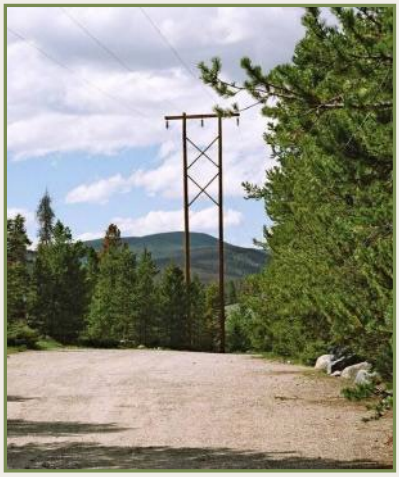
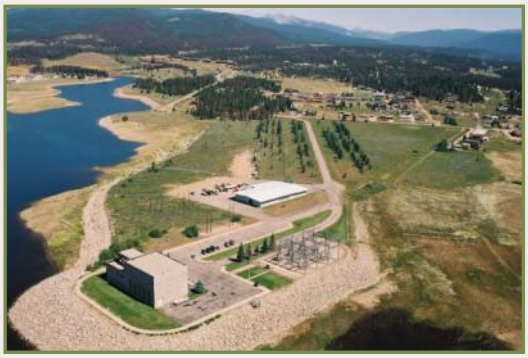
GRANBY PUMPING PLANT SWITCHYARD – WINDY GAP SUBSTATION TRANSMISSION LINE REBUILD, GRAND COUNTY, COLORADO

DOE/EIS-0400

Final Environmental Impact Statement
Appendices





Western
AREA POWER
ADMINISTRATION

Grand County, Colorado
June 2013

Grand County
Colorado

Appendix A
EIS Scoping Report

GRANBY PUMPING PLANT – WINDY GAP TRANSMISSION LINE REBUILD PROJECT ENVIRONMENTAL IMPACT STATEMENT

SCOPING SUMMARY REPORT

December 4, 2007

FINAL

Prepared for
Western Area Power Administration

1.0 INTRODUCTION

Western Area Power Administration (Western) is preparing an Environmental Impact Statement (EIS) for the Granby Pumping Plant – Windy Gap Substation Transmission Line Rebuild Project (GPP-WG). Western is a power marketing agency of the U.S. Department of Energy (DOE). The EIS will be prepared in accordance with the National Environmental Policy Act (NEPA) and DOE Implementing Procedures (10 CFR 1021). The EIS will address the environmental effects associated with siting, constructing, operating, and maintaining the transmission line and associated facilities.

Western is the lead Federal agency for the NEPA process. The U.S. Forest Service is a cooperating agency. The Bureau of Land Management and Grand County, Colorado have requested cooperating agency status (status pending at time of draft). Other project participants include Tri-State Generation and Transmission, Inc. (Tri-State), Mountain Parks Electric, Inc. (MPEI), and the Northern Colorado Water Conservancy District (NCWCD).

This Scoping Summary Report describes scoping and public involvement activities conducted as part of the NEPA process for the proposed project. Specifically, this scoping summary report:

- Describes coordination with Federal, state, and local agencies; Native American tribes; other interested parties, including the public, on the scope of actions.
- Provides information about the public scoping meeting.
- Lists and summarizes all comments received, consolidated by topic (comments submitted verbally, by website, fax, email, or U.S. mail).

1.1 Description of Project

The transmission system in the Granby-Grand Lake area is currently fed by two 69-kV transmission lines: one from the west at Windy Gap Substation (near Granby) and one through the Alva B. Adams Tunnel (Adams Tunnel) from the east at Mary's Lake Substation (Estes Park). This two-way feed arrangement allows the three substations (Granby, Granby Pumping Plant, and Willow Creek Pumping Plant) to be fed from the Windy Gap Substation, Mary's Lake Substation, or both.

Substations receiving electricity from more than one source create "looped" (two-way) systems, which are more reliable than if "radially" (one-way) fed from a single source. Substations fed from a two-way system can remain in service as long as at least one of the lines feeding the substation remains in service, whereas one-way feed substations are out of service whenever the single line feeding them is out of service.

The electric cable in the Adams Tunnel between Estes Park and Grand Lake has exceeded its predicted useful life (40 years) and, upon failure, will not be replaced. The failure of the cable will leave 6,750 Mountain Parks Electric (MPEI) customers with only a one-way transmission supply. Without the completion of this project, these customers risk extended power outages,

especially during adverse winter weather and periods of line maintenance, due to the lack of an alternate transmission circuit to supply the area. Installing a double-circuit line from the Windy Gap substation to the Granby, Granby Pumping Plant, and the Willow Creek Pumping Plant substations will address the electrical deficiencies that will be created when the cable fails.

The proposed project would rebuild and upgrade approximately 12 miles of existing single-circuit 69-kV line as a double-circuit 69/138-kV transmission line. A new substation would be built at the Granby Pumping Plant to accommodate the second line and a new power transformer. A new line connection would be added at the Windy Gap Substation to accommodate the second circuit.

The project would ensure that the electrical system in the area would continue to operate within established electrical criteria during motor starting operations at Granby and Willow Creek Pumping Plants. Engineering studies indicate that once the Adams Tunnel cable is out of service, the voltage drop upon starting the pumping plant motors will exceed acceptable limits by the year 2010, if load growth in the area continues at the current rate. The purpose of this project is to:

- Provide a second power source to the Grand Lake-Granby area before the failure of the Adams Tunnel cable.
- Continue to provide reliable, looped transmission supply to MPEI customers in advance of the Adams Tunnel cable failure.
- Ensure that the area's electric system will continue to operate within acceptable voltage criteria while accommodating future load growth in the area and the operations of the pumping plants.
- Allow Tri-State to serve its local member (MPEI) with reliable power.
- Allow Western to provide reliable service to the area.
- Replace a 60-year old transmission line and meet safety requirements by building line to be compliant with the current NESC.

1.2 Project Background

In 2005, Western began preparation of an Environmental Assessment (EA) as the appropriate level of NEPA compliance for the proposed Granby Pumping Plant – Windy Gap transmission line rebuild. Two public meetings, intended to inform the public of the project, the environmental analysis process, and to invite public feedback, were held in July 2005 and November 2006. Prior public meeting summaries are included in Attachment A. Based on a review of numerous public comments and public concern regarding the potential for significant impacts, Western determined that an Environmental Impact Statement (EIS) would instead be the appropriate level of analysis and compliance.

A Notice of Intent (NOI) to prepare an EIS was published in the Federal Register on August 10, 2007. The NOI invited public participation in the EIS scoping process and solicited public

comments on the scope and content of the EIS. Formal public scoping for the EIS was initiated with the publication of the NOI and ended on September 17, 2007. The NOI is included in Attachment B.

2.0 SCOPING ACTIVITIES

2.1 Scoping Process

The National Environmental Policy Act (NEPA) defines the process of scoping as "an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action," (40 CFR 1501.7). As the lead agency, Western is responsible for the following actions as part of the scoping process:

- Invite the participation of affected Federal, state, and local agencies, any affected Indian tribe, the proponent of the action, and other interested persons (including those who might not be in accord with the action on environmental grounds), unless there is a limited exception under Sec. 1507.3(c). An agency may give notice in accordance with Sec. 1506.6.
- Determine the scope (Sec. 1508.25) and the significant issues to be analyzed in depth in the EIS.
- Identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3), narrowing the discussion of these issues in the statement to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere.
- Allocate assignments for preparation of the EIS among the lead and cooperating agencies, with the lead agency retaining responsibility for the statement.
- Indicate any public environmental assessments and other EISs which are being or will be prepared that are related to but are not part of the scope of the impact statement under consideration.
- Identify other environmental review and consultation requirements so the lead and cooperating agencies may prepare other required analyses and studies concurrently with, and integrated with, the environmental impact statement as provided in Sec. 1502.25.
- Indicate the relationship between the timing of the preparation of environmental analyses and the agency's tentative planning and decision making schedule.

2.2 Scoping Coordination

Scoping activities for the Granby Pumping Plant – Windy Gap Substation Transmission Line EIS included the publication of an NOI in the Federal Register; notification of stakeholders by U.S. mail and phone; a public scoping meeting; and correspondence with potentially affected Federal, state and local agencies and Tribes.

The following Federal, state, and county agencies and Native American tribes were notified of the EIS. See Attachment C for local and municipal agencies, including Chambers of Commerce, sanitation districts, and utility providers that were notified of the project.

- Colorado Department of Agriculture
- Arapaho and Roosevelt National Forest, U.S. Forest Service
- Cheyenne and Arapaho Tribes of Oklahoma
- Northern Arapaho Business Council
- Arapaho Language and Cultural Commission
- Northern Ute Tribe
- Grand County Planning and Zoning and Commissioners
- Kremmling Field Office, Bureau of Land Management
- Southern Ute Indian Tribe
- State Historic Preservation Officer, Colorado Historic Society
- Rocky Mountain National Park, National Park Service
- Northern Arapaho Tribe
- Colorado Department of Transportation
- Ute Mountain Ute Tribe
- U.S. Fish and Wildlife Service
- Northern Cheyenne Tribal Council
- Colorado Division of Wildlife
- Uintah and Ouray Tribal Business Council
- Shoshone Tribe Business Council
- Colorado State Engineer's Office

Following publication of the NOI, the Bureau of Land Management (Kremmling Field Office) and Grand County requested cooperating agency status (status pending at time of this report). The Northern Cheyenne Tribe Tribal Historic Preservation Office requested on-site consultation. Western is coordinating the requested on-site consultation for late 2007. The National Park Service, Colorado Division of Wildlife, U.S. Bureau of Reclamation, U.S. Fish and Wildlife Service, and Environmental Protection Agency submitted comment letters and requested to be kept informed of project progress. Throughout the EIS process, consultation with each of these agencies will be conducted as necessary.

Additionally, Western compiled a list of private stakeholders from property records searches, prior project mailing lists, and interested parties and/or persons that requested to be notified of the project. Attachment C contains a list of stakeholders notified during the EIS scoping process. Example stakeholders include, but are not limited to: interested individuals and local businesses, potentially affected landowners, special interest groups, and news media.

Throughout the EIS process, Western is maintaining a project website (http://www.wapa.gov/transmission/infragranby.htm). The project website provided advance notice of the scoping meeting, meeting materials presented at the scoping meeting (posted after the meeting), background information and maps, and an online comment form.

2.3 Scoping Meeting

Western conducted one EIS scoping meeting on August 30, 2007 from 4–7:00 pm at the Mountain Parks Electric, Inc. office in Granby, Colorado. Public meeting notices and requests for public input were published in *Sky-Hi News*, the local newspaper in August 2007, prior to the August 30th meeting. A copy of the newspaper notice is included in Attachment D.

