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**Final Scoping Summary Report**

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*Appendix D*

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Comment Documents

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**APPENDIX D  
COMMENT DOCUMENTS**

This appendix includes all unique scoping comment documents received. Scoping comment documents were logged and assigned a document number. Document numbers are stamped at the top right of each page. To locate a comment, refer to Appendix C.

1001

**Stevens, Kimberly**

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**From:** gjs@nwc.cog.co.us  
**Sent:** Friday, April 02, 2010 3:44 PM  
**To:** Western Area Power Administration Transmission Line Management Reauthorization Project  
**Subject:** email account not active

Attention:

This email account is no longer active as of January 1st, 2010. Please remove from your contact list.

Thank you.

1002

**Walsh, Joseph**

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**From:** Warren, Michael [Michael.Warren@state.co.us]  
**Sent:** Thursday, April 08, 2010 11:27 AM  
**To:** Western-FS-EIS@wapa.gov  
**Cc:** Riggs, Dean; Warren, Michael  
**Subject:** Shape files for R-O-W segments within the State of Colorado

Mr. Hartman

I would appreciate any help you can provide.

I would like to get a copy the shape file(s) for the r-o-w segments in Colorado. Would you please email them to me so that the Colorado Division of Wildlife can conduct a more appropriate scale analysis of potential impacts to wildlife. If you are not the person who would have this information will you please forward this request to the appropriate person.

Thank you for your help.

Michael Warren  
Land Use Specialist  
Colorado Division of Wildlife  
711 Independent Ave.  
Grand Junction, CO 81505  
(W) 970-255-6180  
(F) 970-255-6111

**Walsh, Joseph**

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**From:** jean public [usacitizen1@live.com]  
**Sent:** Friday, April 09, 2010 2:34 PM  
**To:** western-fs-eis@wapa.gov; americanvoices@mail.house.gov; comments@whitehouse.gov  
**Cc:** james.hartman@wapa.gov  
**Subject:** public comment on federal register FW: investigate the use of toxic herbicides by these right of way profiteers - they kill

Western energy needs to be balanced by the toxic assault on birds, butterflies, insects and animals from their use of toxic herbicide which is also inflicting cancer on people in the area. one expects when one goes into the woods one will NOT be assaulted by chemicals, but the forest service seems perfectly willing to let everybody get cancer from the overuse of these toxic pesticides, herbicides, etc. there seems to be no balance here since that awful george bush became president with his cheney business assaulters on the environment. no balance is shown by the fs at all at any time.its all about greed and money in this agency. and bribes of course from local profiteers. the corrupt washington business focused agencies are allowing our nation to be ruined. the "suits" will be at these hearings, which are usually held when the working people are at work and therefore have no voice at all with these bloated corrupt washington dc agencies. stop all the overuse of prescribed burning and toxic herbicide. we are all being poisoned with cancer from this overuse for profiteers and bribes to bloated washington bureaucrats.  
jean public 8 winterberry court whitehouse station nj 08889

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[Federal Register: April 8, 2010 (Volume 75, Number 67)]  
[Notices]  
[Page 17913-17915]  
From the Federal Register Online via GPO Access [wais.access.gpo.gov]  
[DOCID:fr08ap10-56]

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DEPARTMENT OF ENERGY

Western Area Power Administration

DEPARTMENT OF AGRICULTURE

Forest Service

Maintenance and Vegetation Management Along Existing Western Area Power Administration Transmission Line Rights of Way on National Forest System Lands, Colorado, Utah, and Nebraska (DOE/EIS-0442)

AGENCIES: Western Area Power Administration, DOE; Forest Service, USDA.

ACTION: Notice of Intent to Prepare an Environmental Impact Statement and to Conduct Scoping Meetings; Notice of Floodplain and Wetlands Involvement.

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SUMMARY: Western Area Power Administration (Western) proposes to improve the way it manages vegetation along its rights-of-way (ROW) on National Forest System lands in the states of Colorado, Utah, and Nebraska. Implementing the proposal would include modifying existing

1003

United States Forest Service (Forest Service) authorizations or issuing new authorizations to accommodate Western's vegetation management proposal and maintenance of the electrical transmission facilities. Western and the FS will be joint lead agencies in the preparation of an environmental impact statement (EIS) on the proposal in accordance with the National Environmental Policy Act of 1969 (NEPA), U.S. Department of Energy (DOE) NEPA Implementing Procedures, and the Council on Environmental Quality (CEQ) regulations for implementing NEPA.

Western's need for agency action is to ensure that it can safely and reliably operate and maintain its existing electrical transmission facilities. Western must meet North American Electric Reliability Corporation's mandatory vegetation management and maintenance standards (FAC-003-1) in accordance with section 1211 of the Energy Policy Act of 2005 and industry standards. These industry standards are designed to ensure the safe and reliable operation of the transmission system.

Portions of the proposed Project may affect floodplains and wetlands, so this Notice of Intent (NOI) also serves as a notice of proposed floodplain or wetland action, in accordance with DOE floodplain and wetland environmental review requirements.

**DATES:** This NOI begins the public scoping period. The public scoping period will close May 26, 2010. Western and the Forest Service will consider all electronic and written scoping comments that are received or postmarked by midnight May 26, 2010.

**ADDRESSES:** Western and the Forest Service will host public scoping meetings on Thursday, April 22, 2010, at the Ramada Plaza Denver North, 10 East 120th Avenue, Denver, CO 80233; Friday, April 23, 2010, at the Museum of Western Colorado, Whitman Educational Center, 248 S. 4th (4th and Ute), Grand Junction, CO 81501; and Monday, April 26, 2010, at the Uintah Basin Applied Technology College, 450 N. 2000 W., Vernal, UT 84078. Scoping meetings will be from 3 p.m. to 7 p.m. The meetings will provide information to the public and gather comments from the public. The meetings will be informal, and attendees will be able to speak directly with Western and FS representatives about the proposal. Attendees may provide written comments at the public scoping meetings, or send them to James Hartman, Environmental Manager, Rocky Mountain Regional Office, Western Area Power Administration, P.O. Box 3700, Loveland, CO 80539-3003, e-mail: [Western-FS-EIS@wapa.gov](mailto:Western-FS-EIS@wapa.gov).

