



United States
Department of
Agriculture

Forest
Service

Arapaho and Roosevelt
National Forests and
Pawnee National Grassland

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File Code: 2720

Date: April 23, 2012

Steven W. Webber
Lands Team Lead
Western Area Power Administration
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228

Dear Mr. Webber:

This is regarding Western's Estes-Lyons and Estes-Pole Hill proposed transmission line rebuild project partially located on National Forest System (NFS) lands on the Canyon Lakes Ranger District, Roosevelt National Forest. The purpose of this letter is to clarify the U.S. Forest Service position on the two lines as they relate to the designated utility corridor for which we have conducted a thorough review of the 1997 Revision of the Land and Resource Management Plan (Forest Plan) for the Arapaho-Roosevelt National Forests and Pawnee National Grassland (ARP) as well as the 1984 ARP Forest Plan and their respective records.

On June 1, 2011, Western submitted a special use application for the project which proposes to consolidate two existing transmission lines located between Estes Park and the Flatirons Reservoir into a single transmission line. Because sections of these two lines cross NFS lands, the Forest Service entered into a Memorandum of Understanding (MOU) and a Cost Recovery Agreement with Western, with Western being the lead agency. The U.S Forest Service is a cooperating agency on this project and we will be making a separate decision based on the NEPA analysis to consider authorizing this consolidated transmission line.

As background, both of these transmission lines were authorized by the Forest Service to be constructed and maintained on NFS lands under special use permits, the southern Estes-Pole Hill authorized in 1951 and the northern Estes-Flatiron line in 1939.

During scoping for this proposed project, an issue was raised by members of the public that they believed the southern Estes-Pole Hill transmission line is not within the utility corridor as designated in the Forest Plan, while the northern Estes-Flatiron line is within the utility corridor. They have asserted that consolidating the two lines following the southern line location would not be in compliance with our Forest Plan, because they believe it is outside the designated utility corridor.

Our findings are as follows:

1. Research of the Forest Plan record indicates that the one linear corridor showing Western's northern Estes-Flatiron transmission line is a graphic representation of the whole system, including the southern Estes-Pole Hill line. It is not meant to represent the exact location of the two transmission lines or a utility corridor. This conclusion is based on the following:



- Consultation with our Forest GIS Program Manager clarified that the linear feature on our maps is a “symbology type” (GIS term) and that it does not imply any width, even though the map legends and our 8.3 Utility Corridor Management Area use the word “corridor.”
- This is verified in the *Data Dictionary for Utility Corridors* for the Forest Plan which states, “Data was prepared for use with the Plan. Shows main utility corridors. This is a temporary coverage with approximated locations.”
- The Estes-Pole Hill transmission line right-of-way width on NFS lands is defined in its authorizing instrument per 36 CFR 251. This is true for any linear-type of special use permit, such as gas lines, power lines, and roads.

2. In the EIS of the Forest Plan, *Utility Corridors Environmental Consequences* section on pages 415-418 it states,

“A utility corridor is defined as a designated parcel of land, either linear or areal in character,... Corridors are not usually wider than 5 miles, and are limited by technological, environmental, and topographical factors... The corridors are set in width as identified by the special use permit issued.”

3. Other information found in the Forest Plan record includes:

- A December 28, 1993, memo from the Regional Office Planning Director, to the ARP Forest Planner and others included an attachment on how to use the Western Utility Corridor Study for Forest Plans. Item #2 of that memo states, "Corridors vary between 2-5 miles in width, depending on anticipated use." (Forest Plan Document #2076, Book #46, Utility Corridors).
- Documentation from a utility corridor meeting on October 14, 1994, gives direction to "show the utility corridor as a line on the Management Area map, with the Management Area prescription." (Forest Plan Document #2078, Book #46, Utility Corridors).
- In a memo dated February 13, 1995, from the ARP Forest Planner to his Forest Plan Revision Interdisciplinary (ID) Team, he forwards the Desk Guide Addition, called *Utility Corridor Analysis Direction*. This direction states,

All occupied and new unoccupied utility corridors for various uses will be identified in Forest Replanning as required by the Federal Land Policy and Management Act of 1976.

A Utility Corridor is: a linear strip of land, varying in width up to 5 miles wide where major utility transmission facilities are located. Those facilities do include electric transmission lines...

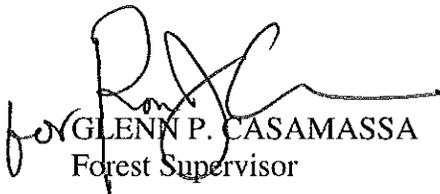
After reviewing the Forest Plan, its EIS, and the Forest Plan record, it is the Forest Service’s conclusion that the designated Utility Corridor included both transmission lines which were under authorization prior to either the 1984 Forest Plan or the current Forest Plan.

To address other comments made by the public, though our Forest Plan shows a utility corridor line going west towards Lake Estes and outside the Roosevelt National Forest proclaimed boundary, this was done to show the connecting nature of the transmission line. The Forest Service has no authority to permit anything not on NFS lands, and therefore, the Forest Plan provides no direction on non NFS lands.

During the NEPA analysis we will work with Western on its proposed action and any other alternatives that may be developed. The Forest Service interdisciplinary team will be reviewing all of the analysis for the EIS to ensure that all Forest Service required laws, regulations and policies are followed. Once the EIS has been completed and all public notice and comment requirements are met, I will make an appropriate decision.

We look forward to continuing working with you on this project. If there are any questions, please contact the lead for this project, Sue Greenley at 970-295-6735 or by e-mail at sgreenley@fs.fed.us.

Sincerely,



for GLENN P. CASAMASSA
Forest Supervisor

Cc: Tim Snowden