Western selected an open house format for the meeting. Large-format informational displays and take-home fact sheets provided information about the project. A large aerial-based map showing parcel boundaries and depicting the alternative corridors facilitated discussion with landowners and interested individuals to identify specific property issues and concerns.

Western staffed the scoping meeting with approximately 12 project representatives who could respond to public comments and questions, including Western's NEPA project manager, two realty specialists, the project electrical engineer, and a public information specialist. EDAW, the consulting firm contracted with Western to assist in the development of the EIS, staffed the meetings with their project manager, assistant project manager, visual resource specialist, and wildlife biologist. Additionally, Tri-State and NCWCD staff was available for questions.

The project representatives and meeting facilitators present included:

Mark Kueny, Western
Rodney Jones, Western
Ruthette Kennedy, Western
Carey Ashton, Western
Randy Wilkerson, Western
Tom Friar, NCWCD
Bruce Meighen, EDAW
Jeremy Call, EDAW
Molly Cobbs, EDAW
Diana Leiker, EDAW
Sonia Kim, Tri-State

Approximately 26 individuals attended the August 2007 scoping meeting. Landowners with residential land in proximity to the alternative corridors were the primary attendees. Other meeting participants included representatives from the National Park Service (NPS), local government officials, electrical utility representatives, media, and business owners. The sign-in sheets from the meeting will be used to update the project mailing list (Attachment F).

3.0 COMMENTS RECEIVED

Western received approximately 200 comment forms, letters, emails, and faxes throughout the pubic scoping period, as well as verbal comments. After the meetings, representatives responded to queries from commenters that could not be addressed at the meetings. All original comment letters, forms, and scoping meeting sign-in sheets will be maintained in the project record.

Western distributed an official comment form including a checklist of issues and resources to be marked as important when evaluating the transmission line alternatives (Attachment E). The most frequently marked topics on the official comment form checklist were visual effects,

proximity to residences, and land use. Health and safety, physical issues (weed control, erosion), biological issues (wildlife habitat, wetlands), and historic or cultural resources were also noted as important. The form also included space for handwritten comments and questions.

All comments received were reviewed by Western and sorted into one of four categories based on how they will be addressed in the EIS: Topics to be Considered in the EIS, Comments to be Analyzed as Cumulative Effects, Comments on Process and Public Involvement, and Comment on Alternative Corridors. Comments appearing multiple times have been grouped into a single statement. These following summarized statements will be used to focus the scope of the EIS.

3.1 Topics to be Considered in the EIS

The following summary statements pertain to the project description and Purpose and Need statement:

- Outline local benefits of project
- Address the perception that transmission line rebuild would only benefit water pumping, large water projects, and Front Range water users
- Provide clarification on whether there is any connection between Windy Gap Firming Project and GPP-WG Rebuild
- Provide clarification on the decision and need for upgraded voltage
- Consider the national initiative to provide “green power”
- Stress the financial responsibility of NCWCD to partially fund the line
- Outline the premise of the project (e.g., feasibility and engineering studies on rebuilding Adams Tunnel cable)

The following summary statements are resource specific. Western will consider the direct, indirect, and cumulative effects of the project on each of the resources listed below. The comments provided will help to identify the potential scope of impacts as well as to identify previously unconsidered impacts or concerns.

Visual

- Consider visual impacts throughout valley
- Refine photosimulations and viewshed analyses

Wildlife & Vegetation

- Consider the effects on:
    - Greater sage grouse
    - Winter range for elk and mule deer; recommend no activities between November and April

    - Spread of non-native plants and noxious weeds
    - Migratory birds
- Provide more information regarding reclamation efforts on the existing ROW (e.g., revegetation plans)

Human Health and Safety (Electromagnetic Fields)

- Consider:
    - Health impacts
    - Interference with electronic devices
    - Potential EMF impacts on cattle

Land Use

- Evaluate outcomes of the BLM-NCWCD Land Exchange
- Assess floodplain risks
- Consider impacts to airports/pilots
- Consider impacts to rural character of community and county
- Review project consistency with Grand County Zoning and Three Lakes Design Review Area
- Consider impacts to existing and proposed conservation easements
- Consider increased fire risk at Cutthroat Trout Bay Campground and CR64
- Consider impacts to local real estate sales
- Concerns regarding towers placed near irrigation ditches
- Consider new subdivisions planned in/near alternative corridors

Socioeconomics

- Evaluate cost differences between above and below ground alternatives and the strategies/tactics for funding each
- Consider costs to the consumer
- Assess impacts to tourism/socioeconomics as a result of diminished views and changed rural character
- Assess impacts on local fire protection and school districts as a result of devalued properties (decrease in property tax)
- Provide comparisons with other mountain towns that have buried lines
- Evaluate tax consequences to local citizens

Wetlands/Fens

- Consider potential impacts to fens

Cultural

- Consider the importance of preserving cultural sites and heritage resources

Recreation

- Consider
    - Impacts to recreation experiences
    - Impacts to model airfield southwest of Willow Creek Reservoir
    - Keeping the line out of the ANRA; removing line from the ANRA

3.2 Comments to be Analyzed as Cumulative Effects

These comments will be used to develop the parameters for the cumulative effects analysis in the EIS, particularly with respect to present and reasonably foreseeable future actions and concerns within the project area.

- Consider the effects of:
    - Local pine beetle epidemic
    - Ongoing development in valley, particularly with respect to culture, character, and visual resources
    - The proposed transmission line and beetle kill (dead stands) on wildlife
    - Beetle kill and forest stand removal on visual resources (opening viewscape)

3.3 Comments on Process and Public Involvement

These comments will be used to enhance future public involvement activities and improve the process for public comment and communication.

- Provide additional opportunities to comment
- Provide explanation as to why the process taking so long

3.4 Comments on Alternative Corridors

These comments will be considered when refining project alternatives, including routing considerations and construction methods.

- Consider burying the lines underground, in tunnels, or on the lakebed of Lake Granby

- Provide more information on the proposed access roads and infrastructure needed for line construction and maintenance
- Provide additional information on what will become of the line to Estes Park. Will it be disabled or left in-tact?
- Consider impacts of undergrounding cable including extensive excavation, ground disturbance, and the need for continuous access

3.5 Summary

The EIS will address impacts of the proposed project and a range of reasonable alternatives that achieve the purpose and need of project. The list of issues contained in this report is a compilation of comments received during the EA and EIS scoping periods. Western will use the public scoping comments and information received to help define the scope of potential environmental issues, refine project alternatives, and identify mitigation measures associated with the project. In addition, based on comments received during scoping, the project Purpose and Need will be restated to further clarify 1) the central reasons for pursuing the project and, 2) the local benefits of the project.

4.0 ATTACHMENTS

Attachment A – Environmental Assessment Public Meeting Summaries
Attachment B – Federal Register Notice of Intent
Attachment C – Project Mailing and Notification List
Attachment D – Public Meeting Notice
Attachment E – Official Comment Form
Attachment F – Public Meeting Sign-in Sheets
Attachment G– Categorized Public Comments

Attachment A
Environmental Assessment Public Meeting Summaries

Public Scoping Meeting Summary
July 28, 2005

I. Background

The Western Area Power Administration (Western) owns and operates a 12-mile, 69,000 volt (69-kV) electric transmission line in Grand County, Colorado that originates at Windy Gap Substation, located immediately northwest of the intersection of U.S. Highway 40 and Colorado State Highway 125 (Map 1-1). The single circuit, wood pole, H-frame transmission line generally runs northeast along U.S. Highway 34 and terminates at the Granby Pumping Plant Switchyard at the end of County Road 64. Portions of the existing transmission line are adjacent to the western shoreline of Lake Granby. The Study Area includes tracts of Bureau of Land Management (BLM) land managed by the Kremmling Field Office, United States Forest Service (Forest Service) land managed by the Arapaho National Forest including portions of the Arapaho National Recreation Area (ANRA), Colorado State land, and private land.

The Alva B. Adams Tunnel (Adams Tunnel) is a water diversion tunnel routed under the Continental Divide between Estes Park and the Town of Grand Lake. The tunnel carries a 69-kV transmission line in the form of an electric cable owned by the Bureau of Reclamation (BOR) and operated by Western. This cable currently provides a second source of electrical power to the Grand Lake-Granby area by allowing looped transmission service between the Estes Park and Windy Gap substations. The Adams Tunnel cable has exceeded its predicted useful life (40 years) and, upon failure, will not be replaced. The Granby Pumping Plant – Windy Gap transmission line rebuild project is being proposed to address the electrical deficiencies that will be created when the cable fails.

II. Purpose and Need

The failure of the Adams Tunnel cable system will leave large parts of the Mountain Parks Electric (MPEI) system with only a one-way or radial transmission supply. The portion of the MPEI system affected by this transmission system includes members in the areas extending from the west side of Rocky Mountain National Park on the north, to the YMCA Snow Mountain Ranch on the south, and from Byers Canyon on the west to the Arapaho National Recreation Area/Continental Divide on the east. Included in this area are the towns of Hot Sulphur Springs, Granby, and Grand Lake, as well as hundreds of customers in rural parts of the area, particularly along the U.S. Highway 34 corridor. Without completion of this project, 6,750 MPEI customers risk extended power outages especially during adverse winter weather due to the lack of alternate transmission circuits to supply the area. This would affect the Northern Colorado Water Conservation District (NCWCD) and MPEI customers served by these facilities.

The project would ensure that the electric system in the area will continue to operate within established electrical criteria during motor starting operations at Granby and Willow Creek pumping plants. Engineering studies indicate that once the Adams Tunnel Cable is out of service, the voltage drop when starting motors at Willow Creek Pumping Plant will exceed acceptable limits by the year 2010, if load growth in the area continues at the current rate.

Grand County is one of the fastest growing counties in Colorado. Between 1990 and 2003, Grand County experienced a 63% increase in population (CODO website, U.S. Census Bureau). Similarly, the number of housing units in Grand County increased 35% between 1990 and 2003. Between 1990 and 2000, the towns of Grand Lake and Granby experienced population increases of 72.6% and 57.9%, respectively (CODO website, U.S. Census Bureau). Population growth projections suggest that Grand County will experience a 125% increase in population by the year 2030. Electrical load demand is expected to increase, commensurate with county population growth projections.

The purpose of this project is to:

- Provide a second source of power to the area between Grand Lake and Granby before the failure of the 69-kV Adams Tunnel cable.
- Continue to provide reliable, looped transmission supply to MPEI customers in advance of the Adams Tunnel cable failure.
- Ensure the electric system in the area will continue to operate within acceptable voltage criteria while accommodating future load growth and the operations of the Farr (Granby) and Willow Creek pumping plants.
- Allow Tri-State Generation and Transmission (Tri-State) to serve its local member (MPEI) with reliable power.
- Allow Western to serve customers in the area in a reliable manner.
- Replace a 60-year old overhead transmission line and add shield wires for improved lightning protection.