**FOR FURTHER INFORMATION CONTACT:** For information on the proposal and the environmental review process, contact James Hartman at the above address. For general information on DOE's NEPA review process, contact Carol M. Borgstrom, Director, Office of NEPA Policy and Compliance, GC-54, U.S. Department of Energy, 1000 Independence Avenue, SW., Washington, DC 20585-0119, telephone (202) 586-4600 or (800) 472-2756, facsimile (202) 586-7031. For information on the Forest Service role in this effort, please contact David Loomis, Regional Environmental Planner, Rocky Mountain Regional Office, U.S. Forest Service, 740 Simms St., Golden, CO 80401 (303) 275-5008.

**SUPPLEMENTARY INFORMATION:** Western is a Federal power marketing agency within the DOE that markets and delivers Federal wholesale electric power (principally hydroelectric power)

[[Page 17914]]

to municipalities, rural electric cooperatives, public utilities and irrigation districts, Federal and State agencies, and Native American tribes in 15 western and central States. The proposal covers existing transmission lines located on National Forest System lands in Colorado, Utah, and Nebraska and operated and maintained by Western's Rocky

Mountain Region. Western proposes to improve the way it manages vegetation on FS lands in part to ensure compliance with section 1211 of the Energy Policy Act of 2005 and the subsequent changes in industry standards for vegetation management to control the costs of vegetation management, to reduce the risk of wildfires caused by vegetation interacting with energized transmission lines, and to reduce the potential impact of wildfires on the transmission lines. Forest Service authorizations, issued under 36 CFR 251.54, for Western's use of National Forest System lands would need to be modified to accommodate this proposal.

**Purpose and Need for Agency Action**

Western must ensure that it can safely and reliably operate and maintain its existing electrical transmission facilities to deliver electrical power. Western must ensure access to its transmission facilities for maintenance and emergency response. Western must also ensure that the costs associated with maintaining the transmission system can be controlled in accordance with sound business principles. Western must meet mandatory vegetation management standards in accordance with section 1211 of the Energy Policy Act of 2005 and industry standards. The vegetation management standards are designed to ensure the safe and reliable operation of the transmission system.

To ensure that Western can safely, reliably, and cost-effectively operate, maintain, and access its transmission system and implement required vegetation management practices on lands managed by the FS, Western needs to participate with the FS to evaluate options to renew or modify Western's current authorizations.

Western's objectives for this proposal are to maintain its transmission lines, ROW and access roads to:

- Protect public and worker safety
- Ensure power system reliability
- Comply with current industry standards and mandatory reliability standards
- Achieve technical and economic efficiencies to minimize impacts on transmission line tariff costs and electrical power rates
- Reduce the risk of wildfires caused by vegetation growing into or falling onto transmission lines
- Reduce the risks to facilities from fires
- Control the spread of noxious weeds
- Ensure that Western's transmission facilities remain operational for the useful life of the facility
- Maintain flexibility to accommodate changes in transmission system operation and maintenance requirements

**Proposed Action**

Western proposes to improve the way it manages vegetation along its ROW on National Forest System lands in the states of Colorado, Utah, and Nebraska. Not all areas of Western's ROW would require the proposed changes to vegetation management. Vegetation management approaches would vary along the ROW depending on site conditions and identified risks to the transmission lines, and other factors. Over the life of Western's facilities, proposed vegetation management changes would be implemented in locations along its ROW where vegetation could interfere with Western's ability to reliably operate and maintain the facilities. In general, Western proposes to change its vegetation management practices in the following manner:

Implement and then maintain vegetation conditions along the ROW that reduce the risk to the transmission lines from vegetation-caused interference with the maintenance and operation of the transmission line. This could include establishing relatively stable

native vegetation that, at mature height, would not grow into conductors, fall onto conductors or structures, or contribute to high fuel loads.

Change from a largely reactive approach of cutting danger trees with annual ROW re-entry cycles to a proactive approach that incorporates integrated vegetation management. The objectives would be to control vegetation that, at mature height, presents a risk to transmission line maintenance and operation, and allow for longer ROW re-entry intervals.

Reduce as necessary and manage the amount of fuel-loading on the ROW to reduce the risk of transmission line-caused wildfires and to reduce the potential impacts of wildfires to transmission lines and structures.

#### Alternatives

Alternatives to Western's proposal include the no action alternative. In this alternative, Western would continue its maintenance according to past and current practices. Danger trees would be managed as they are now using a reactive approach with annual re-entry cycle to locate and cut danger trees. Other alternatives may be identified based on public and agency comments.

#### Floodplain or Wetland Involvement

Since the proposed Project may involve action in floodplains or wetlands, this NOI also serves as a notice of proposed floodplain or wetland action, in accordance with 10 CFR 1022.12 (a). The EIS will include a floodplain/wetland assessment and floodplain statement of findings following DOE regulations for compliance with floodplain and wetlands environmental review (10 CFR 1022).

#### Environmental Issues

The location of the proposal is on National Forest System lands in Colorado, Utah, and Nebraska. National Forests in Colorado include the Arapaho-Roosevelt, Grand Mesa-Uncompahgre-Gunnison, White River, Routt, San Juan, and Pike-San Isabel. The project also includes the Nebraska National Forest in Nebraska and the Ashley National Forest in Utah. Western maintains approximately 300 miles of ROW in these forests. The ROWs cross through a variety of vegetation communities at elevations ranging from approximately 6,000 to 11,000 feet. The widths of the transmission line ROW depend on the voltage of the line and typically range from 75 to 175 feet. The EIS will evaluate impacts on a variety of environmental resources that may occur along the approximately 4,000 total acres of ROW. The EIS will include design criteria and other actions to avoid or minimize impacts. The EIS will also present the results of compliance with other environmental regulations including the Endangered Species Act, National Historic Preservation Act, Clean Water Act, Clean Air Act and others.

#### Public Participation

Interested parties are invited to participate in the scoping process to identify important issues to be analyzed in depth, and to eliminate from detailed study issues that are not pertinent. The scoping process will involve all interested agencies (Federal, State, county, and local), Native American tribes, public interest groups, businesses, affected landowners, and individual members of the public.

Western and the FS will consult with affected tribes to evaluate and address the potential effects on cultural

[[Page 17915]]

resources, traditional cultural properties, or other resources important to the tribes. These consultations will be conducted in accordance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (65 FR 67429), the President's memorandum of April 29, 1994, Government-to-Government Relations with Native American Tribal Governments (59 FR 22961), DOE-specific guidance on tribal interactions, and applicable natural and cultural resources laws and regulations.

The public is encouraged to provide information and comments on issues it believes should be addressed in the EIS. Comments on the scope of the EIS will be addressed by Western and the Forest Service. Comments will be accepted at any time during the EIS process. Comments received outside of the scoping period may be addressed in the draft EIS if practicable, otherwise they will be addressed later in the process, such as in the final EIS.

