

Exhibit P6
Corporations

Comment(s)

Response(s)

CP1	Anadarko Petroleum Corporation
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From: **Hitt, Tammi** <Tammi.Hitt@anadarko.com>
Date: Fri, May 16, 2014 at 11:32 AM
Subject: Energy Gateway South Transmission Project DEIS Comments from Anadarko
To: "BLM_WY_GatewaySouth@blm.gov" <BLM_WY_GatewaySouth@blm.gov>

Good morning:

Anadarko Petroleum Corporation (Anadarko) values the opportunity to respond to the Feb. 21, 2014 Federal Register Notice of Availability for the Draft Environmental Impact Statement (DEIS) and potential Resource Management Plan amendments for the proposed Energy Gateway South Transmission Project (Project). Our comments are attached.

Please contact me if you have any questions.

Tammi Hitt
Senior Regulatory Analyst
Anadarko E&P Onshore LLC

1400 E. Lincoln * Gillette, WY 82716

Office 307-670-6032 * Cell 307-682-4502 * Fax 832-636-5949



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Comment(s)

Response(s)

CP1 **Anadarko Petroleum Corporation (cont.)**

ANADARKO PETROLEUM CORPORATION

1400 E LINCOLN - GILLETTE WYOMING - 82716



May 13, 2014

Tamara Gertsch
National Project Manager
Bureau of Land Management
Wyoming State Office
P.O. Box 21150
Cheyenne, WY 82003

VIA EMAIL AND UPS OVERNIGHT

RE: Notice of Availability of the Draft Environmental Impact Statement and Land-Use Plan Amendments for the Energy Gateway South Transmission Project in Wyoming, Colorado, and Utah, 79 Fed. Reg. 9916 (February 21, 2014)

Dear Ms. Gertsch:

Pursuant to the Bureau of Land Management’s (BLM’s) February 21, 2014 Notice of Availability of the Draft Environmental Impact Statement (DEIS) and Land-Use Plan Amendments for the Energy Gateway South Transmission Project (Project) in Wyoming, Colorado, and Utah¹. Anadarko Petroleum Corporation (Anadarko) respectfully submits this letter containing pertinent information that should be considered in any decision or evaluation regarding the Project.

Anadarko owns significant surface and mineral interests in the land grant “checkerboard” which is almost 700 miles long and 40 miles wide and where every other section is managed either by the BLM or private interests. BLM authorizations for the Project in the checkerboard will impact Anadarko’s current and prospective uses of its surface and subsurface properties. A key component of the Project will be grants of rights-of-way (ROWs) that may impact mineral interests and lease interests. Specifically, within Wyoming, the Project footprint encompasses portions of lands (surface and mineral) owned by either Anadarko or one of its subsidiaries and has the potential to substantially affect ongoing operations and prospective development of oil and natural gas and other mineral resources such as coal and oil shale. In Utah and Colorado, minerals owned or leased by Anadarko or a subsidiary underlay segments of proposed transmission routes.

CP1a

Within the Project area involving the checkerboard lands, Anadarko and other private land owners own 54percent of the land. To break down ownership/management interests, within the land grant checkerboard the BLM manages 43 percent of the surface, state agencies manage three percent, and private owners, primarily Anadarko, manage the remaining 54 percent. Within the checkerboard lands, the Project area encompasses portions of the Great Divide Basin, Kindt Basin as well as the Hanna Basin. These areas are highly prospective for, among other minerals, coal. Anadarko has coal projects in the Hanna Basin including Freezeout, Cyprus-Shoshone, Semioe I and II, Rosebud, Vanguard and Hanna coal projects. These projects contain several million tons of coal resources. To the west, in the Kindt and Great Divide Basins, Anadarko’s coal projects include Severson, Bolten Ranch, Cherokee, Creston, China Butte, Juniper, Atlantic Rim, and Red Desert. Within these areas are several hundred million tons of additional coal resources owned and leased by Anadarko.

CP1b

¹ On February 21, 2013 the BLM announced the notice of availability of the DEIS and Land-Use Plan Amendments for the Energy Gateway South Transmission Project in Wyoming, Colorado, and Utah to allow public comment (79 Fed. Reg. 9916; February 21, 2014).

CP1a

The Bureau of Land Management (BLM) would issue a 250-foot-wide right-of-way grant across the lands it administers that is consistent with applicable regulations, recognizing that PacifiCorp, doing business as Rocky Mountain Power (Applicant), must acquire all access permissions for lands outside of their jurisdiction. It is expected that the Applicant would resolve conflicts with regard to mineral ownership and access along the selected route, including any compensation for economic impacts on leaseholders, etc., through fee mineral and landowner agreements and permissions. Also, 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, BLM expects 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, and notes 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.

CP1b

In accordance with National Environmental Policy Act, the potential impacts of a federal action on a particular resource or resource use are analyzed and reported similarly for all jurisdictions. An assumption for analysis inherent in the approach to analysis of potential impacts on oil and gas and other mineral resources is that all leases are (or would become) producing wells. BLM believes 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.

Comment(s)

Response(s)

CP1 Anadarko Petroleum Corporation (cont.)

CP1c

Anadarko comments that the BLM's ROWs or other authorizations should not occur prior to completion of fee mineral and surface owner access agreements as such action by the BLM would negatively impact private ownership interests on lands intertwined with the BLM managed lands. Because of this, all ROWs granted by the BLM should be subject to existing mineral and lease rights and conditioned that the transmission line will have to be relocated or the mineral interest owner paid fair market value of the minerals it cannot access due to placement of the line. Indeed, the BLM is required under the Federal Land Policy and Management Act of 1976 (FLPMA) to manage its lands for multi-use that preserves present and future interests for the most productive uses of the lands in a harmonious and coordinated manner. 43 U.S.C.A. § 1701 *et seq.*

CP1c

See response to Comment CP1a and CP1b.

CP1d

Given past development trends and rapid advances in mining technologies, as evidenced by recent shale plays around the country, siting of the transmission line should not unreasonably limit or impact Anadarko's legal right to develop its minerals, especially coal, oil and natural gas. The BLM must consider the potential value of these mineral resources that could be lost or made inaccessible by the proposed Project.

Transmission lines prohibit development of all coal or other minerals directly beneath their respective ROWs. Due to safety reasons, there could be no mining directly beneath the lands covered by the transmission lines and on those lands within a certain distance of the ROW, sterilizing even more mineral resources. Often, blasting activities are required to produce coal and other minerals. However, blasting would not be able to occur under or near the transmission lines further severing Anadarko's access to its coal resources. If the ROW cuts through the middle of a mine site, it may sever mine operations thus increasing mining costs. For underground mines, the Project would sterilize the coal directly beneath the towers as well as a distance laterally. Therefore, an un-mined column must be left in place that is larger than the actual footprint of the tower. If mining were to occur via longwall methods, mine operators would likely be unable to leave columns beneath towers. Additionally, due to the nature of longwall mining, the ground would likely experience subsidence. Given this, longwall mining, a sometimes more cost effective mining method, would be impossible in the vicinity of the Project. The BLM must fully take into consideration the economic loss the Project would have on the fee mineral holdings within the checkerboard given the likelihood that these holdings would be used for energy projects during the life of the Project.

CP1d

See response to Comment CP1a

CP1e

The BLM must consider the economic costs to fee mineral and federal lease interest holders should the Project prohibit development of such minerals. To that end, additional information is needed regarding the economic impact resulting from the loss of opportunity to develop fee minerals caused by the Project. Selective Mitigation Measure 7 (MM-7), defined as "to span or avoid sensitive features", states that, "tower structures would be located so as to span active mines and producing oil, gas, or geothermal wells to limit conflicts with access to, or expansion of, these sites, where practicable" (DEIS 3-70). The DEIS acknowledges potential impacts including "loss of mineral resources caused by construction activities," and "limit[ation] and/or prevent[ion of] existing and/or future development and extraction of mineral resources resulting from the presence of permanent facilities" (DEIS 3-685). The DEIS further states, "In the event mineral extraction operations cannot be avoided during siting and final engineering, the Applicant will compensate lease holders. In an instance where the Project could not avoid a mineral extraction operation, a mineral entry would take precedence over other land uses. The granting of a utility right-of-way would not overrule the mineral owners' right to develop and extract minerals within the right-of-way identified."

CP1e

See response to Comment CP1d.

CP1f

Anadarko requests MM-7 be made a condition of approval for the Project and furthermore, it should clearly state the compensation to leaseholders should apply to all potentially recoverable minerals on federal, state and fee mineral resources and not just current mine operators. Resolution of private property mineral and access agreements should also be completed prior to authorizing the BLM ROWs. Alternatively, the ROW grant should be conditioned to require the resolution of private property mineral and access agreements prior to initiation of construction activities. Anadarko also requests the length of each segment that crosses mineral resources be quantified in the Summary of Residual Impacts.

CP1f

See response to Comment CP1d.

Comment(s)

Response(s)

CP1 Anadarko Petroleum Corporation (cont.)