The parties involved include Western, U.S. Forest Service (USFS), Tri-State Generation and Transmission (Tri-State), MPEI, and Northern Colorado Water Conservancy District (NCWCD).

III. Public Scoping Meeting

A public scoping meeting was held on July 28, 2005 at the Grand Lake Fire Protection District to identify issues early in the project. Individual notification letters were sent to property owners within 500 feet of any potential alignment corridor. Newspaper advertisements, letters to government officials, local articles and fliers were also used to notify the public. Thirty-one people attended the meeting. At the meeting, attendees were asked to visit informational stations to learn about the project. Attendees participated in interactive activities to identify issues, objectives and alternatives, and were given comment sheets. Western, MPEI and USFS staff were available to answer questions and receive comments from attendees. All attendees were encouraged to sign up for the project mailing list to stay informed of the project's progress.

A. Purpose, Need and Issues Comments

During the public meeting, attendees participated in an issue identification exercise; each person was asked to write specific issues or concerns that the EA should address. If a comment was already on the presentation boards, participants placed a green or red dot (sticker) next to the

comment to indicate whether they agreed or disagreed with the statement. Participants also added comments under the statements to explain why they thought it was important.

Comments received on the Purpose and Need statement focused on who will benefit from the power upgrades. Western staff restated that the primary purpose of the project is to ensure reliable power to local residents. The other issues identified ranged from wildlife protection to private property impacts.

B. Data Maps

Comments received on the data map included:

- The elk winter and production area shown on the map extends east, to the west side of Table Mountain.

C. Alternative Map Comments

Attendees were asked to comment on the maps showing preliminary alternative concepts. Many attendees liked Alternative C and the concept of removing the line from its current location, as well as the consolidation of lines. Attendees also liked the concept of removing lines from highly visible areas near U.S. Highway 34. Other attendees liked the concept of moving the existing line, because it is in close proximity to a number of residences and passes through the center of a subdivision.

Numerous attendees disliked Alternative C, because it relocated the existing line to a new location. Their concern focused on the new route and impacts to viewshed and property values.

Several people were concerned that both Alternatives B and C include a larger right-of-way and greater tower heights than current conditions. This could result in the removal of homes in Alternative B as well as impacts to visibility.

Other comments on the map included the need to bury the line.

IV. Comment Forms, Letters and Emails

In addition to comments received at the meeting, other comments were received from emails, letters and comment forms. A general summary of comments are found below, organized by comment subject. All comments, original letters, emails and comment forms are contained, in their entirety, in the project record.

Alternatives

- Remove existing lines if not needed
- Consolidate existing lines
- Upgrade lines to meet existing National Safety Code standards
- Need construction standards for new transmission lines
- Need to bury the line

- Bury the line near or under Lake Granby
- Use only wood poles
- The cost to bury the line will be absorbed by rate payers
- How is the power allocated?
  - Local residential
  - Local commercial
  - Power to pump Grand County water out of the county?
- Since power is used to pump water out of the county, recipients can contribute to the cost of burying the line
- Support for relocating the existing line
- Support for consolidating multiple lines
- Support for moving the existing line from in front of the lake
- Support for burying the line
- Support for replacing the existing line (no change to the existing environment), this will minimize impacts to new areas
- It was stressed that Western should reevaluate the cost of burying the line and not just choose the low cost option
- Restate who is benefiting from the line and the need to break out power consumption need by residents, commercial, Granby Pumping Plant and other consumers
- What percent of power will be going outside of Grand County?
- Overall, support the purpose and need
- A new monopole facility located in the current ROW, higher off the ground, would be an improvement
- The existing ROW was legally obtained, so we should use it
- Existing residential developments have long since accommodated the existing power transmission facility
- It is a time-honored and proven tenet of land use planning and development that utilities share a common "corridor," where possible. Such has been the case for decades, with the existing subject ROW, over most of its length along the east side of Table Mountain, paralleling Highway 34.
- Support an Environmental Impact Study instead of and Environmental Assessment
- Relocate a portion of the reroute at the bottom of Lake Granby
- Concerns about whether the alignment can be modified
- Need for assurance that the existing line will be removed
- Concern on how one line will be added and another removed
- Need assurance that the ROW will be vacated if the line is removed
- Need assurance that the vacated ROW will be restored
- Would a wider easement be needed if the existing line is upgraded?
- Acknowledgment that an upgrade is necessary under Alternatives B or C
- The benefit of forward thinking, of providing power to the area
- What other agencies will be involved (e.g., FERC)?
- What is the level of permitting that is required?

- How will decisions be communicated to the public?
- Reconstruct the line in the Adams Tunnel
- Thanks for doing the public meeting
- Need to improve public notification
- Evaluate the option for use of the existing pipeline between Windy Gap and Lake Granby for the installation of a cable system to carry the proposed electrical transmission lines

Wildlife

- Minimize impacts to wildlife
- Impacts to wildlife should be evaluated
- Avian collisions
- Effect on deer and elk winter range
- Effect of creek crossings on brook trout
- Effects on wildlife, fish and plant Threatened, Endangered and Sensitive species (TES) and other species of concern
- Soil erosion and disturbance to vegetation will impact aquatic resources
- Potential impacts to threatened, endangered and sensitive species
- Potential impacts to species of concern, including greater sage grouse
- Concerned about impacts to undisturbed rural landscape and wildlife
- Potential of adverse impacts to wildlife, including critical wintering habitat and migration routes

Visual

- Visual effects in Grand County
- Impacts to viewsheds need to be evaluated (including within and adjacent to USFS lands)
- It is believed there are elements of the project that are inconsistent with criteria in the Three Lakes Design Review Area (Section 14.5) of the Grand County Zoning Regulations
- Need for visual modeling
- Concern over the size of poles and visibility of poles
- Potential improvements of views to the lake with removal of the existing line
- Concern with compliancy with the Grand County Master Plan
- The need to limit site disturbance and vegetation clearing that is visible from residential developments and public roads by means of minimizing clear-cut widths and other established landscape techniques, such as a revegetation plan
- Ensure compliance with the Grand County Zoning Regulations – Section 14.5. Three Lakes Design Review

Fire

- Effect on planned Table Mountain burn (NF lands)
- Consider fire hazards - wooded vs. grassland

Public Safety

- Impact to public safety
- Concern over the safety effects from EMF to existing residents if the existing line was rebuilt

Cultural

- Potential disturbances to significant paleontological or cultural sites
- Ensure the protection of historic and archeological sites

Recreation

- Impact on recreation sites
- Impacts to the Arapaho National Recreation Area should be analyzed (wildlife and visual), which was established for its cultural and scenic value

Land Use

- Consider the effects on property values if the line is relocated
- Concern over loss of property values if the existing line was rebuilt
- Impacts of reroute to property values and future home construction
- Consider existing and planned land uses

Wetlands

- Potential impacts to wetlands and fens

Socioeconomic

- The need to protect the County's rural character while maintaining the economy by providing reliable, cost-effect electrical services
- Ensure that new development is served by adequate infrastructure by enhancing system reliability

V. Additional Information

For more information or to provide comments, please contact:

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970-461-7371

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970-887-4136

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GRANBY PUMPING PLANT – WINDY GAP TRANSMISSION LINE REBUILD PROJECT ENVIRONMENTAL ASSESSMENT

PUBLIC MEETING #2
MPEI COMMUNITY ROOM, GRANBY, COLORADO
NOVEMBER 15, 2006 4-7PM

Background

The transmission system in the Granby-Grand Lake area is currently fed by two 69-kV transmission lines: one from the west at Windy Gap Substation (near Granby) and one through the Alva B. Adams Tunnel (Adams Tunnel) from the east at Mary's Lake Substation (Estes Park). This two-way feed arrangement allows the Granby, Granby Pumping Plant, and Willow Creek Pumping Plant substations to be fed from the Windy Gap Substation, Mary's Lake Substation, or both.

Substations receiving electricity from more than one source create "looped" (two-way) systems, which are more reliable than if "radially" (one-way) fed from a single source. Substations fed from a two-way system can remain in service as long as at least one of the lines feeding the substation remains in service, whereas one-way feed substations are out of service whenever the single line feeding them is out of service.

The electric cable in the Adams Tunnel between Estes Park and Grand Lake has exceeded its predicted useful life (40 years) and, upon failure, will not be replaced. The failure of the cable will leave 6,750 Mountain Parks Electric (MPEI) customers with only a one-way transmission supply. Without the completion of this project, these customers risk extended power outages, especially during adverse winter weather and periods of line maintenance, due to the lack of an alternate transmission circuit to supply the area. Installing a double-circuit line from the Windy Gap substation to the Granby, Granby Pumping Plant, and the Willow Creek Pumping Plant substations will address the electrical deficiencies that will be created when the cable fails.

Purpose and Need

The project would ensure that the electrical system in the area would continue to operate within established electrical criteria during motor starting operations at Granby and Willow Creek Pumping Plants. Engineering studies indicate that once the Adams Tunnel cable is out of service, the voltage drop upon starting the pumping plant motors will exceed acceptable limits by the year 2010, if load growth in the area continues at the current rate. *The purpose of this project is to:*

- Provide a second power source to the Grand Lake-Granby area before the failure of the Adams Tunnel cable.
- Continue to provide reliable, looped transmission supply to MPEI customers in advance of the Adams Tunnel cable failure.
- Ensure that the area's electric system will continue to operate within acceptable voltage criteria while accommodating future load growth and the operations of the pumping plants.
- Allow Tri-State to serve its local member (MPEI) with reliable power.
- Allow Western to provide reliable service to the area.
- Replace a 60-year old transmission line and add shield wires for improved lightning protection.

Public Open House

The first public meeting was held in Grand Lake on July 28, 2005. Western received feedback on the preliminary alternatives and the aspects of the project area's unique natural environment. As a result of the input received at the first meeting, the project team decided to delay the project in order to best address

public comments through additional resource analyses, including additional visual, recreation and wildlife studies, and alternative considerations.

Since the public meeting in July 2005, Western's primary goal has been to better understand the affected resources and refine alternatives. The purpose of the November meeting was to share the results of the additional studies and solicit input on the project alternatives. The input received from this round of public consultation will enable us to evaluate our proposed and alternative actions.

The November 2006 meeting format was intended to promote informal interaction between project personnel and the interested public, with exhibits and opportunities to make written and verbal comments. Meetings attendees were invited to visit numerous presentation boards to learn about the background, existing conditions, issues, and alternatives, and to provide their input to Western and USFS representatives and the consulting team. Attendees provided their input directly on the boards, to representatives, or on comment sheets available at the meeting entrance. Approximately 40 interested persons attended the meeting.

