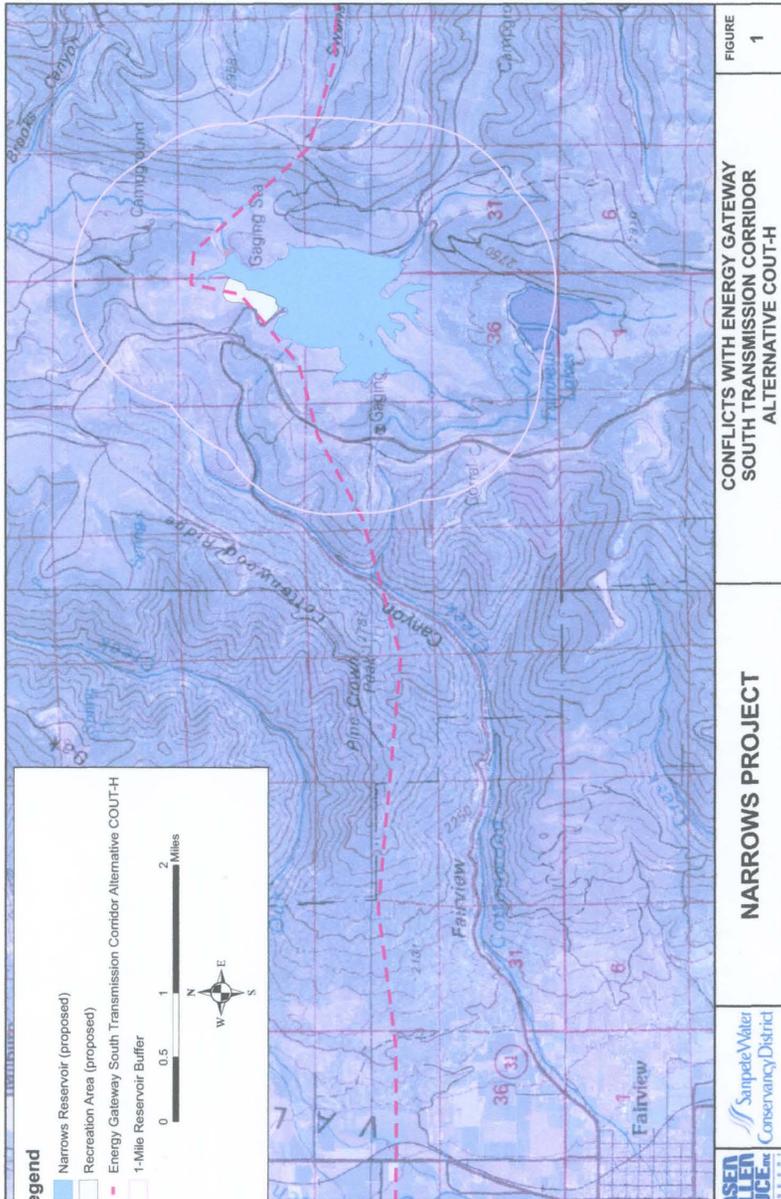
Comment and route preference noted.

Comment(s)

Response(s)

C8

Sanpete County Commissioners (cont.)



Comment(s)

Response(s)

C9 **Sanpete County Public Lands Council**



2014 MAY 13 AM 10:01
 RECEIVED
 DOI-BLM
 CHEYENNE WYOMING

April 23, 2014

Tamara Gertsch
 National Project Manager
 BLM Wyoming State Office
 PO Box 21150
 Cheyenne, WY 82003

Re: ENERGY GATEWAY SOUTH TRANSMISSION PROJECT DEIS

C9a

We strongly encourage the selection of the BLM/Agency Proposed Preferred Alternative route. The BLM/Agency Preferred Alternative route which runs near US 6 to Thistle and then to Salt Creek Canyon has less impact on the planned Narrows Reservoir, forest environment, wildlife, grazers, recreationists, private property owners, and local residents in the vicinity of this proposed preferred alternative route. We believe the BLM/Agency thorough review of this project has taken into consideration the most appropriate and relevant factors in determining their preferred alternative route.

