



U.S. Department of the Interior  
Bureau of Land Management

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# Scoping Summary Report

Wyoming Pipeline Corridor Initiative Project  
Draft Environmental Impact Statement

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January 2020

## **PREPARING OFFICE**

U.S. Department of the Interior  
Bureau of Land Management  
Wyoming State Office



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# 1 INTRODUCTION

The Wyoming Pipeline Corridor Initiative Project (WPCI Project or project) is a proposal from the State of Wyoming to designate approximately 1,914 miles of pipeline corridors across private, state, and Bureau of Land Management (BLM)–managed lands throughout the central and western portions of the state that are essential to future production and distribution of oil and gas products viable to the state’s economy (Figure 1). Approximately 1,105 miles of the proposed corridors is located on BLM-managed lands in nine field offices: Buffalo, Casper, Cody, Kemmerer, Lander, Pinedale, Rawlins, Rock Springs, and Worland. The WPCI Project as proposed by the State of Wyoming would designate a statewide pipeline corridor network dedicated to pipelines and facilities associated with carbon capture, utilization, and storage (CCUS), and of pipelines and facilities associated with enhanced oil recovery (EOR). The project would not authorize any new pipelines or construction but would amend several BLM resource management plans (RMPs) across the state.

Consideration of the project is a federal action requiring compliance with the National Environmental Policy Act (NEPA) of 1969. To comply with the requirements of NEPA, an environmental impact statement (EIS) is being prepared to disclose the potential environmental impacts associated with the proposed project and to consider alternatives to the project. The BLM Wyoming State Office is the lead agency for the preparation of the EIS. The EIS will inform the public and agencies about the potential impacts the project could have on the human environment.

## 2 SCOPING PROCESS

The BLM follows the public involvement requirements according to the Council on Environmental Quality (CEQ) regulations set forth in 40 Code of Federal Regulations (CFR) 1501.7, which states “There should be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” The scoping process was open to agencies, tribes, and the public to identify the range of issues to be addressed during the EIS process. The BLM solicited comments from relevant agencies, tribes, and the public. Additionally, the BLM held internal scoping meetings with resource specialists across the state to solicit feedback on potential resource issues. Comments from both the external and internal scoping meetings were organized and analyzed, and then issues that will be addressed in the EIS analysis were identified.

In addition to the identification of relevant issues, another key objective of the scoping process is to identify alternatives that should be analyzed in detail. Under CEQ regulations, the scope of an EIS consists also of alternatives that warrant consideration and detailed analysis, including the no action alternative, as well as mitigation measures and other reasonable courses of action (40 CFR 1508.25 (b)).

### 2.1 Publication of the Notice of Intent

The formal public scoping process for the project began on November 15, 2019, with the publication of the notice of intent (NOI) (Appendix A) in the *Federal Register*. The NOI initiated the public scoping process and served to notify the public of the BLM’s intent to prepare an EIS. The BLM also issued media releases and emails that announced the public scoping comment period to the project mailing list. The mailing list was developed from the BLM’s mailing list, tribal contacts, and other cooperating agencies. The public scoping comment period concluded on December 27, 2019. Although the formal comment period has ended, the BLM will, to the best of its ability, continue to consider all comments received. However, any future scoping comments received may not be formally published in a scoping report or other document.

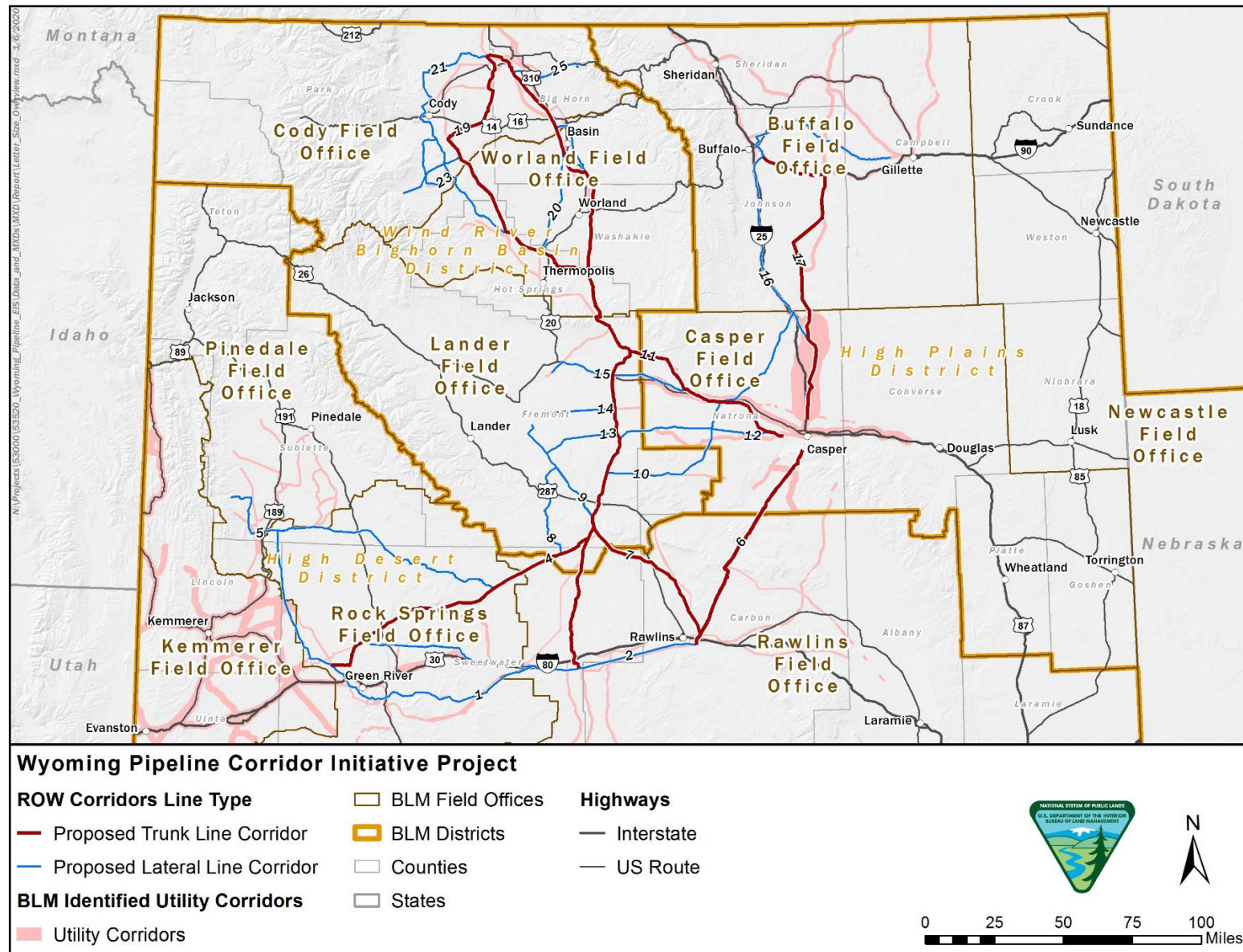


Figure 1. Project Overview

## 2.2 Scoping Meetings

Cooperating agency scoping meetings were held in Cheyenne, Casper, Thermopolis, and Rock Springs, Wyoming, on December 9, 10, 11, and 12, 2019, respectively, at 2:00 p.m. Mountain Time, and a formal public scoping meeting followed directly after at 4:00 p.m. Mountain Time.

For the cooperating agency meetings, the BLM provided a short presentation summarizing the WPCI project, schedule, and NEPA process and solicited feedback and questions from the cooperating agencies for consideration. Cooperating agencies were able to review all scoping meeting materials including maps and handouts.

The public scoping meetings were open-house forums that provided information on the Proposed Action and gave members of the public the opportunity to ask questions or make comments. Representatives from the BLM, the State of Wyoming, and the third-party NEPA contractor SWCA Environmental Consultants were available during the public scoping meetings for questions. Meeting attendees were encouraged to review materials and maps available and to ask questions.

The BLM developed several posters that were on display throughout the room; these showed an overview of the proposed project, the project schedule, methods for providing comments, and several overview maps. Scoping meeting materials are provided in Appendix B.

## 2.3 Opportunities for Public Comment

Members of the public, tribes, cooperators, and other agencies had several methods for providing comments during the public scoping comment period:

Comments could be handwritten on comment forms at the scoping meeting. Comment forms were provided to all meeting attendees and were also available throughout the meeting room so attendees could write and submit comments during the meeting.

Electronic submissions were received via the BLM's ePlanning website:  
[go.usa.gov/xpCMr](https://go.usa.gov/xpCMr)

## 3 COOPERATING AGENCIES

The CEQ's regulations implementing NEPA allow the lead agency to invite tribal, state, and local governments, as well as federal agencies, to serve as cooperating agencies during the NEPA process. To serve as a cooperating agency, the potential agency or government must have either jurisdiction by law or special expertise relevant to the environmental analysis.

State agencies are cooperators under the memorandum of agreement between the BLM and State of Wyoming. Agencies not listed below may later become cooperating agencies if they are found to have jurisdiction by law or special expertise.

Agencies invited to be cooperators include the following:

- Albany County Commissioners
- Big Horn County Commissioners
- Bureau of Indian Affairs
- Bureau of Reclamation
- Campbell County Commissioners
- Campbell County Conservation District
- Carbon County Commissioners
- Carbon County Commissioners

- Clear Creek Conservation District
- Coalition of Governments
- Converse County Commissioners
- Department of Revenue
- Fremont County Commissioners
- Hot Springs Conservation District
- Hot Springs County Commissioners
- Johnson County Commissioners
- Laramie County Commissioners
- Lincoln Conservation District
- Lincoln County Commissioners
- Little Snake River Conservation District
- Lower Wind River Conservation District
- Medicine Bow Conservation District
- Meeteetse Conservation District
- National Park Service
- Natrona County Commissioners
- Natrona County Conservation District
- Office of Surface Mining Reclamation and Enforcement
- Office of the Governor of Wyoming
- Park County Commissioners
- Popo Agie Conservation District
- Powder River Conservation District
- Powell-Clarks Fork Conservation District
- Saratoga-Encampment-Rawlins Conservation District
- Shoshone Conservation District
- South Big Horn Conservation District
- State of Wyoming
- Sublette County Commissioners
- Sublette County Conservation District
- Sweetwater County Commissioners
- Sweetwater County Conservation District
- U.S. Department of Agriculture
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- U.S. Geological Survey
- Uinta County Commissioners
- Washakie County Commissioners
- Washakie County Conservation District

## 4 TRIBAL CONSULTATION

The requirements for consultation under the National Historic Preservation Act are in addition to and independent of the opportunity for qualified entities to cooperate under the provisions of NEPA. Letters to initiate tribal consultation were sent to the tribes listed below on December 10, 2019. The letters notified the tribes of the proposed project and requested government-to-government consultation between the BLM and the tribes.

- Blackfeet Nation
- Cheyenne and Arapaho Tribes of Oklahoma
- Cheyenne River Sioux Tribe
- Chippewa Cree Tribe of the Rocky Boy's Reservation
- Comanche Nation
- Crow Creek Sioux Tribe of the Crow Creek Reservation
- Crow Tribe of Indians
- Eastern Shoshone Tribe of the Wind River Reservation



- Fort Peck Assiniboine and Sioux Tribes
- Lower Brule Sioux Tribe
- Nez Perce Tribe
- Northern Arapaho Tribe
- Northern Cheyenne
- Oglala Sioux Tribe
- Omaha Tribe of Nebraska
- Ponca Tribe of Nebraska
- Rosebud Sioux Tribe
- Shoshone-Bannock Tribes of the Fort Hail Reservation
- Sisseton Wahpeton Oyate of the Lake Traverse Reservation
- Spirit Lake Tribe
- Standing Rock Sioux Tribe
- Three Affiliated Tribes
- The Ute Tribe of the Uintah and Ouray Reservation
- Winnebago Tribe of Nebraska
- Yankton Sioux Tribe

## 5 SCOPING COMMENTS

This section summarizes the individual comments received during the formal public scoping comment period and during the BLM's internal scoping process. In accordance with CEQ NEPA regulations (40 CFR 1501.7), it is through the scoping process that the lead agency will

- determine the scope and significant issues to be analyzed in depth in the EIS;
- identify and eliminate from detailed study the issues that are not substantive, narrowing the discussion of such issues to a brief presentation in the EIS about why the project effects related to these particular issues would not have significant effects on the human environment; and
- identify a range of reasonable alternatives that address the issues identified during scoping.

### 5.1 Public Scoping

#### 5.1.1 Summary of Submissions

The BLM Wyoming State Office received 33 submissions from members of the public, federal agencies, state agencies, organizations, businesses, and cooperating agencies during the public scoping comment period (Table 1). Comments consisted of three handwritten comments submitted during the public scoping meetings and 30 submissions emailed directly to the BLM Project Manager, Heather Schwartz, and/or submitted electronically via the BLM's ePlanning website. All comments were given equal consideration, regardless of method of submittal.

**Table 1. Comment Submissions**

Submission Number	Date Received	Submission Type	Name
001	12/11/2019	Cooperating agency	Hot Springs County
002	12/11/2019	Individual	Carol Dockery
003	12/12/2019	Individual	David Allison
004	11/18/2019	Individual	Jean Public

Submission Number	Date Received	Submission Type	Name
005	12/19/2019	Cooperating agency	Campbell County Board of Commissioners
006	12/17/2019	Cooperating agency	Board of Carbon County Commissioners
007	12/9/2019	Cooperating agency	Hot Springs County
008	12/3/2019	Federal agency	National Park Service National Trails
009	12/5/2019	Business	Occidental Petroleum Corporation
010	12/20/2019	Organization	Petroleum Association of Wyoming
011	12/20/2019	Business	Power Company of Wyoming LLC/Transwest Express LLC
012	12/16/2019	State agency	Wyoming Department of Environmental Quality, Abandoned Mine Land Program
013	12/27/2019	Cooperating agency	Wyoming County Commissioners Association
014	12/18/2019	Organization	Wyoming Pipeline Authority
015	12/19/2019	State agency	Wyoming Department of Agriculture
016	12/18/2019	State agency	Wyoming Department of Environmental Quality, Air Quality Division
017	12/26/2019	Cooperating agency	Converse County Board of Commissioners
018	12/24/2019	Organization	Enhanced Oil Recovery Institute
019	12/24/2019	Business	Genesis Alkali
020	12/23/2019	Cooperating agency	Hot Springs Conservation District
021	12/26/2019	Cooperating agency	Hot Springs County Natural Resources Planning Committee
022	12/27/2019	Cooperating agency	Saratoga-Encampment-Rawlins Conservation District
023	12/23/2019	Federal Agency	U.S. Fish and Wildlife Service
024	12/27/2019	Cooperating agency	Washakie County Commissioners
025	12/23/2019	State agency	Wyoming Game and Fish Department
026	12/23/2019	Organization	Wyoming Farm Bureau
027	12/19/2019	Cooperating agency	Office of Governor Mark Gordon
028	12/20/2019	Organization	Western Watersheds Project
029	12/18/2019	Cooperating agency	Sweetwater County Board of County Commissioners
030	12/26/2019	Federal agency	U.S. Environmental Protection Agency
031	12/27/2019	Cooperating agency	Washakie County Conservation District
032	12/26/2019	Organization	Wyoming Outdoor Council and Greater Yellowstone Coalition
033	12/27/2019	Organization	Continental Divide Trail Coalition

### 5.1.2 Methodology and Comment Coding

Once public comment submissions were received, individual comments were identified with a unique numeric identifier and coded according to an initial list of categories (Table 2). If a specific comment pertained to more than one category, that comment was assigned to multiple categories. In total, 283 unique comments were identified from all 33 submissions. Similar comments coded to each category were aggregated and used to develop category questions (Section 5.1.3). Each group of comments contains key categories and a brief summary, identifies all comments used to develop the question, and lists a few representative comments. The selected comments are not all inclusive but are intended to provide a

representative example that is typical of others in the category and to illustrate the common themes and concerns summarized. A complete record of all public comments is available in the project's administrative record.

**Table 2. Public Comment Coding Categories**

Initial Coding Category	Coding Counts	Percentage of Total
Add to mailing list	4	1%
Air quality	13	3%
Alternatives	32	7%
Avoidance, minimization, and mitigation	60	14%
Cultural resources	1	0%
Cumulative effects	14	3%
Environmental justice	3	1%
General ecological resources	1	0%
Geology and minerals	11	2%
Groundwater	9	2%
Hazardous and solid waste management	3	1%
Land use and access	23	5%
Native American concerns	3	1%
Negative comment (non-substantive)	2	0%
NEPA analysis and related processes	29	7%
Out of scope	8	2%
Positive comment (non-substantive)	20	5%
Proposed Action	27	6%
Public health and safety	6	1%
Purpose and need	5	1%
Range and grazing	12	3%
Recreation	18	4%
Request for additional information	6	1%
Socioeconomics	22	5%
Soils	4	1%
Special-status species	29	7%
Surface water	24	5%
Transportation	5	1%
Vegetation	14	3%
Visual resources	6	1%
Wildlife, general	26	6%

### **5.1.3 Public Scoping Comments**

#### **Air Quality**

##### **AIR 1: Would Storage of Large Quantities of CO<sub>2</sub> in the Pipeline Corridor affect Wyoming's GHG Emissions?**

(028-009, 030-018, 028-007, 028-008, 028-012, 030-016)

Commenters expressed concern about the scientific uncertainty of CO<sub>2</sub> capture benefits, like those associated with the proposed action. It was recommended that the BLM analyze the net emissions consequences of increased oil production from EOR, as well as the residual, non-captured coal plant emissions potentially enabled by the project. Representative comments follow:

“Because so much uncertainty exists as to whether the CO<sub>2</sub> pipelines for which the state wishes to see BLM amend nine RMPs would be net CO<sub>2</sub> contributors or net CO<sub>2</sub> negative, BLM's EIS must fully analyze an alternative that assesses the impacts of the possible net CO<sub>2</sub> outcomes and discuss how the impacts of a net CO<sub>2</sub> contributor outcome would be minimized, avoided, and mitigated.” (028-008)

“The EPA recommends that the BLM include a general description of the anticipated direct and indirect greenhouse gas (GHG) emissions and reductions associated with the CO<sub>2</sub> sequestration and enhanced recovery projects.” (030-018)

“However, current scientific literature assessing the GHG emission impacts of EOR finds mixed results, not the purely positive impact asserted in the WPCI Proposal. It is currently far from clear whether EOR is a net CO<sub>2</sub> contributor or whether it is net carbon negative, and the available research studies are difficult to compare because the GHG emission scenarios are set up differently within them. Furthermore, that determination rests in large part on whether the source of the CO<sub>2</sub> is anthropogenic (e.g., created by coal-fired power plants) or naturally occurring (already in the ground). The majority of EOR projects have used naturally occurring CO<sub>2</sub>, and absent a large increase in oil prices or some other kind of strong, reliable financial incentive, this seems likely to continue.<sup>6</sup> If this is the case for EOR projects associated with the WPCI project, it would push the WPCI project's downstream GHG and climate change impacts toward the net CO<sub>2</sub> contributor end of the spectrum. The WPCI Proposal does not specify whether anthropogenic or naturally occurring sources of CO<sub>2</sub> would be carried in this pipeline network, and instead merely identifies the locations of both. Whether an EOR project is net carbon negative or a net CO<sub>2</sub> contributor can also be influenced by how old a specific EOR project is. Research suggests that EOR projects are initially net carbon negative for their first few years but then become net CO<sub>2</sub> contributors if they continue.” (028-007)

##### **AIR 2: Would Emissions from Aboveground Facilities, Equipment, and Vehicles used during Pipeline Construction and Operation affect Air Quality, including Visibility?**

(032-015, 028-003, 028-004, 028-005, 028-017, 030-006)

Commenters recommended that the BLM consider the GHG emissions and exacerbation of climate change that could result from the construction and operation of the pipeline. Commenters also suggested the BLM quantify and discuss the significance of the direct, indirect, and cumulative GHGs generated by the Proposed Action. Representative comments follow:

“BLM must consider recent climate science as well as the GHG emissions that would result from the construction and operation of the CO<sub>2</sub>, oil, and natural gas pipeline network for which it is considering amending nine RMPs. BLM must also consider the

upstream, downstream, and cumulative GHG and climate change impacts from the increased oil production that is a purpose of the WPCI Proposal, increased natural gas production that would result from increased access to markets resulting from the Project's natural gas pipelines, as well as cumulative impacts from past, present, and reasonably foreseeable projects." (028-004)

"Based on our current understanding of the proposed Wyoming Pipeline Corridor Initiative (WPCI) project and the area, the EPA has identified the following key topics that we recommend be analyzed and discussed in the Draft EIS so that potential impacts to public health and the environment can be fully understood: (3) air resources; (4) GHG emissions and climate change." (030-006)

## **Alternatives**

### **ALT 1: Alternatives to the Proposed Action should include other Source and Sink Locations.**

(005-001, 005-002, 017-002)

Commenters suggested that additional CO<sub>2</sub> sources and oil fields that could benefit from EOR should be included in the analysis. Representative comments follow:

"Additionally, there are significant CO<sub>2</sub> sources such as the Dry Fork Station and the Wyodak Campus, which could be analyzed as the origin of supply source points in the pipeline network recognizing that private surface easements would need to be obtained by a third party before construction of pipelines could occur. The Dave Johnson and Laramie River power plants should also be considered as a major CO<sub>2</sub> supply source in this study." (005-002)

"While we recognize that Converse County has a significant portion of private surface, there could be some tangible benefits of getting CO<sub>2</sub> to the county through this infrastructure proposal by promoting opportunities to develop additional lateral pipelines for EOR to multiple existing oil field complexes." (017-002)

### **ALT 2: Alternatives to the Proposed Action should include Flexibility in Use of Designated Corridors.**

(010-004, 013-003, 022-015, 024-003, 026-003, 030-002)

Commenters suggested that corridors should be flexible in the types of uses permitted in the corridors. Representative comments follow:

"The RMPs must provide flexibility to allow use of the pipeline corridors for various purposes consistent with BLM's Federal Land Policy and Management Act (FLPMA) multiple use mandate; and the RMPs must retain flexibility to resolve resource conflicts, in the context of valid existing rights on a case by case basis. In summary, flexibility in the use of pipeline corridors, the ability to resolve potential resource conflicts with respect to pipeline corridors, and the inclusion of other key resource issues in the RMP amendments are of significant concern to our members and, as such, BLM needs to ensure they are clearly provided for in the EIS and potential RMP amendments." (010-004)

"As the WPCI moves forward, the County would like the Bureau of Land Management and State of Wyoming to also plan for future gas & crude pipelines to be included in the corridor. Consideration of the possibility to allow broadband infrastructure could be an

added benefit to help connect rural Wyoming. Finally, it will be important to explore any overlooked opportunities for potential future lateral pipelines to tie-in to the main trunk lines.” (024-003)

“Broadband infrastructure is an important topic in Wyoming and WyFB likes that the proposal references broadband infrastructure as a use that could be located in the corridor in the future. WyFB requests that further details and analysis regarding future siting telecommunication infrastructure placement in the proposed corridor. As technology advances, reliable broadband will become more and more critical to WyFB members.” (030-002)

### **ALT 3: Alternatives to the Proposed Action should avoid Known Environmental Conflicts.**

(006-003, 011-006, 019-003, 019-004, 019-005, 019-006, 020-008, 025-001, 028-026, 032-007)

Commenters suggested that alternatives should be developed that avoid known environmental conflicts such as scenic and recreational areas, important habitats for wildlife, and existing rights. Representative comments follow:

“The BLM must consider the factors enumerated at 43 C.F.R. § 2802.11(b) along with other relevant factors and should consider identifying areas where the BLM will not allow corridors for environmental, safety, or other reasons in accordance with 43 C.F.R. § 2802.11(d).” (032-007)

“When considering the proposed pipeline corridor, we encourage evaluating alternative routes with existing line development and corridors. Although the current proposed trunk corridor (6) is the location of an existing product pipeline, there is no established corridor. Corridor 6 is proximate to significant scenic and recreational areas including the Seminoe to Alcova Scenic Byway. Alternatives to the proposed action should evaluate other routes in Carbon County that have existing corridor development to lessen potential degradation to scenic & recreational areas, habitat fragmentation and disturbance. Examples of possible alternative routes include two on trunk corridor 6—running along an existing corridor south of Casper towards Hanna or Medicine Bow and along US 30 and I-80 that would go to Sinclair; or headed west from Casper, North of Alcova, then South on US 789 towards Bairoil.” (006-003)

“Given the extensive conflicts with existing, authorized, and planned infrastructure and current right-of-way grants, PCW and Trans West recommend that BLM develop an alternative route for the WPCI corridors currently proposed for south of Rawlins. Due to the congestion in the I-80 utility corridor, which PCW and Trans West believe is at or near capacity between Sinclair and Rawlins, we encourage the BLM to develop alternative WPCI corridors, as well as any new RMP utility corridors, north of Sinclair and Rawlins.” (011-006)

“Many of the proposed pipeline corridors are within biologically important big game habitats; are within sage-grouse core population areas; or are within 0.6 miles and 0.25 miles of numerous core area and non-core area leks, respectively. Although these proposed corridors generally follow existing pipelines and corridors, we recommend developing an alternative that analyzes minor changes to the proposed routes where they bisect ‘vital’ habitats (per the Wyoming Game and Fish Commission Mitigation Policy 20 16) in order to avoid potential loss of habitat function.” (025-001)

**ALT 4: Alternatives to the Proposed Action should be Located on Federal Lands and Collocated.**

(004-003, 017-004, 022-011, 022-023, 022-033, 025-002, 029-001, 029-003, 029-009, 030-008, 032-004)  
Commenters suggested that alternatives should be located on federal lands to the extent possible, collocated with existing corridors to minimize impacts, and collocated with existing rights-of-way to reduce disturbance. Representative comments follow:

“The SER CD fully supports the statement in the Purpose and Need, ‘Identifying integrated corridors across federal lands under the direction of the various field offices in Wyoming would lead to greater consistency among the individual field offices and would comprehensively address the desire to manage the location of future pipeline construction and operation activities across field offices, thereby minimizing the aggregate impact of future projects on federal lands in Wyoming.’ The SER CD believes it is imperative that integrated corridors be collocated with existing statewide utility corridors (see Map 1 attachment) or collocated with Region 4 Section 368 Energy Corridors (see Map 4 attachment). This will not only minimize the aggregate impact of future projects on federal lands, but on private and state lands too. These existing corridors have roads that could be used for more purposes and reduce the need for additional habitat fragmentation, expanded reclamation challenges, and reduce additional noxious weed infestation opportunities.” (022-011)

“Additionally, there are numerous utility corridors already designated in RMPs. Some of these corridors do not line up with field office or other boundaries making it unlikely they will be utilized in the future. We recommend the BLM consider an alternative that looks at all intra-state utility corridors on BLM lands to reduce the number of corridors on the landscape, ensure they connect to other corridors, and consolidate pipelines and other linear infrastructure.” (025-002)

“Unless the BLM identifies resource concerns specific to CO<sub>2</sub> pipelines, we recommend collocating these CO<sub>2</sub> corridors with existing ROWs wherever possible to minimize the footprint of disturbance and associated impacts.” (030-008)

**ALT 5: The Impact Analysis should include an Alternative where Uncertainties Associated with Air Quality are Fully Analyzed.**

(028-006, 028-008)

Two comments suggested that the impact analysis include an alternative that addresses the uncertainties related to air quality. Both comments follow:

“The EIS Must Consider a Range of Reasonable Alternatives, Including an Alternative Studying the Significant Uncertainties Associated with the WPCI Proposal’s GHG Emissions and Net CO<sub>2</sub> Outcomes.” (028-006)

“Because so much uncertainty exists as to whether the CO<sub>2</sub> pipelines for which the state wishes to see BLM amend nine RMPs would be net CO<sub>2</sub> contributors or net CO<sub>2</sub> negative, BLM’s EIS must fully analyze an alternative that assesses the impacts of the possible net CO<sub>2</sub> outcomes and discuss how the impacts of a net CO<sub>2</sub> contributor outcome would be minimized, avoided, and mitigated.” (028-008)

## Avoidance, Minimization, and Mitigation

### MIT 1: Areas that Should be Avoided

(032-025, 033-007)

Commenters provided areas that should be avoided by the Proposed Action and alternatives. A representative comment follows:

“To this end, CDTC seeks to minimize the impacts of utility developments and their associated facilities on the Trail’s resources. To do so, CDTC encourages avoiding the following resources whenever possible in sighting utility corridors and facilities near the Trail:

1. Wilderness areas and their adjacent buffer zones;
2. BLM NLCS and WSA areas, USFS semi-primitive non-motorized areas and NPS natural areas;
3. Areas of significant cultural, historic and natural value;
4. The Foreground zone as determined by the Scenery Management System for all Trails, and as seen from prominent viewpoints and key scenic features such as rock outcrops with large expansive vistas, or open landscape, sub alpine, alpine areas where the landscape is uninterrupted by man’s influence or development;
5. Wetlands and other important natural features; and
6. Any other special area where important Trail values, such as a sense of remoteness, would be compromised.” (033-007)

### MIT 2: Suggested Coordination

(012-002, 012-003, 015-004, 019-004, 019-007, 022-019, 022-021, 022-029, 031-004)

Commenters provided situations where operators should coordinate with other entities to minimize impacts. Representative comments follow:

“We would request that the AML Program be contacted when such planning commences so that we can provide the best available data on known underground mine workings and provide input into either avoidance or mitigative strategies.” (012-003)

“We strongly encourage BLM staff and pipeline development companies to work closely and consistently with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding these proposed corridors. Agriculture producers are intimately familiar with areas affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. We highly recommend that during the planning process developers and BLM officials seek and address the concerns and recommendations of these stewards of habitat, forage and rangeland health.” (015-004)

“WCCD encourages the BLM to work closely with pipeline development companies to ensure the private landowner’s concerns and interests are met on an individual basis including any road construction, reclamation, and pipeline placement.” (031-004)



### **MIT 3: Minimize Disturbance where Possible**

(013-002, 032-011)

Commenters suggested that corridors should be collocated to the extent possible and that pipelines and associated facilities should be placed in such a manner to minimize disturbance. Both comments follow:

“Ensure pipelines and associated facilities are collocated with existing corridors and other disturbances to the extent possible. WCCA appreciates that the majority of the proposed pipeline on public lands will be sited in existing designated corridors or adjacent to existing pipelines. Collocating pipelines will reduce impacts to natural resources, wildlife and wildlife habitat and ensure that public lands remain open to multiple uses. BLM and the State should seek to collocate all pipelines with designated corridors or existing pipelines where practicable. WCCA encourages BLM and the State to consider siting construction rights-of-way, temporary work spaces and associated aboveground facilities on lands that have already been disturbed or to collocate these activities with other similar disturbances. This would also serve to reduce impacts to public lands, natural resources and multiple uses.” (013-002)

“BLM should ensure that any surface disturbing infrastructure is sited appropriately to avoid adverse impacts to other resources, particularly infrastructure that will require ongoing maintenance.” (032-011)

### **MIT 4: Reclamation Practices**

(015-008, 022-006, 022-031, 028-009, 029-005, 032-010)

Commenters suggested that reclamation of disturbed areas be required, and monitoring should be enforced to ensure disturbed areas are returned to pre-disturbance quality. Representative comments follow:

“The WDA Insists the BLM oversee and ensure successful/performance based reclamation and mitigation In the proposed corridor, including any new/temporary roads and disturbed areas. This also Includes monitoring and eradicating Invasive and noxious weeds until desired vegetation Is established.” (015-008)

“Appendix E Upland Erosion Control, Revegetation, and Maintenance Plan and Appendix F Upland Restoration and Revegetation Plan. The SER CD requests ‘Mulch’ procedures be included on all disturbed areas for ‘Installation’, ‘Restoration’, and ‘Revegetation’. With the lack of topsoil in our district, mulch is necessary to have any chance at reclamation success on flat or sloped areas. Appendix E Upland Erosion Control, Revegetation, and Maintenance Plan and Appendix F Upland Restoration and Revegetation Plan. The ‘Seed Mixes’ section on page 80 states, ‘Additionally, agricultural based private lands will be reseeded to the specifications of applicable landowners. All seed mixes on private lands will be consistent with adjacent undisturbed lands and approved by applicable landowners.’ The SER CD requests modifying the statement to say ‘Additionally, private lands will be reseeded to the specifications of applicable landowners. Whether or not the lands are considered agricultural or native, the expertise and goals of the private landowner should be honored. Many times private landowners top priority is soil stability for native private lands and this is not always consistent with planting seeds consistent with adjacent undisturbed lands.’” (022-031)

## **MIT 5: Air Quality**

(030-017, 032-015)

Comments follow:

“Dust suppression from disturbed areas is a particularly critical mitigation consideration in the arid west. The EPA recommends the Draft EIS include a commitment to addressing dust control as site-specific corridor projects are evaluated. We suggest such plans include, but not be limited to; dust suppression methods and the level of required or anticipated control, inspection schedules, and documentation and accountability processes. Given the arid climate of the area and the associated challenges with reclamation, the EPA recommends reducing surface disturbance to effectively reduce fugitive dust.” (030-017)

“The BLM should evaluate and mitigate reasonably foreseeable GHG emissions.” (032-015)

## **MIT 6: Environmental Justice**

(030-019)

Comment follows:

“...Mitigation measures or alternatives to avoid or reduce any disproportionate adverse impacts. The EPA recommends involving any affected communities in developing the measures and in identifying alternate corridor routes. Given that this is a linear project, the BLM may want to consider the guidance developed by the Federal Highway Administration for linear transportation projects ([https://www.environment.fhwa.dot.gov/env\\_topics/ej/guidance\\_ejusticenepa.aspx](https://www.environment.fhwa.dot.gov/env_topics/ej/guidance_ejusticenepa.aspx)). In addition, the EPA recommends reviewing the EIS for the expansion of I-25 through Pueblo, Colorado (<https://www.codot.gov/library/studies/i25pueblois>, see chapter 3.6). The Pueblo EIS has a good discussion of minority and low-income thresholds, examples of adjusting the alternatives to reduce impacts to EJ populations, and mitigation measures.” (030-019)

## **MIT 7: Socioeconomics**

(015-009)

Comment follows:

“The BLM must analyze and mitigate Increased costs and reduced revenues on disturbed land for private landowners and grazing permittees in the final EIS and Record of Decision.” (015-009)

## **MIT 8: Public Health and Safety**

(030-004)

One comment indicated that a spill response plan be included in the analysis. Comment follows:

“Based on our current understanding of the proposed Wyoming Pipeline Corridor Initiative (WPCI) project and the area, the EPA has identified the following key topics that we recommend be analyzed and discussed in the Draft EIS so that potential impacts to public health and the environment can be fully understood: ( 1) pipeline construction, safety and spill response;” (030-004)

## MIT 9: Recreation

(033-008, 033-013)

Two comments provided avoidance, minimization, and mitigation measures for the Continental Divide National Scenic Trail. Both comments follow:

“In addition, we encourage the following guidelines to identify areas, where when necessary to cross, parallel or otherwise include the CDNST, utility lines and facilities may be located as to reduce their impacts to the CDNST:

1. Locating at a site where the CDNST crosses an existing state or federal highway or highway intersection. In these instances, through applying sound sighting procedures, many of these crossings may only be visible at the point of intersection. We encourage the practice of careful sighting whenever possible.
2. Locating at a site where the CDNST crosses areas that are already developed, and classified as Rural or Urban by the USFS Recreation Opportunity Spectrum (ROS);
3. Upgrading or co-aligning a new corridor with existing lines, or relocating existing lines into new single corridors, and the subsequent decommissioning of replaced or relocated utility lines;
4. Utilization of an underground route through open areas for natural gas pipelines; and
5. Passage through an area where Trail values, such as a sense of remoteness, would not be compromised.

Finally, we highly encourage sighting teams to engage with CDTC and other agency partners to identify these key areas and potential mitigation when the CDNST and its unique resources cannot be avoided.” (033-008)

“We recommend that the should any impacts occur to the CDNST, the EIS addresses mitigation to help alleviate direct, ancillary and cumulative impacts to the CDT in identification of these potential corridors. The section should address the need for both on-site and off-site enhancements to benefit the unavoidable scenery and Recreation Opportunity Spectrum setting effects on the CDNST and other National Scenic and Historic Trails. Potential mitigation to minimize impacts could be both onsite and off-site strategies and might include the following:

1. Funding for CDNST trail development and maintenance, corridor management, rights-of-way acquisition, and trailhead developments;
2. Removal of facilities that are no longer needed;
3. Relocation of existing smaller capacity transmission lines to the corridors identified by the proposal, and reclamation of those sites back to a natural state;
4. Careful review of the height and type of power line towers;
5. Careful location of power line towers so as to minimize their impacts;
6. Color and reflectivity of facilities; and
7. Landscape treatment within the right-of-way and at other places that screen structures.” (033-013)

## MIT 10: Water Quality

(020-006, 022-034, 023-003, 025-006, 025-007, 025-010, 025-017, 030-012)

Several comments pertained to requiring water quality monitoring and other measures such as setback

distances and implementing erosion control measures as means to minimize and mitigate impacts to water quality. Representative comments follow:

” The SER CD requests any pipeline proponent be required to pay for an extensive water quality monitoring plan and subsequent monitoring for the North Platte River and all tributaries in close proximity to any new Proposed Project corridor per SER CD Long Range Plan, Policy Water Resources #7: ‘The District requires water quality monitoring as a part of all energy and right-of-way development projects to ensure groundwater and surface water quality is not degraded.’” (022-034)

“We recommend extra workspaces for vehicle parking or construction staging areas be located a minimum of 300-feet from wetlands and waterbodies. In addition, we recommend temporary extra workspaces and additional temporary workspaces for stockpiling of excavated material should be located a minimum of 150-feet from wetland and waterbodies.” (023-003)

“Riparian areas and floodplains should not be used as staging or refueling areas. All chemicals, solvents and fuels should be kept at least 500 feet away from streams and riparian areas.” (025-010)

## **MIT 11: Streams and Wetlands**

(025-012, 025-013, 025-014, 025-015, 029-007, 030-014, 030-015, 032-023)

Several comments included mitigation measures that should be included to avoid, minimize, and mitigate impacts to stream and wetland resources. Representative comments follow:

“Where pipeline crossings of streams (perennial or intermittent) will be trenched not bored, stream banks should be re-stabilized with large angular rock (greater than two feet in one dimension). Riprap should be placed from the channel bottom to the top of the normal high-water line on the bank. We recommend that the applicant utilize double-ditching techniques to separate the top one-foot of stream bottom substrate from deeper soil layers. Substrate layers should be replaced in the same order that they are removed from the stream. The trench should be open less than 24 hours if the stream/river is less than 1 00-feet wide and no more than 72 hours if the stream/river is more than 1 00-feet wide.” (025-012)

“Any pipelines that parallel drainages should be located outside the 1 00-year floodplain. Pipeline crossings of riparian areas and streams should be at right angles to minimize the area of disturbance.” (025-013)

“The Green River is the source of drinking water for the cities of Rock Springs, Green River and Granger and for several unincorporated communities. It provides high quality process water for several mines and major industries. In addition, the Green River provides water for the Seedskaadee National Wildlife Refuge and the Fontenelle and Flaming Gorge Reservoirs which support sport fishing, boating and other recreational opportunities. To protect Green River water for these important uses, Sweetwater County recommends that all pipeline crossings of the Green River be completed by boring under the river and that up and down stream safety shut off valves be installed to limit the size of product spills if a potential break in a pipeline occurs.” (029-007)