In summary Anadarko comments that:

CP1g

CP1h

CP1i

CP1j

CP1k

CP1l

CP1m

1. The BLM fully consider requiring shared infrastructure, where feasible, resulting in co-locating transmission lines on common towers/structures. This consideration should include the proposed Gateway West, Gateway South and TransWest Express Transmission Lines.
2. The Project parallel existing transmission line corridors through the checkerboard lands.
3. The BLM site the transmission line corridors in compliance with FLPMA.
4. Construction of two parallel single-circuit lines should not be authorized due to the increased disturbance. A single structure should be used for these lines.
5. The BLM address the steps it will take to preserve Anadarko's ability to access to its coal, oil and natural gas resources and other surface and mineral resources. This should include requirements to relocate transmission lines and towers and/or subside the surface if necessary.
6. The Project follow established energy corridors.
7. The BLM address, and provide the opportunity for public comment on draft language for the analysis regarding the circumstances under which private lands would be condemned, and what the effect would be.
8. Economic impact to federal, state and local taxes (ad valorem and severance) that results from loss of fee, coal, oil and natural gas production due to the Project be disclosed.
9. Mitigation measure MM-7 is made a condition of approval for the ROW and that the language is expanded to include all potentially recoverable minerals on federal, state and fee mineral resources.
10. The BLM list the length of mineral resources crossed by each segment in the Summary of Residual Impacts.
11. The BLM require resolution of private property mineral and access agreements prior to authorizing the BLM ROWs. Alternatively, the ROW grant should be conditioned to require the resolution of private property mineral and access agreements prior to initiation of construction activities.
12. A minimum 300' should be required between existing wells and transmission lines to prevent conductance between the transmission lines and any drilling rig or flare stack needed at the well location.

Anadarko appreciates this opportunity to offer comments and seeks to work with the BLM and the Proponent to maintain reasonable access to its valuable resources. Should you require more information please contact me.

Sincerely,

Tammi Hitt
Senior Regulatory Analyst

CP1g

See responses to Comments CP1a through CP1f.

An additional section has been included in Section 3.2.22.5.2 (Impacts Common to All Alternatives) that will describe the impacts to private property. It will include the following discussion:

Short-term impacts on nearby residents and properties as a result of the Energy Gateway South Transmission Project (Project) would include short-term disruptions during construction. These would include increased noise from construction activities and equipment, the visual presence of construction equipment, and potential traffic and congestion resulting from construction trucks and equipment accessing the right-of-way, use of local roads, and potential short-term road closures during conductor stringing. Long-term impacts on nearby residents as a result of operation of the Project would include low, infrequent disturbance during any maintenance or repair activities (property values are discussed in the subsequent section).

CP1h

New right-of-ways for the construction and maintenance of the new transmission line would be required for the Project. Existing access roads would be used where possible, but additional access road easements would also need to be acquired. The Applicant would pay market value to nonfederal landowners, as established through the appraisal process, for any new land rights required for this Project. The appraisal process takes all factors affecting value into consideration, including the impact of transmission lines on property value. The Applicant would also compensate landowners for any lost agricultural values.

The appraisals may reference studies conducted on similar properties to support their conclusions. The strength of any appraisal depends on the individual analysis of the property, using neighborhood-specific market data to determine market value. The easements required may encumber the right-of-way area with land-use limitations. Each transmission line easement will specify the present and future right to clear the right-of-way and to keep it clear of all trees, whether natural or cultivated, and all structure-supported crops, other structures, trees, brush, vegetation, fire and electrical hazards.

CP1i

See response to Comment CP1e.

CP1j

See response to Comment CP1a.

CP1k

See next page for response to Comment CP1k.

CP1l

See next page for response to Comment CP1c.

CP1m

See next page for response to Comment CP1m.

Comment(s)

Response(s)

CP1	Anadarko Petroleum Corporation (cont.)
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CP1k This information is presented in Tables 3-30, 3-31, and 3-32, the alternative route comparisons of earth resources inventory and residual impacts. This information has also been included in Table S-3a in the Summary.

CP1m The Applicant will study and take into account all alternating current (AC) interferences and coordinate and consult with affected existing infrastructure. Final transmission line design, construction, and mitigations will comply with all National Electrical Safety Code requirements.

Comment(s)

Response(s)

CP2 **Fairview Land and Livestock Company**



**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
(307) 775 6115

2014 APR 18 AM 10:01

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

Please Print Clearly

Name: *Jack McAllister* Date: *4-7-2014*
 Title: *President* Organization that you represent: *Fairview Land & Livestock Co* Self
 Mailing address: *138 W 400 N* City: *Mt. Pleasant* State: *Ut* Zip: *84647*
 Telephone (optional): _____

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

dated 4-2-2014
 Supplemental comments to prior comments
 Pursuant to 23 US Code Sec 162 and
 Utah code 72-4-303, Highway 31 in Fairview
 Canyon, Sanpete County, Utah, is designated
 a National Scenic Byway. A National
 Scenic Byway deserves protection because of
 outstanding scenic, natural, historic and
 cultural qualities. The protection extends
 to the Highway and to adjacent areas.
 If either the Gateway South or Transwest
 Express Transmission lines is approved for
 Fairview Canyon, certainly the intent, letter, and
 spirit of the National Scenic Byway Law
 will be seriously violated.

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.

CP2a

CP2a

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. In regard to the views from the Energy Loop Scenic Byway in Fairview Canyon, which are largely intact with few visible modifications, the Project would result in a high level of visual impacts. Based on these impacts, and other resource effects, this alternative route was not selected as the Agency Preferred Alternative.

Comment(s)

Response(s)

CP2 Fairview Land and Livestock Company (cont.)

CP2b

In a 1984 Supreme Court opinion regarding cellphone 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."

CP2c

If a cellphone tower affects quality of life, the huge transmission line and towers certainly will destroy the outstanding beauty and other qualities of Fairview Canyon. The Fairview Canyon route is ill conceived from a construction point of view. Additionally, there will be scarring, erosion and vehicle abuse among other serious problems affecting the canyon.

We support and encourage the lead agency (BLM) to select the preferred route for the important reason that the BLM route respects and preserves the choice of local citizens, authorities and the state legislature to designate State Highway 31 and adjacent areas as a National Scenic Byway, with its protection of the important qualities found in Fairview Canyon.

*Jack McAllister
Mt. Pleasant UT*

CP2b

As described in the Impacts to Property Values section of Section 3.2.22, property values can be affected by transmission lines, depending on the proximity of the transmission line to structures, the surrounding topography, and the existence of landscaping and other vegetation. There are 10 residences north of Fairview, Utah, located within 0.25 mile of Alternatives COUT BAX-E and COUT H, which are likely to be affected by the proximity of the transmission line.

Furthermore, all residences were included in the analysis of high concern views. In locations where the Project would dominate a natural setting, high impacts on those views were described in Section 3.2.18 and mapped on MV-21b in the Map Volume (MV) of the Final Environmental Impact Statement (EIS). Impacts on the natural character of Fairview Canyon are also discussed in Section 3.2.18 and mapped on MV-23b. Based on these impacts, and other resource effects, these alternative routes were not selected as the Agency Preferred Alternative.

CP2c

It is possible that construction of the Project could increase susceptibility to geological hazards in some areas (e.g., in areas with slumps and flows). Thus, avoidance of geologic hazards and engineering constraints criteria were applied in the Applicant's identification of feasible corridors for the siting and construction of transmission lines as part of the design features of the Proposed Action. Potential impacts on the Project resulting from geological hazards are discussed in detail in Section 3.2.2.5. In the analysis, the area around Fairview Canyon was assessed in the EIS as having high susceptibility for landslides.

Selective Mitigation Measure 5 (minimize new or improved accessibility, Chapter 2, Table 2-13) is applied in areas that have been identified as sensitive to unintended use (all-terrain vehicles), which would be carried forward into the Plan of Development. The Applicant is committed to work with agencies and landowners, through development of the Plan of Development and during implementation and operation of the transmission line. Coordination to limit potential for unauthorized use would occur throughout the life of the Project.

Additionally, design features of the Proposed Action for environmental protection and selective mitigation measures are designed and applied to reduce potential impacts from the Project on recreation resources, grazing uses, and visual resources. Refer to Chapter 2 for a comprehensive list of the design features that will be used for the entire Project and the selective mitigation measures that will be used in specific areas along the Project. See also the response to Comment CP2a and CP2b.

Comment(s)

Response(s)

CP3	Hopcreek Hideaway LLC
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On Fri, Feb 28, 2014 at 10:23 AM, Andy Anderson <andyanderson@utah.gov> wrote:

CP3a

I have a camp ground located East of Nephi Utah in Salt Creek Canyon. I cannot support the location of the proposed route if it comes near my camp ground. I can not access your web site to verify the location. I would like you to send me a more detailed map of the area at MP 40 on SR

CP3b

132. I am opposed to any lines on mt property.

Thanks Andy Anderson
Hopcreek Hideaway LLC.

CP3a

Comment noted. The Project would avoid crossing the campground by passing to the north, approximately 350 feet from the campground.

CP3b

Comment noted. For a more detailed view of where the Project may cross your area of interest, the Applicant landowner parcel map can be accessed at http://gis.paragon-partners.com/FlexMaps/GWS_Website/. This map allows users to zoom into locations and see where Project alternative routes and route variations may cross the user's area of interest.