C9a

Comment and route preference noted.

Our comments will particularly address the Applicant's Preferred Alternative route in the DEIS:

C9b

- The Sanpete Water Conservancy District (SWCD) has serious concern with the Applicant Preferred Alternative Route (COUT-H) for the Energy Gateway South Transmission Project. SWCD plans to construct a dam and reservoir project known as the Narrows Project. The US Bureau of Reclamation recently issued a Record of Decision which will allow a license agreement to be executed for construction of the dam on Reclamation-administered lands. The planned reservoir is located in Sections 24 and 25, T13S R5E and in Sections 19 and 30, T13S R6E, approximately 7 miles east of Fairview, Utah (see enclosed map). As shown on this map, the Applicant Preferred Alternative Route (COUT-H) passes through the planned Narrows Project recreation area on the northwest shore of the reservoir. This project includes recreation facilities of a camp-ground, picnic sites, and a boat ramp. The Applicant's Preferred route would create a major impact that would detract substantially from the quality of this planned recreation experience. The Bureau of Reclamation projected that the reservoir would receive high use for recreation with an estimated 47,000 visitor-days per year. Preserving the visual quality of this area is a high priority. We concur with SWCD and strongly opposed the corridor alignment through their project area.

C9b

The Narrows Project is considered a past/present project in the cumulative effects analysis in the Final EIS (rather than a reasonably foreseeable future action). This project is discussed in the Authorized Projects portion of Section 3.2.11. Also, the Narrows Project recreation area is discussed in Section 3.2.12.

C9c

- The Narrows Reservoir setting is a highly scenic area, adjacent to the Huntington-Eccles Scenic Byway. Pursuant to 23 US Code Sec. 162 and Utah Code 72-4-303, Highway 31 in Fairview Canyon is designated a National Scenic Byway. A National Scenic Byway deserves protection because of the outstanding scenic, natural, historic, and cultural qualities of the highway. This protection extends to the highway and to adjacent areas. If the Applicant's Preferred route is approved, certainly the intent, letter, and spirit of the National Scenic Byway law will be seriously violated.

C9c

Due to the sensitivity of views from this and other scenic byways, all of these roads were included in the assessment of high concern viewers along with all residences. In regard to the views from the Energy Loop Scenic Byway both in Fairview Canyon and atop the Wasatch Plateau, which are largely intact with few visible modifications, the Project would result in a high level of visual impacts. Based upon these impacts, and other resource effects, this alternative route was not selected as the Agency Preferred Alternative.

Comment(s)

Response(s)

C9 Sanpete County Public Lands Council (cont.)



C9c

- There is significant pollution of at least two types that would come as a result of the Applicant's Preferred Alternative route. One is visual pollution: these large towers would become the most prominent feature of our little valley and the sight of them would not be avoidable for miles around. The second is EMF pollution: this effect will be stronger the closer one comes within the range of the lines. Additionally, there will be an effect on all who live in the power line corridor. In a 1984 Supreme Court opinion regarding cell phone towers, Justice Stevens wrote, "The character of the environment affects the quality of life and the value of property in both residential and commercial areas." These huge transmission lines will certainly destroy the outstanding beauty of Fairview Canyon, the planned Narrows Reservoir, the value of the private property, and the quality of life of those in its path.

C9d

- The Applicant's Preferred Alternative route progresses down Fairview Canyon an area where it is very rugged and steep. Any construction to erect and support large towers would have a major negative impact on the soil, public access by ATV riders, grazing rights for stockmen, and on the visual beauty of Skyline Drive and Fairview Canyon.

C9e

- The Applicant's Preferred Alternative route will have significant impact on the wildlife in this area. We have an abundance of rare and protected species that dwell here such as the spotted frog wildlife preserve which is directly in the path of this project. The Utah Division of Natural Resources has an easement close to the Sanpitch River to protect the spotted frogs. The Applicant's Preferred Alternative route would cross wet lands close to the Sanpitch River and this easement. Also, the path of migration of other species such as Canadian geese and bald eagles will be impacted or obstructed by this route. Our population of elk and deer that roam and graze in the power lines path will be negatively impacted as well.