“The EPA recommends that impacts to wetlands and other surface water bodies be avoided and minimized to the maximum extent practicable during waterbody crossings. Where feasible, the EPA recommends the use of horizontal directional drilling for pipeline routing under all water crossings and their associated floodplains and wetlands. Unless other resource concerns outweigh aquatic resource impacts, we recommend

identifying corridor alignments that minimize potential impacts to aquatic resources. If more damaging, open-cut water body crossings are anticipated, it is recommended that mitigation measures be used to stabilize and return stream banks to preconstruction contours, and waterbody crossing areas be graded and revegetated immediately following construction. Additionally, it is recommended that rip-rap, gabions, or other methods to harden banks be avoided or used only sparingly to control erosion and stabilize banks at stream crossings during and/or after construction. The EPA supports an overall goal to return construction sites to natural, preconstruction conditions.” (030-015)

## **MIT 12: Vegetation**

(025-004, 025-008, 025-009)

Representative comments follow:

“Riparian canopy or stabilizing vegetation should not be removed if possible. Crushing or shearing streamside woody vegetation is preferable to complete removal. Any such vegetation that is removed in conjunction with stream crossings should be reestablished immediately following completion of the crossing. Proper riparian grazing management strategies, including rest, should be applied to disturbed stream banks.” (025-008)

“We recommend the use of large wood plank matting joined with cable to minimize impacts to the riparian habitat.” (025-009)

## **MIT 13: Wildlife**

(022-028, 025-003, 025-005, 025-011, 025-016, 028-027, 028-038, 028-041, 028-042, 028-043, 028-044, 028-045, 032-012, 032-018, 032-024)

Several comments pertained to measures to reduce impacts to wildlife and their habitats. Suggestions of avoiding sensitive habitats and following timing limitation stipulations, construction practices to avoid impacting priority streams, and compensatory mitigation were the most mentioned topics. Representative comments follow:

“The Department recognizes it is impossible to avoid all seasonally important wildlife habitats on a project of this scale. If pipeline corridors are designated that do cross important wildlife habitats, we recommend the application of appropriate timing limitation stipulations to construction activity in order to protect species when they are most vulnerable to disturbance.” (025-003)

“Any pipeline crossing of perennial streams that is a Blue Ribbon or Red Ribbon Trout Stream and/or contain Species of Greatest Conservation Need should be accomplished by boring under the active channel to avoid impacts to the channel and associated riparian areas. This would further eliminate any concerns with sedimentation and the need to avoid critical times of year such as when fish species are spawning. Not entering the live channel will also eliminate all aquatic invasive species concerns. Boring pits should be located far enough back from the channel that stream bank stability is not reduced.” (025-011)

“It would be far preferable for the WPCI corridors to be sited outside of priority habitat management areas (PHMA) and sagebrush focal areas (SFA). But if BLM allows siting inside them, BLM should provide the option of voluntary grazing permit retirement buyout as compensatory mitigation for the WPCI project. Permanent retirement of livestock grazing confers multiple benefits for sage-grouse habitats and populations. Permanently retiring grazing allotments is a proven and cost-effective method of obtaining habitat service gains, as well as a way of facilitating fence removal, thus

removing a well-known threat to sage-grouse. Riparian areas where grazing has been removed can show markedly beneficial changes in two to five years, while upland areas take longer.” (028-043)

“Construction, operation, and maintenance should be timed appropriately to avoid raptor nesting seasons, sage grouse lekking, parturition times for big game, and other sensitive times for wildlife where the adverse impacts of development could be exacerbated.” (032-018)

## **Cultural Resources**

### **CUL 1: How Would the Proposed Action affect Cultural Resources and Cultural Resources of Native American Concern?**

(032-020)

Comment follows:

“The BLM must ensure adequate consultation with tribes, particularly regarding traditional cultural properties, which may not be mapped, and any other resources of cultural or spiritual significance. The BLM should avoid designated and proposed National Historic Trails and their viewsheds. The current proposal sites corridors across the Mormon, California, and Oregon trails and through their protected viewsheds.” (032-020)

## **Cumulative Effects**

### **CUM 1: What are the Cumulative Effects from the Proposed Action on the Kirby Creek and Bridger Pass Area?**

(001-001, 007-002, 013-004, 020-002, 020-004, 021-008)

Commenters provided information regarding existing projects and planned projects for the Kirby Creek and Bridger Pass areas. Representative comments follow:

“Bridger Pass (on the boundary between HSC and Fremont Co.) is a choke point. It contains corridors for vehicles, wildlife, drainage and pipelines in a very narrow bit of real estate. I expect Game & Fish will have some issues there. We also have a growing interest in being able to develop the existing County Road into an alternate all-weather route out of the County (since shutdowns in the Canyon are frequent), and this will ultimately require more right-of-way or easement in Bridger Pass than currently exists.” (007-002)

“The Conservation District has historically been involved in the Kirby Creek CRM project which has restored significant segments of Kirby Creek to previous conditions. Millions of dollars have been invested in stream restoration work, much of it, within the designated energy corridors.” (020-004)

## **CUM 2: What are the Cumulative Effects from the Proposed Action and Development Projects?**

(011-002, 019-002, 019-003, 030-003, 033-006)

Commenters provided information regarding development projects that could contribute to cumulative effects. Representative comments follow:

“PCW and Trans West are developing the CCSM Project and TWE Project, respectively, in southern Wyoming. The CCSM Project is an approximately 3,000-megawatt (MW) wind energy project located in Carbon County, Wyoming, south of Sinclair. The TWE Project is an approximately 730-mile transmission line extending to southern Nevada. In Wyoming, the TWE Project begins south of Sinclair, continues west to Wamsutter, and then turns south roughly following the Carbon Sweetwater County line before crossing into Colorado. Development of the CCSM Project and TWE Project has been underway since 2008. Together, the CCSM Project and TWE Project will constitute a \$6 billion investment in Wyoming. PCW and Trans West have collectively invested hundreds of millions of dollars in the development and construction of these critical infrastructure projects.” (011-002)

“Genesis Alkali LLC is a trona mining and soda ash production company in Western Wyoming, producing approximately four million tons per year of natural soda ash and employing about 900 people at our two facilities near Green River, Wyoming. Soda ash is the largest inorganic material exported from the United States and Genesis Alkali is the largest US producer. Ninety percent of all soda ash produced in the United States is produced in Wyoming, just west of Green River. Southwest Wyoming holds almost all of the nation's mineable trona reserves, the majority of which lie within the approximately 700,000-acre Known Sodium Leasing Area (KSLA).” (019-002)

“In addition to looking at direct impacts in the immediate vicinity of the proposed pipeline, the Council on Environmental Quality (CEQ) regulations (40 C.F.R. § 1502.16) instruct agencies to consider other effects that are reasonably foreseeable. Thus, in addition to considering the impacts occurring from the proposed amendments, the EPA recommends that the Draft EIS evaluate whether this project would facilitate increased oil and gas production or exploration and any associated potential impacts including any potential beneficial impacts.” (030-003)

## **CUM 3: What are the Cumulative Effects of the Proposed Action on the Continental Divide National Scenic Trail?**

(033-012)

Comment follows:

“Perhaps our greatest concern has to do with cumulative effects. If full environmental-impact analysis occurs only at the project or activity level, then how does the agency propose to assess the cumulative impacts of multiple projects or activities over time and their impacts to the entire CDNST? While we applaud the agency’s intentions to undertake such a forward looking planning process, we are concerned that without rigorous attention to the cumulative impacts of incremental decisions, the cumulative impacts of multiple projects and activities could be obscured and lead to unintended consequences that may or may not be consistent with a particular management direction for the CDNST. CDTC believes that for linear resources, such as the CDNST, that are affected by more than one corridor, that special attention be given to a full exploration

and understanding of the cumulative effects to these very special and unique resources.”  
(033-012)

#### **CUM 4: What are the Cumulative Effects from the Proposed Action on Wildlife Habitat?**

(028-034, 028-035)

Comments follow:

“Similarly, sage-grouse habitat in Wyoming and across the grouse’s range is impacted by grazing and recreation including authorized and unauthorized off-road vehicle use. The EIS must consider the cumulative impact of the establishment of pipelines and the past, current, and projected energy leasing/development, grazing, and recreational activity on sage-grouse and its habitat.” (028-034)

“The EIS must analyze the impacts to big game species including cumulative impacts. Fragmentation and disturbance of habitat adversely impacts big game species. As with sage-grouse discussed above, the effects of establishing the proposed pipeline corridors must be analyzed in the context of other past, present, and foreseeable activities that affect big game and their habitat. These activities and uses include energy leasing and development, recreation, and linear disruptions such as roads, fences, and fuel breaks.”  
(028-035)

### **Environmental Justice**

#### **ENJ 1: Would Construction, Operation, Maintenance, and Reclamation of Pipelines in the Trunk and Lateral Corridors affect Environmental Justice Communities?**

(028-022, 030-007, 030-019)

Commenters recommended analysis of impacts to minority, low-income, and tribal communities, specifically impacts to the health and welfare of these communities. One commenter recommended involving any affected communities in developing mitigation measures or alternate corridor routes to avoid or reduce any disproportionate adverse impacts to the communities. A representative comment follows:

“In addition, the EIS must analyze the impacts to indigenous communities that would result from the construction and operation of the pipelines and oil and gas development associated with them, including the impacts of worker man camps.” (028-022)

### **General Ecological Resources**

#### **ECO 1: Would the Proposed Construction or Operation of the Pipeline Affect Ecosystem Services?**

(022-014)

One commenter expressed general concern to impacts on ecosystem services. The comment follows:

“The SER CD requests that ecosystem services are analyzed to full extent in the Proposed Action, per SER CD Long Range Plan, Policy Ecosystem Services #1: ‘The District will ensure ecosystem services as defined and outlined by the National Agricultural Statistics Service Wyoming Agricultural Statistics report are analyzed to the full extent within all NEPA documents and subsequent actions.’” (022-014)



## Geology and Minerals

### **GEO 1: Is the Analysis Area Prone to Geologic Hazards (earthquakes, landslides/slumping) that could affect Pipelines or that could be Exacerbated by Pipeline Construction or Oil and Gas Development (fracking) supported by the Proposed Action?**

(012-002, 012-004, 012-005)

Comments noted potential geologic hazards that could affect pipelines supported by the Proposed Action. Comments follow:

“After receiving notice of this initiative, AML asked their consultants who have been working on this large area project to perform a high-level review of the proposed WPCI corridors for such conflicts or potential risks. I am providing some general mapping to illustrate that there are potential risks to the integrity of such installations in some areas. The attached mapping provides a general analysis of potential areas of risk should pipelines or other such utilities be installed over known underground workings. We feel that such areas will need to be considered, and carefully evaluated for geologic stability, and actual risks of ground failure, as final routes for such extensive pipelines are worked out. Many of these workings could be avoided with careful advance planning. Otherwise specialized engineering techniques may be required to ensure the integrity and safety of such installations.” (012-002)

“The attached maps provide what we presently know of mines that would potentially impact the proposed pipelines. You will note that one map also provides a location for a coal fire. The attached maps provide what we presently know of mines that would potentially impact the proposed pipelines. You will note that one map also provides a location for a coal fire” (012-004)

“One attached PDF provides a general view of the proposed pipelines, and a basic map of the distribution of abandoned mines across the state. The remaining PDFs provide mapping of different parts of the state that our consultants have evaluated. We hope this high-level information is informative and provides a place to start a discussion on how underground mine workings should be considered during any design effort for infrastructure that could be at risk from ground subsidence.” (012-005)

### **GEO 2: Would the Pipeline Corridors affect Valid Existing Rights of Mines in the Analysis Area?**

(019-003, 019-004)

Comments follow:

“As proposed, WPCI Lateral Corridor 1 passes through lands designated as Core Population areas pursuant to the Wyoming Executive Order on Greater Sage-Grouse Core Area Protection. Additionally, as proposed, portions of WPCI Lateral Corridor 1, as well as the western most portion of Truck Corridor 4, pass through the KSLA, and more particularly, Genesis Alkali active and planned future mining areas. Genesis Alkali maintains that this proposed routing should be modified both to minimize the impact to trona producers and to avoid the Sage Grouse Core Population areas as well as the KSLA to the maximum extent feasible.” (019-003)

“Trona mining, both dry mining and solution mining, creates surface subsidence of up to seven (7) feet. Genesis Alkali has longstanding experience working with pipeline owners/operators, both natural gas and liquids, to mitigate the impacts of subsidence on

pipelines that cross over mining areas. These mitigation discussions can take significant time and effort and costs can run into the millions, which can take a toll on pipeline owner/operators and on the Wyoming's trona mining businesses who are affected. To avoid such costs, designated routes for new pipelines should be developed to avoid current and future mining areas whenever practicable.” (019-004)

### **GEO 3: Would the Pipeline Corridors make Leasable, Locatable, Saleable, and oil/Gas/Geothermal Mineral Locations Inaccessible to Exploration and/or Development?**

(009-001, 009-002, 010-001)

Representative comments follow:

“Oxy is committed to low carbon ventures utilizing C02 sequestration and EOR as part of its low carbon initiative to become carbon neutral. Oxy is the world's largest handler of C02 for EOR and has potential EOR prospects within the Powder River Basin. In addition to Oxy's alignment with the State of Wyoming's EOR and sequestration initiatives, the proposed corridors cross a significant portion of Oxy owned surface, specifically in SW Wyoming. Oxy generally supports the State of Wyoming's proposal to increase transportation corridors for EOR activities but wants to ensure its interests are fully and adequate protected. For that reason, the BLM must consider and expressly protect all valid and existing rights.” (009-002)

“Collectively, PAW's members produce over 90% of the State's oil and gas, generate more than \$5 billion in economic activity, and employ more than 18,000 of Wyoming's hardworking men and women. Our members have an interest in this project and need to be kept informed of decisions made throughout the process. PAW members are actively pursuing new federal fluid mineral leases in prospective areas and may submit future APDs in order to develop existing and future leases in the proposed area of the corridor. PAW and its members, therefore, may be directly affected by the amended RMPs and associated Records of Decision (ROD).” (019-004)

### **GEO 4: Would the Pipeline Corridors increase Oil and Gas Development in the Analysis Area?**

(028-015, 028-016, 030-003)

Commenters noted that the BLM must update the reasonably foreseeable development scenarios for oil and gas production in the nine RMPs and analyze the impacts to resources from the potential increase in oil and gas development across the state. Representative comments follow:

“BLM's Wyoming RMPs contain reasonably foreseeable development scenarios for oil and gas development, often expressed as a range representing the low and high numbers of oil and gas wells expected to be developed. This approach will need to be augmented for the WPCI Proposal because EOR in depleted oil fields may result in greater production from existing wells, not just the development of new wells. As a result, the reasonably foreseeable development scenarios must also include estimates for increased production from existing wells” (028-016)

“In addition to looking at direct impacts in the immediate vicinity of the proposed pipeline, the Council on Environmental Quality (CEQ) regulations (40 C.F.R. § 1502.16) instruct agencies to consider other effects that are reasonably foreseeable. Thus, in addition to considering the impacts occurring from the proposed amendments, the EPA recommends that the Draft EIS evaluate whether this project would facilitate increased

oil and gas production or exploration and any associated potential impacts including any potential beneficial impacts.” (030-003)

## **Groundwater**

### **GRW 1: Would the Proposed Action Lead to an Increase Risk of Groundwater Contamination from Chemicals?**

(028-013, 028-014, 030-010, 030-011)

Representative comments follow:

“The coal ash disposal impacts of extending the lifespan and/or utilization rate of coal-fired power plants that would otherwise be retired or utilized at lower rates must also be analyzed in the EIS. Wyoming coal ash disposal pond sites are some of the most contaminated in the United States. A May 2019 study of the Dave Johnston power plant’s coal ash disposal pond found ‘arsenic, cadmium, molybdenum and radium were at statistically significant levels above the groundwater protection standards,’ requiring closure and remediation. Groundwater contaminants exceeding allowable standards have also been found at coal ash disposal ponds for the Jim Bridger and Naughton coal power plants, also requiring closure and remediation.” (028-013)

“We recommend the Draft EIS include an evaluation of potential adverse impacts from pipeline leaks or spills. This should include potential adverse impacts to; surface waters, public or private water supplies, human health, vegetation, or wildlife. In this part of the analysis, it would be useful to discuss the probabilities and/or likely frequencies of different types of spill or leak events over the life of this type of pipeline. We expect this information would be useful in determining appropriate, safe corridor locations.” (030-010)

### **GRW 2: How Would the Proposed Action affect Groundwater, Especially Shallow Groundwater Resources?**

(002-001, 021-005, 028-017, 030-005, 030-011, 030-012)

Several comments were general in nature and requested that impacts to groundwater resources be addressed in the analysis. Other comments were more specific as to the type of groundwater resource, including livestock wells, aquifers, and groundwater recharge areas. Representative comments follow:

“Based on our current understanding of the proposed Wyoming Pipeline Corridor Initiative (WPCI) project and the area, the EPA has identified the following key topics that we recommend be analyzed and discussed in the Draft EIS so that potential impacts to public health and the environment can be fully understood: (2) groundwater and surface water resources;” (030-005)

“Is this going to interfere in the livestock wells and also the Big Springs in Thermopolis. Also, the personal water wells.” (002-001)

“...If the BLM determines that leaks from CO<sub>2</sub> pipelines have potential impacts to groundwater resources, we recommend presenting baseline data on groundwater resources, with particular emphasis on: the major aquifers in the project areas; the location and extent of the groundwater recharge areas; the location of shallow and sensitive aquifers that are susceptible to contamination from surface activities; and, the uses of each potentially impacted aquifer ( e.g. stock, domestic, irrigation, public water supply, etc.).” (030-011)

## **Hazardous and Solid Waste Materials**

### **HAZ 1: Would a Hazardous Materials Spill affect Public Health and Safety (e.g., contaminated soils or groundwater, near roadways)?**

(025-007, 025-010, 025-014)

One commenter expressed concern about the potential effects of a hazardous materials spill on water resources. This commenter suggested several mitigation measures. A representative comment follows:

“Any pipeline crossings of live streams should be protected by automatic shutoff valves. Additional shutoff valves should be installed on both sides of any drainage basin crossed within 10 miles above a Blue or Red Ribbon Trout Stream or streams containing SGCN species.” (025-014)

## **Land Use and Access**

### **LUA 1: How would the Proposed Action affect the Relevant and Important Values of Areas with Special Designation?**

(029-008, 032-025)

Comment follow:

“In the vicinity of T17N R106W Section 10 and T17N R107W Section 12, Lateral Pipeline Corridor #1 crosses the Flaming Gorge National Recreation Area (FGNRA). The FGNRA is a national recreation resource whose wildlife, fisheries and scenic resources support a multi-million dollar multi-state recreation industry. With this in mind, Sweetwater County encourages the state, BLM and USFS to ensure that any proposed crossing of the FGNRA be completed in a manner that utilizes existing pipeline corridors and rights of way and preserves water quality, wildlife habitat and visual resources. As previously stated, all crossings of the Green River should be completed by boring underneath the river or gorge and with the installation of up and down stream safety shut off valves.” (029-008)

“BLM should avoid siting the corridor within or along the border of WSAs. For instance, the current proposal sites the corridor on the northern border of Alkali Draw WSA, along the southern border of Pinnacles WSA, and near the southern border of Cedar Mountain WSA, where an important Native American sacred site is located. BLM should also avoid siting corridors along the base of Steamboat Mountain, which is protected by ACEC [areas of critical environmental concern] and SMA designations, provides habitat for a rare desert elk herd, and is significant to Native American tribes.” (032-025)

### **LUA 2: How Would the Proposed Action affect other Corridors, Rights-of-Way, or Land Uses?**

(001-001, 008-003, 011-001, 011-003, 011-004, 011-005, 011-007, 013-005, 020-002, 020-005, 021-006, 029-004, 031-005, 032-014)

Several comments noted potential existing conflicts with other rights-of-ways, and general comments requested these types of conflicts to be addressed in the impact analysis. Additionally, other land use

types near the project were mentioned, and requests were made to include the potential impacts to these other types of land uses. Representative comments follow:

“Our primary concerns are 1) the preservation of NHT resources, 2) the continuation of public access to the NHTs, and 3) the preservation of applicable historic settings along the NHTs.” (008-003)