Western has set up a Web site at <http://www.wapa.gov/transmission/Western-FS-EIS.htm> to facilitate the distribution of project information including meeting notices, project documents, schedules and other information. The public will be able to obtain documents for review from this Web site or request digital or hardcopies of documents for review.

Western anticipates that the EIS process will take about 15 months, and will include public scoping meetings; consultation and coordination with appropriate Federal, State, county, and local agencies and tribes; distribution of and public review and comment on the Draft EIS; a formal public hearing on the Draft EIS; distribution of a Final EIS; and publication of the Record of Decision in the Federal Register.

Responsible Officials

Western: Administrator; Forest Service: Rocky Mountain Regional Forester.

Dated: March 24, 2010.  
Timothy J. Meeks,  
Administrator.

Dated: March 24, 2010.  
Randall Karstaedt,  
Acting Deputy Regional Forester.  
[FR Doc. 2010-7724 Filed 4-7-10; 8:45 am]  
BILLING CODE 6450-01-P

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**Walsh, Joseph**

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**From:** Morse, W. Travis SPK [W.Travis.Morse@usace.army.mil]  
**Sent:** Monday, April 12, 2010 1:48 PM  
**To:** Western-FS-EIS@wapa.gov  
**Cc:** Green, Nathan J SPK  
**Subject:** Public Scoping Meetings

Dear Mr. Hartman,

We are responding to your April 2, 2010 Public Scoping Meetings notice for the Western Area Power Administration Transmission Line Management Reauthorization.

The Corps of Engineers' jurisdiction within the study area is under the authority of Section 404 of the Clean Water Act for the discharge of dredged or fill material into waters of the United States. Waters of the United States include, but are not limited to, rivers, streams, lakes, ponds, wetlands, vernal pools, marshes, wet meadows, and seeps. Project features that result in the discharge of dredged or fill material into waters of the United States will require Department of the Army authorization prior to starting work.

To ascertain the extent of waters on the project site, the applicant should prepare a wetland delineation, in accordance with the "Minimum Standards for Acceptance of Preliminary Wetland Delineations", under "Jurisdiction" on our website at the address below, and submit it to this office for verification.

A list of consultants that prepare wetland delineations and permit application documents is also available on our website at the same location.

The range of alternatives considered for this project should include alternatives that avoid impacts to wetlands or other waters of the United States. Every effort should be made to avoid project features which require the discharge of dredged or fill material into waters of the United States.

In the event it can be clearly demonstrated there are no practicable alternatives to filling waters of the United States, mitigation plans should be developed to compensate for the unavoidable losses resulting from project implementation.

Please refer to identification number SPK-2010-00419 in any correspondence concerning this project. If you have any questions, please do not hesitate contacting me.

Travis Morse, Biologist  
Regulatory Project Manager  
U.S. Army Corps of Engineers  
Colorado West Regulatory Branch  
400 Rood Avenue, Room 142  
Grand Junction, Colorado 81501  
(970) 243-1199, ext. 17 FAX: (970) 241-2358 [w.travis.morse@usace.army.mil](mailto:w.travis.morse@usace.army.mil)

web: <http://www.spk.usace.army.mil/regulatory.html>

Let us know how we're doing.  
<http://per2.nwp.usace.army.mil/survey.html>

Information on the Regulatory Program.  
<http://www.spk.usace.army.mil/organizations/cespk-co/regulatory/index.html>

**Walsh, Joseph**

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**From:** Western-FS-EIS\_scoping\_comment@wapa.gov  
**Sent:** Wednesday, April 21, 2010 11:13 AM  
**To:** Western-FS-EIS@wapa.gov  
**Subject:** Western-FS-EIS Scoping Comment Form

Issues, concerns or questions : Replace this text to list concerns or questions you have about the proposed project.

Mail list yes - E-mail : Yes, add me to the mailing list - e-mail

Name : Cindy L. Smith

Representing : EPG, Inc.

Address : 247 South 500 East

City : Salt Lake City

State : Utah

Zip Code : 84102

Fax : 801.746.3596

E-mail address : [clsmith@epgaz.com](mailto:clsmith@epgaz.com)

1006

**Walsh, Joseph**

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**From:** Western-FS-EIS\_scoping\_comment@wapa.gov  
**Sent:** Sunday, April 25, 2010 1:19 PM  
**To:** Western-FS-EIS@wapa.gov  
**Subject:** Western-FS-EIS Scoping Comment Form

Issues, concerns or questions : In the past WAPA has left a mess behind when cutting trees under the power line in the Hightower Area of Grand Mesa. Hundreds of trees have been left blocking ATV Trails under the power line which resulted in users going off trail, making their own route because the existing trail was not navigable. When trees are cut in the winter, WAPA needs to send someone up as soon as the snow melts to clear the trail.

Name : Steve Chapel

Representing : Western Slope ATV Association

Address : P O Box 4283

City : Grand Junction

State : CO

Zip Code : 81502

Fax :

E-mail address : [dirtuser@bresnan.net](mailto:dirtuser@bresnan.net)



Jim Hartman, Environmental Manager  
Western Area Power Administration  
P. O. Box 3700  
Loveland, CO 80539-3003

via e-mail: [Western-FS-EIS@wapa.gov](mailto:Western-FS-EIS@wapa.gov)

May 19, 2010

Dear Mr. Hartman,

The following are the comments of Colorado Wild, Rocky Mountain Chapter of Sierra Club, Wild Connections, Great Old Broads For Wilderness, Center For Native Ecosystems, Quiet Use Coalition, and San Luis Valley Ecosystem Council on the Transmission Line Management Reauthorization Project, as described in the April 8, 2010 Federal Register notice (75 Fed Reg 17913 et seq.; hereafter “FR Notice”), and in additional material distributed to the public.

**I. INTRODUCTION.** The undersigned understand the need to manage vegetation underneath and adjacent to power lines to ensure the safety and reliability of electric transmission. There are, however, a number of issues that must be addressed to ensure that vegetation management does not cause unnecessarily adverse impacts to a variety of resources. They are discussed in the sections below.

We agree with the proposed change in focus from “danger trees”, i. e., cutting trees that are already at risk of falling on power lines, to active management, under which vegetation is treated, to the extent practicable, before it becomes a threat to power line safety and reliability. However, there are likely numerous areas with possible danger trees that would need to be treated before a more integrated treatment strategy could be implemented. The EIS should identify areas that are most in need of treatment, and what kind of treatments might be done in these areas, as well as what might be done in the future in lower priority areas to prevent threats to power lines from developing.