C9f

We wholly support the BLM/Agency Preferred Alternative route. We believe that the BLM and other affected agencies, ie., the Manti-LaSal Forest and Utah Division of Wildlife, have properly evaluated the impacts of all the alternatives. Their Preferred Alternative route would have the least impact on the environment, the affected land owners, our public, and the Narrows Reservoir.

C9g

Please consider the great damage the Applicant's Preferred Alternative route will cause to our way of life in this pristine farming community of Sanpete County.

Sincerely,

Keith Jensen
Chair, Sanpete County Public Lands Council

C9d

The Applicant is aware of concerns regarding possible health risks from EMF; however no adverse health effects of EMF are conclusively or consistently identified by scientists. As identified in design features of the Proposed Action for environmental protection (specifically, Design Feature 11; refer to Table 2-8), the Applicant will continue to follow studies performed on EMF research. The Applicant relies on the findings and conclusions of public health specialists and international scientific organizations, such as the World Health Organization and the International Commission for Non-Ionizing Radiation Protection, for guidance and guidelines regarding EMF. The potential effects of EMF are discussed in greater detail in Section 3.2.23. Potential impacts to visual resources and scenery are discussed in Section 3.2.18 and socioeconomic conditions are discussed in Section 3.2.22.

C9e

Comment and route preference noted. See responses to Comments C9b through C9d.

C9f

Additional information regarding conservation agreements for Columbia spotted frog have been incorporated into Section 3.2.10.4 and Appendix J of the Final EIS. Preconstruction surveys would be conducted for sensitive species to identify locations where relevant selective mitigation measures and design features would be applied. Impacts on migratory birds are discussed in Section 3.2.9 and would also be reduced through the application of relevant design features and selective mitigation measures.

C9g

Comment and route preference noted.

Comment(s)

Response(s)

C10 **Sanpete County Zoning Administration**



**ENERGY GATEWAY SOUTH TRANSMISSION PROJECT
DRAFT EIS AND LAND-USE PLAN AMENDMENTS
Comment Form**

If you wish to submit comments, please feel free to use this form or other correspondence and hand it in at an open house or mail it to the following address.

Attn: Tamara Gertsch
Bureau of Land Management
BLM Wyoming State Office
P.O. Box 21150
Cheyenne, WY 82003

Or you can submit comments via email to GatewaySouth_WYMail@blm.gov

Please Print Clearly

Name: Scott Olson Date: 3/19/14
 Title: Zoning Admin Organization that you represent: Sanpete County Self
 Mailing address: P.O. Box 286 City: Mant State: Ut Zip: 8461
 Telephone (optional): 435-835-2113

Comments: *(Please use back if additional space is needed)*

at the top of fairview canyon moving the
 alternative route to the north & west of the
 highways thus not crossing the 3 highways
 & also would be less visually inhibiting
 up & down the main canyon road.

Thanks Scott

Please add me to the mailing list for preparation of this environmental impact statement

Please Note:
 Comments are due by May 22, 2014
 Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you may request in your comment that your personal identifying information be withheld from public review, BLM cannot guarantee that it will be able to do so.

C10a

C10a

The effect on views resulting from the Project at each of these three highway crossings were documented using visual contrast rating worksheets (refer to in Appendix M; KOPs #260, #283, and #284). Please note two of these three KOP locations have visual simulations developed showing the impact on views (also in Appendix M).

Locating the transmission line farther to the north and west of these highway crossings would increase impacts on the Skyline Drive Scenic Backway (including the kiosk and parking area) and the Oak Creek Inventoried Roadless Area (IRA). Due to steep slopes on the north side of Fairview Canyon, the transmission line would need to be sited on Cottonwood Ridge, which would introduce views of skylined transmission structures on views from both the highway as well as those from the IRA. Locating the transmission line even farther to the north, to screen views from the highway, would further impact the roadless attributes and wilderness characteristics in the IRA.