“One of the proposed lateral pipeline corridors in Carbon County would interfere with the TWE Project and the CCSM Project. The affected area is located in Township 21 North, Range 86 West, Sections 31 and 32; and Township 21 North, Range 87 West, Sections 33, 34, 35, and 36, Sixth Principal Meridian (see attached Figure 1). Specifically, the proposed lateral pipeline corridor would interfere with the TWE Project transmission line in three locations and would interfere with the Wyoming Terminal of the TWE Project. The TWE Project Northern Terminal is critical and integral to the success of the entire \$3 billion TWE Project. The lateral line corridor would also interfere with the CCSM Project Overland Substation, as well as with multiple electrical transmission lines connecting to the substation. Installing up to three high-pressure pipelines under or within an electrical transmission substation or terminal location is an incompatible use that affects PCW's and Trans West's ability to safely operate the CCSM and TWE Projects within their authorized rights-of way.” (011-003)

“We also encourage BLM to review existing rights-of-way in the proposed WPCI corridors and provide written notice to existing right-of-way holders during development of the draft EIS to solicit early input from these right-of-way holders regarding how the proposed WPCI corridors may affect the integrity of, or the ability to operate, existing facilities. Early avoidance of conflicts between the WPCI corridors and current and authorized infrastructure will help BLM and the State of Wyoming achieve the designation of feasible, functional pipeline corridors that can be used to efficiently locate and analyze future project-specific proposals.” (011-007)

“WCCD encourages the BLM to maintain a strong communication with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding the proposed corridors. Potential concerns may include: Increased off and on-road traffic; Cut fences; Opened gates; Damaged range improvements; Decreased Animal Unit Months; Decreased palatability of vegetation and forage from road dust and development activities; Reclamation failures; Introduction and spread of noxious weeds” (031-005)

### **LUA 3: How Would the Proposed Action affect Land Use Plans?**

(006-001, 006-004, 022-001, 022-002, 022-006, 031-001, 031-002)

Several comments noted existing land use plans that could apply to areas that overlap the project. Most land use plans allow and, in some instances, encourage these types of projects, but there exists the potential for conflicts in priorities and goals. Representative comments follow:

“A goal in the Carbon County Comprehensive Land Use Plan is to achieve a sustainable balance between energy development, agriculture, and the environment. Two strategies to address this goal are the following: encourage a steady, paced development of the gas and oilfields; enhance the County Government's capacity to monitor, comment on, and influence state and federal decisions on energy development projects. Additionally, a goal within the Land Use Plan is to sustain scenic areas, wildlife habitat, and other important open spaces. One strategy is to limit development in wildlife migration corridors, winter range, and birthing areas, and sage grouse core areas.” (006-001)

“Our comments are specific to our mission as a local government entity within the project area: ‘develop and direct programs to promote long-term conservation and enhancement of our natural resources while contributing to the economic stability of the district and its residents.’ As this project impacts the conservation of our natural resources and the stability of the district and residents, we believe it is important you continue to inform us of proposed actions and decisions for the Proposed Project. Conservation districts are the only local government charged, specifically by state statute, with natural resource management. District supervisors serve as the grass roots representatives of private landowners and the general public, providing leadership and direction in natural resource conservation programs. We appreciate the continued opportunity to express the importance of pertinent issues and concerns on the Proposed Project.” (022-001)

“Goal- WCCD supports minerals and oil and gas production and will provide information and education on the importance of natural resource conservation. The minerals and oil and gas industry is a significant part of the custom and culture of the district, and it provides economic opportunity to Washakie County.

- i. Supports the continued development and extraction of minerals, and oil and gas within federal and state jurisdiction in keeping with the local and regional custom and culture, in order to maintain the economic stability of Washakie County.
- ii. Encourages mineral, and oil and gas production to be conducted in an environmentally responsible manner and to ensure industries continuance is compatible with the principles of multiple use on public lands.” (031-002)

## **Native American Concerns**

### **NAC 1: Would the Proposed Pipeline Development Physically (directly) or Indirectly (visually) Affect both Known and Unknown Cultural Resources of Native American concern?**

(028-019, 028-020, 028-022)

One commenter recommended meaningful tribal consultation to ensure traditional ecological knowledge was used in this planning process. A representative comment follows:

“The WPCI Project area encompasses ancestral, historic, traditional, or treaty lands for many indigenous peoples, including the Apsaalooké (Crow); Arapaho; Bannock; Eastern Shoshone; Očeti Šakówinj (Sioux); Só'taeo'o, Tsétséhéstáhesé, and Tsistsistas (Cheyenne); and Ute. Based on past projects, we anticipate that BLM will notify tribes about the Project and invite them to participate in government-to-government consultation, but that BLM will not provide financial resources that would help tribes to do so, nor provide sufficient time for internal tribal decision-making related to the consultation. Given the federal government's track record with other large-scale oil and gas projects in the Great Plains, there is a high risk that this Project's tribal consultation process will not meaningfully influence the outcome of BLM's NEPA decision-making, but instead will merely tick a box on a checklist. However, without meaningful tribal consultation, it will be virtually impossible for BLM's EIS to include traditional ecological knowledge that could help BLM achieve more sustainable land management practices.” (028-020)

## **Negative Comment (non-substantive)**

(004-001, 004-002)

One commenter expressed general opposition to the Proposed Action. A representative comment follows:

“They are blasting. They are destroying vegetation. They are killing all wildlife on this land. This is a totally massively destructive plan to ruin 2000 miles of land.” (004-002)

## **NEPA Analysis and Related Processes**

### **PRO 1: The EIS should include all Statutes and Regulations Pertinent to the Proposed Action and Agency Decision.**

(010-004, 016-001, 022-10, 022-027, 023.002, 032-003)

Representative comments follow:

“Please include the Clean Air Act in this list of regulations.” (016-001)

“The RMPs must provide flexibility to allow use of the pipeline corridors for various purposes consistent with FLPMA’s multiple use mandate; and the RMPs must retain flexibility to resolve resource conflicts, in the context of valid existing rights on a case by case basis. In summary, flexibility in the use of pipeline corridors, the ability to resolve potential resource conflicts with respect to pipeline corridors, and the inclusion of other key resource issues in the RMP amendments are of significant concern to our members and, as such, BLM needs to ensure they are clearly provided for in the EIS and potential RMP amendments.” (010-004)

### **PRO 2: The NEPA Process should include Participation from Various Agencies and Stakeholders, Solicitation of Information from the Public, and a Robust Tribal Consultation.**

(008-002, 011-007, 015-001, 022-001, 022-004, 022-036, 028-002, 028-021)

Commenters requested varying levels of participation from becoming a cooperator to being kept informed of the EIS process for the WPCI Project. One commenter suggested the EIS include a description of the government-to-government consultation with the tribes and how the BLM would support tribal participation in the NEPA process. Representative comments follow:

“As the federal Administrator of these NHT we would like to review with you our options for participation in the NEPA process (including evaluation of proposals under the National Trails System Act) and request consulting party status for the NHPA process.” (008-002)

“We also encourage BLM to review existing rights-of-way in the proposed WPCI corridors and provide written notice to existing right-of-way holders during development of the draft EIS to solicit early input from these right-of-way holders regarding how the proposed WPCI corridors may affect the integrity of, or the ability to operate, existing facilities. Early avoidance of conflicts between the WPCI corridors and current and authorized infrastructure will help BLM and the State of Wyoming achieve the designation of feasible, functional pipeline corridors that can be used to efficiently locate and analyze future project-specific proposals.” (011-007)

“Therefore, the EIS should explain how government-to-government consultation for this Project will be meaningful and how BLM will support tribal participation beyond just issuing invitations.” (028-021)

### **PRO 3: The EIS should include a Summary of how Subsequent NEPA Analysis will be Completed at the Project Level.**

(020-001, 020-009, 021-002, 021-007, 022-010, 028-001, 032-008)

Several comments provided assumptions on how subsequent NEPA would be completed at the project level and requested that clarification be provided. Representative comments follow:

“Secondly, I note that this pipeline corridor initiative was first considered at a multi-state scale, several years ago. This present planning effort will ‘zoom in’ the environmental review of the corridor network to a statewide or county-by-county scale. We recognize that the next (and final) step would be a more site-specific review of individual pipeline proposals within the proposed corridors. The inherent danger of this layering of federal, state, and local focus is that all prior environmental review has been at macro levels. When we finally get to the micro phase, with individual pipelines proposed for placement, will the environmental assessment give the site-specific proposals a ‘pass’ due to the state-level EIS?” (021-002)

“If the current EIS is not able to sufficiently address such environmental impacts at this time, then it should speak to the environmental assessment process for the future pipeline construction permitting stage. Clear direction should be given to address these concerns, in the event it is determined that an EIS is not warranted at that future time.” (021-007)

### **PRO 4: Impact Analysis Methods**

(028-10, 028-15, 028-18, 028-208, 028-039, 028-040, 030,001, 032-002, 033-003)

Several comments included information on how the impact analysis for various resources should be conducted. Representative comments follow:

“The EIS Must Analyze the Impacts of Wyoming Producing More Fossil Fuels Instead of Renewable Energy as a Result of the WPCI Project” (028-010)

“BLM Must Update the Reasonably Foreseeable Development Scenarios for Oil Production in the Nine RMPs, and Analyze the Increased Impacts to Other Resources That Would Result from the WPCI Project” (028-015)

“Wyoming’s pipeline proposal includes 1,105 miles of pipelines on BLM lands and another 809 miles on other lands. The BLM must not only analyze the impacts of the pipeline corridors that traverse BLM-administered lands but must also analyze the impacts related to the 809 miles of pipelines that will be enabled by the construction of pipelines on BLM lands. Related activities on non-federal lands that are connected to the BLM action must be analyzed as indirect impacts and count towards the significance of and required mitigations for BLM actions.” (028-040)

“Because of the projects scope (almost 2000 miles of corridor intersecting nine field offices) the 25 segments of proposed corridor should be analyzed individually as well as cumulatively in order to satisfy NEPA’s ‘hard look’ requirement.” (032-002)

### **Out of Scope**

(003-001, 005-003, 013-001, 017-003, 017-005, 022-007, 026-002, 032-022)

Most out-of-scope comments were regarding the extent of the Proposed Action, export of products out of state, or the potential for future lateral tie-ins. Representative comments follow:

“WyFB requests the State and the BLM consider and analyze ways for future developers to be able to use corridor and associated pipelines. This should include permitting tie-ins



for future lateral pipelines that would cross private lands. It should include working with developers on private lands now to determine where laterals would be sited and permit the public lands portion now.” (026-002)

“Finally, all opportunities for exporting products out of the state (natural gas, oil, CO<sub>2</sub>, etc.) should be considered to the maximum extent possible in this analysis.” (017-005)

## **Positive Comment (non-substantive)**

(002-002, 006-002, 007-001, 010-002, 013-006, 014-001, 015-002, 017-001, 018-001, 018-003, 019-001, 020-009, 021-001, 024-001, 026-001, 027-001, 031-001, 031-003, 033-001)

Several commenters expressed support for the project and project goals. Representative comments follow:

“Carbon County supports the Wyoming Pipeline Corridor Initiative to further the establishment of pipelines associated with CCUS, and EOR.” (006-002)

“PAW understands the benefits of this project and the need to streamline the NEPA process for future pipeline project proponents within the corridor. PAW is pleased to see BLM’s recognition of valid existing rights in the NOI, and the inclusion of valid existing rights as part of BLM’s planning criteria. In addition, we are further encouraged to see oil and gas development in the area is also a stated issue that needs to be addressed in BLM’s analysis.” (010-002)

“The WPA supports the proposed action of the designation of a statewide pipeline corridor network for future pipeline development associated with CCUS as well as associated EOR (CO<sub>2</sub>-EOR) facilities. Amending the RMPs will create greater consistencies and efficiencies across Wyoming BLM field offices to make future analysis of pipeline-specific proposals more efficient.” (014-001)

“Providing incentives for the expansion of pipeline infrastructure for CCUS and EOR is a critical component of Converse County’s overall development and marketing strategy and is vital to the long-term economic health of our county and the State of Wyoming.” (017-001)

“As a proud partner of the USFS, BLM and NPS, CDTC recognizes the need to replace an overly burdensome energy corridor process with more efficient planning methods. We commend the intent of developing a method that defines a collaborative process and provides a framework for pre-selection of potential corridors for future energy development projects.” (033-001)

## **Proposed Action**

### **PRA 1: The Proposed Action Description should include Flexibility in the Use of Corridors.**

(010-003, 010-004, 013-004, 022-15, 026-003, 029-009, 032-13)

Several commenters noted that the Proposed Action description focuses on limiting the corridors to carbon capture and EOR products but does mention that the corridors could be used for other uses such as broadband. Commenters requested that it be made clear that the corridors would be multi-use. Some representative comments follow:

“However, consistent with BLM’s FLPMA multiple use mandate, our members would like to ensure continued flexibility for the State of Wyoming and oil and gas operators to use pipeline corridors for a variety of purposes and to resolve resource conflicts on a case-by-case basis. PAW members are concerned about the State of Wyoming’s

Wyoming Pipeline Corridor Initiative Proposal (WPCI) statement that use of the ‘corridors are constrained to only transport CCUS and EOR products; however, other compatible uses may be considered that would not limit future use of the corridors for CCUS and EOR pipelines and facilities.’” (010-003)

“Ensure the proposed pipeline corridor has the capacity for additional pipelines. BLM and the State should ensure the pipeline as proposed can accommodate additional pipelines. There appear to be segments of the proposed corridor that may not have the physical room needed for additional infrastructure. For example, at least four pipelines, a county road, electrical transmission lines and livestock watering flow lines already occupy the Kirby Creek-Jim Bridger pass route. BLM and the State should consider whether there is sufficient capacity for additional pipelines in this and other already-crowded corridors.” (013-004)

“Section 1.0 Introduction. The purpose identified for the Proposed Project is ‘to establish corridors on public lands dedicated to future use for pipelines associated with CCUS, and EOR.’ Yet it goes on to say, ‘other compatible uses (i.e. broadband infrastructure) at the outer boundaries of the corridors would be considered.’ The remainder of the document only identifies the Proposed Project corridor to be used for CCUS and EOR. The SER CD supports a statewide corridor designation for all energy-related, technology-related, and intra/interstate commerce-related products known now or developed in the future. If the scope of the Proposed Project continues with the narrow focus, we suggest removing the vague statement about other compatible uses unless they are clearly defined.” (022-015)

## **PRA 2: The Proposed Action Conflicts with Existing Rights or Projects.**

(011-001, 011-003, 011-004)

One commenter provided known conflicts with the Proposed Action. Representative comments include the following:

“One of the proposed lateral pipeline corridors in Carbon County would interfere with the TWE Project and the CCSM Project. The affected area is located in Township 21 North, Range 86 West, Sections 31 and 32; and Township 21 North, Range 87 West, Sections 33, 34, 35, and 36, Sixth Principal Meridian (see attached Figure 1). Specifically, the proposed lateral pipeline corridor would interfere with the TWE Project transmission line in three locations and would interfere with the Wyoming Terminal of the TWE Project. The TWE Project Northern Terminal is critical and integral to the success of the entire \$3 billion TWE Project. The lateral line corridor would also interfere with the CCSM Project Overland Substation, as well as with multiple electrical transmission lines connecting to the substation. Installing up to three high-pressure pipelines under or within an electrical transmission substation or terminal location is an incompatible use that affects PCW's and Trans West's ability to safely operate the CCSM and TWE Projects within their authorized rights-of way.” (011-003)

“In addition to the specific conflicts with the CCSM Project and TWE Project discussed above, the WPCI lateral and trunk pipeline corridors south of Rawlins interfere with other existing, authorized and planned infrastructure. There are multiple pipelines, communication lines, and transmission lines owned by other companies in the area and crossing those facilities would either be technically infeasible or would add significant, potentially prohibitive cost to future WPCI pipeline project developers.” (011-004)

### **PRA 3: The Proposed Action was Designed to Minimize Environmental Impacts.**

(014-004, 018-002, 022-011, 022-023, 022-035, 026-001, 027-003, 029-011, 032-005)

Commenters noted that the Proposed Action is collocated with designated corridors or existing pipeline rights-of-way to minimize environmental impacts. Representative comments follow:

“The WPA has been involved with the corridor planning and design since the beginning of the project. The WPA provided technical assistance in the analyses used to develop proposed routes, with primary consideration for EOR development. The majority of the WPCI proposal lies within previously established pipeline corridors in existing RMPs or parallels existing pipeline rights-of-way. In instances where the WPCI proposal diverges from existing corridors or pipelines, it is due to analyses using GIS imagery that diverted the corridors away from potential human conflicts such as housing or agriculture, or other important natural resources.” (014-024)

“The SER CD fully supports the statement in the Purpose and Need, ‘Identifying integrated corridors across federal lands under the direction of the various field offices in Wyoming would lead to greater consistency among the individual field offices and would comprehensively address the desire to manage the location of future pipeline construction and operation activities across field offices, thereby minimizing the aggregate impact of future projects on federal lands in Wyoming.’ The SER CD believes it is imperative that integrated corridors be collocated with existing statewide utility corridors (see Map 1 attachment) or collocated with Region 4 Section 368 Energy Corridors (see Map 4 attachment). This will not only minimize the aggregate impact of future projects on federal lands, but on private and state lands too. These exiting corridors have roads that could be used for more purposes and reduce the need for additional habitat fragmentation, expanded reclamation challenges, and reduce additional noxious weed infestation opportunities.” (022-011)

### **PRA 4: The Proposed Action Description should include a General Description of Pipeline Construction and Associated Facilities**

(006-004, 022-016, 022-018, 022-022, 022-024, 022-026, 030-009)

Commenters recognized that the BLM would not be authorizing construction of any pipelines at this time, but to fully assess the potential impacts to resources, the Proposed Action description should include general construction practices and associated facilities. Representative comments follow:

“Section 2.3 Associated Aboveground Facilities. The SER CD requests clarification for the conflicting statement in paragraph 2.3.1, ‘Access will be year-round, depending upon winter weather.’ If access is dependent on winter weather, it is not year-round access and should be clearly stated as such. Section 2.3 Associated Aboveground Facilities, 2.3.3 Pump and Compressor Stations. Please remove the word ‘approximate’ before the ‘3- to 10-acre fenced area’. It should be either an approximate number of acres or a range but not both. Section 2.3 Associated Aboveground Facilities, 1.2.5 Measurement Facilities. The SER CD requests clarification as to whether the vegetation will be cleared or not in these areas.” (022-024)

“We understand that this EIS will not authorize pipeline construction. We nonetheless recommend that general information about pipeline construction be included so that anticipated impacts can be considered when selecting ROWs. We recommend that information regarding the following project facility components be incorporated into the Draft EIS to assess potential construction impacts within ROW alternatives:

- Description of anticipated support facilities typical for this type of pipeline including; operation and maintenance buildings, construction camps, pipeline yards, compressor stations, maintenance roads, and materials sites;
- Anticipated temporary land use locations;
- Typical pipeline type(s) by use - Type I Single use, Type II Multiple source, Type III Hybrid lines;
- Typical pipeline wall thicknesses; and,
- Location of potential CO<sub>2</sub> sources and sinks to be connected to the proposed pipeline corridors.

