

JAN 20 2012

Bureau of Land Management  
Lander Field Office  
ATTN: Kristen Yannone, RMP Project Manager  
1335 Main St.  
Lander, WY 82520

Re: DRAFT Resource Management Plan & Associated Environmental Impact Statement for  
the Lander Field Office RMP Revision Project

Dear Ms. Yannone:

Western Area Power Administration (Western) has reviewed the September 9, 2011 *Federal Register* notice of availability as well as the web site pertaining to the Draft Resource Management Plan (RMP) and associated Environmental Impact Statement (EIS) for the Bureau of Land Management (BLM) Lander RMP Revision Project. The plan encompasses the National System of Public Lands (public lands) within the administrative boundaries of the BLM Lander Field Office. These lands are located in Fremont, Natrona, Carbon, Sweetwater, Hot Springs, and Teton Counties, Wyoming. The notice states that BLM decision actions will apply only to those public lands under its jurisdiction.

The Draft RMP/EIS includes a series of actions within four management alternatives designed to address challenges and issues raised during scoping. These actions are related to energy development; vegetation management; travel management; wildlife habitat management; and access to public lands, among others, as well as special management areas including Areas of Critical Environmental Concern. Some of Western's concerns include designation of utility corridor rights-of-way (ROW), safety management, transportation planning and travel management, and possible use limitations needed to protect the Greater sage-grouse and other resource values.

Western is aware that any decision affecting public lands may likewise affect Western's ability to ensure the safe and reliable operation of the Federal power transmission system. Therefore, Western is writing at this time to ensure that BLM is aware of and includes Western's transmission lines, fixed site facilities and access needs in its planning effort. Western requests that any new land use decisions be made in the context of current land uses and that travel management plans, which typically create restrictions to vehicular travel and/or limit access, not be used to impede or hamper legitimate uses of the public lands. Since Western's facilities traverse BLM public lands administered by other field offices, Western is concerned that decisions made by the Lander Field Office be consistent with adjacent field offices. We request that decisions related to our facilities be seamless from one local office to the next and that local solutions be integrated as a whole for linear rights-of-way or utility corridors that traverse more

than one administrative jurisdiction. The problem is a real one when different field offices do not recognize and manage a transmission line corridor consistently from one jurisdiction to another.

Western has the following comments related to the Lander Draft RMP and associated EIS.

1. Western's facilities are all currently authorized by BLM either as a notation to the official land records (Reclamation used section 4p of the Fact Finders' Act to authorize transmission lines built to carry electricity from the Federal hydro-power dams) or as a formal ROW grant issued by the BLM Lander Field Offices. In some instances access is implied; in others it is specifically identified. Western believes it has the proper authorizations in place and will update them if necessary prior to conducting any activity that changes the footprint of existing facilities.

2. Western will continue to maintain, operate, reconstruct or upgrade its facilities and requires continuous access to conduct these activities. Western requests that any travel management or transportation planning decision that affects the current use of the roads historically used by Western to access its facilities be coordinated with Western. If the designation of one of our access routes changes to either restricted/limited or closed, Western requests that alternate routes be identified and made available or that the mechanism closing access to the general public be such that Western's lock can be accommodated as well. Western can assist the BLM Lander Field Office in its travel management planning. We have geographic data available that show the location of our transmission lines, fixed facility sites and access routes used by us (see the enclosed map; the electronic data is available as shape files). We typically conduct our own road maintenance activities. We also can work with the Lander Field Office to identify areas where gates or other types of barriers can be used to restrict access.

3. Western is required to ensure the safe and reliable operation of the electric transmission grid. One of the activities conducted by our maintenance crews or contractors is removal of trees or shrubs that have grown to a height that exceeds the safe operating distance from the conductors as determined by the North American Electric Reliability Corporation's Standard FAC-003-1 (version 2 is still in draft) and Western's transmission vegetation management program. Our activities are typically limited to the authorized ROW but in some instances danger trees outside the ROW will also be removed. Vegetation management activities will continue to be coordinated with the Lander Field Office as necessary.

4. Renewable energy projects are being proposed on a regular basis, and Western, as the owner of transmission facilities, may need to upgrade some of its transmission lines to increase the carrying capacity needed to transport electricity from new renewable energy generation sites to markets where the additional power is needed. Existing authorizations will be amended, or if necessary, new authorizations will be sought formally.

5. Western as a Federal agency must meet the requirements of the National Environmental Policy Act of 1969, as amended, prior to completing maintenance activities on the transmission lines or fixed site facilities, or conducting road improvement activities. Routine maintenance is typically addressed under a categorical exclusion. Other activities, such as upgrading or rebuilding the line, are conducted following completion of either an Environmental Assessment (EA) or EIS. New renewable energy projects may be addressed in an EA although typically an

EIS will be required. These actions will be coordinated with the Lander Field Office and/or through one of the BLM project managers.

6. Western is aware and sensitive to resource values important in the Lander Field Office Planning Area. Western realizes there may be special mitigation actions prescribed to protect raptors and sage grouse and limit visual impacts from a linear feature on the landscape. Western requests that the RMP provide management prescriptions for overhead transmission facilities, taking into consideration the typical life span of the facility (usually 50 years), required continued access, including spurs to each transmission structure, emergency maintenance activities, routine maintenance activities, and rebuilding existing lines, as well as constructing new ones.

7. Western's transmission lines will likely be designated as ROW corridors within the Lander Field Office RMP. Please confirm this, as well as whether other linear features, such as pipelines, other transmission lines or distribution lines, will be required to locate adjacent to Western's transmission lines. If that is the case, then Western will work with the new proponent to ensure the continued safe and reliable operation of its facilities.