Comment(s)

Response(s)

C11	Sanpete Water Conservancy District
------------	---



90 West Union Street
 Manti, Utah 84642
 435/835-5671
 435/835-5678 fax

April 11, 2014

Tamara Gertsch
 National Project Manager
 BLM Wyoming State Office
 P.O. Box 21150
 Cheyenne, Wyoming 82003

Re: Energy Gateway South Transmission Project Draft EIS

Dear Ms. Gertsch :

The Sanpete Water Conservancy District (SWCD) has serious concerns with Applicant Preferred Alternative Route (COUT-H) for the Energy Gateway South Transmission Project. SWCD plans to construct a dam and reservoir project known as the Narrows Project. The U.S. Bureau of Reclamation recently issued a Record of Decision which will allow a license agreement to be executed for construction of the dam on Reclamation-administered lands. The proposed reservoir is located in Sections 24 and 25, T13S R5E and in Sections 19 and 30, T13S R6E, approximately 7 miles east of Fairview, Utah (see enclosed map).

In addition to the reservoir, the project plan also includes development of a public recreation area on the northwest shore of the reservoir. The recreation facilities will include a camp-ground, picnic sites, and a boat ramp. The reservoir setting is a highly scenic area, adjacent to the Huntington-Eccles Scenic Byway. This beautiful area is a high-demand area for recreationists. Reclamation projects that the reservoir will receive high use for recreation with an estimated 47,000 visitor-days per year. Preserving the visual quality of this area is a high priority.

As shown on the attached map, the Applicant Preferred Alternative Route (COUT-H) passes through the proposed Narrows Project recreation area. This would create a major impact that would detract substantially from the quality of the planned recreation experience. **SWCD strongly opposes the corridor alignment through our project area.** Consequently, SWCD

C11a

C11a

The Narrows Project is considered a past/present project in the cumulative effects analysis in the Final EIS (rather than a reasonably foreseeable future action). This project is discussed in the Authorized Projects portion of Section 3.2.11. Also, the Narrows Project recreation area is discussed in Section 3.2.12.

Comment(s)

Response(s)

C11 Sanpete Water Conservancy District (cont.)

C11b

favors the Agency Preferred Alternative, which avoids our project area altogether. However, if the Applicant Preferred Alternative is selected, we believe that the alignment must be modified. In order to avoid impacts to our project, we recommend a buffer around the reservoir of at least one mile (preferably two miles). The one-mile buffer is shown on the attached map.

Thank you for your consideration of SWCD's concerns.

