

**From:** [Julie\\_Reeves@fws.gov](mailto:Julie_Reeves@fws.gov)  
**To:** [Amy\\_Defreese@fws.gov](mailto:Amy_Defreese@fws.gov)  
**Subject:** Re: Response to your voicemail  
**Date:** Tuesday, October 09, 2012 3:05:12 PM

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Thanks, Amy,

I was on the call and I heard some of the discussion that you stirred up. I agree that the Service should come up with some sort of consensus on what is "avoidable" and what is "allowable" impacts to GSG, especially because we have so much habitat in our states. I know for Gateway West, the project avoids Core habitat and then follows the energy corridor through the Core habitat where it must be crossed, and that was sufficient for folks in Wyoming (along with going through an impact assessment and habitat equivalency analysis). I think it will be more difficult for states with no defined "no surface occupancy" areas to help route these large projects through them.

I am going to be at the energy meeting next week and I am actually giving a short presentation on Tuesday morning about transmission lines, along with Tyler Abbott of my office. I would love for you to participate, especially to talk about lessons learned in coordination with BLM in doing S to RB. You are also encouraged to give helpful criticism with what is working and what isn't working on TWE and EGS. :) We should definitely do lunch, though I am not going to be on a per diem, so I'll have to keep it cheap. I believe Creed and Jeff Berglund (MT) are also planning to attend the meeting, so maybe us transmission folks can break out into a lunch session one day.

Thank you for the detailed information about S to RB, and I look forward to discussing further next week. I'll add your discussion to the FO transmission team call agenda for November as well. Thanks, and I look forward to meeting you as well!

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We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect. ~Aldo Leopold, A Sand County Almanac

▼ Amy Defreese/R6/FWS/DOI

**Amy  
Defreese/R6/FWS/DOI**

To: Julie Reeves/R6/FWS/DOI@FWS  
cc

Subject: Re: Response to your voicemail 

10/09/2012 02:18 PM

Hi Julie,

Thanks for your note and I apologize again for missing the call. I think you were on the Energy Gateway South BRTG call this morning and may have heard the conversation about gsg at the end of the call. With that in mind, there are some topics that I think might be useful to discuss on our next Transmission Team Call in November.

1) I'm wondering if it would be helpful for me to give a 5-minute brief on the circumstances surrounding the StoRB project here in Utah and how things went with greater sage-grouse. There are some outstanding points of disagreement between FWS and BLM that have not yet been resolved. I provided a briefing paper to Noreen Walsh last week, but I don't know yet what she did or will do with it. Anyway, in summary, FWS and BLM disagreed on the ultimate impacts of the project to gsg, the consideration of an "avoidance" alternative, mitigation ratios, when mitigation would be conducted (ie pre or post construction), and whether mitigation success would be tied to gsg use of the treated habitats as opposed to achievement of vegetation goals. If the Wyoming and Colorado field offices maintain different positions on these topics, then I think it would be useful to see if we can come to some consensus.

2) The S to RB transmission line is proposed through a corner of gsg habitat in Iron County, Utah and is within 4 miles of a lek. You are aware that portions of the TWE line parallel the StoRB line. The two lines have this area of greater sage-grouse habitat in common, so it appears that the Utah Field Office will want to see the line moved outside the 4-mile buffer, and outside the habitat. This is a recommendation we provided to StoRB, but somewhat late in the game. My view with the TWE project is that we are early enough in the process to move the line to avoid the habitat here. It is hard to envision, so I'm attaching a map so that you can see what I am referencing.

3) I heard on the EGS call this morning some general consensus that there is no way to completely avoid impact to gsg. If that is true and FWS accepts that premise, then I'd like to see FWS determine what it believes represents the alternative that best minimizes impacts to gsg and what we believe is necessary to get to a determination that the project "cumulatively maintains or enhances gsg habitat". This is a condition of the BLM's interim guidance as I read it. I imagine that the three field offices may have different ideas about this topic. For Utah, I think we have some specific thoughts for which I would like to solicit some feedback. I think that the application of a 250' setback where gsg leks are a concern is a measure for example that could be included in a "gsg alternative".

I think this is a wordy email ... sorry about that. If you'd like to go over it in person, or have any questions, I'll be around all day Thursday and Friday. I'll also be at the energy conference in Cheyenne next week. Will you be there? If so, we could make a plan for lunch or dinner to discuss. I look forward to meeting you in person!

Best,  
Amy

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▼ Julie Reeves/R6/FWS/DOI

**Julie  
Reeves/R6/FWS/DOI**

ToAmy Defreese/R6/FWS/DOI@FWS  
cc

SubjectResponse to your voicemail

10/04/2012 07:45 AM

Hi, Amy,

I was hoping that you would attend the call, but we'll just have to bring up your issues next month. I was the person who put the WECC recommendations on the agenda, and I discussed some of the specifics that were mentioned in an RRTT call in July. I'm attaching the presentation that was given to the RRTT here as well. I think there are some good links within the presentation to places where more information can be found.

Basically, WECC came out saying that adjacent transmission lines could be sited within 250' of each other and not reduce the reliability rating of either line, as long as those lines are only within that proximity for a "short" distance. From what I remember on the call, the project managers from the BLM who had already been working on agency-preferred alignments were not too happy with this news as they did not want to have to re-work their lines. They did, however, state that many of their preferred alignments were already paralleling existing lines at the 1500' buffer, and that their study area around the centerline would already include the feasibility of locating their lines closer to the existing line if they must. The project managers stated that the applicants would probably not be willing to do this narrower distance between transmission lines because of fears that their reliability rating would decrease, and that they would only consider this for "pinch points" in areas with sensitive habitats or resources.

As an action item, we agreed to look into WECC's guidance a little closer to see if there is any possibility that a policy can be derived from this so each FO biologist will not have to fight for narrower separation on a case-by-case basis. We agreed that this may be something that the regional offices should work on.

Do you happen to have any topics for discussion next month? Thanks!

[attachment "WECC sep and NERC reliabilityBLM RRTT Presentation\_0426-2012\_1.pdf"  
deleted by Julie Reeves/R6/FWS/DOI]

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