The FR Notice (at 17914) states that WAPA’s use of national forest land, authorized under 36 CFR 251.54, would need to be changed. The EIS should describe what the current authorization allows and requires, and how this would be different under the proposal and any alternatives to it.

The EIS should describe the relationship of this project, if any, to the Emergency Powerline Clearing Project on the Arapaho-Roosevelt, White River, and Routt National Forests, for which the Forest Service issued a scoping notice on August 19, 2009. We assume there is some overlap between the two projects, as

Colorado Wild/Rocky Smith ♦ 1030 Pearl St. #9 ♦ Denver, CO 80203  
[www.coloradowild.org](http://www.coloradowild.org)

The analysis area for th[e Emergency Clearing] project includes all distribution and transmission lines on National Forest System lands, approximately 500 miles, across the Routt, Arapaho and Roosevelt, and White River National Forests.

August 19, 2009 Notice at 1.

**II. KEEP THE CLEARED CORRIDORS TO MINIMUM WIDTHS, CONSISTENT WITH SAFETY AND RELIABILITY.** Clearing trees, and in some cases, other vegetation also, from areas in power line corridors creates a break in the forest canopy and a radical change in the habitat for some wildlife species. See further discussion in section IV below. Clearing the corridor and maintaining it causes other problems also, such as weed introduction and spread, which is discussed further in section VIII below.. The wider the clearing, the greater the impacts.

Therefore, the width of vegetation treatment should be as narrow as possible, consistent with safety and reliability of each line segment. In most cases, the clearing need not be more than the height of the tallest tree plus about 10 percent. On some locations where lines cross steep slopes, the treatment distance might need to be greater than this to prevent trees upslope from the power lines from falling on the lines. (Concomitantly, the clearing distance should then be less on the downhill side of the lines.) Also, additional reduction of vegetation may be needed where the distance between towers is long and the lines could sway a distance outward from the corridor during periods of high wind.

The EIS should be as specific as possible about how treatment would be implemented under each alternative. Granted, the possible or likely treatments for every line segment could not easily be specified. However, the EIS' design criteria need to specify tree-removal widths for power line corridors, and particularly, state under what circumstances and in what areas would clearing distances of more than the tallest tree height plus about 10 percent be expected to be needed or desirable. It is not appropriate or acceptable to state that a large clearing width, applicable everywhere, would be allowed.

To avoid a stark contrast between the surrounding forest and the treated transmission corridors, i. e., a straight line cut, the edges of areas where trees are cleared should be "feathered", i. e., the cutting intensity should gradually transition from full clearing (where needed) to untreated area.

Some forest plans have requirements to minimize visual impacts. Note the following from the management plan for the White River National Forest:

Standard: Vegetation management plans, for new or reissued permits, are designed to minimize and rehabilitate visual impacts.

Guideline: The boundaries of the cut areas bordering utility corridors are blended into the surrounding vegetations in locations visible from key viewpoints.

White River Plan at 3-89, in management area 8.32, Designated Utility Corridors – Existing and Potential. Similarly, the plan for the Grand Mesa-Uncompahgre-Gunnison (GMUG) National

Forest has direction that utility lines must “harmonize with the landscape”. GMUG Plan at III-97. The Arapaho-Roosevelt (A-R) Plan has a guideline with similar language. A-R Plan at 386. Both the White River and GMUG plans direct that, to the extent possible, management in transmission corridors be consistent with that in adjacent management areas. White River Plan, id., and GMUG Plan, id.

These and other requirements of all national forest management plans must be followed.

**III. SLASH TREATMENT MUST BE CAREFULLY DESIGNED.** A major issue in the project will be how to dispose of slash, or logging waste. Cutting trees will produce a sizable volume of unmerchantable material, including tops, branches, and cull logs. In some cases, trees may be too small or too deteriorated to be sold for any product, in which case, entire trees would be “slash”. Most of this material cannot be left on site, as it would result in too high of a fuel loading. Fires in such material could produce a flame high enough to threaten the power lines, especially if the slash was first piled. Even if such fires did not threaten lines, fires in a large slash bed could produce enough smoke to cause arcing, which would result in an interruption of electric transmission.

But removing slash or disposing of it in place would be a challenge. Removing most of it would be quite expensive, requiring many truck trips. Or slash could be skidded away from the power line corridors. But that could cause soil impacts, such as compaction, displacement, and erosion, from dragging logs and the use of heavy equipment to do so. For transport of slash off-site for disposal, there would have to be designated and approved areas for dumping the slash, as it could not be placed anywhere, since doing so could just as easily create a fuel loading problem at the new location.

Burning would cause the problems noted above, especially if the slash was first piled. Also, burning large slash piles or those containing material larger than about three inches in diameter is not a good practice because it creates a long, hot fire that sterilizes the soils beneath it and makes them water-repellent.

Chipping or masticating could be done for a small percentage of the slash, but it would also be expensive. Also, a layer of chips or chunks on the ground would retard or prevent, for a long time, re-establishment of ground vegetation and trees. It might also use up most of the nitrogen in the soil, further retarding the establishment and growth of any vegetation. If chipping or masticating will be deployed, we recommend that no more than about 20 percent of the ground in scattered, small patches be covered with chips or chunks, and the depth should be no more than about two inches for chips and three inches for chunks.

It is desirable to have ground vegetation in power line corridors. Thus some wood in all size classes should be retained on site to reduce soil erosion and gradually decompose into new soil. This would also provide a little shade and help retain moisture, which in turn would facilitate the establishment of ground vegetation. See further discussion in section VIII below. Retained wood should touch the ground so it will decay relatively rapidly and not pose a fuel problem that would threaten the lines.

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In some areas, it might be possible to reduce slash by offering free firewood to the public. But this would not likely remove enough of the material, and it would be limited to areas that were easily accessible via system roads.

In sum, all slash disposal methods have problems of possible resources damage, cost, or possible undesirable effects on the power lines. WAPA and the Forest Service should develop combinations of disposal methods for use on various segments of power lines that would minimize impacts and threats to the lines while sufficiently reducing slash at reasonable cost. The EIS should discuss the benefits and detriments of various slash disposal/reduction methods and combinations of methods. The design criteria should state which methods will be used in which areas or situations, and in what proportions. Monitoring of areas where slash was treated should be done to assess impacts, including any weed introduction and spread (see section VIII below), and to modify future treatments as needed.