Thank you for the opportunity to review the Lander Field Office Resource Management Plan Revision Project. Please feel free to contact Susan Starcevich at (720) 962-7275 or starcevi@wapa.gov if you have questions or need additional clarification.

Sincerely,

**STEVEN W. WEBBER**

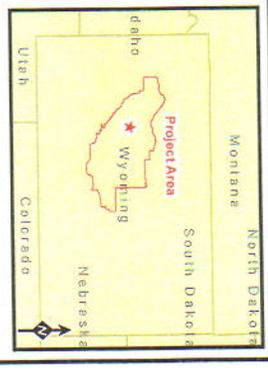
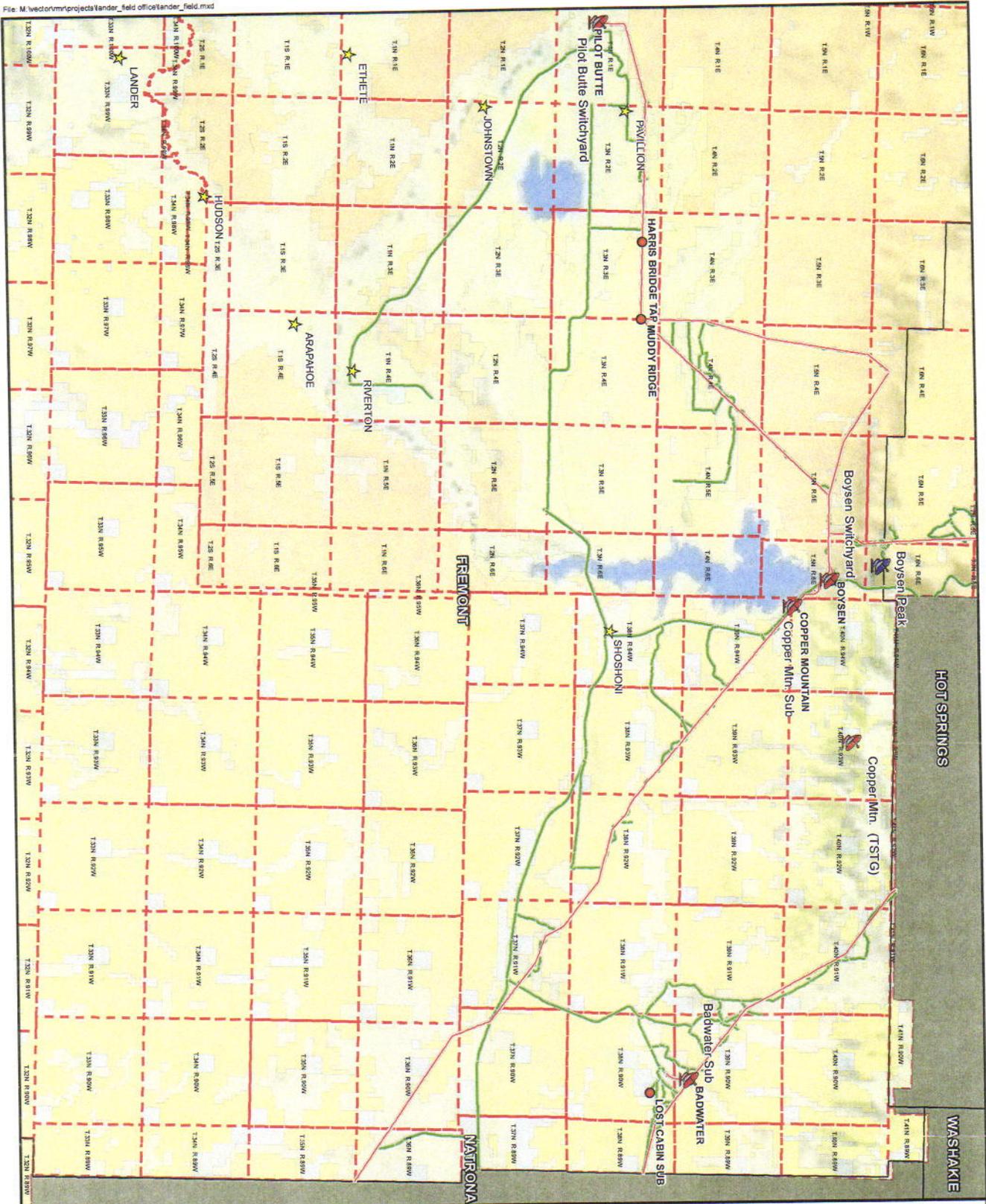
Steven W. Webber  
Lands Team Lead

Enclosure

bcc:

A7400 (RF, Starcevich)  
C. Ashton, A7400.LV, Loveland, CO  
G. Iley, J0460, Loveland, CO  
K. Mayer, J5100.CS, Caper, WY

A7400:SMStarcevich:x7275;lou:1/20/12:LanderFieldOfficeRMP



- Legend**
- Facility/Substation
  - ★ Cities
  - MW & VHF
  - Microwave Active
  - Existing Transmission Centerline
  - Access Roads
  - - - Township/Range
  - - - County Boundary
  - BIA
  - BLM
  - BOR
  - STATE



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UNITED STATES DEPARTMENT OF ENERGY  
WESTERN AREA POWER ADMINISTRATION  
CORPORATE SERVICES OFFICE - LAKEWOOD, COLORADO

LANDER FIELD OFFICE  
WYOMING  
BLM LOCATION MAP

Designed: COLLEEN KENNEDY Approved: Manager  
JANUARY 19, 2012 DRAFT