Comment(s)

Response(s)

CP4 Church of Jesus Christ of Latter-day Saints

*mailed post-
5/22/14 marked*

Thomas K. Checketts
tchecketts@kmcclaw.com
801.321.4847

KIRTON | M'CONKIE

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May 22, 2014

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Energy Gateway South Project
Bureau of Land Management
Attn: Tamara Gertsch
P.O. Box 21150
Cheyenne, WY 82003
GatewaySouth_WYMail@blm.gov

With copy to:

Juan Palma
Utah State Director
U.S. Bureau of Land Management
P.O. Box 45155
Salt Lake City, UT 84145-0155

Cheryl Probert
Deputy Forest Supervisor, Uintah-Wasatch-Cache National Forest
U.S. Forest Service
857 West South Jordan Parkway
South Jordan, UT 84095

Rod Fisher
Regional Manager, Customer & Community Relations
Rocky Mountain Power
201 South Main St.,
Salt Lake City, UT 84111

Re: Comments to the Draft Environmental Impact Statement for the Proposed Gateway South Transmission Project

Dear Ms. Gertsch:

This firm represents Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-day Saints ("CPB"). CPB welcomes the opportunity to comment on the Draft Environmental Impact Statement ("DEIS") that you have prepared for the Gateway South Transmission Project, proposed by Rocky Mountain Power, a subsidiary of PacifiCorp. CPB owns multiple properties within or in the immediate vicinity of the Preliminary Agency Preferred Route corridor and roughly the same number of properties within or in the immediate vicinity of the Alternative Route corridors. CPB is therefore vested in the final decision regarding the route of the transmission line.

4840-2021-5579

ATTORNEYS AT LAW
www.kmclaw.com

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1800 World Trade Center, 60 East South Temple, Salt Lake City, UT 84111
Thanksgiving Park Four, 2600 W. Executive Parkway, Ste. 400, Lehi, UT 84043

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801.328.3600 /t/ 801.321.4893 /f/x/
801.426.2100 /t/ 801.426.2101 /f/x/

Comment(s)

Response(s)

CP4 Church of Jesus Christ of Latter-day Saints (cont.)

Gateway South Transmission Project
 Bureau of Land Management
 May 22, 2014
 Page 2

CPB values efforts to minimize impacts to the environment as much as is reasonably possible. Regarding the transmission line’s location, CPB requests that the Final EIS reflect the following comments:

Recreational Camps, Duchesne County

CP4a

CPB is very concerned about the impacts of the Agency Preferred Route on its recreational camp properties in Southwestern Duchesne County. As shown on the attached Maps, the Agency Preferred Route would have a substantial impact on CPB owned lands.

CPB invests significant sums into its recreational properties to allow families and CPB groups to enjoy the beauty of nature. Most of these properties are mountainous, wooded areas that are ideal camping destinations for groups and individuals to use for recreational and spiritual purposes. These camps provide an escape from the manmade intrusion of our everyday lives. CPB therefore highly values the seclusion and pristine nature of these settings and desires to preserve their quality for the future. The pristine and natural setting of these camps fosters an appreciation for the Creator and contributes to the overall religious experience of the participants.

Camp Timberlane is a good example (see Maps 2 and 3). This is an existing camp that offers improvements and facilities for large groups of people. The Agency Preferred Route corridor bisects Camp Timberlane. The fact that the line may be located within the camp or very near to it is very concerning. A high voltage transmission line is starkly inconsistent with the purpose of a large camping complex frequented by large youth groups and families. Given the setting, the visual impact of the line would be jarring and would significantly degrade the value and purpose of the camp.

CP4b

Another good example is the Crescent Regional Recreation Camp (see Map 4). Like Camp Timberlane, this camp is improved with camping and recreational facilities (including a reservoir) for large youth and family groups. The current Agency Preferred Route runs across the northern boundary of this camp at a higher elevation overlooking the camp. Presumably the line will be highly visible from nearly anywhere in camp and very accessible to camp patrons. As noted above, the visual prominence of the transmission line would significantly degrade the experience of the campers and the value and purpose of the camp.

CP4c

Further, it is CPB’s experience that when a new road is built even on private land, the public takes this as an invitation to use the private road to access nearby public and private lands. The road system that will accompany the new transmission line will inevitably lead to greater trespassing on CPB camping properties in the area. This will

4840-2021-5579

CP4a

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 would not be 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).

Regarding Camp Timberlane, when data were compiled, data received for the area indicated privately owned parcels and did not indicate existence of an organized recreational youth camp. Comments on the Draft EIS from the CPB informed the EIS team of the recreational use of the area. In response to this new information, representatives of the CPB, Applicant, and BLM met in April 2014 to discuss the CPB properties. Subsequently, the Applicant identified route variations in this area that would avoid Camp Timberlane while considering other 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.

CP4b

Based on the proximity of the Project to recreation structures (i.e., cabins), high impacts were assigned in this area due to a largely natural setting found adjacent to Reservation Ridge. Recently the location of this camp has been brought to the attention of the Project and as such, impacts on these views have been described in Chapter 3 of the EIS. Also, see the response to Comment CP4a.

CP4c

See response to Comment CP4a.

Comment(s)

Response(s)

CP4 Church of Jesus Christ of Latter-day Saints (cont.)

Gateway South Transmission Project
 Bureau of Land Management
 May 22, 2014
 Page 3

CP4c

further degrade the quality and safety of CPB properties. It also raises significant safety concerns as these camps are often utilized as “Girl’s Camps” where groups of young women between the ages of 12 and 18 come from local congregations to utilize the camps. Because the properties are remote, it will be difficult to police trespassers. Finally, trespassing by hunters that will be facilitated by the required roads presents real safety concerns for the camp patrons.

CP4d

Additionally, and possibly most importantly, placing the transmission lines on the Agency Preferred Route will likely affect a greater number of people than nearly any other proposed route. During the summer months, the CPB recreational camps are occupied almost continuously by hundreds of people per day, with thousands of unique individuals using the camps in a single summer. The users of this property are primarily outdoors so the presence of a large transmission line will be even more strongly felt than for other recreational properties or even residential areas. Even though the camps are primarily used during the summer months, these properties are likely the most heavily used properties within a many mile radius.

CP4e

For these reasons CPB opposes the Preliminary Agency Preferred Route and requests that you utilize one of the Alternate Routes, preferably the northernmost route that runs from Dinosaur, Colorado, through Roosevelt, Utah, and rejoins the Preferred Route southeast of Spanish Fork, Utah (“Northern Route”). If the Agency does decide to use the current Preliminary Agency Preferred Route, CPB requests that the Agency micro-site within the Agency Preferred Route corridor in a way that circumvents the CPB recreational camps. CPB feels that placing the transmission lines on the current Agency Preferred Route, and thereby negatively affecting thousands of people seeking to experience unspoiled wilderness, would not be in harmony with the Agency’s stated purpose in the Summary of the DEIS “to minimize damage to scenic and esthetic values and fish and wildlife habitat and otherwise protect the environment through avoidance or mitigation.” CPB sees no reason to incur such a detrimental impact to its and other people’s private properties in a green field area when an established transmission corridor already exists in the Northern Route and can readily accept the Gateway South Project with significantly less disturbance and impacts to the pristine lands that would be affected by the Agency Preferred Route. While perhaps not true in all cases, the vast majority of the private lands impacted by the Northern Route are agricultural or industrial in nature. In contrast, the vast majority of the lands impacted by the Agency Preferred Route are, like CPB’s affected camping properties, recreational in nature and have very high greenfield, scenic, natural and retreat value. This value is much more easily degraded by the presence of a high voltage transmission line than that of agricultural or industrial property.

4840-2021-5579

CP4d

See response to Comment CP4a.

CP4e

See response to Comment CP4a.

Comment(s)

Response(s)

CP4

Church of Jesus Christ of Latter-day Saints (cont.)

Gateway South Transmission Project
Bureau of Land Management
May 22, 2014
Page 4

The routing adjustments requested in this letter best balance the impacts on Utah's resources and on CPB's affected properties in particular. CPB appreciates your hard work and efforts to prepare the DEIS and looks forward to a final decision on the routing of the line. Please ensure that I am added to the official mailing list for this project.

Sincerely,

KIRTON McCONKIE



Thomas K. Checketts

Encls.

4840-2021-5579

Comment(s)

Response(s)

CP4 Church of Jesus Christ of Latter-day Saints (cont.)

MAP 1



4840-2021-5579

Comment(s)

Response(s)

CP4

Church of Jesus Christ of Latter-day Saints (cont.)

MAP 2
Camp Timberlane
(Property No. 513-2495)

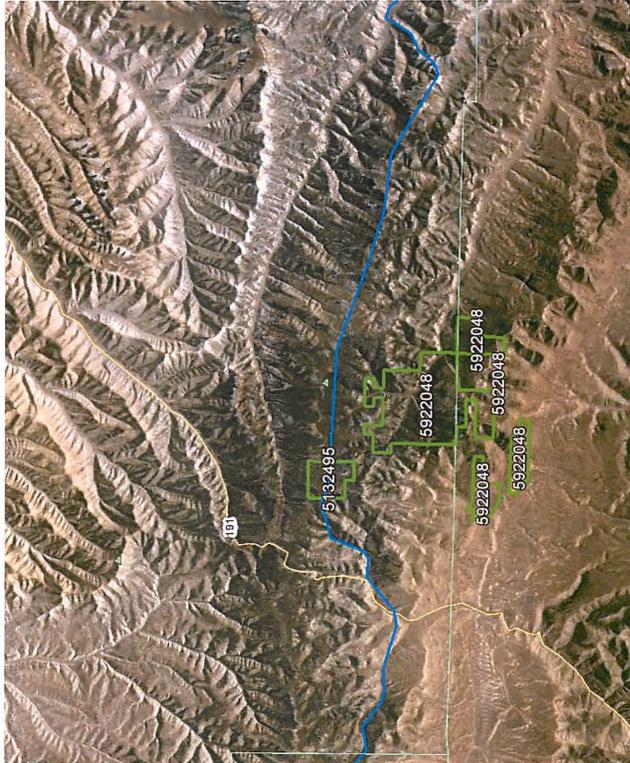


Comment(s)

Response(s)

CP4	Church of Jesus Christ of Latter-day Saints (cont.)
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MAP 3
Camp Timberlane
(Property No. 513-2495)



4810-2021-5579

Comment(s)

Response(s)

CP4

Church of Jesus Christ of Latter-day Saints (cont.)

