APPENDIX C
COMMENT DATABASE SUMMARY

The following includes the comments as they appeared in the letters. For the most part, the comments in this table are as they were written in the letter, although in some cases, spelling and grammar was corrected, or other minor modifications made so the comment makes sense in this context.

A few comments related to more than one subject, so they were given to comment codes (Code 1 and Code 2 in the table). This table is sorted by the Code 1 column. Codes are defined in **Section 3.2.** Additionally, during the process of identifying issues from the comments for **Section 3.2**, parts of these comments may have been included in a different location than the code indicates in this table.

Code 1	Code 2	Comment
10		BLM should give specific attention to the purposes and needs that will be analyzed. The relative value of the Gateway Project area for meeting energy needs versus supplying environmental amenities/needs should be considered in identifying the purpose(s) and need(s) for this project. Similarly, identification of where specifically energy development is appropriate and inappropriate in the Gateway Project area, and why, should be addressed in the environmental analysis as part of the definition of the purpose and need for the Gateway Project. We think it is fundamentally inappropriate to define the purpose and need for this project in terms so narrow that the project is defined as only having the purpose of allowing electricity to be transferred from point A to point B. "One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing 'reasonable alternatives' out of consideration (and even out of existence,)" Davis v. Mineta, 302 F.3d 1104, 1119 (l0th Cir. 2002) (invalidating a NEPA analysis partially on this basis) (quoting Simmons v. United States Army Corps of Eng'rs, 120 F.3d 664, 669 (7th Cir. 1997)).
10		BLM should evaluate whether the need for the power lines could be avoided altogether if Rocky Mountain Power and Idaho Power aggressively pursued conservation and efficiency. We understand that Idaho Power is moving forward energy efficiency programs that NRDC has called "a regional leader." But those programs were only initiated in 2007. According to the Western Governors' Association's Clean and Diversified Energy Advisory Committee (CDEAC)achievable, if high but achievable levels of efficiency are reached in the western region, approximately 30 percent of a projected need for 4,000 miles of new power lines, or 1,150 miles, could be eliminated. (CDEAC, http://www.westgov.org/wgaJinitiatives/cdeac/)
11		There are 7 proposed lines across Southern Idaho. What existing or proposed lines could be upgraded to eliminate the construction of parts or the entire Project? The State of Idaho has the 13th greatest potential for wind energy. Wind farms can be built and online quicker than constructing a power line that is not scheduled for completion until 2014. Has investing in local wind projects been considered rather than the transmission line?
11	1500	The Need for the Gateway West Transmission Line Project is Not Apparent in this Era of Climate Change, When the Nation Needs to Reconfigure its Energy Policy Immediately and Provide Refuge for Species Suffering the Effects of Global Warming Public Lands.
11		...fully explain WHY this line, along with all the other existing proposed and foreseeable corridors are needed.
11		Please describe the current structure of the industry and parties involved in transmission and power and mega-projects vs. small projects.
11		Finally, Western may require the transmission line proponent to enter into a

Code 1	Code 2	Comment
		contractual agreement with Western to ensure the integrity of the Federal power system. More information about that can be provided after the final alignment for the 203 and 500-kV transmission lines is determined.
20		We urge the BLM to not select his route
20		We urge the BLM and Forest Service to only approve a route that carefully tracks along existing highway corridors or other transmission line corridors.
20		The proposed route appears to diverge north of I-80 west of Rock Springs and Green River. We urge the BLM to reject selection of this route. The power line should more closely track I-80. If the power line were to veer that far north in this area, it could have negative impacts on Seedskadee National Wildlife Refuge.
20		How much power will be lost in the remote lands siting of energy projects that may tie into this line, vs. siting closer to metro areas and/or emphasis on local and more self-sufficient generation of wind, geothermal, solar and other power? How might local or self-sufficient generation of power alleviate or reduce rolling black-outs, and other effects of an overloaded centralized grid?
20		There are possibly two Western transmission lines that may be in the path of one or more segments of the proposed line. Western's facilities lie in Townships 21 and 22 North, Ranges 80-86 West, 6th Principal Meridian. Please confirm whether these facilities are impacted by the proposal.
30		We recommend that the BLM evaluate the road and transportation network to avoid impacts to sage-grouse habitat where feasible, and close or decommission unneeded roads and corridors.
30		Accordingly, and in light of the current and projected impacts of global warming, the only lawful and common-sensical scenario where hundreds of miles of the nation's public lands might possibly be justifiably sacrificed for the Project would be if the Project itself will, in turn, result in the transmission of energy coming solely from renewable, non-carbon emitting sources with little to zero carbon emissions. In this context, this means that BLM must develop and propose a "renewables-only" alternative and/or a "no action" alternative.
30		FMC believes that there is an alternative route that the proponents should consider that would also avoid the FMC mining area. This alternative would involve connecting the northern (red) route with the southern (green) route beginning at a suitable point along the northern route in Section 31, T21N, R110W in Sweetwater County, and terminating at intersection with the southern route at a suitable location in Sections 29 or 30, T20N, R111W in Sweetwater County.
30		The National Trust is cautiously optimistic that, by adopting this alternative, BLM could avoid many, if not all, of the effects of the Transmission Project on the setting of the Sublette Cutoff, Emigrant Springs and the emigrant gravesites.
30		The proposed route in the vicinity of Kemmerer calls for special mention. Besides impacts on the historical trails, the proposed route appears to diverge far from any existing roads or power lines (this appears to also be true of the alternative route proposed by the Kemmerer Field Office. The areas of the Kemmerer Field Office that appear to be proposed for penetration by this power line are recognized by the BLM in the draft environmental impact statement (EIS) for the Kemmerer Resource Management Plan (RMP) as having special value due to large, contiguous sagebrush habitats in this area. In fact, the draft Kemmerer RMP calls for protection of these large contiguous sagebrush habitats. The proposed route could thwart that management goal, and thus it should be rejected. At a minimum, the power line must be required to follow existing roads and power line corridors. What we propose is this. The Gateway Project should be required to closely parallel I-80 through its entire

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		route in Wyoming, and on into Utah in Salt Lake City. There it could turn north and follow the 1-15 corridor north to 1-86 and then run west from there.
30		We specifically request that an alternative be considered where the route only tracks along existing highway corridors and existing transmission corridors.
30		In general, we recommend the proposed transmission lines follow existing corridors wherever possible to minimize disturbances to wildlife and wildlife habitats.
30		If feasible, given the goal of this project, establishing only one new line along the existing power line corridor from Dave Johnston Power Plant through Shirley Basin in would minimize disturbance of wildlife habitat and is preferable to an additional corridor.
30		Wildlife habitat enhancement projects have been implemented in the Bates Hole Management Area (BHMA) and more are scheduled in the future. Considering the importance of this area to wildlife and the cooperative habitat enhancements we have done with BLM, we suggest a more conservative approach to routing and constructing power lines within this segment
30		Laramie Region-Highway 487 to Ft. Steele In much of this portion of the Laramie Region, the proposed lines would parallel existing lines at a 1,500 feet offset, further widening an existing transmission line corridor. If implemented, the new transmission lines would undoubtedly include new service roads which would create a potential for increased erosion, noxious weed problems, a direct loss of habitat, increased fragmentation of habitat, and increased disturbance of wildlife. The proposed transmission lines would intersect important habitats for many wildlife species including sage grouse, raptors, songbirds, many species of small mammals and big game. We recommend the proposed route follow the footprint of existing lines, as much as possible, to reduce the amount of ground disturbance and potential impacts to wildlife.
30		Green River Region- Wamsutter to Idaho We do not favor the proposed "alternate" route from Kemmerer west to Utah-Idaho. Given the location of this alternative, it will have issues regarding crucial winter range for Wyoming Range mule deer, and with the largest contingent of occupied greater sage-grouse leks in the Green River Region. The resultant wildlife impacts would be highly detrimental to these important wildlife populations.
30		Alternative A (constructing the new line along the same corridor as the existing line north and west of Kemmerer) is the Department's preferred route, as any impacts would be within an already impacted zone.
30		We offer the following routes as alternatives that we believe will have fewer impacts to wildlife resources than the BLM proposed alternate route: 1. Alternative B (see attached map Alternative B) - This route would avoid many of the winter range and lek impacts associated with the BLM's alternative. It would also avoid the concerns expressed by BLM regarding the special designation zone associated with Lost Creek and the Raymond Mountain WSA. The proposed route would be as follows: follow the existing power line ROW to Dempsey Ridge; follow ridgeline north to Coke Mountain; turn westerly and follow Sublette Canyon west-northwest; proceed northwesterly to Quealy Reservoir; follow Quealy Canyon westerly to the existing corridor.
30		Alternative C (see attached map Alternative C) - As stated previously, the BLM proposed Alternate Route south of US 30 would likely produce significant negative impacts to crucial winter range for mule deer and the largest sage-grouse lek complex remaining in this portion of the Green River Region (e.g. Collett Creek leks,