**IV. PROTECT RARE WILDLIFE AND PLANTS.** Removal of mature trees and some other vegetation adversely alters habitat for a wide variety of wildlife, and can destroy plant populations. Most affected are likely to be species that depend on, or at least prefer, a continuous forest canopy. These species include, but are not limited to: lynx, marten, goshawk, boreal owl, golden-crowned kinglet, olive-sided flycatcher, and red crossbill.

Lynx are known to avoid large openings; in general they “avoid open areas where security cover is lacking”. Aubry et al, 1999 at 381; citation omitted. Specifically, these authors cite previous work showing that lynx only cross openings that were less than 100 meters wide. Id. It is very important to maintain landscape linkages to ensure connectivity of lynx habitat. Identified and potential linkage areas must be identified and protected. See Ruediger et al, 2000, at 88-90. Corridors where vegetation is cleared to protect power lines in the proposed project area should not ever need to be 100 meters wide.

WAPA needs to work with the Forest Service wildlife biologists to minimize the adverse impact to lynx habitat for all proposed treatment, especially for any wide clearing areas. Consultation with the Fish and Wildlife Service under section 7 of the Endangered Species Act (ESA) will also be necessary if there is a “likely to adversely affect” determination, which there will probably be for some line segments.

All proposed treatment areas should be surveyed by a qualified botanist prior to treatment. Areas with plants that are endangered, threatened, proposed for ESA listing, or Forest Service sensitive, or otherwise known to be rare (such as those identified by the Colorado Natural Heritage Program) must be treated carefully to avoid destroying any plant populations. Rare plant populations must be clearly marked to make it easy for contractors to avoid them. Treatment must also be limited in adjacent areas to allow rare plants to occupy new ground.

For Forest Service sensitive species, both plant and animal, procedures at FSM 2672.42 and 2672.43 must be followed.

**V. LIMIT ROADS USED FOR TREATMENT AND PROHIBIT PUBLIC USE OF THEM.** Vegetation treatment will require roads along most segments of each power line. In most cases, such roads already exist. These roads and any new ones built should be maintained to the lowest standard needed to provide access to treat vegetation and accomplish any other maintenance and repair work, consistent with safety. However, the design and construction of roads must minimize erosion. (For work in perennially wet areas, see additional discussion in section VII below.)

It is important that such roads be closed to public motorized use, unless they have been approved as system routes after a public process. The Forest Service already has a road system larger than it can manage. In some areas, use of motor vehicles on non-system (usually illegally created) routes is a major problem. Allowing, by design or default, public motorized use on roads intended only for power line maintenance would exacerbate this problem, as any such use would not necessarily be limited to the power line roads. Some motorized recreation enthusiasts frequently explore whatever areas they can, regardless of whether such use is legal or appropriate, often causing considerable impacts to soils, water quality and wildlife habitat effectiveness. Where system roads cross power line roads, it may be necessary to block motor vehicle access to the power line roads from the other roads.

All roads not intended to open to public motorized use should be gated and signed closed. Regular patrols by law enforcement officers should occur, especially during big game rifle hunting season, when many road use violations occur. It is important that gates be placed in areas where they are most likely to be effective, i. e., not in cleared or naturally open areas where they can easily be avoided. Rather, gates should be placed in other areas where mature trees or boulders, e. g., would prevent or discourage driving around gates.

Roads in areas where vegetation treatment has been completed and will not likely need to be done again for many years should be obliterated. This would discourage illegal public access.

**VI. PROTECT ROADLESS AREAS.** It is likely that some of the approximately 270 miles of WAPA power lines on Colorado's national forests pass through some roadless areas. While power line corridors in these areas may still need to be treated, any treatment should be done in such a way as to conserve, to the maximum extent possible, roadless area characteristics. These are:

- Roadless area characteristics. Resources or features that are often present in and characterize inventoried roadless areas, including:
- (1) High quality or undisturbed soil, water, and air;
  - (2) Sources of public drinking water;
  - (3) Diversity of plant and animal communities;
  - (4) Habitat for threatened, endangered, proposed, candidate, and

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sensitive species and for those species dependent on large, undisturbed areas of land;

- (5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;
- (6) Reference landscapes;
- (7) Natural appearing landscapes with high scenic quality;
- (8) Traditional cultural properties and sacred sites; and
- (9) Other locally identified unique characteristics.

From the Roadless Area Conservation Rule, 36 CFR 294.11 (2001). This Rule is in effect on Colorado's national forests.

Any treatment within roadless areas should be designed to minimize impacts. New road construction must be minimized. Before any roads are constructed, non-road construction alternatives should be considered. Any roads must be low standard and, if possible, be obliterated after treatment. Road closures must be made effective.

There should be no piling of slash in roadless areas. Weeds must be eradicated.

**VII. CAREFULLY DESIGN TREATMENT IN AREAS NEAR WATER BODIES.** The Federal Register notice states that the project “may involve action in wetlands or floodplains”. FR Notice at 17914. Any activity in wetlands must avoid long- and short-term impacts associated with the destruction or modifications of wetlands. 10 CFR 1022.3(c). See also 10 CFR 1022.14(a). Alternatives that would avoid or mitigate damage to wetlands must be considered. 10 CFR 1022.3(d). The practicality of alternatives to wetland actions and of the mitigation measures must be evaluated with consideration of any public comment. 10 CFR 1022.15(b).

The project may also involve action in riparian areas, those areas immediately adjacent to streams and lakes that show influence of a higher water table. Collectively, riparian, wetland, and floodplain areas are known as the water influence zone (WIZ).

Actions in such areas must be designed to minimize damage to soils, water quality, and non-target vegetation. Generally, heavy equipment, such as tractors, feller-bunchers, log forwarders, etc. commonly used in logging, should be kept out of such areas, as heavy machinery could cause a considerable amount of damage by compacting soils and causing sediment deposition into water bodies.

Trees that need to be cut should hand felled (i. e. by people with chainsaws), then either treated in place or skidded out of the WIZ, if the latter can be done with minimal damage. The exception would be if the fisheries biologist believes that woody debris would create, maintain, or enhance fish habitat, in which case some tree bole sections could be retained in the WIZ or the stream itself. However, logs should not be placed near culverts or bridges, nor in such numbers or configuration that a debris jam could occur.

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The management measures, design criteria, and monitoring requirements in the Forest Service's Watershed Conservation Practices Handbook, FSH 2509.25, must be followed.