MAP 4
Crescent Regional Recreational Camp
(Property No. 517-1407)

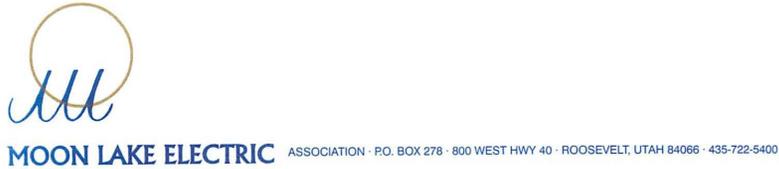


Comment(s)

Response(s)

CP5

Moon Lake Electric Association



BLM Wyoming State Office
Attn: Tamara Gertsch
PO Box 21150
Cheyenne, WY 82003

April 1, 2014

Dear Ms. Gertsch,

I appreciated meeting with you at the BLM’s public meeting in Roosevelt, Utah to discuss the Energy Gateway South Transmission Project. As mentioned, I am the General Manager/CEO of Moon Lake Electric Association, Inc, and our headquarters is based in Roosevelt. We cover some 8000 square miles of service territory in the Uintah Basin, and serve over 19,000 meters with 3850 miles of line.

From our discussion, along with the maps and information you provided, it appears the preferred route of The Energy Gateway South Transmission Project is well south of the Moon Lake service territory. If that is the eventual route, Moon Lake should not have a concern. However, an alternate route shows the proposed power line coming through the Ft Duchesne, Utah area. In addition, as I understood from our conversation, BLM’s position is as follows; “where there are other transmission power lines (specifically the Transwest Express Line) being proposed to be constructed through this same area, BLM’s approval would be contingent on these lines being built in the same corridor”. Please be aware that the two additional lines have the potential of creating a significant amount of congestion in the Ft Duchesne area, given the existing Deseret Power 345kv line and a proposed 138kv Moon Lake transmission line.

Moon Lake has acquired rights of way agreements from land owners in the Ft Duchesne area in preparation to construct a 138kv transmission line from the Bonanza Power Plant to Moon Lake’s, Upalco Substation. We are unsure of the timing of construction of this line but would not want any of the current rights of way compromised in any way by either of these proposed lines. Due to growth over the past few years and projected growth over the next 6-8 years, additional electrical capacity is needed in the Roosevelt and surrounding areas. The area paralleling the Deseret 345kv line is the most direct and cost effective route for Moon Lake to provide the needed capacity to our members.

I appreciate your interest and consideration of our concerns and would be happy to discuss these issues in further detail.

Respectfully,

Grant J Earl, General Manager/CEO

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CHEYENNE WYOMING

CP5a

CP5a

The BLM received data for a portion of the proposed 138-kilovolt transmission line from the Moon Lake right-of-way department. Data for the entire proposed transmission line were not available. The data for the portion of the planned transmission line received was included in the analysis of impacts on future land use presented in Section 3.2.11 and as a reasonably foreseeable future action in the analysis of cumulative effects presented in Chapter 4.

Comment(s)

Response(s)

CP6	Myrin Ranch, Inc.
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Myrin Ranch, Inc., and
Myrin Livestock Co., L.L.C.
HC 65 Box 30
Altamont, UT 84001

Attn: Tamara Gertsch
Energy Gateway South Transmission Project
Bureau of Land Management
PO Box 21150
Cheyenne, WY 82003

5/22/14

To Whom it May Concern,

We are writing to comment on the Draft EIS for the proposed Energy Gateway South Transmission Project. Myrin Ranch Inc. and Myrin Livestock Co LLC own real property generally west of Roosevelt, Utah situated under two of the alternative routes in sections 28, 29, 32 and 33, T2S, R3W, USM. Our family, business, property and community will suffer significant adverse impacts if the proposed transmission line follows one of these alternative routes. The Agency and Applicant Preferred route is preferable as it impacts less private land, less agricultural land, and less populated areas.

CP6a

Our family ranch is situated on the Lake Fork River and runs from the mouth of the river canyon where it opens up into Arcadia, to the confluence of Pigeon Water Creek a few miles upstream. The river canyon is roughly 150 feet deep and a quarter mile wide with red sand ledges and steep slopes framing the sides. From one vantage point along the edge you can see the entire property from end to end in one view, encompassing the river, wetlands, meadows, sage brush flats, juniper forest, clay hills, cottonwood bottoms, beaver ponds, and pastures. There are no roads or utilities that cross the river canyon except one existing transmission line very near the south end of the property, so the view is expansive and uninterrupted by development. The open vista has aesthetic value which also contributes to the economic value of our property. Part of the proposed alternative transmission line corridor passes over the best vantage point on the ranch. If the proposed transmission line is built along the alternative route it will foul the vista and will adversely affect the value of our property.

CP6b

Going east from our property through Ioka toward Roosevelt the alternative route follows a valley with contrasts of pastures and red bluffs. An existing transmission line runs through this valley but to add more transmission lines would clutter the view and the properties. While we

CP6a

As described in the Impacts to Property Values section of Section 3.2.22, property values can be affected by transmission lines, depending on the proximity of the transmission line to structures, the surrounding topography, and the existence of landscaping and other vegetation. Based on the comment, the value of this property would be adversely affected by the siting of the transmission line.

Furthermore, all residences were included in the analysis of high concern views. In locations where the Project would dominate a natural setting, high impacts on those views were described in Section 3.2.18 and mapped on MV-21b in the Map Volume of the Final EIS. Impacts on the natural character of the region are also discussed in Section 3.2.18 and mapped on MV-23b. Based upon these impacts, and other resource effects, this alternative route was not selected as the Agency Preferred Alternative or the Applicant’s Preferred Alternative.

CP6b

Due to the large number of residences in this area, and across the Uinta Basin, high impacts were assessed on these views even with the presence of the existing transmission line. These impacts, and other resource effects, led to this alternative route not being selected as the Agency Preferred Alternative. Design techniques to reduce visual clutter associated with adding a second transmission line could include reducing the distance between the Project and the existing line. Additionally by placing the towers at the same intervals, the clutter from the two lines would be reduced through maximizing the distance between structures instead of staggering the towers that creates a wall-like effect.

Comment(s)

Response(s)

CP6 Myrin Ranch, Inc. (cont.)

CP6b understand the argument for grouping utilities in corridors, we notice that corridors with multiple transmission lines are visually cluttered and uninviting places even relative to locations with only one transmission line.

CP6c The existing transmission line over the south end of our property crosses over one of our pivot sprinklers with a large tower near the pivot center. The transmission line was built before the sprinkler was installed and we were able to fit the sprinkler around the tower but the shape and size of our pivot design was significantly limited. We would have been able to design a larger and more efficient pivot sprinkler in the absence of the tower. So, in addition to the obvious conflicts with existing agricultural infrastructure, a new transmission line also installs obstacles to future improvements on farms and ranches. The Agency Preferred route would avoid these issues for us and many of our neighbors in the populated and largely agricultural 17 or so mile long stretch of the alternative route corridor between our property and Ballard.

CP6d We regularly work directly under and adjacent to the existing transmission line. We spend time maintaining and operating our pivot sprinkler, moving electric fences, moving grazing animals and farming. The existing transmission line is visually obtrusive, very noisy, and we worry about the long term effects of stray voltage, of electromagnetic fields, of using the earth as a conductor, as well as safety in the event of a failure, for our livestock as well as for ourselves. The alternative route shows the proposed new transmission line passing over and near areas where we spend even more time including a pond where we fish and recreate, an orchard, fields where our children move sprinklers and one of the best locations on the ranch for wildlife viewing and hunting.

CP6e We have worked hard to protect wild areas along the river as well as develop tree rows and other cover for wildlife between and around our fields and pastures. The Applicant Proposed route passes over areas of our property where deer have their fawns, where wild turkeys roost and nest, where moose cows spend part of the summer with their calves, where songbirds abound, and where elk along with the other wildlife find cover during the day adjacent to grazing and browsing areas they use in the evenings. There are Eagle nests in the ledges just north of the corridor. We observe how all the wildlife in the area call to each other and we believe that not only the construction, but the permanent intrusion – especially the constant noise created by the transmission line – would be detrimental to the wildlife and their habitat. This habitat and wildlife population adds economic value as well as aesthetic value to our property. We believe that a transmission line along the alternative route would adversely impact the value of our property as well as our ability to enjoy our property through adverse impacts on the varied habitat and the wildlife.

Our community also benefits from the varied and healthy habitat and wildlife population on our property. We see the deer and elk, turkeys and other birds venture back and forth to and from

CP6c Comment noted. Should this alternative route be selected, a number of design features of the Proposed Action for environmental protection (Design Features 20, 22, 23, 26, and 27) and selective mitigation measures (Selected Mitigation Measures 1 and 11) have been identified for implementation to reduce potential impacts on agricultural irrigation systems. Information discussing these design features and selective mitigation measures is presented in Chapter 2 and Section 3.2.11.4.2. In general, these design features and selective mitigation measures are designed to align the right-of-way on agricultural land insofar as is practicable to reduce the impact on farm operations and agricultural production.