The EPA recommends that to the greatest extent possible the WPCI pipelines be co-located within existing infrastructure ROWs and make use of existing Federal and State designated corridors on public land, avoiding potential additional adverse impacts to wetlands and other aquatic resources; and to avoid the need for additional access roads and material source sites.” (030-009)

#### **PRA 5: Sweetwater County supports the Current Placement of Trunk Corridor #4.**

(029-010)

Sweetwater County supports the placement of Trunk Corridor #4 in its current location because it minimizes impacts to the Tri-territory Scenic Loop Tour route. The comment follows:

“Approximately one third of the WPCI Pipeline Trunk Corridor #4 is located adjacent to and parallel to the Tri-territory Scenic Loop Tour route. In this corridor, proposed pipelines would be buried and surface disturbance reclaimed thus resulting in minimal view shed impacts to the Tri-territory Loop Tour. Because of this, Sweetwater County supports the establishment of Pipeline Corridor #4 in this location. It should be emphasized that Sweetwater County opposes the West-wide Energy designation of the Tri-territory Loop Tour portion of this corridor as a multi-modal corridor which would allow both underground and above ground energy transmission lines. Sweetwater County believes that construction of above ground transmission facilities within this would be a detriment to the Tri-territory Scenic Loop Tour and the scenic vistas of the Killpecker Sand Dunes, North and South Table Mountains, Spring Butte, Steamboat Mountain and Boars Tusk and others. For the protection of these natural features and the scenic loop tour, Sweetwater County supports this corridor as an underground right of way corridor only which would be compatible with the WPCI project. To ensure proper coordination with West-wide Energy above ground only corridors, Sweetwater County encourages the BLM to compare the western portion of this trunk line with the West-wide Energy Corridor.” (029-010)

### **Public Health and Safety**

#### **SAF 1: How Would a Hazardous Materials Spill Affect Public Health and Safety?**

(004-005, 012-001, 012-004, 030-004, 030-010)

A couple of comments were general, indicating that the analysis should include a look at the potential impacts from spills. A couple of comments provided details of how conflicts with underground mines could lead to public health and safety concerns. Representative comments follow:

“We recommend the Draft EIS include an evaluation of potential adverse impacts from pipeline leaks or spills. This should include potential adverse impacts to; surface waters, public or private water supplies, human health, vegetation, or wildlife. In this part of the

analysis, it would be useful to discuss the probabilities and/or likely frequencies of different types of spill or leak events over the life of this type of pipeline. We expect this information would be useful in determining appropriate, safe corridor locations.” (030-010)

“The Wyoming AML Program has performed a recent assessment of underground mine workings as they intersect existing infrastructure such as power transmission lines, pipelines, roads, and other utilities and infrastructure. We have found that there are numerous intersections of such infrastructure with subsiding mine workings, and that in some areas there is risk of failure of the ground surface which could significantly disrupt or damage such infrastructure, and as a result interrupt public services. In some cases, such failures could significantly compromise public health and safety. We have concerns that such conditions could occur within the proposed pipeline corridors if the locations, extents, and depths of abandoned underground mines are not considered by designs for the pipelines that may eventually be installed under this initiative.” (012-001)

## **SAF 2: How would fire affect public health and safety?**

(028-030)

Comment follows:

“Further, an increase in annual grass abundance in the pipeline corridor and adjacent lands alters the fire regime, changing the timing and style of wildfires. This in turn can lead to larger scale ecological transformation as burnt areas are more likely to see annual grasses revegetate instead of native vegetation.” (028-030)

## **Purpose and Need**

### **PAN 1: The Need for the Project Must be Clearly Explained and Verified.**

(013-005, 032-001)

Commenters requested clarification on use of the corridors and how these corridors relate to other designated corridors. The comments follow:

“Provide evidence for the purpose and need of this project. The evidence should address the need for each segment of the project as well as the project as a whole. This discussion should clearly explain that a corridor designation is not a prerequisite to the grant of a pipeline rights of way, and that the absence of a designated corridor is not an impediment to the authorization and construction of new pipelines.” (032-001)

“Clarify the anticipated use and scope of the proposed pipeline corridor and how the proposed corridor might interact with the Section 368 Energy West-Wide Energy Corridors. It is unclear based on the Proposal whether the proposed corridors would be solely for CO<sub>2</sub> [carbon dioxide] pipelines or would be available for pipelines transporting other resources, such as natural gas or crude. WCCA requests the BLM and the State clarify the ultimate intent of the corridors and consider uses beyond solely CO<sub>2</sub>. Additionally, WCCA asks that BLM explain how the WPCI fits within or relates to the Section 368 West-wide Energy Corridor. Specifically, are the efforts duplicative, interconnected and/or complementary? WCCA encourages BLM and the State to reduce redundant analysis where possible and to broadly consider the location of corridors to ensure efficient and effective development and collocation where possible.” (013-005)

**PAN 2: The Purpose and Need should include a Description of How the Project Encourages Carbon Capture Technology and Infrastructure.**

(014-005, 027-002, 027-004)

Commenters suggested that the project would encourage development of pipeline infrastructure that would support further development of carbon capture technologies. Representative comments follow:

“The WPCI is a first of its kind project that we believe incentivizes solutions to some of our nation's most substantial environmental and economic challenges.” (027-004)

“The WPCI proposal is receiving national attention as a model for the federal government to support the development of CO<sub>2</sub> pipeline networks for use in CCUS. This project is in alignment with the federal bipartisan USE IT Act (Utilizing Significant Emissions with Innovative Technologies). The USE IT Act supports the commercial use of industrial CO<sub>2</sub> emissions and carbon capture technology as well as expedited permitting for the development of CO<sub>2</sub> pipeline infrastructure.” (014-005)

**Range and Grazing**

**RNG 1: Would Vegetation Removal and Surface Disturbance Temporarily and Permanently Affect Available Animal Unit Months or Acres with Suitable Forage for Grazing?**

(015-003, 015-007, 021-003, 022-003, 026-004)

Commenters expressed general concern regarding the suitability of disturbed areas for continued livestock grazing. Representative comments follow:

“This corridor project will have a direct Impact on livestock grazing as pipelines are built. The BLM should analyze any loss or Impact to these Important environmental, historical and social values of livestock grazing.” (015-007)

“WDA appreciates the BLM recognizing the potential impact to livestock grazing and agriculture producers in the 1,914 mile proposed corridor area. However, there are a number of specific impacts to agriculture the BLM must analyze in the EIS: increased off- and on-road traffic, increased number of speeding vehicles In the area causing death or impairments of livestock, cut fences, opened gates, damaged range improvements, decreased Animal Unit Months (AUM's), decreased palatability of vegetation and forage from road dust and development activities, unsuccessful reclamation of disturbed areas, introduction and spread of noxious weeds and other detrimental social and economic impacts on livestock management operations.” (015-003)

**RNG 2: Would the Pipeline Affect the Various Range Improvements it Intersects during Construction?**

(015-003, 002-001)

General concern was expressed regarding the potential for damaged range improvements. A representative comment follows:

“Is this going to interfere in the livestock wells and also the Big Springs in Thermopolis. Also, the personal water wells.” (002-001)

## Recreation

### **REC 1: Would the Construction, Operation, and Long-Term Presence of Aboveground Facilities and Access Roads affect Recreational Experience and Access?**

(029-002, 029-008, 033-011)

Commenters generally asked for additional analysis of impacts to recreational experiences within, intersected by, or otherwise impacted by the proposed corridors. Using existing pipeline corridors and rights-of-way to preserve recreational user experience and access was suggested. Representative comments follow:

“As a unit of the National Trails System, and otherwise considered designated area, the proposal should include a more fully evaluated section on impacts to recreational experiences within, intersected by, or otherwise impacted by the proposed corridors. We realize that each trail section is unique with specific localized conditions, however, we also feel that there should be consistent treatment of the Trail and its resources and the experience it offers all users in the discussion of impacts to recreational resources in this document. We encourage that evaluation of the potential impacts to recreational resources of the CDNST be included in the EIS.” (033-011)

“In the vicinity of T17N R106W Section 10 and T17N R107W Section 12, Lateral Pipeline Corridor #1 crosses the Flaming Gorge National Recreation Area (FGNRA). The FGNRA is a national recreation resource whose wildlife, fisheries and scenic resources support a multi-million dollar multi-state recreation industry. With this in mind, Sweetwater County encourages the state, BLM and USFS to ensure that any proposed crossing of the FGNRA be completed in a manner that utilizes existing pipeline corridors and rights of way and preserves water quality, wildlife habitat and visual resources. As previously stated, all crossings of the Green River should be completed by boring underneath the river or gorge and with the installation of up and down stream safety shut off valves.” (029-008)

### **REC 2: How Would the Proposed Action Affect National Historic and Scenic Trails?**

(008-001, 008-003, 029-006, 029-011, 033-002, 033-003, 033-004, 033-005, 033-006, 033-007, 033-008, 033-009, 033-010, 033-011, 033-012, 033-013)

Commenters recommended that the analysis of impacts to National Historic and Scenic Trails include preservation of trail resources, public access and recreation experience, visual and audible impacts, and cumulative effects of infrastructure projects. Additionally, commenters requested more detailed mapping of where the Proposed Action would parallel or intersect National Historic and Scenic Trails.

Representative comments follow:

“Our primary concerns are 1) the preservation of NHT resources, 2) the continuation of public access to the NHTs, and 3) the preservation of applicable historic settings along the NHTs.” (008-003)

“There are several routes that will cross, parallel and/or may impact the CDNST. While many of these corridors will occur at road intersections or overlap with existing corridors, the CDNST should be identified in the project planning map so that adequate evaluation may occur. The corridors include the following: 1. Lateral Corridors: #2, #8 and maybe #9 (difficult to tell from the project map), 2. Trunk Corridors: #3, #4 and maybe #7 (difficult to tell from the project map). Specifically, where the crossings/alignments for corridors #7, #8, #3, #4 and #9 intersect nearby where the CDNST occurs and should be more

adequately mapped to reflect and evaluate any potential impacts to the CDNST. It is good to see that the CDNST is not included the oil production and CCUS areas.” (033-002)

“As a unit of the National Trails System, and otherwise considered designated area, the proposal should include a more fully evaluated section on impacts to recreational experiences within, intersected by, or otherwise impacted by the proposed corridors. We realize that each trail section is unique with specific localized conditions, however, we also feel that there should be consistent treatment of the Trail and its resources and the experience it offers all users in the discussion of impacts to recreational resources in this document. We encourage that evaluation of the potential impacts to recreational resources of the CDNST be included in the EIS.” (033-011)

## **Socioeconomics**

### **SOC 1: How Would the Proposed Action Affect the Economic Output of Other industries in the Analysis Area?**

(009-001, 010-001, 011-002, 015-003, 015-005, 015-009, 022-032, 026-004, 031-006)

Commenters recommended the analysis include the economic contribution of other oil and gas production, transmission construction and operation, grazing leases, and tourism. Representative comments follow:

“Oxy submits these scoping comments to the BLM because of the significant impact the proposed amendments to the RMPs may have on Oxy's ongoing and future operations in the State of Wyoming. Oxy has significant interest in areas managed by the BLM including over 225,000 acres of operated oil and gas leases, as wells as employees and contractors in the State of Wyoming. Oxy is also among the world's largest independent oil and natural gas exploration and production companies. Oxy has fee ownership of mineral rights under nearly eight million net lease hold acres across the west, much of this in Wyoming, inclusive of royalty interests, and holds significant fee and federal mineral leases within the planning areas associated with the proposed RMP amendments.” (009-001)

“PCW and Trans West are developing the CCSM Project and TWE Project, respectively, in southern Wyoming. The CCSM Project is an approximately 3,000-megawatt (MW) wind energy project located in Carbon County, Wyoming, south of Sinclair. The TWE Project is an approximately 730-mile transmission line extending to southern Nevada. In Wyoming, the TWE Project begins south of Sinclair, continues west to Wamsutter, and then turns south roughly following the Carbon Sweetwater County line before crossing into Colorado. Development of the CCSM Project and TWE Project has been underway since 2008. Together, the CCSM Project and TWE Project will constitute a \$6 billion investment in Wyoming. PCW and Trans West have collectively invested hundreds of millions of dollars in the development and construction of these critical infrastructure projects.” (011-002)

“livestock grazing represents a vital economic value to agriculture producers and to local communities.” (015-005)



## **SOC 2: How Would the Proposed Action Affect Employment, Earnings, and Output over the Life of the WPCI Project?**

(014-003, 017-001, 022-008, 022-009, 022-013, 024-002, 028-003, 028-004, 030-003, 030-019, 031-002, 032-026)

Several comments requested the analysis include the socioeconomic impacts to local economies from the WPCI Project and from increased oil and gas development that the project would encourage. One comment requested that this analysis include the economic impacts to environmental justice (EJ) communities within nearby communities. Representative comments follow:

“Injecting C02 into depleted oil fields would increase oil production unrecoverable through conventional methods while offering a solution to reducing carbon emissions. Increased C02-EOR development would also generate considerable royalties and taxes to the State of Wyoming and associated counties as well as adding thousands of jobs.” (014-003)

“The SER CD requests a socio-economic impact analysis be provided in the Proposed Action, per SER CD Long Range Plan, Policy Socio-economics #3: ‘Local, state, and federal agency plans or management recommendations shall include a socio-economic impact description (either brief or in-depth depending on the case needs) that addresses the effects on the District natural resources, economies, and health and welfare of the District citizens.’” (022-013)

“...Assess EJ and other socioeconomic concerns for any EJ communities, to the extent information is available, including: A discussion of the potential direct, indirect and cumulative environmental impacts of the proposed project on the health or welfare of these communities, including air quality and water quality and impacts. Health risks to EJ communities from the proposed pipeline may include construction and operation impacts as well as potential leak risks. An evaluation of the socio-economic impacts and benefits to the local communities, including the potential for any additional loading placed on local communities' abilities to provide necessary public services and amenities...” (030-019)

## **SOC 3: How Would the Proposed Action Affect End-Consumer Purchases?**

(028-011)

Comment follows:

“The WPCI Proposal proposes increased use of EOR in depleted Wyoming oil fields and new CO<sub>2</sub>, oil and natural gas pipelines. This would tie up capital that could be used instead for renewable energy production and would result in additional fossil fuel products being offered to the public instead of renewable energy, potentially displacing the public’s purchase of renewables. As a result, the EIS must analyze the impacts of Wyoming producing additional new fossil fuel for end-consumer purchase instead of producing renewable energy. Any EIS must also fully disclose the potential indirect and cumulative impacts of CO<sub>2</sub> pipeline use on coal combustion and coal-fired power plant retirement and/or utilization.” (028-011)

## Soils

### **SOL 1: Would Project Design and Location Affect the Risk of Ground Subsidence and Soil Erosion Associated with the Proposed Action?**

(012-005, 019-004, 020-007, 032-009)

Commenters expressed concern about the risk of surface subsidence, erosion, and seismicity associated with mining practices and pipeline location decisions. Representative comments follow:

“The BLM should evaluate seismicity, slope stability, soil type, and reclamation potential in the locations of the proposed corridor.” (032-009)

“Trona mining, both dry mining and solution mining, creates surface subsidence of up to seven (7) feet. Genesis Alkali has longstanding experience working with pipeline owners/operators, both natural gas and liquids, to mitigate the impacts of subsidence on pipelines that cross over mining areas. These mitigation discussions can take significant time and effort and costs can run into the millions, which can take a toll on pipeline owner/operators and on the Wyoming’s trona mining businesses who are affected. To avoid such costs, designated routes for new pipelines should be developed to avoid current and future mining areas whenever practicable.” (019-004)

## Special-Status Species

### **SSS 1: How Would the Proposed Action Affect Habitat and Local Populations of Greater Sage-Grouse?**

(019-003, 019-005, 022-032, 025-001, 028-023, 028-024, 028-025, 028-026, 028-031, 028-033, 028-034, 032-006, 032-017)

Commenters requested that the analysis include potential impacts to greater sage-grouse designated habitat areas (e.g., priority habitat management areas and core) and individuals. Representative comments follow:

“Many of the proposed pipeline corridors are within biologically important big game habitats; are within sage-grouse core population areas; or are within 0.6 miles and 0.25 miles of numerous core area and non-core area leks, respectively. Although these proposed corridors generally follow existing pipelines and corridors, we recommend developing an alternative that analyzes minor changes to the proposed routes where they bisect ‘vital’ habitats (per the Wyoming Game and Fish Commission Mitigation Policy 20 16) in order to avoid potential loss of habitat function.” (025-001)

“The avoidance of PHMAs and SFAs is vitally important because, for the most part, Wyoming PHMAs and SFAs are within Priority Areas of Conservation (PACs), key habitats for sage-grouse conservation that were identified by the U.S. Fish and Wildlife Service. The U.S. Fish and Wildlife Service’s 2013 Conservation Objectives Team Report (COT Report) states, ‘Development of infrastructure for any purpose (e.g., roads, pipelines, powerlines, and cellular towers) results in habitat loss, fragmentation, and may cause sage-grouse habitat avoidance. Additionally, infrastructure can provide sources for the introduction of invasive plant species and predators.’” (028-025)

“The EIS Must Analyze the Impacts to Greater Sage-Grouse and Other Wildlife of Amending the RMPs to Establish Pipeline Corridors.” (028-031)

## **SSS 2: How Would Water Depletions Affect Species Protected under the Endangered Species Act in the Upper Colorado River Basin and Platte River Basin?**

(023-001)

Comment follows:

“Appendix I does not discuss federally listed species that may be affected by water depletions but should be included. Please be aware that under the Upper Colorado River Endangered Fish Recovery Program and the Platte River Recovery Implementation Program, formal interagency consultation under section 7 of the ESA is required for projects that may lead to water depletions, in excess of 0.1 acre-foot per year, from any system that is a tributary to the Colorado River, and central and lower Platte River. Federal agency actions resulting in water depletions to the Colorado River system may affect the endangered bonytail (*Gila elegans*), Colorado pikeminnow (*Ptychocheilus lucius*), humpback chub (*Gila cypha*), and razorback sucker (*Xyrauchen texanus*) and their habitat downstream in the Green and Colorado River systems. In addition, upstream depletions may contribute to the destruction or adverse modification of designated critical habitat for these four species. Critical habitat is designated for Colorado River Fish in Colorado and Utah in downstream riverine habitat in the Yampa, Green, and Colorado River systems (see 50 CFR 17.95(e)). The Service, in accordance with the Upper Colorado River Endangered Fish Recovery Program, adopted a de minimis policy, which states that water-related activities in the Upper Colorado River Basin that result in less than 0.1 acre-foot per year of depletions in flow have no effect on the Colorado River endangered fish species, and thus do not require consultation for potential effects on those species. Similarly, detention basins designed to detain runoff for less than 72 hours, and temporary withdrawals of water outside of critical habitat (e.g., for hydrostatic pipeline testing) that return all the water to the same drainage basin within 30 days, are considered to have no effect and do not require consultation. Federal agency actions resulting in water depletions to the central and lower Platte River may affect the whooping crane (*Grus americana*), including their critical habitat, and the endangered least tern (*Sternula* [*Sterna*] *antillarum*), pallid sturgeon 2 (*Scaphirhynchus albus*), Western prairie fringed orchid (*Platanthera praeclara*), and the threatened piping plover (*Charadrius melodius*).” (023-001)

## **SSS 3: How Would the Proposed Action Affect Special-Status Plants?**

(032-019)

Comment follows:

“BLM should ensure that potential adverse impacts to rare and sensitive plants are evaluated and avoided to the extent possible.” (032-019)

## Surface Water

### **SWR 1: Would Construction Associated with the Proposed Action Lead to Increases in Erosion and Resultant Sedimentation with the Potential to Affect Water Quality?**

(020-006, 020-007, 030-012)

Representative comments follow:

" The Hot Springs Conservation District has site specific knowledge of erosion and erosion control which may be of use during Phase III NEPA analysis of an actual carbon dioxide pipeline project." (020-007)

"When considering corridor alternatives, the EPA recommends that the following resource impacts be discussed, including disclosure of which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters: Surface Water Quality and Sedimentation: Potential impacts to water quality from runoff associated with surface disturbance. Runoff could introduce sediment as well as salts, selenium and other pollutants. Drinking Water: Any potential impacts to drinking water from the project, including source water protection areas and other municipal or private water supplies. Impaired Waterbodies: Potential impacts to impaired waterbodies, including waterbodies listed on the CWA § 303(d) list and waterbodies with Total Maximum Daily Loads (TMDLs). Groundwater: Any potential impacts to groundwater, including groundwater recharge areas and shallow and sensitive aquifers..." (030-012)

### **SWR 2: Would the Proposed Action Affect Surface Water Resources?**

(021-005, 028-017, 030-005, 030-010)

A few comments were general in nature requesting that impacts to surface water resources be addressed in the analysis. Representative comment follows:

"Based on our current understanding of the proposed Wyoming Pipeline Corridor Initiative (WPCI) project and the area, the EPA has identified the following key topics that we recommend be analyzed and discussed in the Draft EIS so that potential impacts to public health and the environment can be fully understood: (2) groundwater and surface water resources;" (030-005)