**VIII. PLAN TO MAINTAIN OR ESTABLISH SOME VEGETATION IN TREATED TRANSMISSION CORRIDORS, BUT ERADICATE NOXIOUS WEEDS.** While trees and other vegetation that could fall onto power lines need to be treated, ground vegetation must be maintained, and/or reestablished as necessary. Failure to do so would lead to soil erosion and increase the chances of establishment and spread of noxious weeds. Various types of native vegetation, i. e., grasses, forbs, and some shrubs, can be safely grown underneath and adjacent to power lines without fear that they would grow tall enough to interfere with the lines.

A design criterion should require establishment of native vegetation as soon as possible after treatment. It is most important to do so in areas where power lines cross steep slopes, as such locations would have the highest potential for water erosion of soils. While native plant species should be used, sterile, annual, non-native plants can be used while native species are getting established on sites that are difficult to revegetate. All sites where revegetation is necessary need to be regularly monitored to assess the progress of reestablishment of vegetation.

Prior to any treatment in a given power line corridor, there must first be a thorough survey for noxious weeds. Any such plants found should be eradicated, to the extent practical.<sup>1</sup> After treatment, survey and eradication should be done for at least two full growing seasons. There must also be requirements for vehicles used in treatment operations to be washed before they come on to the national forest each day.

**CONCLUSION.** Treating vegetation near power lines to maintain the safety and reliability of electrical transmission is important. However, treatment should be limited to areas and methods that truly reduce existing threats to power lines and/or reduce the likelihood of future threats arising. Areas where vegetation is removed must not be any more than is needed to protect the electrical lines, with a small added safety margin.

Roadless area characteristics must be protected to the maximum degree possible. Effects on habitat for any endangered, threatened, and sensitive species must be minimized. Populations of rare plants must be avoided entirely, and a suitable buffer to allow population expansion must be required. Treatments in wet areas must be limited to protect soils, water quality and vegetation.

Slash disposal/removal must be carefully designed and implemented, and the results monitored. All existing and new roads used for access to treatment areas must be closed to public motorized use unless legally open to such use. Existing weed populations must be eradicated, and new populations must not be introduced.

Sincerely,

---

<sup>1</sup> In some areas, it may not be possible to completely eradicate well-established invasive species such as Canada thistle. But it is important that operations be designed and conducted to ensure there is minimal likelihood of introducing or spreading weeds.

Colorado Wild

1007  
Page 8

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Christine Canaly, Director  
San Luis Valley Ecosystem Council

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Colorado Wild

1007  
Page 9

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[slvwater@fairpoint.net](mailto:slvwater@fairpoint.net)

cc: Dave Loomis, USDA Forrest Service  
Ron Turley, WAPA

#### REFERENCES

Aubry, Keith B., Gary M. Koehler, and John R. Squires, 1999. Ecology of Canada Lynx in Southern Boreal Forests. In: Ecology and Conservation of Lynx in the United States. Leonard F. Ruggiero, Keith B. Aubry, Steven B. Buskirk, Gary M. Koehler, Charles J. Krebs, Kevin S. McKelvey, and John R. Squires. USDA Forest Service RMRS-GTR-30WWW, October, 1999.

Ruediger, Bill, Jim Claar, Steve Gniadek, Bryon Holt, Lyle Lewis, Steve Mighton, Bob Naney, Gary Patton, Tony Rinaldi, Joel Trick, Anne Vandehey, Fred Wahl, Nancy Warren, Dick Wenger, and Al Williamson. 2000. Canada Lynx Conservation Assessment and Strategy. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Missoula, MT.

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1008

# UINTAH COUNTY

**RECEIVED**  
BY JGA | DATE 12 MAY 2010



STATE OF UTAH  
*Our past is the nation's future*

COMMISSIONERS:  
Michael J. McKee  
Darlene R. Burns  
Mark D. Raymond  
ASSESSOR - Rolenne Rasmussen  
ATTORNEY - JoAnn B. Stringham  
CLERK-AUDITOR - Michael W. Wilkins  
RECORDER - Randy J. Simmons  
TREASURER - Wendi Long  
SHERIFF - Jeff Merrill  
SURVEYOR - John Slaugh

May 6, 2010

Mr. Jim Hartman  
Environmental Manager, J0400  
Western Area Power Administration  
PO Box 3700  
Loveland, CO 80538

RE: Western Area Power Administration Right-of-way  
Management and Authorization on Forest System Lands.

Dear Mr. Hartman,

Thank you for the opportunity to comment on the proposed Environmental Impact Statement (EIS) by Western Area Power Administration to improve the way it manages and maintains existing transmission lines on National Forest System lands in Colorado, Utah and Nebraska. Transmission line routes are permanently altered areas; tall trees are not compatible with power lines. Without proper routine management, power outages have occurred. Encroachment of vegetation in the rights-of-ways hinders and causes delays for emergency vehicles. Maintenance of electric utility rights-of-way is necessary to reduce wildfire risk, incorporate multiple use objectives, reduce fuels and ensure safety and reliability.

Uintah County extends its support for this proposed EIS and is always interested in the management, multiple use and safety of the Forest.

Sincerely,

UINTAH COUNTY COMMISSION

  
\_\_\_\_\_  
Darlene R. Burns

  
\_\_\_\_\_  
Michael J. McKee

  
\_\_\_\_\_  
Mark D. Raymond

cc: Mr. David Loomis

COUNTY BUILDING • 152 EAST 100 NORTH • VERNAL, UTAH 84078

Robert Riddle  
Wasatch County, Utah

1009

Public Scoping Meeting  
Western Area Power Administration

**Vegetative Maintenance Design Features:**

**Plants**

Wasatch County encourages utilization of merchantable timber wherever possible and opposes the policy of cutting, loping and scattering timber resources that could be developed into a product.

Forest management plans shall be written and effective management techniques adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative. ( Act of 2003, P.L. 108-148) Efficient and effective use of National Environmental Policy Act Documentation for limited timber harvest will be encouraged. Use of Interim Directive (ID) 1909.15 – 2003-2 will be encouraged for timber harvest projects that do not require further analysis and may be categorically excluded as outlined in categories 12, 13 & 14 of said ID. Opportunities for harvesting forest products shall be promoted.

**Developed Recreation Sites, Trails, Trailheads, and Administrative Sites**

Wasatch County encourages restrictions of corridor access roads to the general public to avoid future impacts to the watershed and to prevent user developed roads within the corridor.

Future access needs must be planned and analyzed to determine the disposition of the road at the completion of its intended life. This is to ensure that needed access is maintained or that such access is removed and resulting disturbances reclaimed.