The BLM is responsible for determining whether or not to issue a right-of-way grant on the land it administers and, if so, under what terms and conditions. The BLM has no authority on lands outside of its jurisdiction and is not responsible for enforcing state takings law. If a right-of-way is granted, the Applicant would negotiate individual rights-of-way on private land crossed by the selected route directly with the landowners. The Applicant would work closely with private landowners to micro-site the transmission line, determine valuation, and secure easements consistent with applicable law.

CP6d See next page for response to CP6d.

CP6e Comment and route preference noted.

CP6f Comment and route preference noted.

Comment(s)

Response(s)

CP6	Myrin Ranch, Inc. (cont.)
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CP6d

A number of design features and selective mitigation measures have been identified to reduce potential impacts on agricultural irrigation systems. The design features include Design Features 20, 22, 23, 26, and 27. The selective mitigation measures include Selective Mitigation Measure 1 and 11. Information discussing these design features and selective mitigation measures can be found in Chapter 2 and Section 3.2.11.4.2.

In general, these design features and selective mitigation measures are designed to align the right-of-way on agricultural land insofar as is practicable to reduce the impact on farm operations and agricultural production.

The Applicant will negotiate individual rights-of-way on private land directly with the landowners. The Applicant works closely with private landowners to microsite the transmission line, determine valuation, and secure easements, consistent with applicable law. In the event agricultural operations cannot be avoided during siting and final engineering, compensation would be negotiated between the Applicant and the landowners and/or lessee.

Potential impacts to visual resources and scenery are discussed in Chapter 3, Section 3.2.18 of the Final EIS.

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 (Table 2-8, Design Feature 11), the Applicant would 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. EMF is discussed in greater detail in Section 3.2.23 of the Final EIS.

Comment(s)

Response(s)

CP6 **Myrin Ranch, Inc. (cont.)**

neighboring properties and the surrounding area while using the river bottom as refuge. The area of our ranch under the alternative route corridor is a uniquely quiet, isolated and undeveloped area where wildlife can get away from highways, houses, oil wells and noise.

CP6g

We also own property in Ioka and Arcadia which falls in another alternative route corridor. This route raises similar concerns about adverse impacts to us and our community.

We believe adverse impacts to property, property values, agricultural operations, habitat, the local environment, wildlife, scenic vistas and health and safety of community would be far greater in the alternative route corridor than in the Agency Preferred corridor. We urge that the project be located in the Agency Preferred route corridor.

Sincerely,



Alarik F. Myrin
Myrin Ranch, Inc.
Myrin Livestock Co., L.L.C.

CP6g

Comment and route preference noted.

Comment(s)

Response(s)

CP7 **QEP Field Services Company**



1955 Blairtown Road
PO Box 2819
Rock Springs, WY 82902

May 21, 2014

BLM, Wyoming State Office
P.O. Box 21150
Cheyenne, WY 82003
Email: GatewaySouth_WYMail@blm.gov

Re: Comments on Draft Environmental Impact Statement and Land-Use Plan Amendments for the Energy Gateway South Transmission Project In Wyoming, Colorado and Utah, Federal Register / Vol. 79, No. 35 / Friday, February, 21, 2014 / Notices

Dear Ms. Gertsch:

QEP Field Services Company (QEPFS) hereby comments on the subject Rocky Mountain Power (RMP) Energy Gateway South Transmission Project DEIS and Land-Use Plan Amendments. QEPFS operates approximately 86 miles of steel natural gas pipelines that are located in the vicinity of the proposed primary and alternative routes. As discussed in further detail below, placing a high voltage electrical transmission line in proximity to these pipelines will likely lead to degradation of the integrity of the pipelines.

CP7a

RMP's proposed high voltage power lines will subject QEPFS pipelines to induced AC voltages which are known to cause corrosion. This type of corrosion, commonly referred to as AC corrosion, is very difficult and expensive to mitigate. Mitigation typically consists of extensive, buried AC grounding systems, involving high up-front capital expenditures as well as ongoing maintenance and replacement costs. Further, even a properly implemented corrosion mitigation program is not 100 percent effective. Consequently, corrosion risk (and the resultant risk of pipeline leak or other incident) still exists. The best way to prevent AC corrosion is to simply avoid placing high voltage power in close proximity to pipelines.

In the attached map, we have identified the QEPFS pipelines that would be impacted by both the primary and alternative routes.

CP7b

To obviate the corrosion risk and mitigation need, QEPFS recommends that the BLM select an alternative route to avoid QEPFS's pipelines. To the extent the RMP line must be located in proximity to QEPFS' pipeline, then QEPFS requests that the BLM require the project proponent to retain and fully fund a qualified consulting firm to perform a detailed corrosion analysis to determine the potential impacts and to design an appropriate mitigation system or systems.

Please do not hesitate to contact us should you have any questions.

Sincerely,

Kevin Peretti
Vice President, Engineering & Operations

CP7a

The agencies do not have the technical expertise to assess impacts on pipeline integrity. Also, the decision-maker would not base a decision on the outcome of such an issue. The BLM believes the technical nature of the issue places the issue between the Applicant and any pipeline company with facilities that may be crossed by the selected route. Additional information from the Applicant regarding preconstruction activities related to coordination with pipeline companies whose facilities may be crossed by the selected route, if applicable, has been included in Section 2.3.1.8 of the Final EIS.

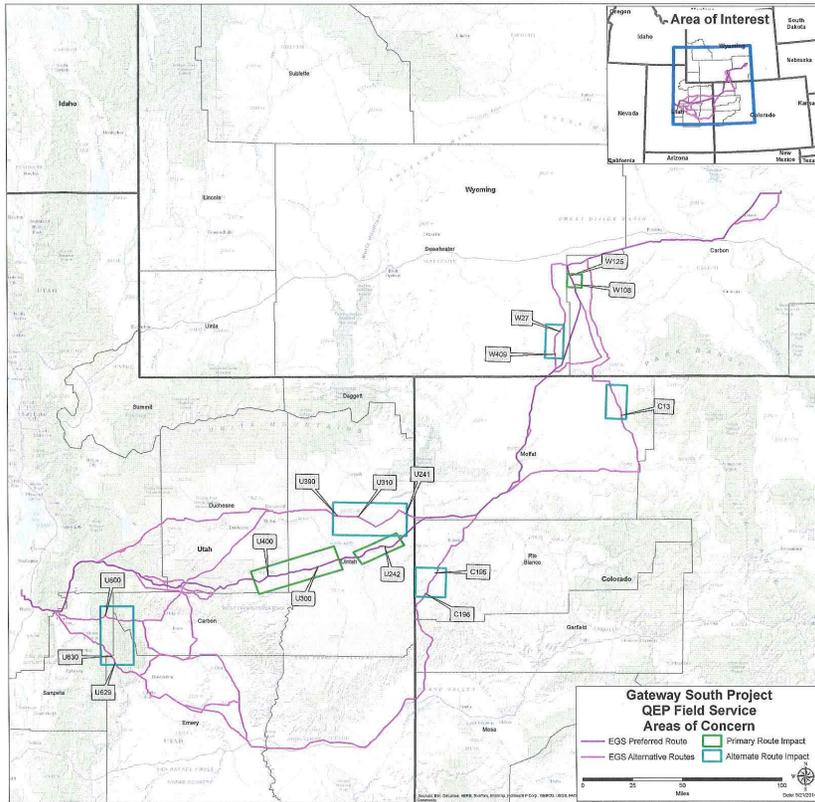
CP7b

See response to Comment CP7a.

Comment(s)

Response(s)

CP7 QEP Field Services Company (cont.)



Comment(s)

Response(s)

CP8 **Questar Pipeline Company**



Questar Pipeline Company
 333 South State Street
 P. O. Box 45360
 Salt Lake City, UT 84145-0360

RECEIVED

MAR 21 2014

BLM-WY STATE OFFICE

May 19, 2014

Tamara Gertsch
 Bureau of Land Management
 5353 Yellowstone Road
 Casper, Wyoming 82009

Subject: Energy Gateway South Transmission Project - Draft Environmental Impact Statement (DEIS), February 2014

Dear Ms. Gertsch:

Questar Pipeline Company (Questar Pipeline) is writing to comment on the Rocky Mountain Power (RMP) Energy Gateway South Transmission Project (Gateway South) DEIS. Questar Pipeline is a federally-regulated interstate natural gas pipeline company that provides transportation and underground storage services in the Rocky Mountain region. Questar Pipeline owns and operates over 2,600 miles of high pressure steel pipelines, including two major natural gas lines that are located adjacent to the proposed Gateway South corridor in eastern Utah. As discussed in the following comments, placement of a high voltage alternating current (HVAC) transmission line in close proximity to and especially parallel to these high pressure steel natural gas pipelines is of concern to Questar Pipeline as it may increase total environmental impacts, increase proponent and/or other facility capital and operating costs, potentially put these pipelines out of compliance with U.S. Pipeline Hazardous Material Safety Administration (PHMSA) requirements, and could endanger the safety of the public in proximity of the pipelines.

Background

Questar Pipeline has identified approximately 40 miles of natural gas pipelines that would be paralleled, crossed, or could be impacted by the proposed RMP project. These pipeline lines are critical to the operation of our system. In the following table, nine pipelines are identified with a descriptor of Main Line (ML), Jurisdictional Line (JL), or Jurisdictional Tap Line (JTL) and a line number. The mainlines function as major transmission lines that are typically fed by other mainlines and jurisdictional pipelines.