Sincerely,



Edwin B. Sunderland
Chairman

Enclosure

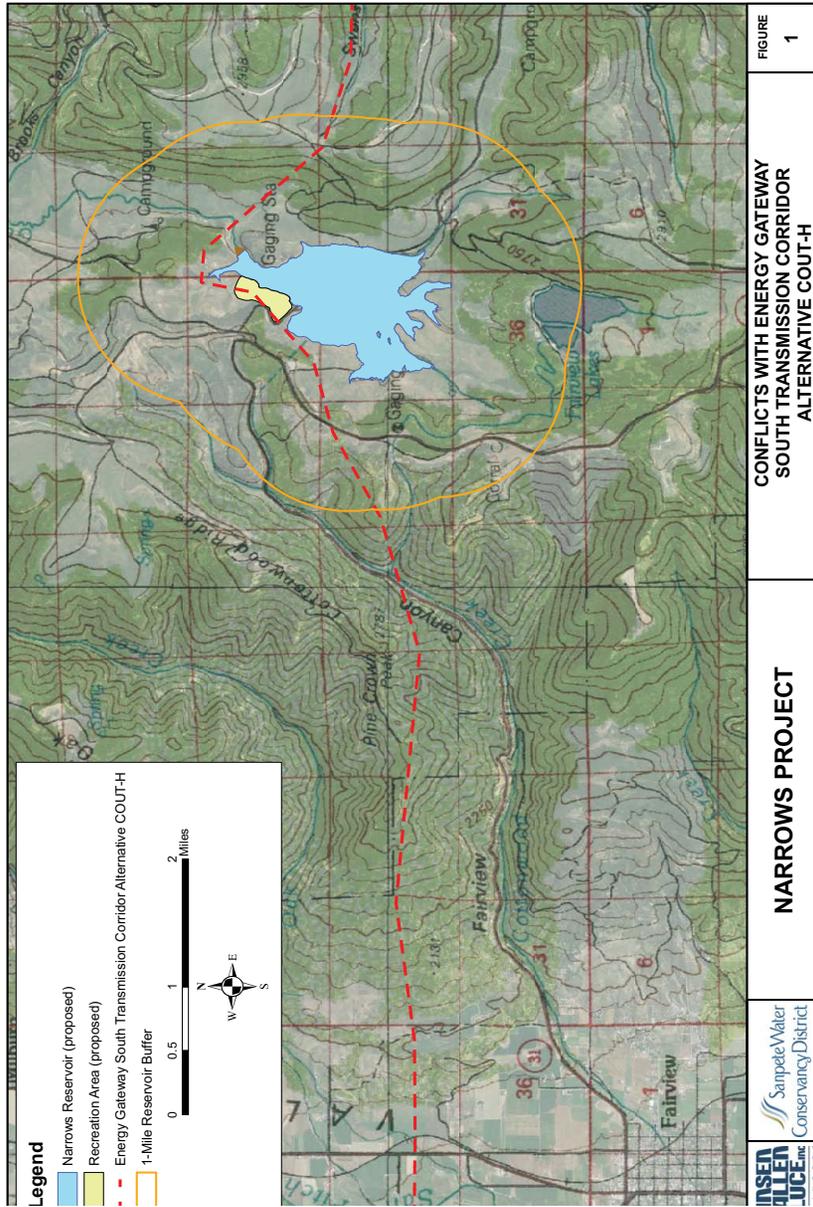
C11b

Comment and route preference noted.

Comment(s)

Response(s)

C11 Sanpete Water Conservancy District (cont.)



Comment(s)

Response(s)

C12 **Sweetwater County Commissioners**

BOARD OF COUNTY COMMISSIONERS



80 WEST FLAMING GORGE WAY, SUITE 109
GREEN RIVER, WY 82935
PHONE: (307) 872-3890
FAX: (307) 872-3992

- o WALLY J. JOHNSON, CHAIRMAN
- o JOHN K. KOLB, COMMISSIONER
- o GARY BAILIFF, COMMISSIONER
- o REID O. WEST, COMMISSIONER
- o DON VAN MATRE, COMMISSIONER

Wednesday, May 7, 2014

Tamara J. Gertsch, National Project Manager
BLM Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009
tgertsch@blm.gov

Amanda Pryor - O'Conner
EPG
208 East 800 South
Salt Lake City, UT 84111
aoconnor@epgz.com

RE: Sweetwater County, Wyoming comments regarding the Gateway South Transmission Line Project - Draft Environmental Impact Statement and Land Use Plan Amendments.

Dear Ms. Gertsch and Ms. Pryor-O'Conner

Sweetwater County would like to thank the BLM and EPG for the opportunity to comment on the Gateway South Transmission Line Project - Draft Environmental Impact Statement and Land Use Plan Amendments (DEIS-LUPA). The following provides Sweetwater County comments regarding the DEIS-LUPA:

Sweetwater County Preferred Alternative Route: The Sweetwater County preferred Alternative Route for the Gateway South Transmission line is the same as the Applicant and the Agency Preferred Alternative (Alternative WYCO-B on Map 2-2a on Page 2-105 of the DEIS-LUPA). This alternative is the Sweetwater County preferred route because it is the route that has been agreed upon by Carbon, Moffat and Sweetwater Counties. As they are applied to Wyoming, the slight variations, between the BLM and the Applicant Preferred Routes described on Page 2-109 – Section 2.5.2.1 of the DEIS-LUPA, are acceptable to Sweetwater County.