The project representatives and meeting facilitators present included:

Roy Gearhart, Western
Mark Kueny, Western
Rodney Jones, Western
Ruthette Kennedy, Western
Carey Ashton, Western
Randy Wilkerson, Western
Les Shankland, MPEI
Tom Friar, NCWCD
Bruce Meighen, EDAW
Chad Schneckenburger, EDAW
Molly Cobbs, EDAW
Carol Kruse, USFS
Brad Orr, USFS

Summary

In general, the comments received from the public meeting indicate that the public is in favor of moving the lines to the west side of Table Mountain, away from the Scanloch subdivision, Lake Granby, and U.S. Highway 34. Land use, proximity to residences, visual effects, and human health and safety were among the most important issues to meeting attendees.

However, Western received several comments in direct opposition to Alternative C and the project overall. Opposition was based on wildlife and visual concerns, the preservation of the landscape character west of Table Mountain, and the perceived potential for connected actions related to water development. Other comments in opposition to the alternatives and/or overall project challenged the language of the project's presentation, including the purpose and need statement and project title.

All public meeting comment forms and comment letters received since the November 15 meeting can be found in Attachment A.

Issues and Comments

All comments are presented verbatim from the comment forms and boards. No changes/edits have been made (including spelling errors). Where handwriting is illegible on the forms, EDAW has attempted to correctly interpret comments. EDAW will maintain the original forms in the administrative record.

Comments Received on 72x90 Tabletop Map:

- Would like to see imaging of changes at Stillwater Tap area (towers, lines). Not available at 11/15 meeting.
- Could someone address the visual impact of Alt. C. near Orvis-Shorefox. It's location to the ridgeline? Not available at 11/15 meeting in Granby.

Comments Received on Presentation Boards:

Alternative	Benefits	Disadvantages
Alternative A	(No comments received)	(No comments received)
Alternative B	▪ Alternative B is preferred because it will impact an existing right of way – no impact new undisturbed lands with high quality environmental resources. People impacted by Alternative B are already impacted by these powerlines. ▪ Please use colored poles!!!	▪ Need to reconsider putting line under Lake Granby from Granby Pumping Plant to Granby Substation. The technology exists and is done beneath Great Lakes and oceans. It terms of minimizing impacts to subdivisions and important agricultural lands this would be the best alternative.
Alternative C	▪ Best choice – If Alternative B is considered my property in Scanloch will be unbuildable and you will be negotiating decreased value compensation for many homeowners and property owners. The brown poles blend in best with the environment. ▪ Most logical choice, hands down. ▪ Absolutely the best choice. ▪ Best choice for everyone. ▪ Best choice – has the least impact on the most people and properties. ▪ Go "C" (comment repeated on three boards) ▪ Excellent choice. Great care and thought for all issues. ▪ Only choice for all considerations. ▪ Best option for all the people who use Lake Granby and live near it and view it. Much more cost effective and keeps it hidden more. Longer we wait the more it will cost – lets do it now! ▪ The consideration of using 'camoflague' [*sic*] paint on some of the towers; green – in forested area, tan/brown – in shrub area (flat land) ▪ Best choice for all of us living on the pumping plant road. Not near as many home and best for all. ▪ Best option – use brown poles. ▪ Visually & residentially the best choice for all concerned. ▪ Please use colored poles!	▪ Impact entirely new ground, including valuable raptor, elk, mule deer, bear and wetlands/fens habitat! Impacts Traditional Cultural Property on Table Mountain. Impacts lands protected by conservation easements. One of the justifications – removal of line from ANRA is misleading – Alternative C also would impact a new section of ANRA land!

Comments Received on Comment Forms:
15 comment forms were received from the public meeting.

"Please check the following issues important to you for evaluating the transmission line alternatives."

Visual Effects: 12, Need to adhere to Three Lakes Design Review for pole placement, materials and siting
Physical issues (weed control, erosion): 2
Proximity to residences: 13
Radio or television interference: 4
Noise: 3
Public Lands: 3
Recreation Resources: 4
Health and safety: 11
Land use (fields, corrals): 6
Water issues (springs, seeps, wells): 3
Biological issues (wildlife habitat, wetlands): 4
Historic and cultural sites: 3
Project Cost: 2
Other: 3, Proposed Alternative C, Connection to Windy Gap Firming and CBT projects, Moving the line makes the land useless.

"Are there any special uses, circumstances, or factors on your land, not already addressed, that you would like the Granby Pumping Plant – Windy Gap EA to be aware of? If so, please list."

We strongly support your proposed action Alternative C. It will enhance the view from the lake, highway 34, and other areas as people traverse between Granby and Grand Lake. 80 properties 20 new versus 20 properties only 4 new is huge. Strong consideration should be given to this additional impact. Property value, aesthetics are huge. Proposed Alternative C meets and supports ALL NEEDS. Electrical supply, visual enhancement, property value, AND SAFETY. Bullet 1 & 2 are HUGE given environmental issues and saving our spaces. Strongly support Proposed Alternative C.

We live on the pumping plant road and feel it is best to go with Alternative C for us our trees (healthy trees) on private property and all people in line on this road. Go "C" the best choice.

I am concerned that the construction of this line will affect the value of my property. For the past 5 years we have been waiting for Three Lakes Sanatation Dist. To remove the abandon ponds that I look at every day now I am face with looking at a large power line. The distruction of public land, national recreation area. [*sic*] (Note: Commenter lives approximately 0.3 mile from all alignments. Residence is located in the Stillwater Estates subdivision.)

Yes 1) Your lines presently go over 5 of my lots thereby decreasing the value of these lots and preventing any building on them. 2) I own one small lot that is directly on and within the confines of the Granby Substation. There is no access to my lot except through the substation. Perhaps you folks would like to purchase this lot and thereby prevent me from paying taxes on land I can't use!

I live at L15 Cty Rd 64. This would greatly improve my lot and house if Alternative C is used.

No. But would like to see Plan C take effect.

You are to be commended on considering all options and selecting option C with minimum visual impact when viewed from highway 34 and Lake Granby. These locations have the highest human traffic. Cost will be much reduced from other options.

Would like to see option C because of visual impact, and concerned about set backs.

If option B is used and Western power had to obtain 100' ROW it would require them to buy my house and several others in my Scanloch neighborhood. Option C greatly improves the views from Lake Granby, Hwy 34 and homes in the area.

Re: Scanloch Subdivision on Table Mountain. Homes on either side of line according to 30 foot easement. Alt. B Rebuilding in existing = 100 foot easement which is literally impossible to implement due to homes within this easement area. This is NOT about view! We already live next to existing line. Alternative C is most viable for property concerns, without question.

The [Purpose and Need] still identifies project as a "rebuild" although various alternative analysis discussed increased/upgraded transmission capacity. Grand County has raised this concern at July 2005 Public House, January 24, 2006 letter and October 24, 2006 letter.

If the [Purpose and Need] is an upgrade that Grand County believes that the analysis under the EA process does not fully address affected environment, as well as connected activities described in Item 3, as required under NEPA.

Grand County believes there is a connection between this project, the Windy Gap Firming Project, the Windy Gap project and the CBT. The availability of increased transmission capabilities will directly benefit all of these projects and their facilities.

Grand County believes WAPA has a responsibility in the long term roles, and cost sharings for the current drawdown post monitoring, as well as future drawdown efforts. The drawdown option was recommended by the USBOR as the "best method" to control weed growth in Shadow Mountain. The weed growth has accelerated in the last decade, and will probably require more frequent occurrences. The impact of weeds relates to water quality, recreation and overall riparian health. We expect that WAPA would be a partner in future efforts related to weed growth.

The Public House provided considerable information to previously raised issues/concerns w/ regards to visual, alternative analysis for UG/UG hybrids/tunnel upgrades, and associated costs. This is reflected by the general discussion with participants and the written comments.

Moving the lines from their present location renders the lots owned by Winston Hill totally useless for residential use. Those four lots must be purchased by WAPA if the lines are changed. They are presently on the market for $360,000.

Half of my land is not useable under the current configuration. The line is almost directly over my house. I would like to see it moved.

The lower lines that feed downhill of the main lines are very low in front of my driveways. The lowest phase should be moved up to top of pole. Large vehicles can touch them if we are not careful, and my trees will soon hit the low phase.

"Please provide any other comments on the Granby Pumping Plant – Windy Gap EA and identify any issues that need to be addressed."

The choice of recommending lower poles, the tan option and making the changes in the near future rather than waiting for an emergency reflect sound judgment.

Please use the brown poles.

Please address above issue as an addendum consideration if Alternative B is selected, so that a special consideration will be made for specific areas of existing line running directly thru these residential areas, for it to be re-routed around these homes. Appears only other option is to purchase our properties??? MUST be addressed!!!

I am a proponent of Alternative C for a number of reasons – mainly the property (private) issues. I commend you for doing your homework as your information presented was well presented and thought out.

Grand County resubmits the 10/24/06 letter recently sent to WAPA. Items 1, 2, 3 and 4 restate the major points of this letter. Grand County has not received a formal response to this letter. Refer to Attachment A. (Note: Copy of October 24, 2006 letter to Rodney Jones attached to comment sheets)

Issue: moving the lines would make all four lots useless.

Moving the lines to opposite side of Table Mountain is most beneficial to the most people and also provides clearer path for wintering elk to come off Table and down to lake, and protected area south of dam road E of 34. Over there the impact on housing and living conditions will be minimal as most lands is farmed/hayed. Our two families vote for move to other side.

Attachment B
Federal Register Notice of Intent

g. *Filed Pursuant to:* 18 CFR 4.200.

h. *Applicant Contact:* David Lovely, Hydro Supervisor, Madison Paper Industries, P.O. Box 129, 3 Main Street, Madison, Maine 04950–0129, (207) 696–1225.

i. *FERC Contact:* Robert Bell, (202) 502–6062.

j. *Deadline for filing comments, motions to intervene and protest:* August 20, 2007.

Please include the project number (P–2365–040) on any comments or motions filed. All documents (original and seven copies) should be filed with: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 888 First Street, NE., Washington, DC 20426. Comments, protests, and interventions may be filed electronically via the Internet in lieu of paper, see 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site under the ''e-filing'' link. The Commission strongly encourages electronic filings. Please include the project number (P–2365–040) on any comments or motions filed.

The Commission's Rules of Practice and Procedure require all intervenors filing documents with the Commission to serve a copy of that document on each person in the official service list for the project. Further, if an intervenor files comments or documents with the Commission relating to the merits of an issue that may affect the responsibilities of a particular resource agency, they must also serve a copy of the document on that resource agency. A copy of any motion to intervene must also be served upon each representative of the Applicant specified in the particular application.

k. *Description of Request:* The license request approval to temporarily modify the operation of the project by lowering the water level in the project forebay to allow repair of the western forebay wall.

