



THE WILDERNESS SOCIETY

West Wide Energy Corridors Draft Programmatic Environmental Impact Statement – Talking Points

The proposed designations in Draft Programmatic EIS (PEIS) will have significant impacts to wildlife habitat, cultural resources, recreation opportunities, and many other resources on federal lands across the west. Once designated, the corridors (averaging 3500 feet wide but ranging up to 5 miles in width) will cover 6,000 miles and almost 3 million acres of public lands. Areas within the designated corridors are essentially deemed appropriate for pipelines and powerlines, with expedited construction applications and limited environmental review. With large-scale buildup likely within these corridors - the PEIS contemplates that about 9 individual 500-kv transmission lines, as many as 35 liquid petroleum pipelines or up to 29 natural gas pipelines could be supported within a single 3,500-foot-wide corridor – public involvement in the planning process is crucial to ensure that the designation of these corridors is a positive step for our public lands. Key points to raise at public meetings include:

By taking the responsibility to move forward with a process to designate large swaths of our federal lands as places for oil, gas and hydrogen pipelines and power lines, the government also took on the responsibility of doing it right. Doing it right would involve ensuring that:

- **new pipelines or powerlines are actually needed** – agencies should analyze the potential to meet growing energy demands through increased energy efficiency, distributed generation and maximizing the use of the existing power grid through technology upgrades before turning to additional or wider corridors on our public land;
- **federal lands are necessary locations and special or sensitive public lands are avoided altogether** – agencies should continue analyzing impacts to special public lands and moving corridors to avoid them. Agencies should also make this process and information transparent to the public;
- **projects are subjected to best management practices to limit damage to other resources, recreation and views** – agencies should make their Interagency Operating Procedures mandatory;
- **risks to federal and other affected lands are realistically and thoroughly assessed, so that those risks can then be avoided or minimized** – agencies should analyze cumulative impacts to both federal lands and state, private, and tribal lands which will be impacted when the corridors are connected;
- **once appropriate locations are identified, projects on federal lands are presumptively limited to those corridors** – agencies should limit projects on federal lands to corridors;
- **consideration is given to improving access for renewable energy, such as wind and solar** - agencies should take the opportunity to reduce our dependence on fossil fuels, limit the effects of climate change and help build a sustainable energy future for the West by seriously evaluating alternatives to maximize use of renewable energy;
- **avoid areas in pending legislation** - wildlands included in recently-introduced wilderness bills (such as those in Oregon, Washington, Colorado, and California) will also be impacted by the proposed corridors. Analysis of such impacts has not been completed yet, but as agencies are provided with relevant information they should consider moving or modifying corridors; and
- **alternatives are presented and considered** – without alternatives, the public can only comment on what they don't like about the proposed plan. The agencies (who have all of the pertinent information) should provide the public with choices – that's why NEPA requires them to develop alternatives.

Talking About Specific Issues and Special Places Impacted

It is crucial to raise concerns regarding impacts to specific places and issues in your region; the agencies want to hear about these problems, and bringing specific places and proposed changes or improvements to their attention is one of the best ways to have places you care about protected in the final PEIS. The next two pages contain examples of contentious issues from across the West. There is value in raising these issues at any of the meetings, and the overall concerns highlighted above apply everywhere. However, a strong effort should be made to raise issues local to the state/area of each meeting, so please also use the list below as examples for how to frame important matters in your area.

New Mexico

Proposed corridor through the **Proposed National Conservation Area in Organ Mountains** – This area (also identified as meeting criteria for wilderness designation by the New Mexico Wilderness Alliance as the Organ Foothills or Talavera Proposed Wilderness Area) is included in a proposed national conservation area that is endorsed by the Las Cruces City Council, Dona Ana County Commission, conservation groups, hunters, backcountry horsemen, the Las Cruces Homebuilders Association and other elected officials. While there is an existing power line here, it is certainly not an area where anyone contemplated placement of 9 large power lines or 30 pipelines – but designation of the area as an energy corridor makes this scale of development more likely, an impact neither addressed nor mitigated in the Draft PEIS.