Pipeline	Diameter	Utah County, Utah	Duchesne County, Utah	Uintah County, Utah	Moffat County, Colorado	Sweetwater County, Wyoming
ML41	18"	X				
ML104	24"	X	X	X		
ML40	20"		X	X		

CP8a

This comment was forwarded to the Applicant as it is up to the Applicant to coordinate with pipeline company requests, including Questar. The Applicant responded to comments from Questar by preparing an alternative route revision (Alternative COUT-C) in the Uinta Basin (in the vicinity of the Green River) to address corrosion concerns raised by Questar Pipeline Association with siting the Project in proximity to their pipelines. The BLM Vernal Field Office reviewed the alternative route refinement and then incorporated the refinement into the analysis presented in the Final EIS.

CP8a

Known pipeline facilities crossed by the alternative routes and route variations are displayed on the resource mapping in the Map Volume of the EIS. The BLM believes all pipelines are captured in the EIS analysis.

Comment(s)

Response(s)

CP8 Questar Pipeline Company (cont.)

CP8a

Pipeline	Diameter	Utah County, Utah	Duchesne County, Utah	Uintah County, Utah	Moffat County, Colorado	Sweetwater County, Wyoming
JL47	12"		X			
JTL78	6"		X			
JL138	16"		X			
ML103	16"			X		
ML23	10"				X	X
JL65	10"					X

Out of all of the pipelines affected, Main Lines 40 and 104 are of significant concern due to the several miles of proposed parallel construction for the preferred alignment. These pipelines constitute Questar Pipeline’s Southern Transmission system which transports in excess of 0.5 billion cubic feet per day of natural gas to both the Wasatch Front load center and the Kern River Pipeline under load conditions. A general area map depicting areas of concern is included as an attachment.

CP8b

For the pipelines in the project area, RMP’s proposed high voltage power lines could cause corrosion of the pipelines through a process called Alternating Current (AC) coupling (see National Association of Corrosion Engineers Publication 35110). AC coupling is the “sharing” of an electromagnetic field typically between a current carrier (overhead power lines) and a parallel conductor (steel pipeline). If unmitigated, AC corrosion occurs much more rapidly than other pipeline corrosion mechanisms and is unpredictable as to when and where it may form. In addition to corrosion, AC coupling or faulting can introduce levels of electrical current serious enough to cause bodily injury or death to those who might come into contact with the pipeline or any associated above-ground facilities (see National Association of Corrosion Engineers paper 4389). Mitigation is very expensive and typically consists of extensive, buried AC grounding systems.

CP8c

In order to mitigate the harmful effects of AC corrosion due to co-location of these facilities, Questar Pipeline would need to install below-ground AC grounding facilities parallel to each of the two separate existing pipelines inside the proposed power corridor. This mitigation would require excavation of continuous trenches along each pipeline (a minimum of two excavations) and would need to be installed prior to energizing the proposed power lines. It has been Questar Pipeline’s experience that excavating the trenches in these particular locations will likely require using a combination of blasting and rock grinding for nearly the entire length of the pipeline through the rocky terrain. In addition to the trenches parallel to the pipelines, crossover trenches between the ground cable trench and the steel pipeline would need to be constructed at 1,000 foot intervals. The trenching would start at the intersection of the White River and Glen Bench Road (approximate latitude: 40.0390, longitude: -109.4585) and continue to the 9 Mile Canyon Rd (approximate latitude: 39.8106, longitude: -110.2379). The mitigation measures would deplete over time and would need to be replaced about every 20 years; therefore

CP8b

The agencies do not have the technical expertise to assess impacts on pipeline integrity. Also, the decision-makers for rights-of-way across federal lands would not base a decision on the outcome of such issue. BLM believes the technical nature of the issue places the issue between the Applicant and any pipeline company with facilities that may be crossed by the selected route. See also response to Comment CP8a.

CP8c

See response to Comment CP8b.

Comment(s)

Response(s)

CP8	Questar Pipeline Company (cont.)
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CP8c

this ground disturbance would be repeated over the lifetime of the pipeline. In addition to the environmental impact of installing the buried facilities, additional environmental impacts would occur as Questar Pipeline would also need to install over 200 above ground mitigation facilities. As the distance between the HVAC line and the pipeline decrease, more AC protection and ground disturbance would be required. The same holds true for any increases in HVAC loading over time. Please note that at least two other pipeline operators share this same ROW with Questar Pipeline, and they would likely require some form of AC mitigation system to protect their assets as well.

Suggested Actions

CP8d

For compatibility purposes, Questar Pipeline would recommend an alternative route to avoid the mitigation measures described above and associated environmental impacts. The alternative route should avoid the existing pipeline ROW by a minimum distance of 2,000 feet or more. If a crossing needs to be made, the HVAC lines should cross at a 90 degree angle and the footings should be kept a minimum of 75 feet away from the pipeline at these crossings to help minimize the AC interference or risk from fault conditions. If the above separation distances could not be accommodated, an experienced consulting firm specializing in AC interference on pipelines would be required to perform a detailed study to fully understand the potential effects of the proposed RMP corridor and to design and install the AC mitigation systems. Of course, Questar Pipeline would expect the project proponent to agree to fully fund the AC interference study and all mitigation recommended by the study.

Given the technical nature of this issue, Questar Pipeline staff is available to assist with any further explanation or discussion of these concerns.

Regards,



Ron Jorgensen
General Manager, Operations

CP8d

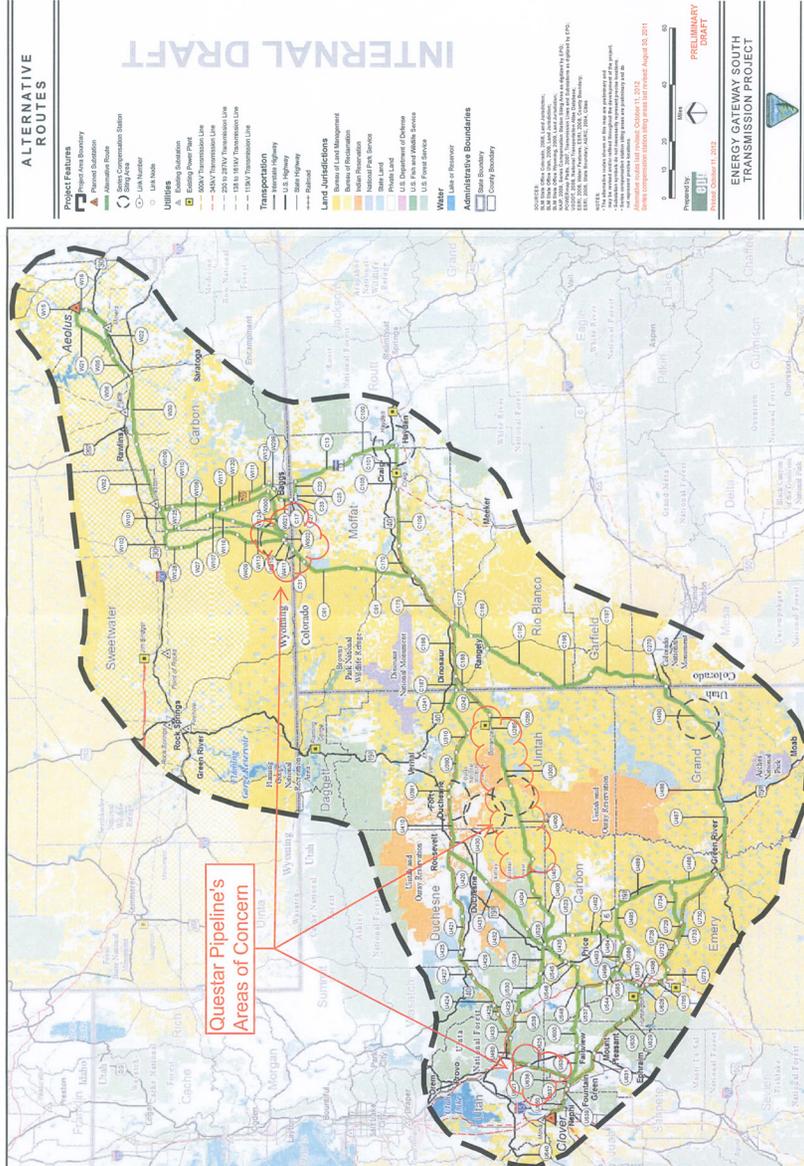
This comment was forwarded to the Applicant; it is up to the Applicant to coordinate with pipeline company requests, including Questar.

Response(s)

Comment(s)

CP8

Questar Pipeline Company (cont.)



Comment(s)

Response(s)

CP9	Rocky Mountain Power
------------	-----------------------------



May 22, 2014

Tamara Gertsch
 Bureau of Land Management
 P.O. Box 21150
 5353 Yellowstone Road
 Cheyenne, WY 82003

Re: Rocky Mountain Power Energy Gateway South Draft Environmental Impact Statement and Land-Use Plan Amendments Comment Letter

Dear Ms. Gertsch,

Rocky Mountain Power, a division of PacifiCorp (“RMP”), expresses thanks for the United States Bureau of Land Management’s (“BLM”) and the cooperating agencies’ diligent efforts on the development and publication of the Draft Environmental Impact Statement (“DEIS”) for the Energy Gateway South Transmission Project (herein referred to as the “Project”). RMP appreciates the BLM’s cooperation, dedication and professionalism as the Project has progressed through the National Environmental Policy Act (“NEPA”) process.