This maintenance work will consist of refacing the existing wall through the placement of forms and pouring concrete. In order to expose the area to be repaired such that the majority of the work will occur above the waterline, MPI proposes to temporarily lower the water lever of the forebay and headpond by approximately 2.5 feet from normal pond level of 248.15, at the top of the inflatable flashboards. The licensee proposes to gradually lower the forebay from its normal full pool elevation and to maintain the reduced water level via operation of the powerhouse turbines and deflating the inflatable flashboards and waste gate. The required minimum downstream flow (1,540 cfs or inflow, whichever is less) in the Anson tailrace will be maintained during this drawdown period via the turbines and flashboards/waste gate as well. The licensee anticipates a need to maintain this lowered elevation for intermittent periods of time for up to two months beginning on or about August 6, 2007 while the work is being accomplished. If there is sufficient inflow to the project, the licensee proposed to raise the pond level to the normal operating elevation on weekends and other periods when the Contractor is not working. Once the repair work, along the wall progresses above the lower elevation the pond level will be returned to the normal operating level.

The licensee proposes to maintain minimum downstream flows while refilling the project forebay by gradually filling the pond through maintaining a higher inflow than outflow, until the pond level is returned to normal.

l. *Locations of the Application:* Copies of this filing are on file with the Commission and are available for public inspection and reproduction at the Commission's Public Reference Room, located at 888 First St., NE., Room 2A, Washington, DC 20426. This filing may be viewed on the Commission's Web site at *http://www.ferc.gov* using the ''eLibrary'' link. Enter the docket number excluding the last three digits in the docket number field to access the document. You may also register online at *http://www.ferc.gov/docs-filing/esubscription.asp* to be notified via email of new filings and issuances related to this or other pending projects. For assistance, call 1–866–208–3676 or e-mail *FERCOnlineSupport@ferc.gov* or for TTY (202) 502–8659. A copy is also available for inspection and reproduction at the address in item (h) above.

m. Individuals desiring to be included on the Commission's mailing list should so indicate by writing to the Secretary of the Commission.

n. *Comments, Protests, or Motions to Intervene:* (Anyone may submit comments, a protest or a motion to intervene in accordance with the requirements of Rules of Practice and Procedure, 18 CFR 385.210. 385.211, and 385.214. In determining the appropriate action to take, the Commission will consider all protests filed, but only those who file a motion to intervene in accordance with the Commission's Rules may become a party to the proceeding. Any protests or motions to intervene must be received on or before the specified deadline date for the particular application.

o. Any filings must bear in all capital letters the title ''Comments'', ''Protest'', or ''Motion to Intervene'', as applicable, and the Project Number of the particular application to which the filing refers.

p. *Agency Comments:* Federal, state, and local agencies are invited to file comments on the described application. A copy of the application may be obtained by agencies directly from the Applicant. If an agency does not file comments within the time specified for filing comments, it will be presumed to have no comments. One copy of an agency's comments must also be sent to the Applicant's representatives.

q. Comments, protests, and interventions may be filed electronically via the Internet in lieu of paper. See, 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's Web site at *http://www.ferc.gov* under the ''e-filing'' link.

Kimberly D. Bose,

Secretary.

[FR Doc. E7–15645 Filed 8–9–07; 8:45 am]

BILLING CODE 6717–01–P

DEPARTMENT OF ENERGY

Western Area Power Administration

Granby Pumping Plant-Windy Gap Transmission Line Rebuild Project, Grand County, CO

AGENCY: Western Area Power Administration, DOE.

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

SUMMARY: The Western Area Power Administration (Western), U.S. Department of Energy (DOE), intends to prepare an Environmental Impact Statement (EIS) for rebuilding the Granby Pumping Plant-Windy Gap transmission line in Grand County, Colorado. The U.S. Forest Service (USFS) will participate in the preparation of the EIS, which will address the proposed removal of about 12 miles of 69-kilovolt (kV) transmission line, the construction and operation of about 12 miles of new 138–kV double-circuit transmission line (operated at 69/138–kV), and adding a second power transformer. Input for the scope of the EIS may be provided in writing or at an open-house scoping meeting in the project area.

DATES: An open-house public scoping meeting will be held Thursday, August 30, 2007, from 4 p.m. to 7 p.m. in Granby, Colorado. The public scoping period starts with the publication of this notice in the **Federal Register** and closes at midnight on September 17, 2007. To be assured of consideration, all

comments or suggestions regarding the appropriate scope must be received by the end of the scoping period.

ADDRESSES: The open-house public scoping meeting will be held at Mountain Parks Electric, Inc., 321 West Agate Avenue, Granby, CO 80446–0170. Written comments regarding the project should be addressed to Mr. Rodney Jones, NEPA Document Manager, Western Area Power Administration, Rocky Mountain Region, P.O. Box 3700, Loveland, CO 80539–3003; fax (970) 461–7213, or e-mail *GPPWGP@wapa.gov.*

FOR FURTHER INFORMATION CONTACT: For information about the proposed project, to be added to the project mailing list, or to request a copy of the EIS, contact Mr. Rodney Jones at the address provided above or at toll-free telephone (800) 472–2306. For general information on DOE's NEPA review procedures or status of a NEPA review, contact Ms. Carol M. Borgstrom, Director of NEPA Policy and Compliance, GC–20, U.S. Department of Energy, 1000 Independence Avenue, SW., Washington, DC 20585, telephone (202) 586–4600 or (800) 472–2756.

SUPPLEMENTARY INFORMATION: Western is a power marketing agency of DOE that markets Federal electric power to statutorily defined customers, including project use, municipalities, irrigation districts, and Native American tribes. Western initially determined that an Environmental Assessment (EA) would be prepared for the proposed Granby Pumping Plant-Windy Gap Transmission Line Rebuild Project on February 25, 2005. Western held open-house scoping meetings on July 28, 2005, and November 15, 2006. The public expressed numerous concerns about the impacts of the project. Based on a review of the public's concerns, Western subsequently determined that an EIS would be prepared.

The EIS will address the environmental impacts of the proposal to remove about 12 miles of existing 69–kV transmission line and the construction and operation of about 12 miles of new 138–kV double-circuit transmission line (which would be operated at 69/138–kV), and adding a second power transformer. Alternatives, including the no action alternative, will also be addressed in the EIS. Western's EIS process will comply with NEPA (42 U.S.C. 4321–4347, as amended), Council on Environmental Quality regulations for implementing NEPA (40 Code of Federal Regulations [CFR] parts 1500–1508) and DOE NEPA implementing procedures (10 CFR part 1021). Because the proposed project may involve action in floodplains, the EIS will include a floodplain assessment and floodplain statement of findings following DOE regulations for compliance with floodplain and wetlands environmental review requirements (10 CFR part 1022).

Description

Western's Rocky Mountain Region proposes to rebuild and upgrade the Granby Pumping Plant-Windy Gap 69–kV transmission line, between the Windy Gap Substation and the Granby Pumping Plant, a distance of approximately 11.7 miles. The transmission line, which was constructed on wood-pole H-frame structures, is located in Grand County, Colorado, near the towns of Granby and Grand Lake. Other participants in the project include Tri-State Generation and Transmission, Inc. (Tri-State) and the Northern Colorado Water Conservancy District (NCWCD).

Western's Granby Pumping Plant-Windy Gap 69–kV transmission line has been in operation approximately 65 years. It supplies electrical power to the Colorado-Big Thompson Project (C–BT) facilities and electrical substations operated by Mountain Parks Electric, Inc. (MPEI), a Tri-State member operating company.

The area transmission system has also been served by the Bureau of Reclamation's (Reclamation) Adams Tunnel 69–kV cable for the past 50 years, and the cable is at the end of its planned service life. The Adams Tunnel 69–kV cable provides Tri-State with a second power source for MPEI loads. In 1992, Western and Reclamation studied costs, engineering requirements and electrical system constraints for replacing the Adams Tunnel cable in anticipation of its eventual failure. In 1994, Western and Reclamation decided not to replace the cable if it fails.

For electrical service reliability, Tri-State must maintain a second source of power for MPEI loads. The result of systems studies by both Western and Tri-State demonstrated electrical system reliability improvements when a new 138–kV transmission line was added between the Windy Gap and Granby substations.

The NCWCD expressed interest in extending the 138–kV transmission line directly to C–BT Project facilities at Granby Pumping Plant to allow better voltage support for motor starting at Granby Pumping Plant.

The proposed project includes the following actions.

- Remove 10.0 miles of 69–kV circuit: Windy Gap Substation-Stillwater Tap.
- Remove 1.7 miles of 69–kV circuit: Stillwater Tap to Granby-Granby Pumping Plant Substation.
- Remove three 69–kV line switches at Granby Tap.
- Construct 10.0 miles of 138-kV double-circuit transmission line with overhead fiber optic ground wire (operated at 69/138–kV): Windy Gap Substation-Stillwater Tap.
- Construct 1.7 miles of 138–kV double-circuit transmission line with overhead fiber optic ground wire (operated at 69/138–kV): Stillwater Tap-Granby Pumping Plant Substation.
- Install 69–kV three-way line switches at new Willow Creek Tap (replaces Granby Tap).
- Install 69–kV three-way line switches at Stillwater Tap.
- Construct a new 138/69–kV Granby Pumping Plant Substation, consisting of two circuit breakers with 138–kV main and transfer busses and a 138/69–kV power transformer.
- Install a new 69–kV circuit breaker at the existing 69/6.9–kV Granby Pumping Plant Substation.
- Install a new 138–kV circuit breaker bay at the Windy Gap Substation.

The right-of-way for the existing transmission line is generally 30-feet wide, which is inadequate for new transmission line construction and maintenance. Some segments of the proposed rebuilt and upgraded transmission line would be constructed on new rights-of-way on alternative alignments. Remaining segments of the transmission line would be constructed on existing rights-of-way that will be widened to accommodate construction, operation, and maintenance.

The proposed substation site for the new 138/69–kV Granby Pumping Plant Substation would be approximately 200 feet by 150 feet in area, and located entirely on Reclamation property.

No Action Alternative

Under the No Action alternative, none of the proposed facilities would be constructed, and the existing 69–kV transmission line would be left in place. Different transmission projects could be proposed by other entities to strengthen the electrical system in the project area.

Agency Responsibilities

Western has determined that an EIS is required under DOE NEPA implementing procedures, 10 CFR 1021, in light of the public's concerns about potential impacts of the project. Western will be the lead Federal agency for preparing the EIS, as defined in 40 CFR 1501.5. In addition, the USFS has been designated a cooperating agency. Western invites interested agencies,

Tribes, organizations, and members of the public to submit comments or suggestions to assist in identifying environmental issues and in determining the appropriate scope of the EIS. Western will invite other Federal, State, local, and tribal agencies with jurisdiction by law or special expertise, with respect to environmental issues, to be cooperating agencies on the EIS, as defined in 40 CFR 1501.6. Such agencies also may make a request to Western to be a cooperating agency. Designated cooperating agencies have certain responsibilities to support the NEPA process, as specified in 40 CFR 1501.6(b).