### **SWR 3: Would the Proposed Action Result in the Net Loss of Wetland Areas?**

(020-003, 030-011, 030-013, 030-014, 030-015)

Commenters requested that wetlands be described and impacts to wetlands and wetland function be analyzed. Representative comment follows:

"We anticipate that the primary potential for impacts to surface waters would stem from pipeline construction and from permanent surface disturbances such as access roads and ancillary facilities. The EPA recommends that the BLM characterize surface waters in proximity to the proposed corridors by: Mapping surface water resources in the proposed development areas. This could include a summary discussion of the water resources that exist in the project areas. Presenting baseline data on the condition and quality of surface water resources, and where appropriate and possible, reasons why these resources have been impacted, including: Lists of any Clean Water Act impaired or threatened waterbody segments within or downstream of the project areas, including the designated uses of those waterbodies and the specific pollutants of concern; Inventories and maps of existing wetlands and Waters of the U.S. within the project areas, including wetlands that

are regulated under Section 404 of the CWA, and wetlands that are determined to be non-jurisdictional and protected under Executive Order 11990-Protection of Wetlands (May 24, 1977), and, where project impacts are likely, acreages and channel lengths, habitat types, values, and functions of these waters” (030-011)

#### **SWR 4: Would the Proposed Action Lead to Alteration of Stream Channels and Drainage Flows and Ultimately Stream Classification?**

(020-004, 022-032, 029-007, 030-013, 030-015)

Commenters requested the analysis to include impacts to stream and rivers. Representative comments follow:

“The protection, improvement, and restoration of wetlands and riparian areas are a high priority. These resources increase landscape and species diversity, support many species of western wildlife, and are critical to the protection of water quality and designated beneficial water uses. In addition, these areas warrant protection under Section 404 of the CWA as well as Executive Order 11990. We suggest that the BLM analyze potential impacts to the following for each proposed corridor: Stream structure and channel stability; Streambed substrate, including seasonal and spawning habitats; Stream bank vegetation, riparian habitats, and aquatic biota;...” (030-013)

“Segment 6 Location Concerns. The SER CD has major concerns with the location of Segment 6. As located in the Proposed Project, it cuts through mule deer crucial range and mule deer winter range; goes across a blue ribbon stream segment; crosses the North Platte River in the miracle mile area, an area with very high economic value for tourism and recreation (see circled area on Map 3 attachment); it crosses the North Platte River 3 times and appears to be in the river bed for nearly a mile (see circled area on Map 2 attachment); goes through winter and yearlong bighorn sheep area; goes through pronghorn crucial range; bisects the sage-grouse core area v4 west of Seminole Reservoir and would be in close proximity to at least 2 leks (see circled area on Map 2 attachment).” (022-032)

## **Transportation**

#### **TRA 1: Would the Proposed Action Affect Existing Transportation Corridors or Public Access?**

(001-001, 021-006, 029-004, 029-011, 032-014)

Commenters generally suggested areas of specific concern or sensitivity. Representative comments follow:

“One concern: Bridger Pass. It gets crowded up there, and the County may propose substantial improvements to the road.” (001-001)

“Pipeline Lateral Corridor #5: Sweetwater County supports this corridor and its designation as an underground pipeline corridor only. During construction, special attention should be given to historical trails, crossings of Sweetwater County roads, and protection of wildlife habitat especially the aspen groves and isolated springs along Bush Rim. Sweetwater County supported locating the Denbury Pipeline within this corridor.” (029-011)

## **Vegetation**

### **VEG 1: Would the Proposed Action Affect Vegetation Cover?**

(004-002, 004-004, 033-005, 028-028)

Commenters were generally concerned about potential negative impacts to vegetation cover and subsequent habitat fragmentation. A representative comment follows:

“Adverse impacts also include lights, access roads, cleared swaths of land, off-road vehicle access on utility rights-of-way, guy wires, chain link fences, and chemical treatments of the vegetation in the corridor.” (033-005)

### **VEG 2: Would the Proposed Action Result in the Introduction and Spread of Noxious Weeds and Other Invasive Plants?**

(015-008, 022-012, 028-029, 031-006)

Commenters recommend that the EIS analyze and disclose the potential to increase the spread of noxious weeds and other invasive plants. A representative comment follows:

“The WDA Insists the BLM oversee and ensure successful/performance-based reclamation and mitigation in the proposed corridor, including any new/temporary roads and disturbed areas. This also Includes monitoring and eradicating Invasive and noxious weeds until desired vegetation Is established.” (015-008)

### **VEG 3: Would a Pipeline Leak or Spill Affect Vegetation Cover?**

(030-010)

The comment follows:

“We recommend the Draft EIS include an evaluation of potential adverse impacts from pipeline leaks or spills. This should include potential adverse impacts to; surface waters, public or private water supplies, human health, vegetation, or wildlife. In this part of the analysis, it would be useful to discuss the probabilities and/or likely frequencies of different types of spill or leak events over the life of this type of pipeline. We expect this information would be useful in determining appropriate, safe corridor locations.” (030-010)

## **Visual Resources**

### **VIR 1: Would Construction Activity and the Long-Term Presence of the Pipeline Affect the Analysis Area's Viewshed and Sensitive Viewing Locations?**

(015-006, 022-005, 029-002, 032-020, 032-021, 033-010)

Commenters expressed concern about existing open spaces, scenic vistas, and other protected viewsheds that could be traversed or impacted by the identified corridors. Representative comments follow:

“CDTC recommends the mapping of visual resources and the impacts to these resources conducted in a manner consistent with the Scenery Management System to adequately protect the integrity and quality of the scenic resources in the areas traversed or impacted by the identified corridors.” (033-010)

“The BLM must ensure adequate consultation with tribes, particularly regarding traditional cultural properties, which may not be mapped, and any other resources of cultural or spiritual significance. The BLM should avoid designated and proposed

National Historic Trails and their viewsheds. The current proposal sites corridors across the Mormon, California, and Oregon trails and through their protected viewsheds.” (032-020)

## **Wildlife, General**

### **WLF 1: How Would the Proposed Action Affect Big Game Migration Routes and Important Habitat Areas?**

(022-032, 025-001, 028-035, 028-036, 032-016)

Commenters requested that the analysis include potential impacts to big game designated migration routes and important habitat areas including crucial, winter, and year-long ranges. Representative comments follow:

“Segment 6 Location Concerns. The SER CD has major concerns with the location of Segment 6. As located in the Proposed Project, it cuts through mule deer crucial range and mule deer winter range; goes across a blue ribbon stream segment; crosses the North Platte River in the miracle mile area, an area with very high economic value for tourism and recreation (see circled area on Map 3 attachment); it crosses the North Platte River 3 times and appears to be in the river bed for nearly a mile (see circled area on Map 2 attachment); goes through winter and yearlong bighorn sheep area; goes through pronghorn crucial range; bisects the sage-grouse core area v4 west of Seminole Reservoir and would be in close proximity to at least 2 leks (see circled area on Map 2 attachment).” (022-032)

“The current proposal sites corridors within stopovers in the famous and imperiled Red Desert to Hoback (Sublette) mule deer migration corridor and within the proposed Wyoming Range MDC. BLM should avoid crossing designated and proposed migration corridors, particularly in stopovers, and must incorporate the best available science on mule deer migrations in its draft EIS. The current proposal sites corridors within crucial winter range for at least eleven mule deer herd units including the Sublette herd. Given population declines and various environmental pressures on our mule deer herds, BLM should avoid mule deer CWR to the maximum extent possible.” (032-016)

### **WLF 2: How Would the Proposed Action Affect Wildlife Species?**

(021-004, 028-031, 028-32, 029-002, 030-010)

Commenters requested that the analysis include general impacts to wildlife species. Representative comment follows:

“The EIS must analyze the direct, indirect, and cumulative impacts of amending the RMPs on wildlife. Of particular concern are special status species [SSS] and wide-ranging species that are affected by habitat fragmentation.” (028-032)

### **WLF 3: How Would the Proposed Action Affect Wildlife Habitat?**

(004-002, 004-004, 020-005, 022-005, 022-009, 022-012, 029-011)

Commenters requested that the analysis include general impacts to wildlife habitat. Representative comments follow:

“Policy Ecosystem Services #3: The District, in agreement with Carbon County, wants to sustain scenic areas, wildlife habitat, and other important open spaces (Carbon County 2012).” (022-005)

“The SER CD is concerned with continued habitat fragmentation within the district including developing new installation roads, operation and maintenance roads, increasing native range disturbance, and expanding the spread of noxious/invasive plants as supported by SER CD Long Range Plan, Policy Wildlife #1: ‘The District promotes wildlife conservation, sustainability of healthy wildlife habitat and populations, and their contributions to the local economy.’ and Policy Range #6: ‘The District supports and strongly encourages the control of noxious weeds and pests by owners, managers, and users of all lands.’” (022-012)

## **5.2 BLM Internal Scoping**

### **5.2.1 BLM Internal Scoping Process**

The BLM Wyoming State Office coordinated with the nine BLM field offices (Buffalo, Casper, Cody, Kemmerer, Lander, Pinedale, Rawlins, Rock Springs, and Worland) to solicit feedback and comments on the Proposed Action during the internal scoping process. The BLM Wyoming State Office held a project kickoff meeting and conference call on August 8, 2019, to present proposed project information to selected representatives and resource specialists (collectively known as the interdisciplinary team [IDT]), from the nine field offices. Follow-up conference calls were held in late August and September 2019. The IDT provided comments and identified issues for their area of expertise and field office throughout the process, and comments were continually refined. The BLM Wyoming State Office also held IDT meetings in conjunction with the public scoping meetings to discuss and finalize comments. The comment tracking spreadsheets, comment documents, and IDT meeting notes are available in the project’s administrative record.

### **5.2.2 BLM Comments**

#### **Air Quality**

How would emissions from equipment and vehicles used during pipeline construction and operation affect air quality, including visibility?

How would storage of large quantities of CO<sub>2</sub> in the pipeline corridor affect Wyoming’s GHG emissions?

#### **Alternatives**

Corridor reroute possibilities include for Segment 7 to head west to U.S. Route 287 and follow the route north to the crossing and to shift Segment 6 to the east along Wyoming Highway 487 to pass east of Shirley Mountain and toward Medicine Bow.

The Rawlins Field Office is satisfied with where the existing corridors are placed in their region, but there are some issues with where the existing corridors cross into the Lander Field Office.

A proposed solar project in Section 24, Township 19 North, Range 109 West appears to conflict with the Proposed Action. The Proposed Action would need to be rerouted around this facility.

The establishment of a ROW corridor pursuant to Section 503 of FLPMA, the width needs to be consistent with the planned or established uses within the corridor. This includes the appropriate offsets for any pipeline placement to the appropriate industry and governmental standards. Five pipelines in 150



feet of corridor may require a wider corridor. Consider less pipelines and larger pipes instead. For instance, in place of 20-inch use 24-inch or 30-inch pipeline.

## **Avoidance, Minimization, and Mitigation**

Regardless of whether invasive plants are currently present or how much prevention control is conducted, it should be assumed that some level of new infestations will be introduced from potential construction activities. Seed mixes for reclamation are required to be noxious weed free; however, under state law, seed mixes can contain a 3% of other weeds. This alone can possibly create weed issues. There is no BLM statewide standard for the amount of invasive plants and other noxious weeds allowed in any given area.

## **Cultural Resources**

How would the Proposed Action physically (directly) affect both known and unknown cultural resources?

How would the proposed pipeline development indirectly affect known eligible cultural resources with integrity of setting?

How would the proposed pipeline development physically (directly) or indirectly (visually) impact both known and unknown cultural resources of Native American concern?

## **Cumulative Effects**

Approximately 5 miles of Segment 2 in the Rawlins Field Office area is located within the Red Rim-Daley WHMA, which parallels an existing transmission line. This would widen the existing disturbance in this area, further fragmenting habitat. This increased fragmentation could lead to increased predation because of adequate vegetation, e.g., large sagebrush or greasewood, cover.

Construction would be seasonal, and workers would be competing for limited temporary housing with workers on other projects as well as tourists and recreationists. The discussion of cumulative housing impacts would be important.

## **Environmental Justice**

Would construction, installation, cleanup, and reclamation of pipelines in the trunk and lateral corridors affect environmental justice communities?

Would operations and maintenance of pipelines in the trunk and lateral corridors affect environmental justice communities?

Would reclamation following the abandonment of pipelines in the trunk and lateral corridors affect environmental justice communities?

## **Fire and Fuel Loads**

How would a human-made fire affect BLM management of wildfires and fuel loads?

## Geology and Minerals

Is the analysis area prone to geologic hazards (earthquakes, landslides/slumping) that could affect pipelines or that could be exacerbated by pipeline construction or oil and gas development (fracking) supported by the Proposed Action?

Would pipeline construction increase the likelihood of landslides in landslide-prone areas?

Would disturbance from pipeline construction affect cave and karst resources?

Would the pipeline corridors overlap and affect active mines in the analysis area?

Would the pipeline corridors make mineral locations inaccessible to exploration/development?

## Groundwater

Would construction activities associated with the pipelines in the designated corridors (including hydrostatic testing) increase the risk of surface water or groundwater (including seeps and springs) contamination from chemicals?

Would water-consumptive activities associated with Proposed Action construction affect the availability and quality of water resources, including groundwater and springs and seeps?

How would the Proposed Action affect groundwater, especially shallow groundwater resources?

## Land Use and Access

How would the Proposed Action affect other corridors, ROWs, and/or land use authorizations?

How would the Proposed Action affect agricultural land uses on private property and/or state lands?

How would construction, operation, and maintenance of the project affect land uses and land use plans?

## NEPA Analysis and Related Processes

A mining claim report needs to be run to determine potential impacts to existing mining claims.

As a direct competent to trails management, the National Trails Act identifies trail resources to include the landscape and noise that can be seen and/or heard from the trail. The trails visual protection corridor decisions found in the BLM land use plans are a direct result of the BLM protecting places on the trails where sensitive trail resources are present. Any proposal that is in direct conflict of the National Trails Act is considered interference with the nature and purpose of the trails.

For the socioeconomic analyses, it is reasonable to use the Riley Ridge to Natrona analysis as an example of economic impacts associated with short-term construction and long-term operation of the pipeline. There is a lot of uncertainty in when and where pipelines would be constructed; therefore, impact calculations should be the per-mile impacts associated with construction and operation phases from the Riley Ridge to Natrona analysis. Reporting total statewide impacts would inevitably inflate impacts and imply a false sense of precision. The Riley Ridge to Natrona analysis can also be used to estimate sales tax and lodging tax and to report potential tax revenue generated per worker.

Property taxes should be addressed qualitatively by saying that property taxes would be levied on pipelines and infrastructure in each county.

Severance taxes are levied on the extraction of minerals, not its transportation, so if the assumption is that no operators would employ EOR without the presence of a pipeline in these corridors, then severance taxes levied on the incremental reserves extracted from existing fields through EOR would be relevant to this analysis.

Impacts to SSS need to be analyzed individually as to which species or habitats could be impacted.

Impacts to Visual Resource Management (VRM) need to be evaluated in association to the Proposed Action and how it may contrast with the land use plan VRM Class objectives. The Visual Resource Inventory will be used to define the baseline data to help inform the contrast analysis and visual simulations in relation to the proposed action and its location on BLM lands. If the contrast to the landscape does not meet the current VRM objectives on the ground, then alternatives and BMPs would need to be developed to meet those objectives.

## **Noise**

How would noise generated by construction, operation, and maintenance of the pipeline affect sensitive receptors, and what impacts could remain after the mitigation is applied?

## **Paleontological**

How would construction related to ground-disturbing activities directly or indirectly affect known or unknown paleontological resources?

How would an increase in human activity during and after construction directly or indirectly affect known and unknown paleontological resources?

## **Proposed Action**

Segment 6 overlaps the Seminole-Alcova Backcountry Byway, Morgan Creek WHMA, Miracle Mile Blue Ribbon trout fishery and recreation area, sand dunes near Seminole State Park, North Platte River, and Dugway Campground. Many areas could have erosion and reclamation issues because of steep slope and poor soil stability. Sand dunes are also potential habitat for blowout penstemon.

Segment 7 could have erosion and reclamation issues because of poor soil quality and boggy soap holes, which would make it difficult to access some portions of the corridor.

Segment 3 overlaps the following no surface occupancy areas for sage-grouse leks: May Day, Fivemile Junction, Sourdough, Minex West, Discover, and Discover South. Segment 6 overlaps the following no surface occupancy areas for sage-grouse leks: Idaho Airstrip, Gooseberry Creek, 2783111, Kortes Road, Canyon Creek, Canyon Creek South, Meers Camp, Rattlesnake Spring, Canyon Creek North Fork Lower, Kortes Road, Canyon Creek, and Rattlesnake Spring. Segment 7 overlaps the following no surface occupancy for sage-grouse leks: Tin Can, Conners, and Frenchmen.

## **Public Health and Safety**

How would a hazardous materials spill affect public health and safety (e.g., contaminated soils or groundwater, near roadways)?

How would a fire affect public health and safety?

## **Range and Grazing**

How would vegetation removal and surface disturbance temporarily and permanently affect acres with suitable forage for grazing?

How would vegetation removal and surface disturbance affect the available animal unit months within each allotment crossed by the corridors, temporarily and permanently?

How would the pipeline impact the various range improvements it intersects during construction?

How would disturbance associated with the Proposed Action increase invasive species and reduce forage for livestock?

## **Recreation**

How would the proposed pipeline corridor network affect recreation management areas, recreation resources, special recreation and management areas, and extensive recreation and management areas?

How would the long-term presence of aboveground facilities and access roads affect recreational experience and access?

How would construction, operations, and maintenance activities in the ROW affect recreational experience and access?

How would restricting all pipeline ROWs and associated roads to energy-related vehicles only affect recreation resources and all other BLM resources given strong concern regarding route densities?

How would the Proposed Action impact national historic and scenic trails?

## **Socioeconomics**

How would construction, installation, operations and maintenance, cleanup, and reclamation of pipelines in the trunk and lateral corridors affect the direct, indirect, and induced employment, earnings, and economic output from related expenditures within the analysis area?

How would construction, installation, operations and maintenance, cleanup, and reclamation of pipelines in the trunk and lateral corridors affect the demand for short-term housing, long-term housing and public services, such as police, emergency response, and health services, within the analysis area?

How would construction, installation, operations and maintenance, cleanup, and reclamation of pipelines in the trunk and lateral corridors affect state and county tax revenues, primarily from sales and lodging taxes?

How would operations and maintenance of pipelines in trunk and lateral corridors affect state and county tax revenues, primarily from property and severance taxes from oil, gas, and CO<sub>2</sub> production?

How would construction, operations and maintenance, installation, cleanup, and reclamation of pipelines in the trunk and lateral corridors affect the tourism and recreation economy from the temporary closures of public land?

How would construction, installation, operations and maintenance, cleanup, and reclamation of pipelines in the trunk and lateral corridors affect non-market values and property values?

How would construction, installation, operations and maintenance, cleanup, and reclamation of pipelines in the trunk and lateral corridors affect private land values near the corridors?

How would the pipeline corridors impact indirect socioeconomic resources (i.e., employment, earnings, and output) through EOR over the life of the project?

## **Soils**

Would construction associated with the Proposed Action result in soil compaction?

Would construction associated with the Proposed Action result in disturbance to sensitive soils (e.g., biological crusts)?

Would the Proposed Action result in increased erosion from lack of soil protection?

Would the Proposed Action result in temporary loss of soil productivity until successful reclamation?

Would the Proposed Action result in long-term loss of soil productivity in areas with soils that have low reclamation potential?

Would construction associated with the Proposed Action result in soil compaction?

Would construction associated with the Proposed Action result in disturbance to sensitive soils (e.g., biological crusts)?

Would the Proposed Action result in increased erosion from lack of soil protection?

Would the Proposed Action result in temporary loss of soil productivity until successful reclamation?

Would the Proposed Action result in long-term loss of soil productivity in areas with soils that have low reclamation potential?

