

BUREAU OF LAND  
MANAGEMENT  
CASPER FIELD OFFICE

06 OCT 18 AM 10:17

October 17, 2006

**Ms. Linda Slone**

Team Leader, Casper RMP Revision  
Casper Field Office  
2987 Prospector Drive  
Casper, WY 82604

Re: **PacifiCorp** Comments on the Draft Environmental Impact Statement (EIS)  
for the Casper Resource Management Plan (RMP)

Dear **Ms. Slone**:

PacifiCorp appreciates the opportunity to provide comments on the draft EIS for the Casper RMP. The following document is enclosed for your review and consideration:

**Enclosure A:** PacifiCorp's comments on the draft EIS

**As** a means of introduction, PacifiCorp is a large, regulated western electric utility that serves approximately 1.6 million residential, commercial and industrial electric customers throughout its six state service territory. PacifiCorp owns 6,400 gross megawatts of coal-fired generation company-wide in addition to other generating resources including hydroelectric, natural gas, geothermal and wind. We own approximately 15,000 miles of transmission lines, 40,000 miles of overhead distribution lines and 11,000 miles of underground distribution cable across the west. The 15,000 miles of transmission lines interconnect with other utilities in about 150 locations in the western US and Canada enabling PacifiCorp to transfer power among more than 60 other western utilities. PacifiCorp also owns and operates the Dave Johnston Power Plant and the Glenrock Coal Mine, which has ceased operations and is currently being reclaimed. Both facilities are located within the Casper Resource Area. This makes PacifiCorp a critical resource for generating, supplying and moving power throughout the west.

PacifiCorp assets and facilities, in the aggregate, are spread across many western states, including many BLM lands. In particular, PacifiCorp electrical transmission and distribution lines cross the Resource Management Plan Planning Area (RMPPA). In that regard, we anticipate a need to continue to maintain existing lines and facilities in and near the RMPPA. In addition, we anticipate a need to locate new facilities and expand or upgrade existing operations in the RMPPA. Therefore, in order to continue to meet the electricity requirements of our customers and our

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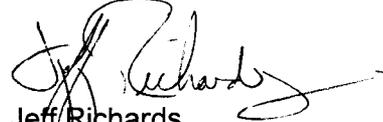
interconnection obligations with surrounding utilities, PacifiCorp looks for the RMP to enable PacifiCorp to:

- maintain existing facilities
- upgrade and/or expand existing facilities; and
- locate new facilities as needed

PacifiCorp appreciates the opportunity to submit these comments. We have long recognized the need to develop business practices, both on public and private lands, which are in harmony with valid and appropriate land use requirements. We are confident that our record of stewardship on BLM lands and our comments concerning the Draft EIS will allow BLM to produce a final RMP that offers suitable protections to the variety of issues affecting the RFO lands while accommodating both existing and future PacifiCorp facilities used to provide critical electric services to the people of Wyoming and throughout the west.

If you have any questions on the comments, please feel free to contact Brian Young in PacifiCorp's Salt Lake City office. Brian can be reached at 801-220-2516.

Sincerely,



Jeff Richards  
Senior Counsel

Enclosures

cc/encl: Mike Jenkins, PacifiCorp  
Kirt Rhoads, PacifiCorp

PacifiCorp Comments on the DRAFT Environmental Impact Statement (EIS)  
 For the Casper Resource Management Plan (RMP)

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Reference	Description of Issue	Suggested Revision/Action
<p><b>General</b>                      Energy Development</p>	<p>As part of their strategic goals, BLM must help meet energy resource needs. The draft reviewed to date by PacifiCorp appears to under-emphasize the energy development needs of electrical generation and transmission.</p>	<p>As a general matter, PacifiCorp believes that the EIS and RMP should better emphasize and promote issues related to electrical energy development.</p>
<p>Sustainable Development</p>	<p>PacifiCorp is aware that many federal land management agencies, including the BLM and the Forest Service, have issued policy statements in regard to sustainable development concepts, which includes provision for renewable energy resources. For example, see the joint federal agency explanation of this concept entitled "Sustainable Development and its Influence on Mining Operations on Federal Lands" dated April 2002. In the context of resource planning, this document describes sustainable development as addressing social, economic and environmental interests. This is consistent with PacifiCorp's own vision of sustainability as reflected in our environmental and other policies.</p>	<p>PacifiCorp urges the BLM to use these principles and this terminology when evaluating alternatives.</p>
<p><b>1000 – Physical Resources</b></p>		
<p><b>2000 - Mineral Resources</b></p>		
<p><b>3000 – Fire Management and Ecology</b></p>		
<p><b>4000 – Biological Resources</b></p>		
<p><b>Wildlife and Fisheries</b></p>		
<p>Guidelines for Protection of Sensitive Biological Resources</p>	<p>Timing and spatial stipulations for sensitive biological resources should be regarded as guidelines only and not as definitive dates and distances. A one-size fits all approach puts an undo burden on the applicant.</p>	<p>Although PacifiCorp understands the need for developing guidelines to protect sensitive biological receptors, site and project specific information must be taken into consideration. The Agency should present the conditions for controlling surface disturbing and disruptive activities as guidelines, not as mandates.</p>
<p><b>5000 – Heritage and Visual Resources</b></p>		
<p>Guidelines on Avoidance Areas near Cultural Property or Visual Horizons</p>	<p>PacifiCorp is opposed to establishment of an Avoidance Area within an area of ¼ mile of a cultural property or visual horizon as well as the complete disallowance of all surface disturbing activities within ¼ mile.</p>	<p>PacifiCorp must have the ability to maintain existing power lines even if it results in some surface disturbing activities within ¼ mile area of a cultural property or visual horizon. PacifiCorp, of course, will comply with applicable requirements that enable surface disturbing activities necessary to support line maintenance in such areas as</p>