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		Bullpen leks). Our proposed change to this route to make it better accommodate wildlife would be as follows: from Kemmerer, proceed westerly-northwesterly across the Elkol Mine and along the existing pipeline corridor to Fossil; proceed westerly in the bottom of the Twin Creek drainage to T2IN; R118W; Sec. 10; turn southwesterly at this location to the extreme southern boundary (center section) of T21N; R118W; Sec. 9; proceed due west to the extreme southeastern comer T21N; R119W; Sec 12; proceed generally westerly to Sage Junction; proceed northwesterly across Wyoming Highway 89; proceed northerly to the existing pipeline corridor (T22N; R120W; Sec 26); proceed northwesterly to a point .25 mile west of Lincoln County Road 7; follow this road northerly to the existing power line ROW. This route would also accommodate concerns from BLM cultural resource personnel regarding viewsheds to historic trails by running the line south of US Highway 3O. This would be a more acceptable southern route to us (though not desired).
30		My comments regarding this project are related to the last 25 miles of new alignment for Segment 8 in Ada and Canyon Counties. The Ada County Highway District (ACHD) and Nampa Highway District No. 1 (NHD) are in the process of scoping an alignment for a &gt225 Ft. ROW for the Kuna Mora Rd. Corridor Study Project. The BLM desires both of these projects have as little detrimental effect on the Birds of Prey National Conservation Areas as possible. Just this once could there please be some cooperation and coordination in such major long-range planning efforts in the Treasure Valley. While there is no way to avoid making some residents unhappy with either one of these alignments, there is no reason why these two projects can't use the same ROW thus placing an incredible burden on as few residents as possible.
30		Our board is very concerned about the location of the transmission line in the Cokeville, Wyoming area. As a board, we have been working closely with the Wyoming Water Development Commission and the Cokeville Development Company to construct an irrigation water storage reservoir on Sublette Creek southeast of Cokeville, Wyoming. Please see the attached maps for the location of the proposed reservoir site. You will note the existing power transmission lines just clip the proposed reservoir pond area on the northeast end. If the proposed Gateway West Transmission Line goes south of the existing power transmission lines it would run right through the proposed reservoir pond area and negate the efforts of LCD, Wyoming Water Development Commission, and the Cokeville Development Company for several years to get an irrigation water storage reservoir built, which is greatly needed by agriculture in the Cokeville area.
30		To avoid these impacts it appears that a route farther south, indicated by the green line on the map that was included in the packet given to those attending the public scoping meeting held in Kemmerer on June 12, would be preferable. At very least, that route should be included in the work done in preparation of the Environmental Impact Statement.
30		I am aware of measures being planned by the companies to lessen the visual impact of the transmission line, but still am of the opinion that moving the line completely away from the trails is the better alternative. This concludes my statement as a board member of the Wyoming State Historical Society.
30		I would like to see the Gateway Transmission line routed away from Sage Grouse habitat.
30		It would make more sense to route the stretch of line between Hammett and the Hemmingway substation north of the Snake River, through the Snake River Birds of Prey National Conservation Area (NCA). Routing the transmission line near existing 138-kV lines north of the river would cause no additional visual obstructions.

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30		also the east side of 30 Hi way (Thompson Ranch area) south of Cokeville (thus the need to go that short distance into Utah!) I suppose there would be some private land litigation?
30		Before everything is finalized, I would like to see a study of the feasibility of a route on the east side of U.S. 30 to the lines South of Cokeville, this would avoid going into Utah and also avoid the Cokeville Meadows.
30		An energy corridor on Page G-4 of the Map Atlas (presumably the northern leg of corridor 78-85) should be re-routed to avoid the Shirley Basin and Bates Hole, and should instead pass to the west of the Shirley Mountains following east of the Kortes Dam and Hanna-Leo Roads. A rough representation of the proposed substitute alignment is appended to these comments (see pdf Attachment 1, Casper and Attachment 2, Rawlins Land Use Maps). It appears our more westward route recommendation was not taken into consideration during earlier phases of public input. We have overlaid these maps, with 10 pt red lines, our recommendations on these maps and a third map that is discussed later. We remain concerned that the proposed powerline routing through the Shirley Basin will negatively impact one of the two viable wild black-footed ferret populations in the world. The Shirley Basin black-footed ferret population is completely dependent on prairie dogs for prey and habitat; a large transmission line through this area could concentrate raptor nesting and roosting activities on prairie dog colonies inhabited by ferrets, resulting in significant impacts on both ferrets and their prey.
30		We have overlain the Rawlin's Biological Resources Map with alternate routes (in solid and dashed 10 pt red lines) that may offer more protection for sage grouse and raptors by creating greater distance from and fewer disturbances to both. The solid red line indicates the route we believe may be most appropriate because: 1) this route would have the least impact on wetlands and thereby expose waterfowl (in particular) to less risk of collisions with transmission lines. 2) this route covers the shorter distance of our two alternative routes and would likely cost less to install than our second alternative (indicated with the dashed red line). This second alternative also creates greater overall distances from sage grouse leks and known raptor nests that the BLM's proposed route. We recognize that our second alternative would expose more waterfowl to risks posed by transmission lines and does add significant distance to the length of the route. It is clear an attempt has been made by the BLM to also minimize the presence of the transmission lines in big game crucial winter range.
30		Energy corridors should be co-located with existing transmission corridors except in cases where there is not a compelling environmental reason not to do so (e.g., adding an aboveground powerline to a pipeline corridor that runs through a sensitive viewshed, where the electrical lines would constitute a major visual intrusion while the buried pipeline does not).
30		Will this transmission line project be used to transmit energy from not-yet constructed fossil fuel facilities or from renewable energy sources such as wind?
30		It would be far better to attract raptors and ravens to cheatgrass-infested areas north of the Snake River where they can feed on ground squirrels than to attract them to more pristine shrubsteppe areas of Owyhee County where Sage Grouse populations are in trouble. It would make more sense to route the stretch of line between Hammett and the Hemmingway substation north of the Snake River, through the Snake River Birds of Prey National Conservation Area (NCA). Routing the transmission line near existing 136-kV lines north of the river would cause no additional visual obstructions.