Environmental Issues

The EIS will address impacts from the proposed project and a range of reasonable alternatives that achieve that same purpose and need. This notice is to inform agencies and the public of the proposed project and solicit comments and suggestions for consideration in preparing the EIS. To help the public frame its comments, this notice contains a list of potential environmental issues Western has tentatively identified for analysis. These issues include:

1. Impacts on protected, threatened, endangered, or sensitive species of animals or plants or their critical habitats;
2. Impacts on other biological resources;
3. Impacts on land use, recreation, and transportation;
4. Impacts on floodplains and wetlands;
5. Impacts on cultural or historic resources and tribal values;
6. Impacts on human health and safety;
7. Impacts on air, soil, and water resources (including air quality, surface water impacts, and groundwater impacts);
8. Visual impacts; and
9. Socioeconomic impacts and disproportionately high and adverse impacts to minority and low-income populations.

This list is not intended to be all-inclusive or to imply any predetermination of impacts. Western invites interested parties to suggest specific issues within these general categories, or other issues not included above, to be considered in the EIS.

Public Participation

Opportunities for public participation are planned for the entire EIS process. Western anticipates the EIS process will take about 12 months and will include an open-house public scoping meeting; consultation and involvement with appropriate Federal, State, local, and tribal agencies; public review and hearing on the published Draft EIS; a published Final EIS; and publication of a Record of Decision. Western will mail newsletters to the mailing list developed for the proposed project to communicate project status and developments. Anyone may request to be placed on the mailing list.

The scoping period will provide opportunity for interested members of the public, representatives of groups, and Federal, State, local, and tribal agencies to give input on the scope of alternatives and issues that will be addressed in the EIS. As part of the scoping period, Western will hold a public open-house scoping meeting near the project area. Interested individuals and groups are invited to attend anytime between 4 and 7 p.m., according to the date and location noted above. The open-house scoping meeting will be informal, with Western representatives available for one-on-one discussions with attendees. Attendees will have the opportunity to view maps of the proposed transmission line route, learn about the NEPA process and the proposed schedule, suggest changes and improvements to the proposed project, and obtain additional information. Written comments regarding environmental issues, alternatives, and other scoping issues may be turned in at the scoping meetings or may be provided to Western by fax, e-mail, U.S. Postal Service, or other carrier. Although comments on the proposed project may be submitted at any time during the EIS process, to be assured consideration in helping define the scope of the EIS, all comments or suggestions regarding the appropriate scope must be received by the end of the scoping period. Comments received by Western at or as a result of the July 28, 2005, and November 15, 2006, open houses will be used to help define the scope of the EIS.

Dated: July 30, 2007.

Timothy J. Meeks,

Administrator.

[FR Doc. E7–15666 Filed 8–9–07; 8:45 am]

BILLING CODE 6450–01–P

ENVIRONMENTAL PROTECTION AGENCY

[EPA–HQ–OECA–2006–0775; FRL–8452–8]

Agency Information Collection Activities; Submission to OMB for Review and Approval; Comment Request; NSPS for Stationary Gas Turbines (Renewal); EPA ICR Number 1071.09, OMB Control Number 2060–0028

AGENCY: Environmental Protection Agency.

ACTION: Notice.

SUMMARY: In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 *et seq.*), this document announces that an Information Collection Request (ICR) has been forwarded to the Office of Management and Budget (OMB) for review and approval. This is a request to renew an existing approved collection. The ICR which is abstracted below describes the nature of the collection and the estimated burden and cost.

DATES: Additional comments may be submitted on or before September 10, 2007.

ADDRESSES: Submit your comments, referencing docket ID number EPA–HQ–OECA–2006–0775, to (1) EPA online using *http://www.regulations.gov* (our preferred method), or by e-mail to *docket.oeca@epa.gov,* or by mail to: EPA Docket Center (EPA/DC), Environmental Protection Agency, Enforcement and Compliance Docket and Information Center, mail code 2201T, 1200 Pennsylvania Avenue, NW., Washington, DC 20460, and (2) OMB at: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, NW., Washington, DC 20503.

FOR FURTHER INFORMATION CONTACT: Learia Williams, Compliance Assessment and Media Programs Division, Office of Compliance, Mail Code 2223A, Environmental Protection Agency, 1200 Pennsylvania Avenue, NW., Washington, DC 20460; telephone number: (202) 564–4113; fax number: (202) 564–0050; e-mail address: *williams.learia@epa.gov.*

SUPPLEMENTARY INFORMATION: EPA has submitted the following ICR to OMB for review and approval according to the procedures prescribed in 5 CFR 1320.12. On October 5, 2006 (71 FR 58853, EPA sought comments on this ICR pursuant to 5 CFR 1320.8(d). EPA received no comments. Any additional comments on this ICR should be submitted to EPA and OMB within 30 days of this notice.

Attachment C
Project Notification and Mailing List

Representing	First Name		Last Name
	Terry	and Sarah	Albright
Commissioner, Colorado Department of Agriculture	Don		Ament
	Stephen	and Donita	Banks
	Thomas		Barrett
	Marjorie L.		Bass
	Barbara		Bearce
	Richard		Beasley
Three Lakes Water and Sanitation District	Sally		Blea
Vice-Chairman, Business Committee, Cheyenne and Arapaho Tribes of Oklahoma	Bill		Blind
	David		Boelter
	Jim	and Jackie	Boyd
	Gerald W.	and Phyllis M.	Bozarth
	Richard	and Barbara	Brancio
Chairman, Northern Arapaho Business Council	Richard		Brannan
Executive Director, Granby Chamber of Commerce	Sharron		Brenner
	Ron		Brown
	Kenneth	and Ann	Brown
Arapaho Language and Cultural Commission	William		C'Hair
	Edward	and Bobbie	Carney
	Donald S.	and Kandi L.	Carpenter
	Frances P.		Carter
Forest Supervisor, Arapaho and Roosevelt National Forests	Glenn		Casamassa
Realty Specialist, Bureau of Land Management, Kremmling Field Office	Susan		Cassel
	Jim		Cervenka
NAGPRA Representative, Northern Ute Tribe	Betsy		Chapoose
	Mark	and Sara	Cherrington
	Jane F.		Cherryholmes
	Ronald	and Jodi	Choronzy
	Michael	and Cynthia	Christianson
	David J.	and Beth	Cimbura
NAGPRA Representative, Southern Ute Indian Tribe	Niel		Cloud
	Barry		Cole
	Gary		Conte
State Historic Preservation Officer, Colorado Historic Society	Georgianna		Contiguglia
	Raymond		Covington

Representing	First Name		Last Name
	Walt	and Lori	Curtis
Grand County Commissioner	Duane		Daily
	Joel		Dale
	Ann E.		De Boe
	Daniel Patrick		Demarco
	Jennifer Rose		Dicarlo
	Julius	and Marlene	Diczek
	David R.		Dillie
	Scott	and Heather	Dirschl
	Ed	and Jane	Dirschl
	Jeffrey	and Dana	Domer
	Douglas R.	and Sandra M.	Doudna
	Doug	and Sandy	Doudna
	Harry	and Christine	Duckwall
	Michael	and Carol	Dunlap
	Randy		Duzan
D.K.P. Inc.	Dennis		Eckley
	Kent		Eckley
D.K.P. Inc.	Clydene		Edelen
	Garth		Eicher
	Garth		Eichler
	Melinda		Ellison
	Holly		Endres
	Dustin	and Anita	Entz
	Victor H.		Esch
	Jim		Felton
	John	and Juliana	Ferguson
	John Robert	and Joann	Fetters
	Todd		Fink
	Edward Henry		Fisher
THPO Officer, Northern Cheyenne THPO Office	Conrad		Fisher
	Ardyth A.		Fournier
	Alfred J.	and Victoria R.	Frank
	Robert A.	and Jennifer S.	Freeman
District Head, IT Branch, Northern Colorado Water Conservancy District	Tom		Friar

Representing	First Name		Last Name
Chairman, Southern Ute Indian Tribe	Clement		Frost
	Wendell		Funk
	Gloria S.		Gale
Chief, Planning and Compliance, Rocky Mountain National Park	Larry		Gamble
	Adam	and Charlotte	Garcia
	Charles Frederick	and Anne M.	Garcia
	Frank B.	and Linda L.	Geddes
	Paul		Gehart
	Lew Paul		Geisendorfer
	Susan		Gerhart
	Thomas Michael	and Rebecca Jean	Gleason
	Ronnie Carl	and Mary	Glover
NAGPRA Representative, Northern Arapaho Tribe	Robert		Goggles
	Troy L.	and Lori Ann	Gonzales
	Marion	and Lavon	Green
	David	and Vera	Grisinger
	Richard		Grout
Colorado Anglers	Michael R.		Guertner
	Greg and Mary		Gutierrez
	Cyrus Allen		Hackstaff
	Janet		Haggard
Town Manager, Town of Granby	Tom		Hale
Town Manager, Town of Grand Lake	Shane		Hale
	Donald W.		Hamilton
	Terry L.		Hammond
	Charles	and Rosemary	Haney
CSFS & Stillwater Fire Abatement Coalition	Mandy		Hanifen
	James C.		Hansen
	Beryl Jo		Harden
Regional Director, Colorado Department of Transportation	Karla		Harding
	Eugene R.	and Bertha L.	Harnke
Harrington Landscapes	Paul		Harrington
	Carletta		Harty
	Toni		Hass
	David		Hastoglis

Representing	First Name		Last Name
	Scott	and Julie	Heiss
	Frederick William		Heiss
	Gary Lee	and Ruth Ann	Herzberg
District Lands Staff, Sulphur Ranger District	Patricia C.		Hesch
	Patricia		Hesch
	Winston C.		Hill
	Earle	and Ivy	Howard
	Clifford M.		Hulbert
Manager, Grand County Water and Sanitation	Bruce		Hutchens
	Michael	and Susan	Hyde
	P. Richard	and Brigid	Irish
	Larry	and Vickie	Ivy
	Jack	and Ramona	James
	Jack	and Katherine	Jenkins
	Paul	and Carol	Jensen
Johnson and Repucci, LLP	Richard		Johnson
	Keith	and Vicki	Johnson
Darcy Jordan Trust	Darcy		Jordan
	Darcy		Jordan
Manager, Thousand Trails Area	Jerry		Junker
	Patrick S.		Kelly
The Kercel Family Trust	Mike		Kercel
	Joe		Kercel, Jr.
	Ronny J.	and Caryl D.	Kershner
Stillwater Creek, LLC / J / Ranch	Bill	and Joanne	Kieger
	Robert		King
	Morris		King
	Rick L.	and Deborah M.	Kinning
	Walter		Kirkwood
	Keith	and Kendra	Klingbail
	Dale Alan		Kluth
NAGPRA Representative, Ute Mountain Ute Tribe	Terry		Knight, Sr.
	Harry		Knottcamp
	Mark	and Jennifer	Krieg
Special Projects Coordinator, Arapaho - Roosevelt National Forests	Carol		Kruse