## **Special Designations**

How would future corridor clearing and surface disturbance affect the relevant and important values of each of the following ACECs crossed by or within 150 feet of the corridors: Beaver Rim ACEC (scenic value), National Historic Trail ACEC (scenic value), Jackson Canyon ACEC, Greater Sand Dunes ACEC?

How would future corridor clearing and surface disturbance affect the relevant and important values of each of the following ACECs crossed: Beaver Rim ACEC (scenic value), Jackson Canyon ACEC, Greater Sand Dunes ACEC?

How would future corridor clearing and surface disturbance affect designated wilderness study areas?

## **Special-Status Species**

Would clearing vegetation decrease sage-grouse reproduction and recruitment, resulting in population declines at both the site scale and subpopulation scale?

Would decreased availability of cover and forage during winters contribute to long-term population declines?

Would pipeline corridors increase potential predation?

Would pipeline corridors increase habitat fragmentation that limits sage-grouse use?

Would the Proposed Action (clearing habitat, fragmentation, roads, increased activity, invasive weeds) result in SSS population declines?

Would pipeline corridors increase SSS habitat fragmentation or predation of SSS?

How would water use, noise, and increased activity impact SSS?

## **Surface Water**

Would construction associated with the Proposed Action lead to increases in erosion and resultant sedimentation with the potential to affect water quality?

Would water-consumptive activities associated with Proposed Action construction affect the availability and quality of water resources, including streams and wetlands?

Does the Proposed Action overlap with eligible or designated wild and scenic rivers, and, if so, would it affect the classification or alter its eligibility?

Would the Proposed Action result in the net loss of wetland areas?

Would the Proposed Action lead to alteration of stream channels and drainage flows and ultimately stream classification, groundwater recharge rates, and surface run-off rates?

What will the water quality and/or quantity impacts be from hydrostatic testing and other water-using activities associated with the proposed pipeline?

Would the Proposed Action lead to increased salinity levels in the Upper Colorado River Basin?

What are the local area and downstream impacts to the increase in salinity?

How would salinity alter the instream habitat and associated aquatic species?

## **Vegetation**

How would construction affect vegetation cover?

Would construction of the corridor remove forested vegetation for which BLM is directed under 43 CFR 5000 to receive fair market value?

Would removal of forested vegetation cause increased sediment delivery to streams and lakes?

Would reclamation efforts use seedlings grown from seed from the correct elevation and seed zones?

Would reforestation success be measured and additional plantings done to ensure reforestation is accomplished within the regulatory required timelines?

Would fuels created from the removal of vegetation be treated sufficiently to reduce the risk of fire?

Would construction cause the introduction and spread of noxious weeds and other invasive plants?

How would the introduction of noxious weeds and invasive species affect revegetation success?

## Visual Resources

How would construction activity and the long-term presence of the pipeline affect the analysis area's viewshed and sensitive viewing locations?

How would construction activity and the long-term presence of the pipeline affect the analysis area's viewshed and sensitive viewing locations?

## Wild Horses

Would wild horses be affected by fragmentation, reduced access to water, open trenches, and vehicular traffic during construction?

Would wild horse grazing affect revegetation efforts within corridors?

## Wildlife, General

How would construction and operations affect big game movement, migration routes, and parturition areas?

How would construction and operations affect raptor and migratory bird nesting activities?

Would construction across stream channels and/or other waters affect native fisheries/aquatic resources because of sedimentation, turbidity, and increase in salinity?

Would water withdrawals for hydrostatic testing and dust abatement reduce fisheries habitat?

## 6 FUTURE STEPS IN THE EIS PROCESS

Once alternatives are developed, the BLM will analyze the effects of each alternative on the environment. The analysis will consider the scoping feedback and finalized issues for analysis. The documentation of the process and the results will be included in the draft EIS.

Once the draft EIS is internally vetted with cooperating agencies, it will be made available for public review. The availability of the draft EIS will be announced in the *Federal Register* and advertised in the local and regional media. Public comments will be accepted for 90 days. The BLM will review and consider all comments received on the draft EIS. The document will be modified as appropriate based on public comments; all substantive comments and responses will be incorporated into the final EIS.

The notice of availability (NOA) of the final EIS will be announced in the *Federal Register* and advertised in local and regional media. The NOA will outline procedures to protest the final EIS during the 30-day period after the NOA is published in the *Federal Register*. A 60-day Governor's Consistency Review will occur concurrent with this protest period.

A record of decision selecting the alternative to be implemented will be issued following the 60-day Governor's Consistency Review and resolution of protests on the final EIS. Throughout the process the public may continue to monitor the BLM's project website for updates and can request to be added to the BLM's project mailing list.

To be added to the mailing list:

**Email:** [hschultz@blm.gov](mailto:hschultz@blm.gov)

**Mail:** Heather Schultz, Project Manager  
BLM Wyoming State Office  
5353 Yellowstone Road  
Cheyenne, Wyoming 82009



## **Appendix A**

***Federal Register* Notice of Intent**



## DEPARTMENT OF HOMELAND SECURITY

[Docket No. CISA-2019-0015]

### Notice of the President's National Infrastructure Advisory Council Meeting

**AGENCY:** Cybersecurity and Infrastructure Security Agency, DHS.

**ACTION:** Announcement of meeting; request for comments.

**SUMMARY:** The Cybersecurity and Infrastructure Security Agency (CISA) announces a public meeting of the President's National Infrastructure Advisory Council (NIAC). To facilitate public participation, CISA invites public comments on the agenda items and any associated briefing materials to be considered by the council at the meeting.

#### DATES:

**Meeting Registration:** Individual registration to attend the meeting in person is required and must be received no later than 5:00 p.m. EST on December 12, 2019.

**Speaker Registration:** Individuals may register to speak during the meeting's public comment period must be received no later than 5:00 p.m. EST on December 4, 2019.

**Written Comments:** Written comments must be received no later than 12:00 p.m. EST on December 11, 2019.

**NIAC Meeting:** The meeting will be held on Thursday, December 12, 2019 from 9:00 a.m.–1:00 p.m. EST.

**ADDRESSES:** The NIAC meeting will be held at the Eisenhower Executive Office Building, 1650 Pennsylvania Ave. NW, Washington, DC 20502.

**Comments:** Written comments may be submitted on the issues to be considered by the NIAC as described in the **SUPPLEMENTARY INFORMATION** section below and any briefing materials for the meeting. Any briefing materials that will be presented at the meeting will be made publicly available on Friday, December 6, 2019 at the following website: <https://www.dhs.gov/national-infrastructure-advisory-council>.

Comments identified by docket number "CISA-2019-0015" may be submitted by any of the following methods:

- **Federal eRulemaking Portal:** [www.regulations.gov](http://www.regulations.gov). Follow the instructions for submitting written comments.
- **Email:** [NIAC@hq.dhs.gov](mailto:NIAC@hq.dhs.gov). Include docket number CISA-2019-0015 in the subject line of the message.
- **Fax:** 703-235-9707, ATTN: Ginger K. Norris.

• **Mail:** Ginger K. Norris, Designated Federal Officer, National Infrastructure Advisory Council, Cybersecurity and Infrastructure Security Agency, Department of Homeland Security, 245 Murray Lane, Mail Stop 0612, Arlington, VA 20598-0612.

**Instructions:** All submissions received must include the agency name and docket number for this notice. All written comments received will be posted without alteration at [www.regulations.gov](http://www.regulations.gov), including any personal information provided. For detailed instructions on sending comments and additional information on participating in the upcoming NIAC meeting, see the "PUBLIC PARTICIPATION" heading of the **SUPPLEMENTARY INFORMATION** section of this document.

**Docket:** For access to the docket and comments received by the NIAC, go to [www.regulations.gov](http://www.regulations.gov).

#### FOR FURTHER INFORMATION CONTACT:

Ginger K. Norris, 202-441-5885, [ginger.norris@cisa.dhs.gov](mailto:ginger.norris@cisa.dhs.gov).

**SUPPLEMENTARY INFORMATION:** The NIAC is established under Section 10 of E.O. 13231 issued on October 16, 2001. Notice of this meeting is given under the Federal Advisory Committee Act (FACA), 5 U.S.C. Appendix (Pub. L. 92-463). The NIAC shall provide the President, through the Secretary of Homeland Security, with advice on the security and resilience of the Nation's critical infrastructure sectors.

The NIAC will meet in an open meeting on December 12, 2019, to discuss the following agenda items with DHS leadership.

#### Agenda

- Call to Order
- Opening Remarks
- Insurance Panel Discussion
- Discuss and Deliberate Current Task
- Public Comment
- Closing Remarks
- Adjournment

#### Public Participation

##### Meeting Registration Information

Due to additional access requirements and limited seating, requests to attend in person will be accepted and processed in the order in which they are received. Individuals may register to attend the NIAC meeting by sending an email to [NIAC@hq.dhs.gov](mailto:NIAC@hq.dhs.gov).

##### Public Comment

While this meeting is open to the public, participation in FACA deliberations are limited to council members. A public comment period will be held during the meeting from approximately 12:45 p.m.–1:00 p.m.

EST. Speakers who wish to comment must register in advance and can do so by emailing [NIAC@hq.dhs.gov](mailto:NIAC@hq.dhs.gov) no later than Wednesday, December 4, 2019, at 5:00 p.m. EST. Speakers are requested to limit their comments to three minutes. Please note that the public comment period may end before the time indicated, following the last call for comments.

#### Information on Services for Individuals With Disabilities

For information on facilities or services for individuals with disabilities or to request special assistance at the meeting, contact [NIAC@hq.dhs.gov](mailto:NIAC@hq.dhs.gov) as soon as possible.

Dated: November 6, 2019.

**Ginger K. Norris,**

*Designated Federal Official, National Infrastructure Advisory Council, Cybersecurity and Infrastructure Security Agency, Department of Homeland Security.*

[FR Doc. 2019-24744 Filed 11-14-19; 8:45 am]

**BILLING CODE 9110-9P-P**

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[LLWY925000.L13400000.PQ0000 20X]

### Notice of Intent To Prepare Resource Management Plan Amendments for 9 BLM-Wyoming Resource Management Plans and an Associated Environmental Impact Statement

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of intent.

**SUMMARY:** In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, and the Federal Land Policy and Management Act (FLPMA) of 1976, as amended, the Bureau of Land Management (BLM) intends to prepare an Environmental Impact Statement (EIS) to analyze potential Resource Management Plan (RMP) amendments for BLM Wyoming's Cody, Worland, Buffalo, Casper, Lander, Pinedale, Kemmerer, Rawlins and Rock Springs field offices. The proposed amendments would designate pipeline corridors as part of the Wyoming Pipeline Corridor Initiative (WPCI) proposed by the State of Wyoming. By this notice, the BLM is announcing the beginning of the scoping process to solicit public comments and identify issues.

**DATES:** Comments on the RMP amendments and associated EIS may be submitted in writing until December 16, 2019. The date(s) and location(s) of any

scoping meetings will be announced at least 15 days in advance through local media, newspapers and the BLM website at <https://go.usa.gov/xpCMr>. To ensure the BLM can adequately consider and incorporate all comments, please submit written comments prior to the close of the 30-day scoping period or 15 days after the last public meeting, whichever is later. The BLM will provide additional opportunities for public participation upon publication of the Draft EIS.

**ADDRESSES:** You may submit comments on issues and planning criteria related to the EIS during public scoping meetings or on the WPCI ePlanning website at <https://go.usa.gov/xpCMr>.

Documents pertinent to this proposal may be examined in person at the BLM Wyoming State Office, 5353 Yellowstone Road, Cheyenne, WY 82009.

**FOR FURTHER INFORMATION CONTACT:**

Heather Schultz, Project Manager, telephone: 307-775-6084; address: 5353 Yellowstone Road, Cheyenne, Wyoming; email: [hschultz@blm.gov](mailto:hschultz@blm.gov). Contact Ms. Schultz to be added to the WPCI mailing list. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

**SUPPLEMENTARY INFORMATION:** The State of Wyoming is proposing a pipeline corridor network for carbon capture, utilization, and storage (CCUS) and enhanced oil recovery (EOR) to be designated on BLM-managed lands in Wyoming through the land use planning process. The State of Wyoming proposes that 2,000 miles and 25 segments of pipeline corridors be designated on BLM-managed lands and in those lands' associated RMPs. The proposed WPCI corridors are divided into segments based on proposed width and the regions they will service.

The BLM plans to analyze the State's proposal by preparing an EIS. Based on the findings of the EIS process, the BLM may amend the nine RMPs containing lands proposed for pipeline corridors to designate those corridors. If the BLM were to receive a right-of-way application for CCUS and EOR pipelines or related facilities in the future, project-specific NEPA would be completed separately at that time. The purpose of this public scoping process is to determine relevant issues that will influence the scope of the

environmental analysis, including alternatives, and guide the planning process. BLM and State of Wyoming personnel have identified preliminary issues to address within the planning area, including Greater Sage-Grouse; big game habitat (including migration corridors); potential conflicts with coal mining and other resource uses; air quality; transportation; vegetation and reclamation success; anticipated oil and gas development in the planning area; and opportunities to apply best management practices and design features.

The BLM also seeks input on planning criteria, which include compliance with laws and regulations and integration into affected plans. The BLM has identified the following preliminary planning criteria:

- The planning and environmental review processes will comply with FLPMA, the Endangered Species Act, the Clean Water Act, and all other applicable laws, regulations, and policies.
- Valid existing rights will continue to be recognized.
- The BLM will continue to manage other resources in the planning areas under pre-existing terms, conditions, and decisions in the applicable RMPs.
- The BLM will coordinate with Federal, State, and local agencies and tribal governments in the development of the EIS.

• Any amendments to BLM RMPs will be consistent with the existing plans and policies of state and local governments, to the extent practicable.

Please follow the procedures identified above to submit comments on issues and planning criteria. 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 can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. The BLM will evaluate identified issues to be addressed in the plan, and will place them into one of three categories:

1. Issues to be resolved in the plan;
2. Issues to be resolved through policy or administrative action; or
3. Issues beyond the scope of this plan.

The BLM will provide an explanation in the Draft RMP/Draft EIS as to why an issue was placed in category 2 or 3. The public is also encouraged to help identify any management questions and

concerns that should be addressed in the plan. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The BLM will utilize and coordinate the NEPA scoping process to help fulfill the public involvement process under the National Historic Preservation Act (54 U.S.C. 306108) as provided in 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed action will assist the BLM in identifying and evaluating impacts to such resources.

The BLM will use an interdisciplinary approach to develop the plan in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Rangeland management, minerals and geology, forestry, outdoor recreation, archaeology, paleontology, wildlife and fisheries, lands and realty, hydrology, soils, sociology, and economics.

**Authority:** 40 CFR 1501.7, 43 CFR 1610.2.

**Duane Spencer,**

*Acting State Director.*

[FR Doc. 2019-24752 Filed 11-14-19; 8:45 am]

**BILLING CODE 4310-22-P**

## DEPARTMENT OF JUSTICE

### Agency Information Collection Activities; Proposed Collection; Comments Requested; Immigration Practitioner Complaint Form

**AGENCY:** Executive Office for Immigration Review, Department of Justice.

**ACTION:** 30-Day notice.

The Department of Justice (DOJ), Executive Office for Immigration Review, will be submitting the following information collection request to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act of 1995.

**DATES:** Comments are encouraged and will be accepted for an additional days until December 16, 2019.

**FOR FURTHER INFORMATION CONTACT:** If you have additional comments especially on the estimated public burden or associated response time, suggestions, or need a copy of the proposed information collection instrument with instructions or additional information, please contact Lauren Alder Reid, Assistant Director,

## **Appendix B**

### **Scoping Meeting Materials**





U.S. Department of the Interior  
Bureau of Land Management

# Wyoming Pipeline Corridor Initiative

## Public Scoping Open House

December 2019

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### About the Proposed Action

The Wyoming Pipeline Corridor Initiative is a proposal from the State of Wyoming to designate almost 2,000 miles of pipeline corridors across private, state and BLM-managed lands in Wyoming (Figure 1). Approximately 1,150 miles of the proposed corridors are located on BLM managed lands. The project would designate a statewide pipeline corridor network for future development of pipelines associated with carbon capture, utilization and storage, as well as pipelines and facilities associated with enhanced oil recovery. The project will not authorize any new pipelines or construction but will amend several BLM Resource Management Plans across the state to make future analysis of project specific proposals more efficient.

One of the primary purposes of the pipeline corridor network is to connect existing oil fields suitable for enhanced oil recovery (EOR) with anthropogenic and natural carbon dioxide (CO<sub>2</sub>) sources. The CO<sub>2</sub> will be injected into existing, often “played-out” oil fields, thereby increasing oil production beyond conventional recovery methods with little additional surface disturbance.

### About This Public Open House Meeting

The purpose of this public open house is to solicit and obtain public feedback regarding the Proposed Action to inform the development of a Draft Environmental Impact Statement (EIS). Resource specialists from the BLM are available to answer your questions.

### How to Comment

The comment period closes on **December 27, 2019**. All comments received during the comment period will be considered equally in the development of the Draft EIS. Scoping comments can be submitted in one of the following ways:

- By providing written comments in the comment forms available at this meeting. The comment station has comment boxes in which you can place your completed comment form. You may also give your completed form to any BLM or USFS employee. These comment forms will not be accepted beyond the conclusion of this meeting.
- If you wish to submit a comment at a later date, please do so via BLM’s ePlanning website: [go.usa.gov/xpCMr](https://go.usa.gov/xpCMr)

*Before including your personal information in your comment, you should be aware that your entire comment—including your personal information—may be made publicly available at any time. Although you can ask us in your comment to withhold your personal information from public review, we cannot guarantee that we will be able to do so. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.*







U.S. Department of the Interior  
Bureau of Land Management

## WYOMING PIPELINE CORRIDOR INITIATIVE

### Public Scoping Meeting Registration and Comment Form

Please be advised that your entire comment—including your personal information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal information from public review, we cannot guarantee that we will be able to do so.

MEETING LOCATION AND DATE (CHECK ONE):

☐ Cheyenne [Dec. 9](#) ☐ Casper [Dec. 10](#) ☐ Thermopolis [Dec. 11](#) ☐ Rock Springs [Dec. 12](#)

NAME/ORGANIZATION: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

EMAIL: \_\_\_\_\_

☐ Yes, please include my information on the mailing list so I can receive information about the project.

PLEASE WRITE YOUR COMMENT ON THE BACK OF THIS FORM AND DEPOSIT IT IN THE COMMENT BOX BEFORE LEAVING THE MEETING TONIGHT. PUBLIC COMMENTS AFTER THIS MEETING WILL ONLY BE ACCEPTED VIA BLM'S EPLANNING WEBSITE.



U.S. Department of the Interior  
Bureau of Land Management

## WYOMING PIPELINE CORRIDOR INITIATIVE

### Public Scoping Meeting Registration and Comment Form

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MEETING LOCATION AND DATE (CHECK ONE):

☐ Cheyenne [Dec. 9](#) ☐ Casper [Dec. 10](#) ☐ Thermopolis [Dec. 11](#) ☐ Rock Springs [Dec. 12](#)

NAME/ORGANIZATION: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

EMAIL: \_\_\_\_\_

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U.S. Department of the Interior  
Bureau of Land Management

## WYOMING PIPELINE CORRIDOR INITIATIVE

### Public Scoping Meeting Registration and Comment Form

Please be advised that your entire comment—including your personal information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal information from public review, we cannot guarantee that we will be able to do so.

MEETING LOCATION AND DATE (CHECK ONE):

☐ Cheyenne [Dec. 9](#) ☐ Casper [Dec. 10](#) ☐ Thermopolis [Dec. 11](#) ☐ Rock Springs [Dec. 12](#)

NAME/ORGANIZATION: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

EMAIL: \_\_\_\_\_

☐ Yes, please include my information on the mailing list so I can receive information about the project.

PLEASE WRITE YOUR COMMENT ON THE BACK OF THIS FORM AND DEPOSIT IT IN THE COMMENT BOX BEFORE LEAVING THE MEETING TONIGHT. PUBLIC COMMENTS AFTER THIS MEETING WILL ONLY BE ACCEPTED VIA BLM'S EPLANNING WEBSITE.