RMP would like to reemphasize how critically important this Project is to ensuring reliable electric service to its retail and network customers. As a regulated public utility, RMP is required to provide electric service to all customers within its service territory without discrimination, and at the lowest cost after consideration of risk. This obligation frames the process RMP uses to make decisions regarding the maintenance and operation of, and upgrades to, our transmission system.

Our comments concern the following topics identified in the DEIS:

- Collocation effort between RMP and TransWest Express LLC (“TransWest”)
- Recent Greater Sage Grouse Resource Management Plan/Land Use Plan Amendments
- Perch Deterrents as Proposed Mitigation
- Efforts Regarding the Habitat Equivalency Analysis
- BLM Preferred Route vs. Alternate Routes

Collocation effort between Rocky Mountain Power and TransWest Express

Consistent with the BLM’s request in its letter dated December 23, 2013, RMP and TransWest are working on collocating the alignment of certain segments of the Project and the TransWest Transmission Project (the “TWE Project”). In fact, over the past four years, TransWest and RMP have been working cooperatively on transmission line siting and engineering issues related to their respective projects.

In accordance with several cooperative agreements, the RMP and TransWest have jointly developed coordinated designs for several areas where multiple project segments might be collocated. In recognition of the BLM’s request, RMP and TransWest are committed to continue to work together to identify and develop feasible transmission line siting solutions.

CP9a

CP9a Comment noted.

Comment(s)

Response(s)

CP9 Rocky Mountain Power (cont.)



Recent Greater Sage Grouse Resource Management Plan/Land Use Plan Amendments

CP9b

Recently the BLM and US Forest Service (“USFS”) released Resource Management Plan and Land Use Plan Amendment Environmental Impact Statements for Colorado, Utah, and Wyoming regarding management of Greater Sage-Grouse habitat (the “Plan”). The Plan amendments evaluate the possibility of restricting habitat-disturbance based on identified disturbance caps. These disturbance caps could potentially result in certain actions or projects not being approved if a disturbance cap for a particular zone has been reached.

With the Gateway South Project so far along in the NEPA process, and in consideration of the efforts that RMP, BLM, and other agencies working on the NEPA process for the Project have undertaken thus far, and RMP requests that BLM consider the Project as part of baseline/existing/planned activities and exempt the Project from the disturbance cap requirements described in the Plan amendment documents.

CP9b

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 resource management plans at the time the decision is issued.

CP9c

In the alternative, since the decisions made as part of the Plan revision process could impact future projects, BLM should describe in the Project Final Environmental Impact Statement (“FEIS”) how disturbance caps would be calculated and additionally, how any remaining disturbance would be tracked from project to project. Furthermore, the cumulative impacts section of the Project FEIS should include information detailing how disturbance caps would be allocated, tracked, and monitored for future projects.

CP9c

See response to comment CP9b.

Perch Deterrents as Proposed Mitigation

CP9d

Mitigation Measure 14 on Page 2-75 of the DEIS mentions the potential use of perch deterrents, also commonly referred to as perch discouragers. Because of perceived avoidance and predation impacts associated with power lines, electric utilities are often asked to install perch discouragers to reduce raptor and raven perching on the transmission facilities. Data from RMP and other utilities indicates that these measures may be ineffective, and in fact, can have unintended negative consequences to habitat and wildlife.

Perch discouragers were originally designed to reduce raptor electrocutions by moving birds from an unsafe (electrocution risk) perching location to a safer alternative, either on the same structure or an alternate structure located nearby. Recent data has documented the limited effectiveness of perch discouragers, and the increased effectiveness of covers for preventing electrocutions (see *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (APLIC 2006), pages 17-18). Despite their declining use by electric utilities, perch discouragers continue to be installed in attempts to dissuade raptors and corvids from perching or nesting on power poles in areas with sage-grouse or other sensitive prey species. Perch discourager research has shown limited effectiveness in preventing perching, the potential for increased nesting on discouragers, and increased electrocution risk associated with perch discouragers. Additionally, in areas where raven predation on sage-grouse nests is a concern, perch discouragers may aid in the accumulation of nest material (APLIC 2006), and could potentially increase raven predation pressure due to nest construction on discouragers in sensitive areas.

The negative impacts of perch discouragers must be weighed against the limited benefits that such measures may provide, particularly these measures are contributing to mortalities of protected birds and facilitating increases in predator nesting populations. The behavior of avian predators of sage-grouse should also be considered, as different species exhibit different hunting strategies, and employ different hunting techniques for different prey species. For example, golden eagle diet is largely mammalian (80-90%, Kochert et al. 2002). Golden eagles prey on sage-grouse opportunistically, and typically hunt sage-grouse by stooping from a high soar or low, coursing ambush flight (Watson 1997, Kochert et al. 2002). Consequently, power poles may not play an important role in eagle predation of sage-grouse. Golden

CP9d

Comment and mitigation preference noted. The BLM developed the mitigation described in the Draft EIS collaboratively with the cooperating agencies and the Applicant and in consideration of industry best practices, including those identified in documents published by the Avian Power Line Interaction Committee, BLM resource management plans, the U.S. Fish and Wildlife Service Conservation Objectives Team Report, and other relevant literature. Additional discussions with these parties between publication of the Draft and Final EIS have resulted in substantial modification and reduction in the recommendations for application of perch deterrents due to evidence suggesting limited effectiveness in many cases and the potential for increased risk of electrocution risk for avian species. Rather, the effects of raptor and corvid predation on sensitive prey species will be minimized by collocating the line with existing transmission lines to the extent feasible, which will reduce the proliferation of perch sites in new areas across the landscape.

Comment(s)

Response(s)

CP9 Rocky Mountain Power (cont.)



eagles are vulnerable to electrocution mortality (APLIC 2006), and perch discouragers have been correlated with increased eagle electrocution risk (PacifiCorp, *in prep.*). Common ravens are known predators of sage-grouse nests, yet ravens are able to overcome perch discouragers and may experience higher nesting rates on poles with perch discouragers.

CP9d

RMP has agreements in place with US Fish and Wildlife Service (“FWS”) regarding its Avian Protection Plans (“APP”), and has implemented measures to prevent electrocutions of raptors and other protected migratory birds. The use of perch discouragers is precluded in our APPs and agreements with FWS due to their limited effectiveness and the associated electrocution concerns. Accordingly, RMP recommends the BLM remove stipulations that require or recommend perch discourager use in the FEIS. RMP further recommends that the BLM seek additional information from the Avian Power Line Interaction Committee (“APLIC”) and FWS regarding these concerns. Additionally, RMP recommends that current APLIC guidance be applied to minimize avian electrocution and collision risks.

Efforts Regarding the Habitat Equivalency Analysis

CP9e

As described in Section 6 and Appendix F of the DEIS, RMP is currently developing a Habitat Equivalency Analysis (“HEA”) to provide a replicable method for determining mitigation that is scaled to project-related permanent and interim losses of sage-grouse habitat services. In connection with this effort, RMP has initiated a HEA Technical Working Group that consists of RMP employees and agency representatives from the BLM, USFS, and FWS, as well as other state and local agencies. As described above, the BLM has requested that RMP and TransWest work together to collocate the projects. Once the collocation effort is concluded and an agency preferred route is determined, RMP will continue to move forward with its HEA effort.

CP9e

Comment noted.

Agency Preferred Route vs. Alternative Routes

CP9f

RMP requests that viable, major alternative routes be retained for continued analysis through the final environmental impact statement. In particular, RMP is concerned that even though the BLM will grant a permit across Bureau of Indian Affairs land, that as a commercial entity, we may not be able to negotiate right of way with respective tribal councils to ultimately gain easement access on tribal lands or allotted lands. Therefore, RMP requests viable alternatives that avoid BIA lands remain in consideration throughout the NEPA process.

CP9f

All major alternative routes and route variations analyzed in the Draft EIS are retained in the Final EIS.

CP9g

As described in the DEIS, the BLM’s agency preferred routes and RMP’s applicant preferred route are similar in most locations. However, subsequent to the release of the DEIS, RMP was informed that the BLM’s GWS agency preferred route near the Colorado-Utah border would change and would need to follow the agency preferred routing of the TransWest Express project, commonly referred to as the “kitten ears” segment. RMP takes exception to this change based on review of potential electrical operations, construction and reliability issues. During RMP’s review with TransWest Express for the agency required collocation exercises, it was determined that six crossings of high-voltage transmission lines could be reduced to one crossing if the current GWS DEIS agency preferred route was retained. This request will be formally presented to the BLM via separate issue from this comment letter in the near future.

CP9g

[Response pending results of current coordination between BLM and the Applicant.]

Comment(s)

Response(s)

CP9

Rocky Mountain Power (cont.)



Rocky Mountain Power appreciates the opportunity to work cooperatively with the BLM, and looks forward to continued collaboration on the Project. Please feel free to contact me with any questions at 801-220-2048 or Sharon.Seppi@rockymountainpower.net.

Sincerely,

Sharon Seppi
Managing Director, Construction Services
Rocky Mountain Power

cc: Todd Jensen, Director Transmission
Rod Fisher, Customer and Community Manager
Cindy Smith, Environmental Planning Group
Robert Hamilton, Environmental Services, RMP
Garry Miller, TransWest Express

Comment(s)

Response(s)

CP9

Rocky Mountain Power (cont.)



List of References Cited in Letter

Avian Power Line Interaction Committee (APLIC). 2006. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, D.C. and Sacramento, CA. 207 pp.

Kochert, M.N., K. Steenhof, C.L. McIntyre, and E.H. Craig. 2002. Golden Eagle. The Birds of North America, No. 684 (A. Poole, Ed.) Ithaca: Cornell Laboratory of Ornithology.