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30		We encourage the land management agencies to strive to use existing rights of way when appropriate so as to minimize additional disturbances to public lands along the transmission line's route, but also to reduce to the maximum extent possible disturbances to wildlife habitat, cultural resources, and soil and vegetation.
30		We would encourage serious consideration of the alternative that follows the existing PacifiCorp 500kv line from Midpoint to Hemingway north of the Snake River, providing such a route ensures minimal wildlife and lands impacts in the Snake River Birds of Prey National Conservation Area.
30		it would be worthwhile to consider the placement of the transmission line in such a manner to enhance the broader development of alternative energy sources.
30	802	We are particularly concerned about impacts to sage grouse leks and associated habitat, particularly in the Populus to Cedar Hill segment, and would urge careful consideration of route alternatives to minimize those impacts.
30		ANY new line here should follow the Freeway to the maximum extent possible, or be bundled into existing utility corridor swaths.
30		What other areas, close to cities and close to existing grids, would provide suitable sites?
30		please consider instead following the freeway to Salt Lake and then heading north along existing routes. If the "Need" is really because there is more demand at certain times - then adding more lines in existing corridors should rectify that.
30		the state of Wyoming requests that the Gateway EIS include a fully-considered alternative aligned directly adjacent to the existing transmission line corridor throughout Segment 4. This alternative consists of constructing the proposed Gateway West Transmission Line 1,500 feet north of the northern most transmission line in the existing corridor from the Jim Bridger Power Station to the Wyoming-Idaho border.
30		[...]an alternative along Highway 30 South of Kemmerer [...] The State has several concerns regarding such an alignment. If the BLM intends to move forward in analyzing such a route in detail, we need to have a follow-up meeting with several of our state agencies to discuss potential conflicts.
30		North Kemmerer Alternative. The red line that begins at Point C and extends to Point F. This alignment is north of the existing transmission corridor and it is our understanding that this is currently the proponent's preferred alternative
30		Existing Corridor Alternative. The purple line that begins at point C and passes through Points D, E, and F. Essentially, this alignment is defined by a 1,500-foot offset from the northern most tranmsision line in the exiting corridor. West of the cross-over between Points A and C, this alternative would be located north of and adjacent to the existing corridor to the Idaho border. (This comment was later retracted by the commentor)
30		The route we proposed that deviates from the red line corridor and follows Demsey Ridge up to Sublette Canyon then NW to Quealy Reservoir would have fewer impacts to wildlife than any of the green lines south of 30. Deviations along the northern route that meet VR and constructions needs are certainly acceptable in our view.
30		OCI Wyoming recommends to avoid OCI leases because of potential conflicts with future trona extraction and possible subsidence concerns. Any routes that avoid these leases would be the best long-term option for this transmission project.
40		We recommend burying the lines where practical or feasible, and locating new lines along existing utility corridors.
40		BLM must fully analyze the energy development that will be induced by this power line and evaluate the environmental impact of various scenarios-including one that

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		fully subscribes the line with wind and one that would result in the construction and operation of one or more new coal fired power plants.
40		We suggest that every effort should be made to bury electrical transmission lines where scenic views would be violated and wildlife impacted by the presence of towers and highlines. If line burial is impossible, we suggest locating towers in corridors that are most suitable for line burial should the technology become available and feasible in the future.
40		Final approval of this transmission line should include a prohibition of wind energy development along in the Hams Fork, Commissary Ridge and Dempsey Ridge areas.
40		A disturbed area simply needs additional monitoring to ensure that a weed problem does not get out of hand. Perhaps that can be put into developer contracts or a joint monitoring system could be put in place, since the BLM is short on range personnel.
40		management strategies may include ensuring the tires and undercarriage of access vehicles are hosed down prior to site access to dislodge noxious weeds.
40		Where impacts are unavoidable, the BLM should implement on and off-sit habitat mitigation to offset any impacts to sage grouse.
40		Restoration and mitigation of negative effects due to the project footprint are important to ensure that crucial loss of habitat or fish and wildlife populations do not result from energy corridor development.
40		Avoidance would seem to be the appropriate method for resolving effects in this case, give the practical difficulties of mitigating or minimizing the effects of the 170 foot steel towers and several hundred miles of transmission lines on a linear historic feature.
40		Recognizing the difficulty of restoring vegetation on disturbed sites in areas with low precipitation, the eventual ROD should require more than simply "work to minimize surface disturbance." As demonstrated with recent pipeline projects, restoring vegetation to reduce erosion, restore habitats, and prevent invasive and undesirable plant invasions requires more than simply minimizing the amount of land disturbed. Some disturbance is unavoidable, and the EIS should evaluate a full range of disturbance area, reclamation techniques available to ensure disturbed sites are quickly and properly reclaimed, and mitigations for unavoidable impacts.
40		In areas where the line must be constructed in Sage Grouse habitat, the utilities should be required to design towers and install perch deterrents to make the structures less attractive to ravens and raptors.
40	1800	Lander Region-Ft. Steele to Wamsutter We recommend the EIS consider and evaluate impacts of construction activities, including travel and housing of work crews, on important wildlife species, particularly during sensitive periods. It should also identify measures to mitigate those impacts. We recommend the EIS evaluate cumulative impacts of construction activities on sage-grouse breeding and nesting time periods.
40	800	Relatively little is known about the wildlife and wildlife habitats in many areas, thus monitoring and evaluation of fish and wildlife resources and habitats is vital. Baseline information about fish and wildlife resources and recreation for any project is often needed to understand and reduce project impacts. Monitoring the effects of corridor projects is also necessary to determine long-term effects and, accordingly, to adaptively manage the design, operation, and mitigation measures of the project.
40	800	The EIS should describe the critical habitat for the species; identify any impacts the proposed project will have on the species and their critical habitats; and how the

Code 1	Code 2	Comment
		proposed project will meet all requirements under the Endangered Species Act (ESA). A proposed mitigation plan with detailed mitigation steps that will be taken to minimize or eliminate adverse impacts should be presented. Replacement trees be planted to offset any unavoidable tree loss. Replacement trees should be planted close to where the loss occurred. Native saplings should be used, if practicable, at minimum ratio of 1:1.
40		an appropriate set of guidelines must be drawn up and this EIS under all alternatives must establish a careful and systematic process to evaluate ecological and other impacts of utility corridor and facility siting.
40		please require that project proponents set aside significant sums for purchase of private lands with important biological values, as well as for purchase of public lands grazing permits and permanent permit retirement for the specific region where the corridor or linked new development is located. This EIS should amend Land Use Plans to authorize such retirement.
40	1400	The project proponent will be required to have a structural review and acceptance by Western if any excavation comes within 100 feet of any Western transmission line tower foundation or the structure itself.
40		Western will prepare a license agreement to address safety and other provisions related to construction, operation and maintenance activities associated with the new 230 and 500-kV transmission lines and to ensure no activities will interfere or conflict with Western's transmission lines.
40		Construction work needs to be coordinated with Western's operations center located in our Rocky Mountain Regions (RMR) Office in Loveland, Colorado. Clearances and/or hot line orders should be considered. Contact Bill Marsh, RMR Safety Manager, at (970) 461-7449, and David Neumayer, Wyoming/Nebraska Division Director, at (307) 232-5200, to coordinate the construction activities. Mr. Marsh will also arrange a required safety briefing with the contractor prior to any work near Western's transmission lines to ensure all workers and operators are aware of the dangers associated with construction near high voltage transmission lines. The contractor should notify Mr. Marsh at least two weeks prior to commencement of the work.
40		In addition to issues related to access, Western wishes to caution the proponent and.or its contract about any site preparation that requires removal of trees. If trees are designated for removal or are harvested within or adjacent to Western's transmission line rights-of-way, there is a potential risk that Western's power line could be damaged or a fire could result if a falling tree gets close to or contacts the conductor. Please ensure that any tree cutting activity in support of the new 230 and 500-kV transmission line construction is coordinated with the Wyoming/Nebraska Maintenance Office in Casper, Wyoming. The contact in Casper is David Neumayer, (307) 232-5200.
50		R1 New layer is needed for Continental Divide Trail. The route is to the west of what is shown on the map.
50		Some areas do not show proper VRM. WSAs are always VRM1 VRM4 not shown at all.
50		R4 Crucial winter range (elk parturition not on map) maps need to be compared to BLM maps.
50		Land status map to be able to show legislative committees about the pros of being able to use state endowment lands for renewable energy.
100		...examine the national security threats pose by large-often foreign-owned or financed corporations/consoritums/entities controlling power distribution and production on remote public lands.