Alternative Route WYCO - C: Due to its close proximity to Adobe Town, Willow Creek Rim, Powder Mountain and a major underground pipeline corridor, Sweetwater County does not support Alternative Route WYCO - C shown on Map 2-2a on Page 2-105 of the DEIS-LUPA. This position is supported by the BLM Rawlins Field Office Visual Resource Inventory (VRI) that rates the visual sensitivity for Alternative WYCO - C as VRI Class II and Class III. It is also supported by the Rawlins RMP that designates an underground utility (pipeline) corridor in the same location as Alternative WYCO-C.

Since Sweetwater County has submitted its TransWest Express DEIS comments and since both TransWest and Gateway South utilize the same alternative routes within Wyoming, it is the desire of Sweetwater County to ensure consistency between its comments for both projects. To provide this consistency, Sweetwater County suggests that the BLM utilize the visual resource analysis provided by the TransWest DEIS in addition to the visual resource analysis that has been provided for the Gateway South DEIS. Also, as Sweetwater County stated in its Gateway South ADEIS#1 and #2 comment letters, the County encourages the BLM to prominently include, in the Gateway South EIS, the visual resource inventory maps used in the TransWest analysis.

C12a

C12a

The visual resource analysis conducted for the Project is based on the Project design (i.e., Project description) and issues identified during scoping. Maps depicting the BLM visual resource inventory (e.g., scenic quality rating units, sensitivity level rating units, distance zones, and visual resource inventory classes) are included in Chapter 3 (within the visual resource section) of the Draft EIS and Final EIS, as requested by cooperating agencies, including Sweetwater County, in comments on the first administrative Draft EIS.

Comment(s)

Response(s)

C12 Sweetwater County Commissioners (cont.)

Protection of Natural Features: The Sweetwater County Comprehensive Plan - 2002 calls for Sweetwater County to: "Recognize and protect the County's unique cultural, recreational, environmental and historic resources." To meet the intent of this goal, Sweetwater County encourages the BLM to select a preferred alternative route that avoids or minimizes impacts to the following features: Adobe Town, Haystacks, Willow Creek Rim, Powder Mountain and the Overland and Cherokee Trails.

Wildlife: Sweetwater County supports the State of Wyoming Sage Grouse Core Area Program and appreciates efforts by Gateway South to comply with this program.

Transportation Planning: To limit the amount of vegetation and ground disturbance, Sweetwater County encourages Gateway South to work with public and private land managers to coordinate transportation routes, construction yards and material storage areas with other neighboring and simultaneously occurring projects. For example, if the TransWest Project finalizes construction within the same time frame as the startup of the Gateway South project, it may be feasible for Gateway South to utilize some of the same construction yards and transportation routes as utilized by TransWest. This would not only limit the amount of new disturbance, but it could also foster the coordination of reclamation efforts.

Municipalities and Incorporated Communities: Within Sweetwater County, the municipalities that will potentially receive direct and cumulative socio-economic impacts from the project include the Cities of Rock Springs and Green River and the Towns of Wamsutter, Superior and Granger. The county unincorporated communities that may be impacted include: Point of Rocks, Farson and the population centers surrounding the Cities of Green River and Rock Springs. Sweetwater County encourages Gateway South, the BLM and the State of Wyoming to work with these communities to ensure that they have sufficient resources to address potential socio-economic impacts.

Cumulative Impacts: It is important to emphasize that Sweetwater County supports the Gateway South Project. To ensure that the project addresses the ability of our communities to absorb socio-economic impacts, Sweetwater County encourages Gateway South, the BLM and the State of Wyoming to carefully inventory the socio-economic impacts of all the industrial projects that are planned during the construction phase of the Gateway South Project.