COMMENT

COMMENT

Do you wish to have your personal information withheld? ☐ Yes ☐ No

Do you wish to have your personal information withheld? ☐ Yes ☐ No

COMMENT

COMMENT

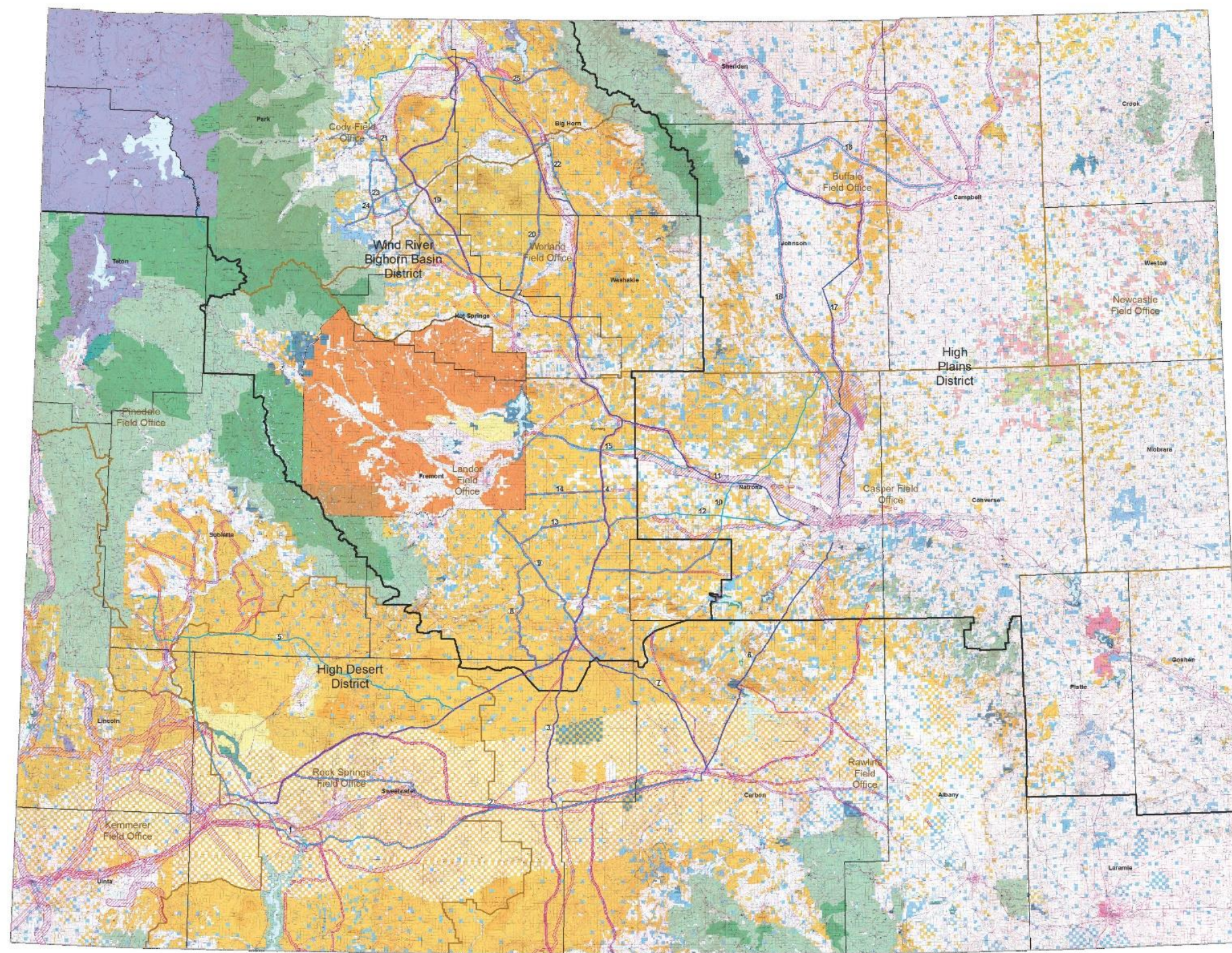
Do you wish to have your personal information withheld? ☐ Yes ☐ No

Do you wish to have your personal information withheld? ☐ Yes ☐ No





## WPCI Overview



**WPCI BLM Statewide ROW Corridors Line Type**

- Lateral Line
- Trunk Line

**BLM Identified Utility Corridors**

- Utility Corridors

**Surface Management Agency**

Bankhead Jones	Department of Veterans Affairs	National Park Service
Bureau of Land Management	Federal Aviation Administration	State
Bureau of Reclamation	Fish & Wildlife Service	State (State Parks & Hist Sites)
Corps of Engineers	Forest Service	State (University of Wyoming)
Department of Agriculture	General Services Administration	State (Wyoming Game & Fish)
Department of Defense	Local Government	Wind River Indian Reservation
Department of Energy	National Grasslands	

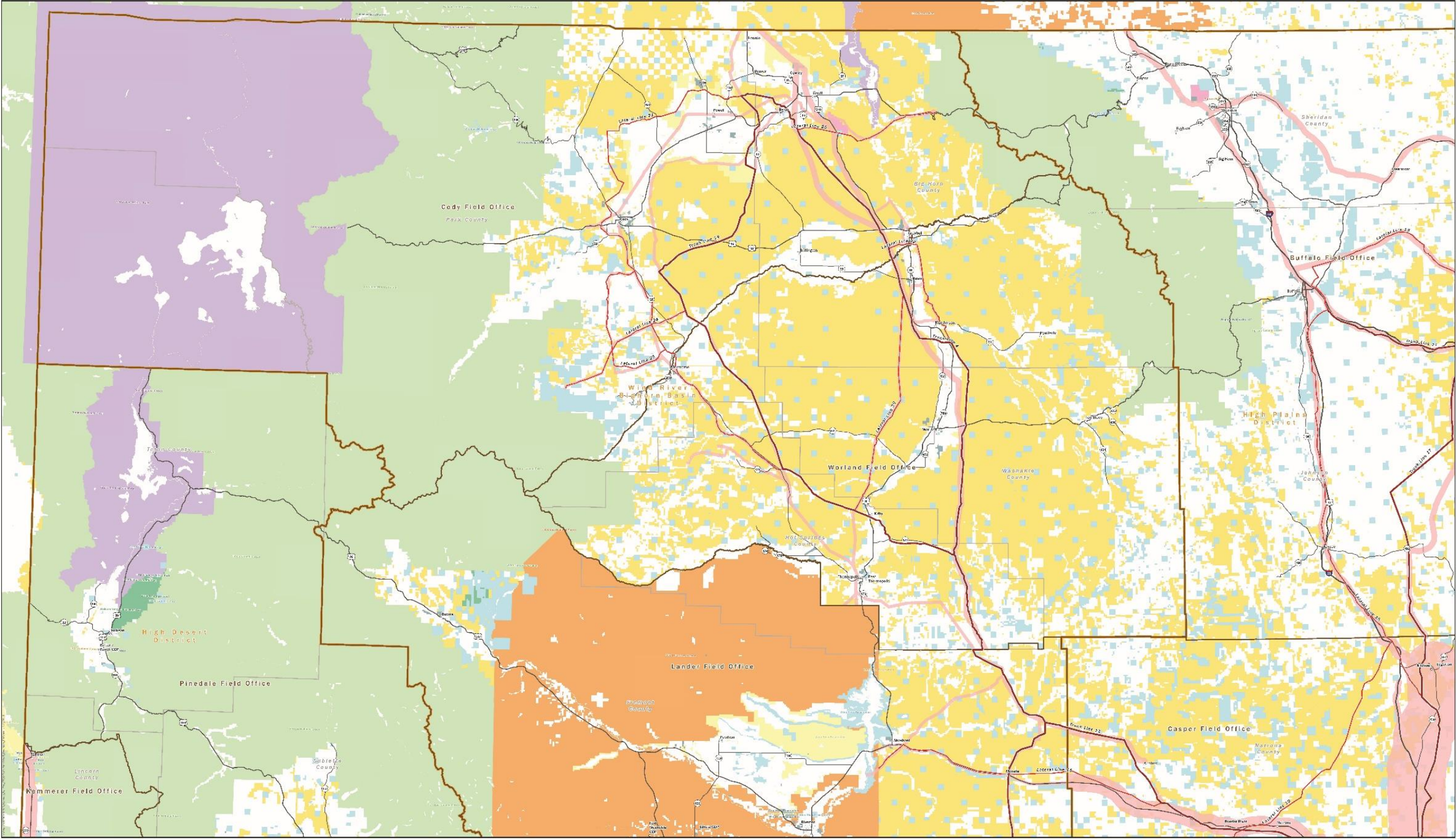
0 12.5 25 50 75 100 Miles

September 2019





# WPCI Project NW Wyoming



- Wyoming Pipeline Corridor Initiative Project**
- |   |                          |                 |                                  |                                  |                                    |   |
|---|--------------------------|-----------------|----------------------------------|----------------------------------|------------------------------------|---|
| <b>ROW Corridors Line Type</b>          | <b>BLM Field Offices</b> | <b>Highways</b> | <b>Surface Management Agency</b> | <b>Department of Agriculture</b> | <b>Fish &amp; Wildlife Service</b> | <b>State (State Parks &amp; Hist Sites)</b> |
| Proposed Trunk Line Corridor            | BLM Districts            | Interstate      | National Grasslands              | Department of Defense            | Forest Service                     | State (University of Wyoming)               |
| Proposed Lateral Line Corridor          | Counties                 | US Route        | Bureau of Land Management        | Department of Energy             | Local Government                   | State (Wyoming Game & Fish)                 |
| <b>BLM Identified Utility Corridors</b> |                          | State Route     | Bureau of Reclamation            | Department of Veterans Affairs   | National Park Service              | Wind River Indian Reservation               |
| Utility Corridors                       |                          |                 | Corps of Engineers               | Federal Aviation Administration  | State                              |   |



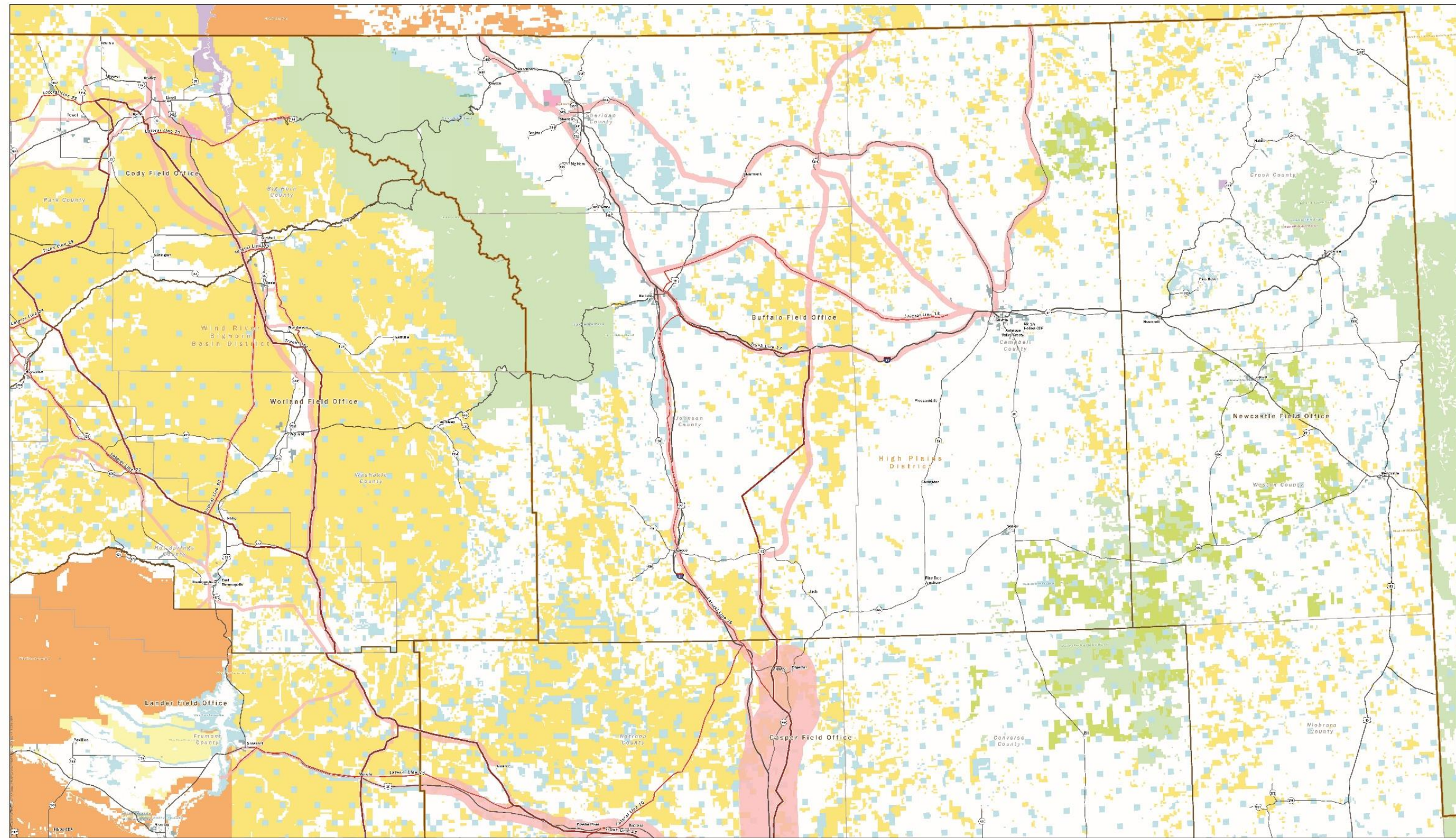
North Arrow  
Scale: 1 inch = 10 miles  
Data Source: State of Wyoming, BLM, USGS, ESRI  
Last Updated: 11/20/2023







# WPCI Project NE Wyoming



**Wyoming Pipeline Corridor Initiative Project**

**ROW Corridors Line Type**

- Proposed Trunk Line Corridor
- Proposed Lateral Line Corridor
- BLM Identified Utility Corridors
- Utility Corridors

**BLM Field Offices**

- BLM Districts
- Counties

**Highways**

- Interstate
- US Route
- State Route

**Surface Management Agency**

- National Grasslands
- Bureau of Land Management
- Bureau of Reclamation
- Corps of Engineers
- Department of Agriculture
- Department of Defense
- Department of Energy
- Department of Veterans Affairs
- Federal Aviation Administration
- Fish & Wildlife Service
- Forest Service
- Local Government
- National Park Service
- State (State Parks & Hist Sites)
- State (University of Wyoming)
- State (Wyoming Game & Fish)
- Wind River Indian Reservation

**Scale**

0 10 20 30 40 50 Miles

**Local Map**

**North Arrow**

N

NAD83, WGS 84

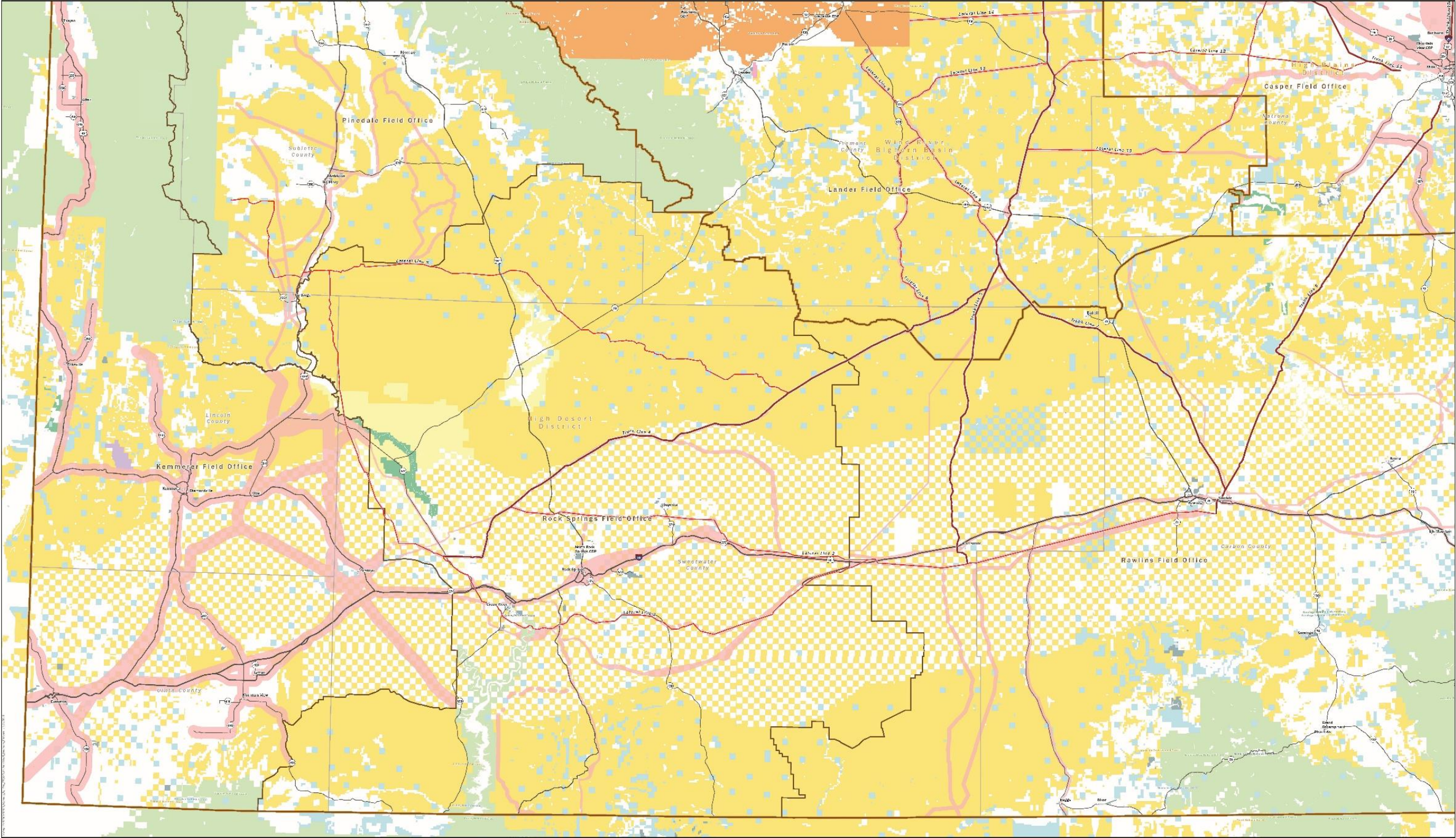
**BLM Logo**

Data Sources: State of Wyoming, FWS, BLM, ESR, USGS  
Last Updated: 11/25/2019





# WPCI Project SW Wyoming



- Wyoming Pipeline Corridor Initiative Project**
- |   |                          |                 |                                  |                                  |                                    |   |
|---|--------------------------|-----------------|----------------------------------|----------------------------------|------------------------------------|---|
| <b>ROW Corridors Line Type</b>          | <b>BLM Field Offices</b> | <b>Highways</b> | <b>Surface Management Agency</b> | <b>Department of Agriculture</b> | <b>Fish &amp; Wildlife Service</b> | <b>State (State Parks &amp; Hist Sites)</b> |
| Proposed Trunk Line Corridor            | BLM Districts            | Interstate      | National Grasslands              | Department of Defense            | Forest Service                     | State (University of Wyoming)               |
| Proposed Lateral Line Corridor          | Counties                 | US Route        | Bureau of Land Management        | Department of Energy             | Local Government                   | State (Wyoming Game & Fish)                 |
| <b>BLM Identified Utility Corridors</b> |                          | State Route     | Bureau of Reclamation            | Department of Veterans Affairs   | National Park Service              | Wind River Indian Reservation               |
| Utility Corridors                       |                          |                 | Corps of Engineers               | Federal Aviation Administration  | State                              |   |



Office Services State of Wyoming, BLM, BLM, BLM, BLM  
Last Updated: 11/20/2023