Access to all water related facilities such as dams, reservoirs, delivery systems, monitoring facilities, communication sites, power line corridors etc., must be maintained. This access must be economically feasible with respect to the method and timing of such access.

**Public Safety**

Wasatch County encourages restriction of corridor access roads to the general public to avoid future impacts to the watershed and to prevent user developed road within the corridor.

Off-highway vehicles should be used responsibly, and the management of off-highway vehicles should be uniform across jurisdictional boundaries. Laws related to the use of off-highway vehicles should be uniformly applied across all jurisdictions.

All necessary action will be taken to protect access. The county will identify and inventory roads and participate with federal and state land management agencies in decision-making regarding site-specific management.

**Riparian Areas, Aquatic Resources, and Water Quality**

Wasatch County encourages utilization of merchantable timber wherever possible and opposes the policy of cutting, loping and scattering timber resources that could be developed into a product.

The management of the watershed should allow for continued multiple use. It should preserve the quality and quantity of water as well as environmental values and allow the watershed to support existing and future uses.

Apply scientifically effective practices to maintain and improve the quality and quantity of desirable plant cover to protect watersheds, timber, and rangelands from soil erosion.

Recognize the Natural Resource Conservation Service (NRCS) soil survey as the authority in matters of soil conservation.



# Western Area Power Administration Transmission Line Management Reauthorization



**Thank you for taking the time to participate in the public scoping process.**  
Please submit your comments at a public scoping meeting or by mail or email by May 26, 2010:

Mail: Jim Hartman, Environmental Manager  
Western Area Power Administration  
P.O. Box 3700, Loveland, CO 80539-3003  
E-mail: [Western-FS-EIS@wapa.gov](mailto:Western-FS-EIS@wapa.gov)

For more information, visit the project website at: [www.wapa.gov/transmission/Western-fs-EIS.htm](http://www.wapa.gov/transmission/Western-fs-EIS.htm)

### Please tell us how we can reach you:

Name: Breanne Glover Organization: \_\_\_\_\_  
Address: 2933A. Bunting Ave.  
City: Grand Junction State: CO Zip: 81504  
Email Address: Brecheesecake23@yahoo.com

Please note that all submissions will be made available for public inspection in their entirety. Your name and address will become part of the public record. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law.

PLEASE PRINT

DATE: 4/23/10

I believe as long as this project doesn't affect wildlife habitat, ground plant growth and reduces the effects of global warming this idea is brilliant and I am in support of it. Colorado is one of the most beautiful states and should be preserved. Teddy Roosevelt would be proud and be in total support of this too, as one of the reasons we have National forests.

Comments can also be sent to: [Western-FS-EIS@wapa.gov](mailto:Western-FS-EIS@wapa.gov)

For more information visit: [www.wapa.gov/transmission/Western-fs-EIS.htm](http://www.wapa.gov/transmission/Western-fs-EIS.htm)

Jim Hartman, Environmental Manager  
Western Area Power Administration  
P. O. Box 3700  
Loveland, CO 80539-3003

Submitted via e-mail: [Western-FS-EIS@wapa.gov](mailto:Western-FS-EIS@wapa.gov)

Dear Sir;

Please accept the following comments ( and examples photos) on WAPA Maintenance and Vegetation Management along existing Western Transmission Line rights of way on CO National Forest System Lands, and Transmission Line Management Reauthorization Project, as described in the April 8, 2010 Federal Register notice (75 Fed Reg 17913 et seq.), and in additional material distributed to the public.  
(found at <http://www.wapa.gov/transmission/Western-FS-EIS.htm>)

We understand a need to have administrative vehicle access routes to WAPA transmission lines for maintenance, inspection and other activities necessary for proper operation of the transmission line. The existence of these routes will have presence effects on the surrounding environment whether they are used or not.

These routes generally receive rather infrequent and low volume use by administrative vehicles, so the actual use effects of these routes on the surrounding environment is minimal. Some routes may only receive administrative use once a month, once a year, or even less. This is compared to the much greater use effects of a route open to unlimited public access like a Forest Service road.

In general, WAPA transmission line access routes were approved under permit for WAPA administrative use only and not open to public use. These routes were generally not designed, constructed or maintained or approved for open public use.

A growing population, advances in OHV technology, increased use of public lands and a lack of signage and education have resulted in what is, in effect, a problem of increased unauthorized use and trespass on WAPA transmission line access routes. Unauthorized public use of these routes results in increased maintenance costs, safety and liability concerns and potential vandalism concerns for WAPA. Unauthorized use of these routes also has numerous individual and cumulative negative effects on the surrounding environment.

We strongly suggest that all transmission line maintenance and right of way (ROW) access routes be properly closed to public vehicle use to limit negative environmental effects. Properly closing transmission line ROW access and maintenance routes to open public vehicle use will have numerous benefits, including but not limited to, reducing the spread of noxious weeds, improving public safety, minimizing resource impacts, minimizing erosion, siltation, sedimentation and impacts to watersheds, minimizing impacts to wildlife and habitat, reducing air and water quality impacts due to vehicle emissions and dust, reducing the chance of vandalism, reducing route maintenance costs and reducing the risk of human caused wildfire.

Unnecessary and unneeded routes in the transmission line right of way should also be revegetated and recontoured to prevent unauthorized use and limit resource impacts and unauthorized vehicle use.

Routes in the transmission line right of way determined to be necessary for administrative maintenance purposes should be properly gated and signed as off limits to public vehicle use. These gates should be locked with only the permit holder and the managing agency having keys. Permit holders and their authorized agents should use these designated routes and the gates so as not to create new routes.

Necessary transmission line administrative routes need to be properly maintained to land management agency specifications reduce impacts to the surrounding environment. Erosion control structures and culverts must be installed and maintained. These necessary routes should be designed, constructed and maintained to only the minimum standards required to accommodate the most common modes and amounts of required access. In other words, a 2 lane paved route is not required for infrequent access when a narrow rough will suffice.

Existing routes within the transmission line right of way that are now open to public use should be evaluated to determine if this public use was determined to be needed and acceptable as the result of a previously documented NEPA decision. There are many instances where improper closure and lack of management on these routes have resulted in land management agencies and the public having the misperception that these routes were open to public use, when in fact they were originally designed and designated as limited access permit roads open only for administrative use. The North Fooses creek route on the USFS Salida District in Colorado is one such route.

We realize the concern with trees possibly interfering with transmission lines because of their height. The removal of all vegetation in a transmission line right of way should be avoided. Some forest dwelling species are very reluctant to

cross open areas and thus a long linear transmission line right of way devoid of cover vegetation acts as a migration barrier to these species. Lynx is one such species that avoids open non-forested areas.