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107		The EIS should include an evaluation of environmental justice populations within the geographic scope of the project.
200		As our country energy needs continue to grow, Wyoming can address some of those needs-which is good for Wyoming's economy.
200		Wyoming is endowed with abundant wind resources, and this transmission project will allow the state to take advantage of that endowment through low-impact energy development that brings jobs and tax revenue.
202		Both Idaho and Wyoming are rural states. By allowing construction of a transmission line, you are helping the grassroots people who try to maintain those open spaces, a viable income through wind energy development.
204		destroyed cattle guards, increased number of vehicles in the area causing death or impairments of livestock, cut fences, opened gates, damaged range improvements, decreased AUMs and pastures for grazing, 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 operators and livestock management operations.
204		We strongly recommend that the EIS includes a full and thorough social and economic impact analysis. Since grazing on public lands represents a vital economic value to agriculture producers and local communities, we specifically suggest that that analysis includes the impacts upon livestock grazing in and adjacent to the planning area. The cumulative impacts of developments upon livestock grazing may jeopardize the livelihoods of grazing permittees. The loss or impaired ability of livestock grazing operations needs to be evaluated in-the EIS.
400	500	As I understand the proposal, there are three potential routes for the Gateway West transmission line through the Kemmerer Field Office area. They are: 1. Along or near the existing transmission lines. 2. Along a route about two to three miles south of the existing line near the Sublette Cutoff. This is the blue line on the referenced map. 3. South of US Highway 30 and then north near the Cokeville Meadows to Cokeville. This is shown a green line on a BLM display panel but it is not shown on the reference map. Discussion during the field trip focused on the existing transmission lines and the "proposed route" (aka the blue line) in the area of the Hill and Corum graves on the Sublette Cutoff. There was little discussion of the alternative represented by the green line. In this context it did appear that the proposed route was better than the existing line's route and that the tower design might be better than the highly visible towers of existing line. However, field studeies in the days following the public tour revealed the likelihood of a very significant adverse impact where the blue line crosses the Sublette Cutoff as the Sublette descends to Dempsey Ridge (Section 22 in T23N, R118W). At this point the Sublette is on a ridgeline that is crossed by the proposed route. It would seem very likely that a tower would be located on the same ridgelines on or very near the trail since the ridgeline is narrow in that area. Both the trail setting and the trail itself are presently in excellent shape in the area. The towers would represent a major intrusion. As a result, it appears that both of the other alternatives (1 and 3 above) would be preferable to the proposed route with the green route (alternative 3) being best although additional detailed analyses in the Cokeville Meadows area are needed. If the route of the existing transmission lines is selected, the route of the most northerly line, which diverges from two other lines in Section 18, T23N, R117W is preferred. It seems apparent that the green line is a longer route than the other two, but this alone is a justification for adversely affecting the trail. While the cost may be significant ($17 million?), the

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		amount can only be evaluated in the context of the total project cost. Also, the cost of mitigating the adverse effect in Section 22 should be considered. It is also possible that the green route while longer may offer some cost reductions due to the avoidance of Dempsey Ridge and other ridge crossing.
400		Sweetwater County has a large percentage of historic trails that are still very visible and undamaged by development. Keeping this new transmission line co-located to the current line will keep the trails integrity.
400		What view sheds are affected?
400		Has important visual resource values.
400		monuments We suggest that viewshed analysis be conducted in each area that may be affected and that placement alternatives be utilized in all areas where visual resources have the potential to be compromised.
500		The Gateway Project environmental analysis document should identify areas where cultural sites are at risk, and the decision document should employ measures to protect these resources. The areas designated should be of sufficient size to allow viable protection of the resources; designation of just the site itself may not allow for effective management.
500		After viewing the Alfred Corum and Nancy Hill gravesite and listening to the diary quotes, we realize this area has such historical significance.
500		The EIS should discuss whether or not the proposed project may affect historical or traditional cultural places of importance to the area's Native American communities. The document needs to identify historic resources, and assure that treaty rights and privileges are addressed appropriately. If the proposed project will have impacts on Native Americans, the development of the EIS document should be conducted in consultation with all affected tribal governments, consistent with Executive Order (EO) 13175 (Consultation and Coordination with Indian Tribal Governments).
500		The proposed route of the Gateway West Transmission Line project has considerable potential to impact the setting of significant national historic trail resources in the vicinity of Emigrant Springs, White Hill, the Alfred Corum grave site and the Nancy Hill grave site. These properties are located on the Hams Fork and Sublette Cutoffs of the Oregon National Historic Trail and are managed by the Kemmerer Field Office. Introducing this Gateway transmission line to the setting would help establish a major utilities corridor through this sensitive area -- a corridor that has been avoided successfully during development of the Westside Energy Corridor Programmatic EIS.
500		We discourage corridors that would degrade the viewsheds of sites and trails like e.g., the Cherokee trail, Overland Trail, and Oregon Trail.
500		The agencies should map historic trails and other known sites on or eligible for the National Register of Historic Places, so that the level of impact of the proposed corridor routings can be adequately assessed. Corridors should be routed to avoid direct impacts or visual impacts to the settings of these sites to the greatest extent possible.
500		It's important to remember that the trail is not simply an accumulation of "sacred" sites such as the Cowen and Hill graves, and the grove of trees at Emigrant Springs. It's a long, linear progression of road from the Missouri River to the west coast, of which little remains today but rare traces. Wyoming has the most and best preserved of these traces - so far. While the proposed route honors the "sacred" sites by running far off on a distant ridge, that ridge in fact intersects the trail further west and would quite literally wipe it out. We're not talking viewshed here. We're talking destruction.