Reference	Description of Issue	Suggested Revision/Action
<p>Access Under Emergency Situations</p>	<p>In an electrical emergency situation, PacifiCorp must be able to enter onto and conduct repairs or adjustments within a right-of-way area governed by a ROW Grant.</p>	<p>The RMP should include the definition of an Electrical Emergency Condition. As defined in PacifiCorp's ROW grants with the BLM, an "Electrical Emergency Condition" is a condition or situation that is imminently likely to endanger life or property or that is imminently likely to cause a material adverse effect on the security of, or damage to, PacifiCorp's electrical system.</p>
<p>Guidelines for Avoidance Areas</p>	<p>Under certain circumstances, the Agency must allow for the placement of utility and energy facilities, transportation systems and communication sites within avoidance areas. Objectives and guidelines for these circumstances must be clear. PacifiCorp has concerns that BLM's Surface Disturbance Mitigation Guidelines do not explain how BLM will intensively manage these areas nor do they provide any guidance on developing plans that will be acceptable to a Surface Management Agency (SMA).</p>	<p>BLM should develop and issue clear objectives and guidelines for minimizing surface disturbances near existing facilities with adequate opportunity for stakeholder input. Most RMP's restrict the use of off road vehicles, including over the snow, in areas of sensitive resources or special management areas. PacifiCorp does have power lines that provide power to facilities within some special management areas or has power lines that run through or adjacent to them. PacifiCorp must be allowed access to inspect or repair its structures and facilities in these sensitive areas.</p>
<p>Guidelines for Avoidance Areas</p>	<p>Utility Avoidance Areas effectively create a barrier for development of power transmission and distribution lines.</p>	<p>The Agency should modify Utility Avoidance Area Maps and designate utility corridors in planning areas. The Agency should designate existing linear facilities such as roads, pipelines, power lines, etc., as utility corridors for existing and future facilities, without restricting the placement of future lines in the same area.</p>
<p><b>Off-Highway Vehicle Management</b></p>		
<p>Access</p>	<p>It is unclear whether PacifiCorp's use of Off-Highway Vehicles (OHV's) to maintain power transmission and distribution lines is expressly authorized or otherwise officially approved.</p>	<p>PacifiCorp must be allowed access to inspect or repair its structures and facilities without vehicle access restrictions. In most situations this will be accomplished by a 4-wheel drive service truck or an all terrain vehicle (ATV). If repairs are necessary, the use of a high range boom truck may be required. These vehicles will use existing roads and trails but in some cases, the use of overland travel may be required. The definition of administrative tasks should be expanded to include power delivery operation and maintenance (O&amp;M) activities and include emergency actions necessary to restore power.</p>
<p>Access</p>	<p>Areas proposed for closure to OHV use will prevent PacifiCorp from being able to access PacifiCorp's transmission and distribution lines and poles.</p>	<p>PacifiCorp must have access to its transmission and distribution lines via mechanized vehicles for routine operation and maintenance, emergency situations (power outages), and for conducting line patrols. Our employees need to be able to do emergency work anywhere it is necessary, at any time. Access via over-the-snow vehicles is also necessary in the winter months.</p>

Reference	Description of Issue	Suggested Revision/Action
<b>Transportation and Access</b>		
Designation of Utility Corridors for Existing ROW Routes	Existing major utility ROW routes must be designated as utility corridors in the RMP.	PacifiCorp has provided the BLM with maps of our existing transmission and distribution systems for inclusion in the RMP. BLM should identify these ROWs as designated utility corridors.
Designation of Utility Corridors for Future ROW Routes	Areas of T&D expansion should be included in the RMP.	PacifiCorp has provided the BLM with maps of our proposed future transmission and distribution systems. PacifiCorp requests that the area for these potential lines be designated as utility corridors.
<b>Renewables</b>		
Renewable Energy Development	Programs that would restrict renewable development based on overall wind class classifications should not be a basis for wind farm development.	PacifiCorp recommends Alternative D become the preferred alternative. Other alternatives restrict development or wind based renewable energy based on wind class categories and presumably other criteria, which weren't identified in the DEIS. There may be site specific areas conducive for renewable energy development that do not necessarily correspond with existing broader wind class classifications. It is critical that development of renewable energy resources not be restricted on global classifications. Global classifications may be an excellent method for permitting purposes, but taking the opposite strategy is not conducive to encourage development of renewable wind energy. The margin of error associated with the classification of the wind categories is significant. There may be potential siting areas with localized wind conditions, or other siting factors, such as the proximity to loads or major distribution or transmission corridors that would make wind farm development economical. The potential outcome of the preferred alternative may have unintended consequences over the long term and is not recommended especially as the need for more renewable energy increases and the need to harvest wind resources with lower wind capabilities increases.
<p>7000 – Special Designations</p> <p>8000 – Socioeconomic Resources</p> <p>7:10 AM 8/1/2009</p> <p>3014 11/11/2009</p>		