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January 28, 2021

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National Project Manager  
Bureau of Land Management  
U.S. Department of the Interior  
1387 South Vinnell Way  
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Mr. Reggie Woodruff  
Energy Program Manager  
U.S. Forest Service  
U.S. Department of Agriculture  
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Dear Mr. Bluma and Mr. Woodruff:

The Western Governors' Association (WGA) appreciates the opportunity to provide comments on the draft Regions 4, 5 and 6 Report (Report) of the West-wide Energy Corridors Regional Review. The designation of, and adjustments to, these corridors can have significant effects on state and regional energy, infrastructure, and land use planning across the West.

In WGA Policy Resolution [2018-04, \*Energy in the West\*](#), Western Governors establish the following as an energy policy priority for the region: "Advance efficient environmental review, siting, and permitting processes that facilitate energy development and the improvement and construction of necessary electric grid (transmission and distribution) and pipeline infrastructure, while ensuring environmental and natural resource protection." Federal agencies' effective implementation of the West-wide Energy Corridors Regional Review helps support this goal. WGA's further perspectives on the West-wide Energy Corridors Regional Review and the importance of state consultation are contained in this 2017 Governors' [letter](#).

The Report considers a number of changes to the Bureau of Land Management (BLM) and U.S. Forest Service's (USFS) interagency operating procedures (IOPs). As noted in the Report, IOPs are "mandatory and apply to all proposals, applications, and authorizations for energy transmission projects in Section 368 energy corridors administered by the BLM or USFS." This "mandatory" application practice underscores IOPs' importance in promoting consistent and cohesive cross-boundary management across multiple federal land jurisdictions.

Western Governors' policy relates to a number of new and revised IOPs described in the Report. These include a potential new IOP focused on Greater Sage-grouse habitat and a revised IOP related to habitat connectivity and wildlife corridors. WGA Policy Resolution [2021-04, \*Species Conservation and the Endangered Species Act\*](#), discusses the importance of coordinated management between state and federal agencies in regards to sensitive species and migration corridors.

The Report notes that the 2019 Region 1 Report includes proposed additional language to an IOP addressing vegetation management and invasive and noxious weeds common in western states.

Mr. Jeremy Bluma  
Mr. Reggie Woodruff  
January 28, 2021  
Page 2

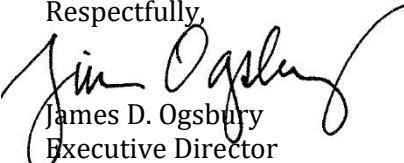
Integration of this language aligns with WGA Policy Resolution [2021-03](#), *National Forest and Rangeland Management*, which states: “Western Governors believe clear, coordinated and consistent application of federal vegetation management practices is integral to maintaining the health of western forests, preventing dangerous and damaging wildfires, and maintaining grid reliability.”

The Report also discusses the need for “improved clarity and consistent guidance for managing existing corridors,” and recommends that agency land use plans include additional information related to corridor uses and compatible infrastructure, including telecommunications and fiber optic infrastructure. WGA Policy Resolution [2020-08](#), *Broadband Connectivity*, discusses challenges with siting broadband infrastructure on federal lands and offers Governors’ support for federal “efforts to improve permitting timelines for broadband infrastructure co-located with existing structures and other linear infrastructure, such as roads, transmission lines and pipelines.”

WGA appreciates that BLM and USFS have designed these IOPs to promote consistent land management practices across multiple jurisdictions. We request, however, that the agencies consult with Western Governors and states regarding the final details of these IOPs and corridor designations prior to their incorporation into BLM or USFS land use plans, guidance, manuals, or handbooks. The fact that these designations are exclusively contained within western states highlights the need for robust state-federal consultation across the region.

Thank you for your attention to this matter. Western Governors look forward to working cooperatively with the BLM and USFS in the implementation of these corridor designations and policy changes.

Respectfully,

  
James D. Ogsbury  
Executive Director