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500		I, along with nine others, spent the next two days on the ground west of the field trip area, searching for segments of the Oregon Trail that had so for only been seen in aerial photographs. We found a wonderful, pristine section of the trail that the BLM archeologists mapped with their GPS units. I had hoped until we found this section of the trail that the proposed transmission lines could possibly be hidden behind ridges out of sight. Unfortunately, this wonderful section of the Trail goes down that very ridge I hoped the transmission lines could hide behind.
500		On Thursday, June 25 and Friday, June 26 I was one of the group looking for where the Historical Sublett Trail crossed the Dempsey Ridge, we found what OCTA & BLM classify as the 1 class trail where there has been probably no one on it since the wagons stopped using it in the mid 1850s other than a few walkers. This segment of class 1 runs down visibly for over 1/2 a mile. This segment must not be disturbed for future generations including view shed we must preserve this segment so that future generation can realize what pioneers went through to their destination.
500	1800	The possibility that whatever route is chosen may eventually carry more transmission lines and pipelines also needs to be taken into consideration when choosing this route.
500	2000	He is concerned primarily with a nine-mile long section of the Oregon Trail that starts at the Parting of the Ways in which emigrants would either stay on the Oregon Trail or head south on the California trail.
500		palentological and geological resources[...] affected parks We suggest a full inventory of these resources be conducted and seriously considered in the process.
500		parks Impacts to cultural resources must also be inventoried and avoided.
500	800	While we concur that the Draft EIS should include and analyze an alternative south of Kemmerer (the green line originating at Point M and passing through points N, R and rejoining the existing corridor at Point E), state agencies have raised serious concerns about the environmental consequences of such an alighment. Your third-party consultant will need to work closely with the Wyoming Game and Fish Department to understand and properly disclose impacts to wildlife resources associated with the South Kemmerer Alternative. Similarly, a thorough consideration of paleontological resource conflicts associated with a southern alternative is warranted.
500		OCTA wishes to have these historic preserved as much as possible.
500		Please contact me for more information or for names and phone numbers of people who are the experts on the trails.
500		These are the names and phone numbers of OCTA people who are the experts on the historic trails - Lee Unalasbwiski (307) 235-1667 - Casper, WY Dave Welch (253) 584-0332 - OCTA Nat'l Preservation Officer Randy Brown (307) 358-5905 Douglas, WY Edna Kennell (307) 265-8030 Capser, WY. She has an office at the Chamber of Commerce.
500		Please consider the well preserved Class 1 & 2 trails through the whole state of Wyo.
600		The BLM must consider the GHG emissions that would result from or linked to the Project as required by NEPA. In this connection, this means that the EIS must analyze all significant impacts that will occur during and as a result of all aspects and phases of the Project, including GHGs emitted as a result of production and combustion of the fossil fuels that will be emitted as a result of the transmission line itself as well as the emissions that are casually linked to it--including, but not limited to, the GHG emissions from the power plants that will supply energy for the line and the fossil fuels that will be mined. (Even if the Project would transmit energy solely from renewable energy sources, BLM must still thoroughly analyze the environmental consequences of the Project's direct, indirect, and cumulative impacts, including GHG

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		emissions.) By ignoring the effects of GHG emissions on the environment, BLM would ignore a critical aspect of the problem, rendering each and every section of the EIS incomplete and inadequate. On the other hand, laying bare the true impacts and costs of the direct and cumulative GHG emissions, and disclosing thoroughly vetting alternatives and mitigation measures, could very well lead to increased energy conservation and use of renewable energy sources.
600		Detailed plans for addressing dust control for the project should be included.
600		The protection of air quality should be addressed in the EIS. The types of fuels to be used during construction activities, increased traffic during operations, and related VOC and NOx emissions, should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities and ongoing operation of the roadways are important concerns, as discussed previously. The EIS should evaluate air quality impacts, and detail mitigation steps that will be taken to minimize associated impacts. This analysis should also address and disclose the project's potential affect on: all criteria pollutants under the National Ambient Air Quality Standards (NAAQS), including ozone; visibility impairment, and air quality related values (AQRV) in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health.
700		Water quality standards are typically composed of numeric standards, narrative standards, designated uses, and an antidegradation policy. All too often, however, only numeric standards are viewed as "water quality standards." That narrow view is incorrect. The Supreme Court held in PUD No.1 of Jefferson County v. Washington Dep't of Ecology, 511 U.S. 700 (1994), that all components of water quality standards are enforceable limits. Consequently. the decision document must ensure all components of State water quality standards are met, not just numeric standards.
700		The environmental analysis should consider the requirements of the antidegradation policy and the decision document should assure these requirements are met.
700		In addition to the antidegradation policy's protections for waters that are meeting water quality standards, where State water quality standards have not been achieved despite implementation of point source pollution controls, section 303(d) of the CWA requires a State to develop a list of those still-impaired waters, with a priority ranking, and to set total maximum daily loads (TMDLs) of pollutants for the stream "at a level necessary to implement the applicable water quality standards...." 33 U.S.C. Â§1313(d)(1)(C). Consequently, to the extent waters within the BLM's jurisdiction have been identified as water quality impaired segments, or contribute stream flow to such segments, the Gateway Project decision document should require affirmative steps toward reducing that impaired status, regardless of whether the State has made a specific allocation of pollutant load to BLM lands at the time the ROD is adopted.
700		Accepted best management practices should be implemented to ensure that all sediments and other pollutants are contained within the boundaries of the work area. Disturbed areas that are contributing sediment to surface waters as a result of project activities should be promptly re-vegetated to maintain water quality.
700		Equipment should be serviced and fueled away from streams and riparian areas. Equipment staging areas should be at least 150 feet from riparian areas.
700		The EIS must disclose which waters may be impacted by the project, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the project that are listed on the States and Tribes' most current EPA approved 303(d) list.

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700		Since construction and operation of the project may impact sources of drinking water, EPA recommends that BLM and FS contact the state agency responsible for developing and maintaining the database to help identify source water protection areas within the project area. The EIS document should: a) Identify all source water protection areas within the project area. b) Identify all activities that could potentially affect source water areas. c) Identify all potential contaminants that may result from the proposed project. d) Identify all measures that would be taken to protect the source water protection areas in the draft EIS.
700		The EIS should document the project's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality.
700		The EIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions of the proposed project corridor. The document should clearly depict reasonably foreseeable direct, indirect and cumulative impacts to groundwater and surface water resources. For groundwater, the potentially affected groundwater basin should be identified and any potential for subsidence and impacts to springs or other open water bodies and biologic resources should be analyzed.
700		The EIS should use existing plans to identify aquatic resources that would be potentially impacted by construction and operation of the proposed project. BLM and FS should coordinate with the U.S. Army Corps of Engineers to determine if the project would require a Section 404 permit under the Clean Water Act. Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230). If, under the proposed project, deredged or fill material would be discharged into the waters of the U.S., the EIS should discuss alternatives to avoid those discharges.
800		The proposed route would apparently mar the Shirley Basin ,and we urge the BLM to reject approval of this route, unless the power line is buried. Running a high voltage power line through this remote area will forever destroy its character, and it could create favorable conditions for predation on black-footed ferrets in this area by creating perch sites.
800		Habitat - The BLM should minimize negative impacts by avoiding areas of critical habitat for species of concern, establishing siting criteria to minimize soil disturbance and erosion on steep slopes, utilizing visual resource management guidelines, avoiding significant historic and cultural resource sites, and mitigating conflicts with other uses of public lands.
800		pygmy rabbits, sage thrasher, sage sparrow, birds of prey, and so forth should be of concern in planning. New construction and infrastructure will also change crucial habitat for these species.
800		The EIS must address the direct and cumulative impacts from construction and operation of the proposed Project, as well as activities casually linked to it, to sensitive, threatened, and endangered within the project site and in the surrounding areas including ecological reserves and public lands.
800		A key recommendation is to give full consideration to species and habitats identified as those of greatest conservation need in the Idaho Comprehensive Wildlife Conservation Strategy (CWCS) (http://fishandgame.idaho.gov/cms/tech/CDC/cwcs_table_of_contents.cfm).
800		The location of the transmission corridor in relation to rare and/or sensitive wildlife habitats including kipukas, lava tubes, caves (natural and man-made), permanent and seasonal wetlands, riparian areas, sensitive and listed plant species, and old