The same corridor also runs through **Sevilleta National Wildlife Refuge** – The Refuge is home to a vast array of wildlife number of important and endangered species, including desert bighorn sheep and bald eagles, as well as Gunnison prairie dogs. While the proposed corridor includes an existing right-of-way and follows a highway, large-scale use of the corridor will necessarily interfere with the protection of the wildlife in the Refuge, which is why conservation groups have advocated for corridors not to be placed in wildlife refuges. The corridor also passes through the **Rio Grande** corridor (one of the most stressed rivers in the country), habitat for the endangered Pecos sunflower and two State Wildlife Refuges, which are not even acknowledged. We are encouraged that in the Draft PEIS, the width of the corridor is limited to 1500-feet through Sevilleta National Wildlife Refuge, but this is not a uniform approach to corridors through wildlife habitat or even for the remainder of this corridor, which will still damage other resources.

Nevada

Two proposed corridors pass through or adjacent to the **Desert National Wildlife Refuge**– The Refuge is home to desert bighorn sheep, as are the three Wilderness Areas (Delamar Mountains, Arrow Canyon and Meadow Valley) which border the proposed corridor to the east of the Refuge. Impacts to the bighorn sheep habitat in the Refuge will likely impact the populations in both the Refuge and the Wilderness areas. The Refuge also provides habitat for the threatened desert tortoise, which the corridor is likely to harm as well. The proposed corridor also impacts the Fossil Elbow and Gass Mountain citizen-proposed wilderness areas, both of which have been found by the U.S. Fish & Wildlife Service to be suitable for wilderness designation. Cumulative impacts from the corridor must be considered in conjunction with the development already occurring, such that all of the other land around the existing highway and proposed corridor to the east of the Refuge that is not protected as Wilderness is already subject to intensive private development.

Idaho

Proposed corridor 19 miles long through the **Snake River-Birds of Prey National Conservation Area**, which was established to protect one of the densest known raptor populations in North America including the habitat of the raptor prey base as well as the nesting and hunting habitat of raptors within the conservation area. National Conservation Areas are not included in the list of “sensitive resources” impacted by the proposed corridors, nor are there requirements for any corridors in those areas to comply with the management priorities set out in the legislation establishing them.

Arizona

Proposed corridor through **Lake Havasu National Wildlife Refuge**, which also passes into California, and includes 30 river miles (300 miles of shoreline) of the Colorado River from Needles, California, to Lake Havasu City, Arizona, bighorn sheep, many species of birds, while providing recreation opportunities to boat through the spectacular Topock Gorge, watch waterbirds in Topock Marsh, or hike to the Havasu Wilderness Area. This corridor is also encompassed by the recently-designated Southwest National Interest Electric Transmission Corridor – making it an even more likely target for development and truncated environmental review.

Utah

Proposed 3500-foot corridor for pipelines and power lines for 20 miles through the **Grand Staircase-Escalante National Monument** does not follow an existing road. This area is in the Southern portion of the Monument and is frequented by hikers, backpackers, hunters, and horseback riders and is generally characterized by its opportunities for a remote and primitive experience. The corridor runs past the Buckskin Mountain area and crosses the Paria River, which has been declared by the BLM as suitable for inclusion into the Wild and Scenic Rivers System. The Paria encompasses the outstandingly remarkable values of scenic, recreational, wildlife, geological, historic, and riparian. From the intersection point with the corridor, the Paria flows immediately through the Paria Canyon/Vermillion Cliffs Wilderness Area and on down to the Colorado River. How this river will be impacted has not been evaluated in the Draft PEIS.

Proposed corridor along the border of **Arches National Park**, where development would impact the experience of the park. Running through some of the most spectacular scenic vistas in Southern Utah, this corridor will actually run through the canyon bordering the park. Neither impacts to this important area adjacent to the park nor the need for such pipelines and/or transmission lines have been assessed.

California

Proposed corridors through the **California Desert Conservation Area**, established to manage desert resources and human uses, including recreation, but not included in the list of “sensitive resources” impacted by the proposed corridors and for which there are no requirements for the multiple corridors to comply with the management priorities set out in the relevant legislation and the complex plan that governs it. These corridors are also within the Southwest National Interest Electric Transmission Corridor – making it an even more likely target for development, including by condemnation of private lands and overruling any state agency objections, but neither the non-federal lands or the likely overlap with the Southwest National Interest Electric Transmission Corridor are addressed in this Draft PEIS.