Some of the potential projects that may begin during the Gateway South construction time frame include: Gateway West and TransWest Transmission Line Projects, Chokecherry/Sierra Madre Wind Energy Project, multiple oil and gas expansion projects like NPL, Moxa Arch, Hiawatha, Continental Divide, La Barge Platform, and industrial developments including the Simplot Ammonia Plant, FMC Granger Optimization Project and Jim Bridger Power Plant air quality modifications.

Even though it is uncertain how many projects will be constructed simultaneously with the Gateway South Project, it is essential for all involved to carefully monitor the cumulative socio-economic impacts of these projects and be prepared to implement a plan that has the financial backing to address any potential community impacts. Impacts that are of concern to Sweetwater County include fire protection, law enforcement, housing, schools, roadways and other community services.

Additional Social and Economic Mitigation Measures: To encourage consistency between the TransWest and Gateway South NEPA documents and to ensure that socio-economic impacts are uniformly addressed, Sweetwater County requests that the BLM add to the Social and Economic Conditions Section of Chapter 3 of the Gateway South EIS - LUPA a section entitled "Additional Mitigation". This Section would contain the same stipulations that are listed on pages 3.17-23 and 3.17-24 of the TransWest DEIS. These "Additional Mitigation" measures, found in the TransWest DEIS, include: 1) Developing a proactive housing plan in conjunction with the Wyoming Industrial Siting

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Comment forwarded to the Applicant for consideration.

The effects of construction workforce on housing and public services in communities near the transmission line have been added to the analysis in Section 3.2.19.2.

Comment forwarded to the Applicant for consideration.

Comment forwarded to the Applicant for consideration.

Comment(s)

Response(s)

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Sweetwater County Commissioners (cont.)

Council and local officials; 2) Encouraging contractors to support local sales and use taxes by purchasing supplies locally and delivering freight FOB within the counties where it will be utilized; and 3) Conducting annual coordination meetings to ensure that local needs and services are addressed. Sweetwater County believes that these measures, if implemented by both Gateway South and TransWest, will help address potential socio-economic impacts.

Permitting on Private and Public Lands: Depending on the Alternative Route selected for this project, the proposed transmission line may cross many miles of public and private checkerboard ownership within Sweetwater County. Considering this, the County encourages the BLM to support Federal, State and County governments in applying their permitting processes to the entire project area including both public and private checkerboard lands. This will ensure that federal, state and county regulations are applied in a uniform manner across ownership eliminating confusion in the permitting process. If there are questions regarding Sweetwater County permitting requirements, please contact Eric Bingham, Land Use Director, at 307-872-3916 for land use issues, and John Radosevich, Public Works Director, for county road issues, at 307-872-3921.

Sweetwater County Comprehensive Plan The Sweetwater County Comprehensive Plan goals listed on page 1-22 of the DEIS are relevant to the Gateway South Project and are consistent with the Sweetwater County 2002 Comprehensive Plan.

Again, thank you for the opportunity to comment on the Gateway South Transmission Line Project DEIS-LUPA. Sweetwater County strongly supports this project, and, if you have any questions concerning this letter, please contact me at 307-872-3897.

Sincerely,



Wally J. Johnson, Chairman
Sweetwater County Board of County Commissioners

- cc Jerimiah Rieman, Natural Resource Advisor, Governor's Office
- Colin McKee, Policy Analyst, Governor's Office
- Don Simpson, BLM, Wyoming State Director
- Sharon Knowlton, BLM, Project Manager, TransWest
- Dennis Carpenter, Manager, BLM Rawlins Field Office
- Mark Storzer, Manager, BLM, High Desert District
- Sweetwater County Board of County Commissioners
- Carbon County Board of County Commissioners
- Moffat County Board of County Commissioners
- Gregory Cowan, Attorney, Wyoming County Commissioner Association
- Eric Bingham, Sweetwater County Land Use Director
- Mary Thoman, President, Sweetwater County Conservation District
- Connie Brooks, Attorney, Coalition of Local Governments
- Kent Connelly, President, Coalition of Local Governments
- John Radosevich, Sweetwater County Public Works Director

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Comment noted.

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