Comment(s)

Response(s)

CP10

TransWest Express LLC



VIA EMAIL DELIVERY

May 22, 2014

Tamara Gertsch, Project Manager
Energy Gateway South Project
Bureau of Land Management, Wyoming State Office
P.O. Box 21150
Cheyenne, WY 82003
gatewaysouth_WYMail@blm.gov

Re: Comments on BLM Draft EIS for the Energy Gateway South Transmission Project

Dear Ms. Gertsch:

TransWest Express LLC (TransWest) appreciates the opportunity to provide comments on the Bureau of Land Management (BLM) Draft Environmental Impact Statement (DEIS) for the Energy Gateway South Transmission Project (Gateway South), as noticed in the *Federal Register* on February 21, 2014 (79 FR 9916).

TransWest is the proponent of the TransWest Express Transmission Project (TWE Project), which is the subject of a separate environmental analysis being conducted by the BLM Wyoming State Office and Western Area Power Administration (Western) as joint lead federal agencies. BLM and Western issued the Draft Environmental Impact Statement (TWE DEIS) for the TWE Project on July 3, 2013. According to the BLM Wyoming “NEPA Hotsheet” published on April 1, 2014, the TWE Project’s “Final EIS is anticipated to be published in September 2014.” In addition, the TWE Project was designated in 2011 as a priority project by the federal interagency Rapid Response Team for Transmission, whose purpose is to “accelerate responsible and informed deployment of several key transmission facilities.”

In Wyoming, Colorado and Utah, the applicant proposed action for the TWE Project, the agency preferred alternative as identified in the TWE DEIS, and other action alternatives under consideration fall within the same planning area as Gateway South. Specifically, the corridors considered for the Gateway South project parallel many of the corridors for the TWE Project.

Accordingly, at BLM’s request, TransWest and PacifiCorp (doing business as Rocky Mountain Power) have worked together under several agreements that document the Parties’ commitment to work cooperatively on siting and engineering matters related to the TWE Project and to PacifiCorp’s Gateway South, Gateway West, and Sigurd to Red Butte Projects. The Parties’ agreements include a Ranch Lands Coordination Agreement and an Engineering Coordination

CP10a

CP10a Comment noted.

Comment(s)

Response(s)

CP10	TransWest Express LLC (cont.)
	<p>Bureau of Land Management May 22, 2014 Page 2</p> 
CP10a	<p>Agreement. Working together pursuant to the agreements, the Parties developed coordinated designs for several areas where multiple projects might be co-located. For example, TransWest and PacifiCorp developed a coordinated design approach that would allow Gateway West, Gateway South and the TWE Project to be sited in the corridor along I-80 in Wyoming and, in fact, submitted this coordinated design to the BLM in March 2012. The Parties also have closely examined the possible co-location of the TWE Project and Gateway South Project routing from Wamsutter, Wyoming, to Nephi, Utah, consisting of approximately 375 miles. TransWest and PacifiCorp reviewed their ability to co-locate the projects along the agency preferred alternative being considered in both EIS’s and have determined that if the BLM co-locates the two projects, they can coordinate alignments as necessary.</p>
	<p>TransWest has three specific comments about the Gateway South DEIS.</p> <p>1. <u>Tribal Lands</u></p>
CP10b	<p>The agency preferred alternative for the segment referred to as Colorado to Utah (COUT) crosses 2.7 miles of tribal lands within the Uintah and Ouray Indian Reservation. The DEIS correctly notes (p. S-39) that the Tribe would have to agree to grant an easement. The Tribe has inherent sovereign power over the lands within its reservation. Tribal consent is required to obtain a right-of-way across tribal lands under 25 U.S.C. §324. Moreover, federal laws prohibit conveyances of Indian lands unless authorized by Congress, and there is no federal statute authorizing condemnation of rights-of-way across tribal lands (though there is authority to condemn allotted Indian lands, 25 U.S.C. §357).</p>
CP10b	<p>Given the uncertainties associated with obtaining a right-of-way across tribal lands on commercially acceptable terms, TransWest recommends that an alternative that would avoid tribal lands be authorized as an alternative to the selected COUT route, in the event the applicant is unable to reach an agreement with the Tribe for an easement. Such an approach would be similar to that adopted in the Record of Decision on the Gateway West Transmission Project (Gateway West ROD at p. 19). In the case of the Gateway West Project, the BLM issued a right-of-way for two alignments of the transmission line route in the vicinity of Cokeville, Wyoming. The decision as to which alignment would ultimately be selected depended on the applicant’s ability to obtain private land easements in the area, and the ultimate route would then be authorized under a Notice to Proceed issued by the BLM. Similarly, here the applicant’s ability to obtain an easement from the Tribe will ultimately control the route of the transmission line, as there is no condemnation authority against the Tribe.</p>
CP10c	<p>We note, in addition, that the Gateway South DEIS does not describe any review of tribal land use plans and so does not disclose any possible conflicts between such plans and the agency preferred alternative (COUT-C-3). This should be remedied in the Final EIS.</p> <p>2. <u>Criteria for Selection of the Agency Preferred Alternative</u></p>
CP10d	<p>It is difficult to discern what parameters the BLM used to identify the agency preferred alternative. Section 2.5 describes the screening process undertaken by Rocky Mountain Power and the Bureau of Land Management to identify the alternatives and eliminate unreasonable</p>

CP10b	<p>Additional description of the criteria for the identification of the agency preferred alternative has been added to Section 2.7.1.</p> <p>Regarding the commenter’s statement that the Final EIS should “should clearly disclose BLM’s rationale for their selection of the agency preferred alternative to provide transparency regarding decision-making,” the commenter is reminded the agency preferred alternative does not constitute a commitment or decision by the lead agency and there is no requirement to select the agency preferred alternative in the Record of Decision. Further, CEQ’s Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations direct that “even though the agency’s preferred alternative is identified by the EIS preparer in the EIS, the statement must be objectively prepared and not slanted to support the choice of the agency’s preferred alternative over the other reasonable and feasible alternatives.” Finally, 40 CFR 1505.2(b) states the rationale for the decision (i.e., the route selected for construction) must be provided in the Record of Decision.</p>
CP10c	<p>No tribal land use plans have been identified during government-to-government consultation between BLM and associated American Indian tribes.</p>

Comment(s)

Response(s)

CP10	TransWest Express LLC (cont.)
	<p>Bureau of Land Management May 22, 2014 Page 3</p>  <p>alternatives. Section 2.5.1.3 (pp. 2-67) states that the results of the comparison of alternative routes are presented in Section 2.7.</p> <p>However, Section 2.7.1 merely describes the route of the agency preferred alternative after stating that this is the route that the BLM, in coordination with the cooperating agencies, believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors. There is no way for the reader to discern how BLM weighed the impacts to various resources to arrive at the agency preferred alternative.</p> <p>Section 3.2 refers to Tables S-16a – S-16d for a comparison of results of the effects analysis for the alternative routes. We find no such tables. But we assume that this reference should instead be to Tables S-3a – S-3d.</p> <p>A review of those tables leaves the reader wondering how the BLM weighed the various negative impacts of the agency preferred alternative as compared to similar or lesser impacts under other alternatives. TransWest believes that the Final EIS should clearly disclose BLM’s rationale for the selection of the agency preferred alternative to provide transparency regarding the decision-making. As it stands, it is unclear what parameters were considered most important by the BLM in selecting the agency preferred alternative.</p> <p>For example, if impacts of alternative COUT-A for special status wildlife are compared to those for the agency preferred alternative, it would appear that alternative COUT-A would be preferable, as fewer miles of black-footed ferret management area are crossed, fewer miles of mountain plover potential habitat are crossed, no Mexican spotted-owl habitat is crossed, and fewer sage-grouse leks are located within 4 miles of the centerline (less than half). Alternative COUT-A does affect slightly more miles of white-tailed prairie dog potential habitat, so the reader is left to wonder if potential white-tailed prairie dog habitat is a controlling rationale when comparing impacts to special status wildlife.</p> <p>We recognize that there are impacts to various resources from any of the alternatives and that weighing the impacts is a difficult job. However, the parameters relied upon by the BLM to identify the agency preferred alternative should be fully disclosed and made transparent to the public.</p> <p>3. <u>Analysis of Impacts to Lynx, Grey Wolf and Wolverine</u></p>
CP10d	<p>Unlike the DEIS on the TWE Project, which in many areas parallels the alternatives analyzed in the Gateway South DEIS, this DEIS does not contain any analysis of potential impacts to the lynx, grey wolf and wolverine.</p> <p>Because those species have the potential to occur in portions of the alternatives, TransWest recommends that the Final EIS include a discussion of the impacts of the proposed Gateway South project and its alternatives on those species.</p>

CP10d Additional description of the rationale for the identification of the agency preferred alternative has been added to Section 2.7.1.

CP10e An analysis of potential impacts on lynx, grey wolf, and wolverine was completed for the Final EIS, and is presented in Section 3.2.8.

Comment(s)

Response(s)

CP10

TransWest Express LLC (cont.)

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Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Garry L. Miller', written over a faint blue grid.

Garry L. Miller
Vice President, Land and Environmental Affairs
TransWest Express LLC

cc: Sharon Knowlton, BLM Project Manager, TWE Project EIS
Steve Blazek, Western Area Power Administration Project Manager, TWE Project EIS
Sharon Seppi, PacifiCorp
Natalie Hocken, PacifiCorp