Representing	First Name		Last Name
Lambright, LLC	Joseph		Lambright
Ms. Lucille M. Lareau	Donna		Lareau
Grand Lake Area Chamber of Commerce	Polly		Lawler
Power System Planning, Tri-State Generation and Transmission Association, Inc.	Stan		Lawrenson
	Barry	and Margaret	Layton
	James		Liles
	Kevin	and Anne	Lillehei
	Irene M.		Lindgren
Colorado Field Supervisor, U.S. Fish and Wildlife Service	Susan		Linner
	Robert	and Sally	Linton
Chairman, Northern Cheyenne Tribal Council	Eugene		Little Coyote
Michael Lombardi Revocable Living Trust	Michael		Lombardi
	John Gregory	and Rogene	Lowe
	Timothy F.		Lyons
	James	and Karen	Maculewicz
District Ranger, Sulphur Ranger District	Craig		Magwire
	Brian Richard	and Ann Michelle	Mahony
	Perry	and Lynn	Malisani
Director, Grand County Planning and Zoning	Kris		Manguso
	Fred		Marrott?
Shore Fox	Jeff		Martin
	Joe	and Caroline	Martin
RMC Consultants, Inc.	Marilyn		Martorano
	Thomas A.	and Victoria A.	Mason
	Homer B.	and Melba D.	Matlock
	Roger		Matlock
Colorado Division of Wildlife	Bruce		McCloskey
	Dan		McGrail
	Lewis		McGrath
	Wayne		McReynolds
EDAW, Inc.	Bruce		Meighen
	Ronald L.	and Gail A.	Mickalson
	Steven	and Patricia	Miller
Mirr Properties, LLC	Kenneth		Mirr
Arapaho Language and Cultural Commission	Alonzo		Moss, Sr.

Representing	First Name		Last Name
	Harry W.		Mott, Jr.
	Patrick		Mundy
	Joseph		Murray
	Joseph		Murray
	Joseph S.	and Josephine S.	Murray
Sr. Environmental Specialist, Tri-State Generation and Transmission Association, Inc.	Karl		Myers
	Paul		Nachtigal
Chairwoman, Uintah and Ouray Tribal Business Council	Maxine		Natchees
	Clarence		Nelson
	Harry	and Irene	Nelson
Grand County Commissioner	James		Newberry
Alice Marie Nordloh Family Protection	Alice Marie		Nordloh
	Michael		Norton
	Jean S.		Nyquist
	Thomas A.	and Kathleen E.	O'Connor
Colorado Division of Wildlife	Kirk		Oldham
	Connie		Opperman
	Brad		Orr
General Manager, Mountain Parks Electric, Inc.	Joe		Pandy
	Frederick	and Deborah	Parsons
	James		Paul
	Robert Scott		Penson
	Raymond	and Katherine	Polk
Chairman, Shoshone Business Council, Shoshone Tribe	Ivan		Posey
	Spike	and Pat	Potts
Mountain Lakes Properties	Donna		Ready
	Scott		Ready
Grand County	Colleen		Reynolds
Director of Public Works, Town of Hot Sulphur Springs	Jack		Rickman
	Connie		Roberts
Grand Lake Real Estate, Century 21	Constance		Robertson
	Robert	and Susan	Ronald
	Pete	and Joan	Rosales
	Bill		Rugin
Field Office Manager, Bureau of Land Management, Kremmling Field Office	John		Ruhs

Representing	First Name		Last Name
	Cynthia		Rupert
Archaeologist, Bureau of Land Management, Kremmling Field Office	Frank		Rupp
	Clare Beth		Rutila
Three Lakes Water and Sanitation District	Dan		Scharaeder
	John	and Kristin	Schiechl
	Kyle	and Mitzi	Schirado
	Donald	and Patricia	Schmid
	L. Scott		Schobe, Jr.
	Sandra Jean		Schoenebeck
	Dan		Schrader
	Dean		Schultz
	Kevin Leigh	and Darlene Renee	Schumacher
	Gregory	and Cynthia	Seader
	Ronald	and Mary Janice	Sears
Sexton Family Trust	c/o Kerrel and Steven		Sexton
Engineering Manager, Mountain Parks Electric, Inc.	Les		Shankland
	Leslie A.		Shankland
SEI	Janet		Shargrew
	Paul	and Judy	Shetler
	Lowell	and Cynthia	Showalter
	Gerald	and Jo Ann	Shumaker
	Scott		Simmons
Colorado State Engineer's Office	Hal D.		Simpson, P.E.
Fairbanks Daily News-Miner, Inc. – MediaNews Group	Dean		Singleton
	Mike	and Cindy	Smith
	Randal L.		Smith
	Cheri		Stanton
	Paul	and Carol	Stauch
	Ken	and Marilyn	Stevenson
	Brit		Storey
Bureau of Land Management, Kremmling Field Office	Renee		Straub
	Ronald	and Olivia	Strauss
Three Lakes Water and Sanitation District	Paul		Strauss
	Kathleen A.		Striegel
Coyote Ridge B and B	Kathy		Stromberg

Representing	First Name		Last Name
Archaeologist, Arapaho and Roosevelt National Forests	Sue		Struthers
Grand County Commissioner	Nancy		Stuart
	Thomas	and Kristin	Swanson
	Gordon Eugene		Tetsell
	William	and Susan L.	Tomasek
	Henry	and Stephanie	Tray
	Janet M.		Tuttle
District Head, Collection Systems Dept., Northern Colorado Water Conservancy District	Noble		Underbrink
Grand County Manager	Lurline		Underbrink-Curran
	Bruce	and Karen	Vangundy
	Raymond F.		Vanous
	Jerry		Vogt
	Kevin A.		Wachter
	Raymore		Walcher
	Janice		Waldron
Mayor, Town of Granby	Ted		Wang
	William	and Beverly	Westlake
Ms. Dorothy F. Taylor	Kathy		Weyer
Ute Mountain Ute Tribe	Selwyn		Whiteskunk
	David	and Patricia	Wishart
	Dale Alan	and Tine M.	Woolley
	Tom		Wunder
Noriyuki & Parker Pc			
Boselli Family Partnership			
Good Skiing, LLC			
Horn Ranches Inc.			
Singing Elf Inn, Inc.			
Stillwater Ranch Development Co.			
Big Rays Enterprises, LLC			

Attachment D
Public Meeting Notice

Open House

Granby Pumping Plant-to-Windy Gap Transmission Line Project

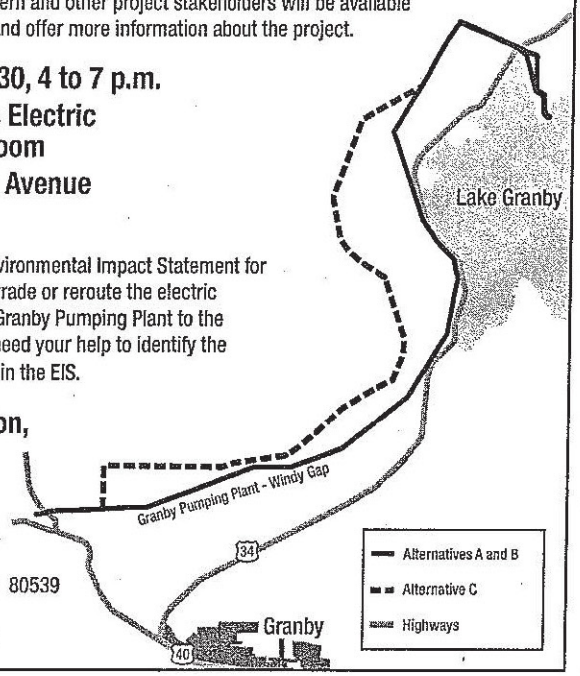
Western Area Power Administration

Learn more about the Granby Pumping Plant-to-Windy Gap transmission line project to help ensure reliable electric service in Grand County at an open house, Aug. 30.

Representatives from Western and other project stakeholders will be available to answer your questions and offer more information about the project.

▶ Thursday, Aug. 30, 4 to 7 p.m.
Mountain Parks Electric
Community Room
321 West Agate Avenue
Granby, Colo.

Western will prepare an Environmental Impact Statement for the proposed project to upgrade or reroute the electric transmission line from the Granby Pumping Plant to the Windy Gap substation. We need your help to identify the scope of issues to evaluate in the EIS.



For more information, please contact:

Rodney Jones,
NEPA Document Manager
Western Area Power Admin.
Rocky Mountain Region
P.O. Box 3700, Loveland, CO 80539
Phone: 970-461-7371
E-mail: gppwgp@wapa.gov

Attachment E
Official Comment Form

PUBLIC SCOPING

COMMENT FORM

Granby Pumping Plant - Windy Gap Transmission Line Rebuild Project

Please submit comments by September 17, 2007. You may:

- Leave this form at the public scoping meeting.
- Mail the form or a letter to the address below.
- E-mail comments to gppwgp@wapa.gov.
- Fax the form or a letter to 970-461-7213.

Please check the following issues important to you for evaluating the transmission line alternatives.

____ Visual effects

____ Physical issues (weed control, erosion)

____ Proximity to residences

____ Radio or television interference

____ Noise

____ Public Lands

____ Recreation Resources

____ Health and safety

____ Land use (fields, corrals)

____ Water issues (springs, seeps, wells)

____ Biological issues (wildlife habitat, wetlands)

____ Historic and cultural sites

____ Project Cost

____ Other_____

Are there any special uses, circumstances, or factors on your land, not already addressed, that you would like the Granby Pumping Plant - Windy Gap EIS to be aware of? If so, please list.

_____

_____

_____

_____

_____

_____

_____

Please provide any other comments on the Granby Pumping Plant - Windy Gap EIS and identify any issues that need to be addressed.

_____

_____

_____

_____

_____

_____

_____

Sign up to receive the Granby Pumping Plant - Windy Gap Transmission Line Rebuild Project EIS

Let us know if you would like to receive a copy of the EIS. Once the EIS is completed, the document will be available at public libraries on CD. **To receive a copy, please check one box:**

☐ Notify me of its availability ☐ Send me an electronic copy on CD-rom

Tell us how to reach you

Western will not share your contact information with others, however, all comments submitted will be become part of the project record.