Where possible, appropriate lower growing species (such as willows, other bushes and shrubs, and perhaps aspen) should be left to provide migration corridors across the transmission line right of way to facilitate species movement. Especially in the higher elevations (9000' and up) that lynx prefer, the growth of trees is very slow. It may take 50 or more years for a seedling to grow to a height where it would interfere with a transmission line. Ground dwelling species like lynx may benefit from 50 meter wide sections of younger trees left to grow periodically under a the transmission line right of way. We know that maintenance crews may have a tendency to just clear all trees and brush in the right of way. A few corridors where this does not occur developed and clearly delineated with the help of Forest Service biologists, would go a long way towards preserving and facilitating species migration.

In some high altitude environments areas cleared of vegetation may not naturally revegetate on their own with grasses and such, or it may take years for this to occur. Without adequate vegetation, these areas are susceptible to soil instability and erosion, especially on sloping land. Extra care should be taken to stabilize these slopes, using a combination of water diversion structures and planting of grasses and other plants.

We thank you for the opportunity to comment on this.

Sincerely

*Tom Sobal*

Quiet Use Coalition  
Tom Sobal; Coordinator  
POB 1452  
Salida, CO 81201  
719-207-4130

All WAPA transmission line photos taken from the East side of the Continental Divide near Monarch Pass Chaffee County, CO.

1011



Improperly signed as an open public road, this administrative access transmission line road on the Salida District invites unauthorized public use. (this route is **NOT** on the Salida District Motor Vehicle Use Map, but remains open to public use)



Improperly signed as open, this administrative access road invites unauthorized public use. (this route is *not* on the Salida District Motor Vehicle Use Map)

1011



Steep route eroding due to lack of water and erosion control structures and open unauthorized public OHV use. Public OHV use of a route loosens the tread surface which may contribute to erosion and increased maintenance costs.



Tracks of ATVs, motorcycles and jeeps on a transmission line administrative access route near Salida that is not properly closed to public use.

1011



Recently graded, maintained and smoothed administrative access road under transmission line near Salida. Was this maintenance intended to facilitate easier public access or simply to make administrative access easier?



Surface water ford under transmission line access route. Unauthorized public OHV use of this route where none should occur contributes to unnecessary oil and gas contamination of watersheds.



This transmission line ROW and access road has *presence* effects on habitats, vegetation, water flow, etc. just by being there. Unauthorized public use of this route contributes to additional *use* effects above and beyond that required for administrative access including disruption of natural soundscapes, increased hunting pressure, increased maintenance, etc.



This inadequately closed side spur route off an administrative access road under transmission line is leading to additional unauthorized use by the public on OHVs.

1011



Locked gate at bottom of transmission line admin/maintenance road is supposed to deny public access, but even the permittees never use it, as evidenced by trees growing in road bed. Permit holders also access the transmission line admin./maintenance road by bypassing gate and using route on the left in next photo. This is route 225.B on the Salida District.



Road 225.B is an administrative permitted transmission line admin./maintenance road beyond this point on the Salida District. There is a locked gate to the right on this switchback which is supposed to deny public access to the power line road. The public bypasses this gate and cuts the switchback where the gate is to gain unauthorized access to 5 miles of road under the transmission line.

1011



Access road contributing to erosion



ROW, cleared area without vegetation and the road are all contributing to soil instability on this slope. This is leading to erosion. Extra care should be taken here at this high altitude location to ensure that vegetation and water diversion structures are installed to adequately stabilize the soil.

1011



Unauthorized public use and insufficient maintenance and water diversion structures contributing to erosion on access road.





Spur route for transmission line access branching off designated Forest road 225.A. Side spur routes like this should be gated or at least signed as "Administrated route No public access" to prevent unauthorized use.

1011



Another spur route branching off designated road and leading to transmission line tower. Does WAPA really want people camping under their towers?

**Walsh, Joseph**

---

**From:** Jim Hartman [HARTMAN@wapa.gov]  
**Sent:** Wednesday, May 26, 2010 2:07 PM  
**To:** Walsh, Joseph; Terry, Madeline  
**Cc:** David E Loomis  
**Subject:** WESTEIS: Request from Bureau of Reclamation--addition to project mailing list

Please add the following person to the mailing list for this project:

Mr. Howard Bailey  
Safety and Security Specialist  
Eastern Colorado Area Office  
Bureau of Reclamation  
11056 W. County Road 18E  
Loveland, CO 80537-9711  
970-962-4355



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Utah State Office  
P.O. Box 45155  
Salt Lake City, UT 84145-0155  
<http://www.blm.gov/ut/st/en.html>



**RECEIVED**  
BY *[Signature]* DATE 28 JUN 2010

IN REPLY REFER TO:  
1610 / 2800  
(UT-935)

James Hartman  
Environmental Manager  
Rocky Mountain Regional Office  
Western Area Power Administration  
P.O. Box 3700  
Loveland, CO 80539-3003

JUN 24 2010

Dear Mr. Hartman:

In response to the April 8, 2010 Notice of Intent to prepare an Environmental Impact Statement (EIS) and conduct scoping meetings for Maintenance and Vegetation Management Along Existing Western Area Power Administration (WAPA) Transmission Line Rights-of-way on National Forest System Lands in Colorado, Utah, and Nebraska, the Utah Bureau of Land Management (BLM) has reviewed WAPA transmission line rights-of-way on BLM administered lands and has determined that WAPA currently has a minimum of five authorized rights-of-ways encompassing about 895 acres of public lands within the BLM Vernal Field Office area.

Since the vegetation management decisions to be made through the subject EIS may also be applicable to BLM administered lands that are closely associated with Forest Service administered lands, the Utah BLM requests the opportunity for review and comment on the administrative draft descriptions of the alternatives and analysis of environmental consequences for the DEIS. Utah BLM also requests to be on the mailing list for the Draft EIS.

Please send the requested information to the BLM Utah State Office, 440 West 200 South, Suite 500, Salt Lake City, Utah 84101-1345; Attention Lisa Bryant. Lisa may be reached at (801) 539-4069, or by e-mail at [Lisa\\_Bryant@blm.gov](mailto:Lisa_Bryant@blm.gov).

Thank you for the opportunity to participate in the development of the EIS.

Sincerely,

Donald R. Banks  
Deputy State Director,  
Natural Resources

cc: Robert Stewart, OEPC, Denver, CO (ER 10/333)  
Loretta Sutton, OEPC, Washington DC (ER 10/333)

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