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		growth forest stands should be evaluated.
800		The effect of energy corridor construction operation and maintenance on fire occurrence, frequency, and severity; especially as it relates to important shrub-steppe and forest habitats, should be analyzed.
800		BLM must ensure its analysis of impacts to wildlife considers indirect, connected, related, long-term, and cumulative impacts in as quantitative, and scientifically supported, a manner as possible.
800		In the scoping document, the included map of important biological resources along the proposed right-of-way does not show at least 3 documented bald eagle nests along the North Platte River, nor the associated 1-mile buffers. Those nest including the following locations: Scout Island at 13T, 333841E, 463083IN Seminoe Back Waters at 13T, 335929E, 4639193N Rochelle at 13T, 338882E, 4621473N We recommend the EIS evaluate expected losses of these species due to collisions with the power line and suggest a range of corrective mitigations where appropriate.
800		The EIS should describe the current quality and capacity of habitat, its use by wildlife in the proposed project area, especially avian populations.
800		The EIS should describe the critical habitat for the species; identify any impacts the project will have on the species and their critical habitats; and how the proposed project will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service (FWS) and National Oceanographic Atmospheric Administration (NOAA).
800		We understand, however, that our preferred southern route as it is now defined could impact wildlife migration routes and possibly cross a national wildlife refuge. We share the concerns of federal and state resource managers about these impacts as well.
800		Habitat attributes that should be avoided for Wyoming are as follows: Prairie dog colonies - These are vulnerable to increased raptor predation as a result of power line siting in or adjacent to active colonies. The degree to which corridors overlaps these sensitive habitats should be analyzed and disclosed. Active prairie dog colonies should be avoidance areas for overhead electrical transmission lines; impacts of pipelines should be much lower and temporary in nature. Grouse and other galliform nesting and wintering habitats- State fish and game agencies typically map sage grouse, Columbian sharp-tailed grouse, and other galliform lek areas (lands within 3 miles of sage grouse leks and within 1 mile of Columbian sharp-tailed grouse leks are typically considered most important as nesting habitats) and wintering areas. The degree to which corridors overlaps these sensitive habitats should be analyzed and disclosed. These are vulnerable to increased raptor predation as a result of power line siting in or adjacent to active colonies. These habitats should be avoidance areas for overhead electrical transmission lines; impacts of pipelines should be much lower and temporary in nature. Sensitive sagebrush obligate species - Species such as the sage sparrow, Brewer's sparrow, Baird's sparrow, and sage thrasher are sensitive to the fragmentation of large blocks of sagebrush habitat. The extent to which the proposed corridors will cumulatively contribute to the fragmentation of these habitats, together with other permitted activities such as oil and gas development, should be fully investigated. Interior forest species - Sensitive species such as the northern goshawk and American marten require large blocks of mature timber and are impacted by forest fragmentation. The extent to which the proposed corridors will cumulatively contribute to the fragmentation of these habitats, together with other permitted activities such as timber harvesting, should be fully investigated. Big game species - Crucial winter ranges, parturition areas, and migration corridors are typically

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		mapped by state fish and game agencies. The degree to which corridors will contribute to direct and cumulative displacement of big game species from these habitats as a result of human activity and vehicle traffic during both the construction and operational phases of energy transmission should be fully disclosed and analyzed, and the overlap between corridors and these sensitive habitats needs to be investigated. Special habitats required by rare or sensitive species. Examples include mature to overmature, dense sagebrush stands and other habitats required by the pygmy rabbit as well as dry, gravelly ridges that appear to be the obligate habitat for the Wyoming pocket gopher. The degree to which there is overlap between these habitats and energy corridors should be evaluated in detail; corridors should be shifted to avoid these habitats to the fullest extent possible.
800		A full inventory of species and their migration routes should be considered, and sufficient tracts of contiguous habitat for the species that reside in and adjacent to these monuments should be provided for.
800		We continue to have significant sage-grouse, migratory gamebird, and wintering mule deer concerns with the green line (or any line south of US 30).
801		Migratory corridors for elk, mule deer, moose, and pronghorn antelope may be blocked or eliminated by development of the energy corridor and its associated human disturbance and development. Elk, mule deer, moose and pronghorn winter range may also be negatively affected due to habitat loss and degradation.
801		Increased motorized access to winter ranges, especially big game winter ranges, is a concern of the Department because road construction and the potential for increased public access/disturbance through construction and service roads can negatively affect wildlife and wildlife use of habitats.
801		When possible, we suggest avoiding construction activity within big game crucial ranges from November 1 through April 30 to minimize disturbance to wintering wildlife.
802		Depending on location and design specifics, the construction of transmission lines within sage-grouse habitat could constitute "nonlinear infrastructure" under the Conservation Plan for the Greater Sage-grouse in Idaho (Idaho Sage-Grouse Advisory Committee 2006). Nonlinear infrastructure is defined as human-made features on the landscape that provide or facilitate transportation, energy, and communications activities...including wind energy facilities."(2)
802		Based on the habitat guidelines for sage-grouse management presented in Connelly et al. (2000),(5) we recommend siting the transmission line in such a way to avoid impacts to sage-grouse.
802		Sage-grouse and sharp-tailed grouse populations and habitats could be affected by corridor development. Grouse may avoid or abandon otherwise suitable breeding habitat, brood areas, and other habitats near linear features (i.e., roads) or tall structures (i.e., towers) or when development within energy corridors degrades or eliminates habitat. Towers with perching sites for raptors and nesting sites for corvids could result in reduced lek attendance and increased grouse predation and nest depredation sites.
802		Sage-grouse The sage-grouse ton usually receives special protective measures, and BLM must ensure full compliance with its Sensitive Species Manual relative to this species, as well as other BLM guidance and guidance from the Wyoming Game and Fish Department. While it is specifically applicable to oil and gas development, the BLM should consider the Game and Fish Department's report "Recommendations for Development of Oil & Gas Resources within Crucial & Important Wildlife Habitats." It is well known that sage-grouse chicks need access to wet meadow areas so they can

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		find high-protein insects to support early growth. Dense stands of sagebrush are critical winter habitat. Thus, these areas should be protected from disturbance. It is also well known that the sage-grouse may qualify for listing as a threatened or endangered species, so BLM has heightened obligations to protect the species. Furthermore, the appropriate means to protect sage-grouse is to not only focus management efforts (and protective measures) on particular habitat needs (e.g., protecting leks), but also to ensure sagebrush habitats, an increasingly imperiled ecosystem, are protected. The same, of course, is true for many other species, including such sagebrush obligate species as Brewer's sparrow, sage sparrow's, and sage thrashers; and of course the same is true for species dependent on other habitats and ecosystems.
802		We request BLM to consider the following report: Knick, S.T., et al. 2003. Teetering On The Edge Or Too Late? Conservation And Research Issues For Avifauna Of Sagebrush Habitats. The Condor 105: 611-634
802		We also request that the BLM determine if this project complies with BLM's evolving Wyoming Landscape Conservation Initiative.
802		Furthermore, as the BLM knows there is an increasing effort to ensure the protection of sage-grouse on a "landscape scale," with this being done through the protection of large "core areas." Exhibit 1. Attached as Exhibit 2 is the Governor's Sager [sic] Grouse Implementation Team recommendations and the Wyoming Game and Fish Department's memorandum regarding the need to manage core areas, and we ask the BLM to fully consider these.
802		...avoiding construction of power lines in occupied sage-grouse habitat, especially within ¼ mile of leks. We further recommend avoiding construction activity within ¼ mile of sage-grouse leks from March 1 through May 15, and avoiding activities in known nesting habitat (within a 2-mile radius of leks) until after the breeding season (July 15).
802		In areas where the line must be constructed in Sage Grouse habitat, the utilities should be required to design towers and install perch deterrents to make the structures less attractive to ravens and raptors.
802		As a private citizen with concerns about birds, sage grouse in particular I was bothered by the answer I received when I asked about anti-perching devices on the towers carrying the transmission line – that the company does not know of anything that works. This is a question that definitely needs further study.
802		We submit for the record A Blueprint for Sage-grouse Conservation and Recovery, Prepared by Clait E. Braun, Ph.D., Grouse Inc., Tucson, Arizona, May 2006 (http://www.voi ceforthewiId.org/SageGrouseStudieslBraunblueprint2 006.pdf). Routing of the powerline must avoid crucial habitat for this species. This includes core areas identified by the State of Wyoming. All surface activity should be prohibited within 5.5 km (3.3 miles) (Holloran and Anderson 2004, 2005) of active Sage Grouse leks. No surface occupancy is preferred to simply limiting use of areas to specific periods, as the latter does not appear to benefit Sage Grouse. Roads should not be placed within 5.5 km (3.3 miles) of active leks. If roads are present, they should be seasonally closed during the sage-grouse breeding season from 1 March to 20 June. In addition to these practices for protection of active leks, BLM should implement standards for protection of areas used by Sage Grouse in winter, spring, summer, and fall and throughout the lifecycle of the birds.
802		We are also concerned about this same powerline segment's potential impact on the Bates Hole Sage Grouse Area of Critical Environmental Concern (ACEC), established in the 2007 Casper Resource Management Plan. As with prairie dogs,

