

October 31, 2013

Julie A. Smith and Christopher Lawrence

Office of Electricity Delivery and Energy Reliability

U.S. Department of Energy

1000 Independence Avenue SW.

Washington, DC 20585

Sent via e-mail: juliea.smith@hq.doe.gov and christopher.lawrence@hq.doe.gov

RE: Comments on a Draft Integrated, Interagency Pre-Application (IIP) Process

Dear Ms. Smith and Mr. Lawrence:

Please accept these Trout Unlimited (TU) comments on the draft Integrated, Interagency Pre-Application (IIP) Process. Trout Unlimited is concerned with expediting renewable development in a thoughtful and deliberate manner in order to protect and conserve fish and wildlife resources and sportsmen's interests. Trout Unlimited routinely participates in the Federal and state processes for environmental review of major energy projects and cooperates with State as well as Federal fish and wildlife and land management agencies.

A well designed pre-application process could be instrumental in avoiding potential issues but Trout Unlimited firmly believes that great care should be taken so that these processes are not duplicative, do not divert the States authority over fish and wildlife resources and does not defeat the purpose of this effort by prolonging project timelines.

- A. State Agencies have authority over fish and wildlife and other resources and in many states sign MOU's that provide for joint Records of Decision and should always be invited to participate in any pre planning activities. This should not be at the discrimination of the NEPA agency.
- B. Existing NEPA and other agreements and processes exist that already provide for a pre-application process that could serve the purpose of early issue identification and coordination. Consideration should be given to formalizing and strengthening this process before adding new steps to the review.
- C. Effort should be exhausted to avoid duplication of effort including clarifying state agency roles and public participation steps resulting in an overall shortened timeline for project review.
- D. Many NEPA process participants are already limited from involvement by lack of capacity. Any additional voluntary or compulsory NEPA related planning steps should be evaluated for cost to the Federal as well as State agencies, the public and non-governmental organizations.

Overall, TU believes that the proposed IIP process fails to acknowledge States authority over fish and wildlife and other resources, and is duplicative in its proposed form. Trout Unlimited believes another unfunded voluntary process offers little guarantee of expediting or improving the NEPA process as it exists. Trout Unlimited believes that the existing NEPA pre-planning process could be improved and that this coupled with a mandatory reduction in the overall timeline would be of greater benefit to sportsmen and the fish and wildlife resources they enjoy.

Sincerely,

A handwritten signature in black ink, appearing to read "T.O. Smith". The signature is written in a cursive style with a long horizontal line extending to the left from the first letter.

T.O. Smith

Renewable Energy

Trout Unlimited

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