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		the construction of overhead power lines can concentrate raptor predation on sage grouse. This basin is recognized as the most important sage grouse breeding complex in the Casper Field Office, and the designation of an energy corridor through this area is inconsistent with BLM's directives to protect the sage grouse habitat for which the ACEC was designated. We have provided Attachment 3 (Gateway West Rock Springs Biological Resources Map with alternate route overlay) to express our concern for the proposed route running east of Opal through T21N, T20N - R114W, R1llW to T2ON - R109W. It appears the proposed route passes through high-density sage grouse lek and raptor nest area, particularly in the following township/range blocks of T20 - Rl12W, R111W and T21N - R111W, R11OW.
802		The maintenance of appropriate habitat and adequate cover, particularly on nesting and brood-rearing habitats, is important to ensure that predation rates do not increase to abnormal levels. In addition to maintaining cover, it is important to avoid the construction of tall structures that serve as raptor perches and concentrate predation pressure, like powerlines and gas condensate tanks, near these habitats.
802		I am concerned about routing this transmission line through important Sage Grouse habitat in southwest Idaho. The route south of the Snake River goes through important undisturbed shrub habitats, is within 15 km of known Sage Grouse leks, and has important visual resource values. By attracting raptors and ravens to nesting, roosting and perching sites, construction of this transmission line could result in increasing predation on declining Sage Grouse populations.
802	807	Within the BLM BHMA, we recommend the EIS address restricting surface development activities from March 15 through July 15 within 4 miles of occupied sage grouse leks and avoiding surface disturbing activities within sagebrush stands of greater than 10 percent canopy cover. Also, within this 4-mile buffer, we suggest installing raptor deterrents on power poles and other high profile structures to help reduce predation on sage grouse.
802		the southern or "green" alternative presently under consideration crosses through an area designated by the state as a sage grouse core area. New transmission through the core area southwest of Kemmerer is incompatible with the core area designation and should be avoided if feasible.
802		Sage grouse habitat developed in southwest corner of T18N, R109West is too large. This is near the Solvay soda ash operation but the disturbed boundary doesn't seem to be correct.
803		Waterfowl and shorebird high-use areas, including wildlife management areas, national wildlife refuges, and areas of high and concentrated use during spring and fall migration, nesting and brood rearing seasons, could be affected by energy corridor development. Also, waterfowl and shorebird migration routes may be affected.
804		Although sparsely documented, seasonal passerine bird migration routes may be affected by electrical transmission corridors, which may also increase mortality of migrating and resident birds.
805		Bat populations and habitats should be evaluated for direct and indirect effects resulting from electric transmission corridor developments.
806		Reptile and amphibian populations and habitats, particularly hibernacula, may be directly or indirectly affected by transmission corridor construction, operation, and maintenance.
807		Direct and indirect effects of transmission corridor construction, operation and maintenance on resident and migratory raptor populations and habitats should be

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		evaluated.
807		Ferruginous Hawks and Other Raptors The environmental analysis should determine whether these species are or could be using the Gateway Project area and ensure that BLM meets its duties to provide management protections for these species that meets the requirements of the Sensitive Species Manual and the relevant RMPs. BLM must ensure that no extreme noise occurs during nesting season or near to occupied nests, including during construction. The environmental analysis should examine whether habitat that could potentially be occupied by raptors, such as previously utilized nests, should receive protection so as to ensure the continued viability of raptors in the area. It should consider all biological needs of raptors and develop suitable protections for all significant life-stages of the various raptors, all of which should be included in the decision document. Additionally, the environmental analysis should address compliance with the Bald Eagle Protection Act and Migratory Bird Treaty Act and the decision document should specify the means by which BLM will ensure compliance with these laws as well as pursue (or facilitate) enforcement of them, relative to raptors as well as other bird species protected by these laws. Whether this power line will contribute to a "take" of protected species should be considered, and means to mitigate any impacts and to provide for enforcement of applicable laws (such as the Migratory Bird Treaty Act) should be identified.
807		We recommend designing overhead power lines to prevent perching by raptors within 1/4 miles of sage-grouse leks. To prevent electrocutions, power lines and conductors should be constructed in accordance with raptor-safe design criteria as suggested in the following publication: Avian Power Line Interaction Committee (APLIC), 2006. Suggested practices for avian protection on power lines: The state of the art in 2006. Edison Electric Institute, APLIC, and the California Energy Commission, Washington, D. C. and Sacramento, CA.
807		Avian Mortality due to Collisions with High Tension Lines
808		Loss and fragmentation of pygmy rabbit habitat through direct project footprint effects and secondary project effects such as habitat fragmentation should be assessed.
809		Whether there will be any project effects to large carnivore (i.e., grizzly bear, wolf, and wolverine) populations and habitats, including linkage corridors and genetic interchange, needs to be determined.
809		We particularly direct the BLM to the Wyoming Game and Fish Department's publication "Recommendations for Development of Oil & Gas Resources within Crucial & Important Wildlife Habitats." BLM should also utilize the information regarding the needs of big game species available from other sources.(i) (i) We specifically request that BLM consider the following studies: Sawyer, H., and F. Lindzey, Jackson Hole Pronghorn Study, Wyoming Cooperative Fish and Wildlife Research Unit, September, 2000; Sawyer, H., and F. Lindzey, Sublette Mule Deer Study, Wyoming Cooperative Fish and Wildlife Research Unit, March 2001; Western Ecosystems Technology, Inc., An Evaluation of The 1988 BLM Pinedale Resource Management Plan, 2000 BLM Pinedale Anticline Final EIS, And Recommendations For The Current Revision Of The Pinedale Resource Management Plan, (Scoping comments submitted for the Pinedale RMP revision), January, 2003.
809		Relative to big game, we urge the BLM to protect more than "critical" big game winter ranges. This approach is biologically and ecologically unsupportable and results in unnecessarily and unduly restricted protections. We therefore request that protective measures be considered not just for "critical" winter ranges, but also for all winter range areas in the Gateway Project area. To the extent BLM excludes "general" winter range areas from the application of protective measures, it should provide a

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		biologically defensible rationale for such a decision.
809		The impact of noise on hunters and the hunting experience must also be fully considered and mitigated.
809		We urge the federal agencies and the project proponents to work closely with the WWHC and with the state wildlife agencies to avoid crucial wildlife habitats and wildlife corridors. (http://www.westgov.org/wga/initiatives/corridors/index.htm).
900		The EIS needs to analyze the impacts of ORV use along transmission corridors and describe the ability for the BLM to monitor and control ORV use as permitted by land management agencies.
1000		BLM activities should limit road use and the exposure of mineral soils where weeds may become established.
1000		A thorough analysis of all existing roading in lands in or near the corridor must be provided. How many of these lands are Forest Service roaded, or potentially suitable for BLM WSA status?
1000		Western requires continuous, uninterrupted access to its facilities. This means that the roads used to get personnel and equipment to Western's facilities cannot be restricted or impaired such that access is denied. If a road is blocked or damaged, an alternative route must be provided. Any damage to the road resulting from activities associated with the new transmission line construction must be repaired by the proponent or its contractor.
1100		The EIS needs to analyze the effects of noxious weeds in transmission corridors and describe BLM management of weeds in these areas.
1100		The decision document must prohibit disturbance in riparian areas and wetlands to ensure these critical resources are fully protected.
1100		The environmental analysis should fully analyze the extent of the invasive species problem in this area, the causes, and options for both restoration and prevention in the future.
1100		The BLM should conduct surveys to determine the location and characteristics of native plant communities and rare or special status species, The survey results should be presented in the environmental analysis, and the decision document should establish standards for protecting native plant communities and rare or special status species.
1100		To adequately protect aquatic resources in this watershed. A buffet strip at least 150 feet wide on each side of streams and water courses should be left undisturbed where healthy riparian vegetation is present. The purpose of this buffer strip is to minimize loss of fish habitat associated with stream bank vegetation and to reduce the possibility of increased sedimentation to aquatic habitats.
1100		Any riparian canopy or bank stabilizing vegetation removed as a result of construction activities should be reintroduced and protected from grazing until well established (typically rested for a minimum of two grazing seasons).
1100		The EIS should include general locations of rare plants, and how these sites will be managed to minimize impacts on the plants.
1100		A vegetation management plan should be prepared to address control of such plant intrusions. The plan should list the noxious weeds and exotic plants that occur in the resource area.
1100		During the construction phase the disturbance of native soils by either earth moving equipment or rubber tired vehicles traversing the area presents an opportunity for

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		invasive species to establish a presence. What steps will the projects do to mitigate this issue? The use of the right of way after construction will continue to make it easier for invasive weed species to establish or maintain a presence. What steps will the project do to mitigate this issue?
1100		What is the full disturbance and fragmentation Footprint for these facilities for sagebrush species?
1200		It is important that best management practices are used to ensure water quality is maintained, disturbance caused by crossings of any perennial and fish bearing waters is minimized, and disturbed instream habitats are restored.
1300		We plan to do an analysis of the proposed route and citizen-proposed wilderness areas and submit supplemental information to the BLM on potential conflicts. The same is true of roadless areas on Forest Service lands.
1400		Wind development utilizes very little of our water resources. The same can be said for transmission lines. Once these things are constructed, they can become part of the natural environment as far as wildlife and plants go. A one time disturbance in an area is much preferred to "forever development"
1400		following are some specific individual effects upon livestock grazing needing analyzed in the EIS: increased off- and on-road traffic, increased number of speeding vehicles, construction of new roads and modifications to existing roads.
1400		The impacts upon food and habitat for fish and wildlife are usually well documented in NEPA documents. The consequences of the transmission line project upon food and habitat for domestic animals deserve the same degree of study and documentation. Grazing is an essential tool to achieve desired environmenta1 objectives in the planning area, including obtaining positive effects upon food and habitat for both wildlife and livestock.
1400		The EIS should therefore include data about existing road networks and evaluate the change in road miles and density that will occur as a result of the project and predicted impacts to water quality by roads.
1400		The new transmission line construction contractor will need to ensure that all electrical safety clearances are maintained during construction. Guidance for these clearances can be found in the Code of Federal Regulations (CFR) for the Occupational Safety and Health Administration at 29 CFR 1910.333(c)(3). In additiona, all vehicles, equipment, machinery, cables, metallic pipe, fencing or other materials near Western's existing transmission line rights-of-way must be properly grounded. The contractor should not store materials in the rights-of-way to avoid static and induced electrical hazards. The use of a full time spotter is also recommended for all work near Western's powerlines
1400		In Idaho, there have been several wildfires from raptor electrocutions on lines falling to earth and igniting cheatgrass or other vegetation.
1403		FMC has several comments regarding the southern route: (1) The southern route crosses an area that is subject to surface subsidence from underground mining activities. Subsidence is monitored, but its magnitude and extent are difficult to predict in advance of additional future mining. Project proponents should consider the potential impact of subsidence on any surface structures that would be placed within the mining area. An electronic copy of the map of current subsidence levels above the mining area has been provided. (2) FMC is concerned about restrictions an overhead powerline may place upon future drilling activities associated with the mine. Boreholes destined to intersect mine workings require precise drilling which leaves little leeway for relocation of drill sites to avoid clearance problems that a drill rig may encounter with an overhead powerline. (3) The southern route passes between two

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		impoundments that FMC uses to drain its tailing line for maintenance purposes or during emergencies. FMC's concern here is that location of a support tower in the immediate vicinity of these ponds may interfere with out ability to conduct line maintenance or impoundment cleaning activities. (4) The southern route crosses various buried pipelines (e.g., tailings, natural gas). Support structures would need to be located to avoid being directly over these lines.
1500		The BLM and the Forest Service have a heightened obligation to consider the impacts of this project on climate change, even if such impacts are indirect. The generation of electricity by burning is coal is an especially large contributor to carbon dioxide emissions. We would note that BLM is under direction from the Secretary of the Interior to "consider and analyze potential climate change impacts" (memorandum dated January 19, 2001). And of course, NEPA requires that BLM consider all environmentally significant issues in its RMP EIS, and there is no doubt that global warming is such an issue.
1500		The EIS document should therefore consider how resources affected by climate change could potentially influence the project and vice versa, especially within sensitive areas. Also, the EIS should quantify and disclose greenhouse gas emissions from the project activities and discuss mitigation measures to reduce emissions.
1500		BLM needs to analyze the generation sources that will be on this power line and what the greenhouse gas emissions will be induced by the development of the proposed project. Appendix A contains information BLM should use in evaluating greenhouse gas emissions (including induced emissions) and impacts of climate change in the West.
1500		Is this transmission line necessary? Has the possibility of using non-transmission energy needs been thoroughly investigated? It is essential that we take steps to reduce the effects of global warming, including reducing our dependence on using fossil fuels for energy generation.
1600		The Gateway Project environmental analysis and decision document should define, and prevent, unnecessary or undue degradation in an equally direct, positive fashion.
1600		The alternatives considered by BLM, and particularly the preferred alternative, must give special emphasis to protecting and providing for relatively rare resources.
1600		Monitoring EPA supports project strategies that include monitoring, which is a necessary and crucial element in identifying and understanding the consequences of actions. The proposed project could be designed to include an effective feedback element, including implementation and effectiveness monitoring.
1700		The EIS should evaluate effects of any proposed road improvements, new road construction, and general ROW construction and operation activities on the area.
1800		BLM must fully examine the plethora of new corridors/lines/disturbance-including natural gas (Ruby, Bronco), DOE corridors, and others in the region of Idaho, Wyoming and Utah.
1800		fully analyze the impacts of "developing" new energy projects (wind, geothermal, fossil fuel, etc.) in the path of this line.
1800		consider the full range of cumulative effects on land and habitats affected by this project-of many other activities such as livestock grazing disturbance and facilities that serve to degrade and fragment habitats, and as referenced in the Westwide DOE comments included here.
1800		Will this line be related to nuclear power plants? INEEL? If so, how might nuclear energy here endanger human health and the environment?