CONTACT INFORMATION (optional)
Please Print
Name:_____
Representing:_____
Mailing Address:_____
City:_____
State:_____
Zip:_____
Daytime Phone:_____
Email address:_____

Completing this form will automatically add you to the mailing list.
If you prefer to not be on the mailing list, please check the box to the right. ☐

THANK YOU FOR YOUR PARTICIPATION !

Western Area Power Administration
Rocky Mountain Region
P.O. Box 3700
Loveland, CO 80539

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Attachment F
Public Meeting Sign-In Sheets

IN ORDER TO PROTECT PERSONAL CONTACT INFORMATION, THESE DOCUMENTS HAVE BEEN WITHHELD FROM THE REPORT.

Attachment G
Categorized Public Comments

GRANBY PUMPING PLANT – WINDY GAP TRANSMISSION LINE REBUILD PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT
CATEGORIZED PUBLIC COMMENTS

Note: The following categorized comments represent most, but not necessarily all, public comments relevant to the specific topics identified below.

SOILS

Keywords searched: soil, erosion, sediment, sedimentation, geology, access roads

Number	***Comment***
1	Important issue, physical issues (weed control, erosion)
2	The alignments presented for the power line rebuild cross and run parallel to portions of Lake Granby and several streams in the Willow Creek Valley. Line construction, removal, and maintenance activities, including access roads, can impact surface waters, wetlands, fens and riparian areas. The runoff of sediments and pollutants along the ROW and the potential disruption of established drainage patterns may require mitigation to minimize impacts. To the extent practicable, impacts to wetlands should be avoided and work near lakes or streams should be carefully managed to avoid impacts to surface water quality and aquatic life. If transmission line construction or removal involves the deposition of dredged or fill material in waters of the United States, including wetlands, the U.S. Army Corps of Engineers should be contacted to determine if a 404 permit under the Clean Water Act. Storm water permits for this project may also be required from both EPA and the State of Colorado. These permits generally require the development a Storm Water Pollution Prevention Plan (SWPP) that may be applicable to both permits. Such plans require the use of best management practices to protect surface waters and wetlands, endangered species and historic properties. For information on securing a federal permit, contact Greg Davis in EPA's Storm Water program at 303-312-6314. For the State of Colorado, contact Nathan Moore at 303-692-3555.
3	We note that WAPA's preferred alternative will require a new alignment and a 100-foot right-of-way (ROW) for a large portion of the transmission line upgrade. The DEIS should assess the environmental impacts and benefits associated with any new alignments and associated access roads and infrastructure, and also identify measures that will be taken to reclaim the former ROW.

SOCIOECONOMICS

Keywords searched: cost, economy, economic, tourism, property, properties, property value, finance, financial, environmental justice

Number	***Comment***
1	It seems to us the real impact issues to be evaluated are; 1) Costs, 2) Views, 3) Health, and in that order. Under costs, it would seem to make sense to spend the deferred repair and maintenance expenses pending on increasing line capacity. I have not patrolled the entire line but, across our lots the poles appear to need replacing and the crossties are rotten and splintered. It appears to me the cost of increasing capacity would be higher with option B as the land values, small lot sizes and multiplicity of owners will force many of the expansion easements into the creation of unusable remainders. There are several cases where existing structures would be within the new easement and additional properties will have significant easements to be purchased. It appears easement costs would be less

	expensive across agricultural and public land as opposed to residential or commercial properties. This should favor option Cover B. While not expressed by Grand County, there is an economic downside to County assessments and taxes by removing or devaluating residential properties as would occur under option B. I am unable to evaluate the reduction in assessed valuation impact to entities such as the Fire District, Recreation District and School District, but clearly residential and vacant residential properties are taxed at a higher rate than agricultural land and public lands bear no tax burden. In summary, Option C is the most desirable. It provides for expansion of electric capacity that will be necessary as the area grows. It impacts the fewest properties and persons. It appears to cost the least and at a minimum protects the existing tax base of several taxing districts. We suspect Option C will actually increase the tax base as properties unusable due to the existing power line easement will become buildable and existing residences will see their values increase with the removal of the current eyesore. Option C will enhance the experience of locals and tourists alike as the view improves through the3 Lakes Design Review Area.
2	Expert Harry Orton, Orton Consulting Engineers International Ltd., indicates underground lines are safer, preserve scenic beauty and cost nearly the same as overhead lines over the long term. East Slope folks are the beneficiaries of the additional or more reliable water supply. It is only fair they fund burying the lines. WAPA's estimate is $10 million for overhead versus $40 million for burial. Assuming a life cycle of 40 to 50 years, the life cycle cost to bury the lines would amount to less than $1 million a year. For the one million East Slope residents who benefit, this would amount to a surcharge of less than $1 a year. Besides, they like to vacation here too! The Federal legislation enabling the Project clearly placed the burden for building and maintaining the facilities on the Project and its successors, namely, the Northern Colorado Water Conservancy. Under those circumstances, the Conservancy should bear the cost of replacing the Adams Tunnel line to assure our access to the "green power" produced with Grand County water in Estes Park.
3	Protecting the County's rural character while maintaining the economy: Reliable, cost-effective electrical services are a basic need for the citizen's of Grand County. Mountain Parks Electric is responsible for this service to Grand County. Mountain Parks Electric will receive a direct benefit from Western's proposed upgrade. We appreciate their ability to provide cost effective, dependable electrical service to the varied topography, remote areas and diverse ecosystems within Grand County. We also commend their proactive outlook to identify current and future service needs of the community, and to identify appropriate capital improvements to meet those needs. We acknowledge that system reliability will be improved with the looped transmission. The delivery of reliable, cost-effective electrical service will support the needs of existing and future customers in an area extending from Rocky Mountain National Park, south to the YMCA Snow Mountain Ranch, between Byers Canyon and the Continental Divide.
4	Cost is not a reason to eliminate an alternative if it is the least environmentally damaging. By not including replacement of the Adams Tunnel line, this eliminates the possibility of Grand County to obtain cheaper power (the hydro component of the Colorado Big Thompson Project has paid for itself many times over) and does not meet the national perspective stating that "Green Power" is necessary for environmental health of the nation.
5	Additional issues: What is the point of installing overhead lines now, just to increase the cost of burying them at a later date?
6	I understand the need of updating the existing 69kv lines with something that will carry the necessary power in the future, and I understand that burying these lines is an option but one that would increase the cost of the installation and the subsequent maintenance/upkeep/etc. There are alternatives being presented by Western (much appreciated) – makes it sound as if Western is well aware there will be a public outcry about the propose towers and route. We need to look toward the future and not toward costs - please consider your alternative option of burying the cables rather than erecting them along the highway.
7	You are already probably well away of the cultural resources present in the area, and the site inspection to be carried out by EDAW, Inc and RMC, Inc will probably bring further resources to light. Should this happen, please please please allow for the cost and time needed to accurately and responsibly record these cultural sites. They are our heritage and once they have been disturbed, much of the information to be gleaned from them is lost.

8	What are the long term costs of this project?
9	For a large stretch of Alternative C, the powerline is proposed to be co-located in the right-of-way ("ROW") currently occupied by the Willow Creek Pipeline. However, the alignment diverges from the pipeline ROW at the point where the Property's southeastern corner adjoins BLM land. There does not appear to be any justification for this divergence from either an environmental or economic standpoint. Lt appears that this realignment may have been done solely to accommodate one private landowner to the south. If so, it seems highly inappropriate for a federal agency to accommodate one private land owner to the direct detriment of another at the cost of additional environmental impacts. Nor is there any reason for WAPA not utilizing the existing ROW under Alternative B as it heads southwest from the BLM property. Use of either of these existing ROWs would reduce ROW acquisition costs, minimize viewshed impacts, and prevent new surface disturbance.
10	Let's see if we can do an underwater pipeline to take the water from the pumping plant intake into the Adams Tunnel and down in elevation in the tunnel to such a level, if possible, that the water will siphon out of Lake Granby. If the drop in elevation is not adequate to create the siphon, maybe a one-way Intake valve can be Installed to pull the water into the pipe. If the siphon could be created to take the water from the Lake Granby intake, a pumping station would not be necessary. It could all be done via siphon! A wye could be installed in the pipe with a one way intake valve to send the water Into the Colorado River below the Shadow Mountain Dam during times when the natural downstream flow was not enough to make up the required stream flow. Power could still be generated from the subcontinental water flow--possibly without even having to pump the water. The approach would solve the water quality issues and return Grand Lake to its once pristine clarity, as It should be. It would also solve the route question for the WAPA power lines. Please forward this concept around to the engineers who can specify how to build the above described system. It will solve the water quality problem which the Big Thompson project has created, and it will solve the route for the WAPA power lines. The relative cost of the project Is small.
11	I would like to see an actual cost figure applied to every alternative and how that cost is spread for the lifetime of the upgrade. I would like to see the actual cost/benefits of this project applied directly to Grand County. Will additional upgrades need to be made to provide power and if so what do these upgrades cost and who will have to pay those costs.
12	I would like to know the price difference in placing the transmission line underground versus erecting above ground towers 120 feet in the air.
13	Alternative C Would Result in Severe Economic Impacts. Damage to conservation values present on the Property through implementation of Alternative C will result in significant adverse economic impacts. The economic impacts to the Ranch Owners for the area taken and to the remainder of the Property from Alternative C would be substantial and would extend far beyond the ROW. The Ranch Owners are concerned that WAPA has not fully considered or taken into account the economic value of these lands and the resultant additional costs that obtaining ROWs would add to implementation of Alternative C. Damage to the Property's conservation values may adversely affect the value of the planned conservation easements and consequently may result in impacts to the donation value that could be claimed by the Ranch Owner under federal and state law. It is estimated that the value to the Ranch Owners of the existing and planned conservation easement donations for the Property will ultimately be in the millions of dollars. If Alternative C is implemented, WAPA would be required to compensate the Ranch Owners to the full extent of the lost economic value to the Property and related existing and future conservation easements. Elimination of alternatives due to additional cost alone is not a sufficient reason to eliminate an otherwise reasonable alternative from consideration. Without fully analyzing these alternatives, there is no way to determine whether an incrementally higher cost may be justified in light of lesser environmental impacts. The Ranch Owners believe that WAPA likely has underestimated the costs of Alternative C by failing to take into account the costs to compensate the Ranch Owners for damage to the Property and conservation easements, which may be in the millions of dollars. Similarly, the need to contract for specialized resources does not justify elimination. Each of these alternatives is economically and technically feasible and warrant

	full consideration as an alternative in the NEPA process.
14	What will be the tax consequences to the county residents and businesses? It is time strong consideration is given to placing all new lines underground regardless of cost. Further degradation caused by the installation of huge poles and lines could cause financial burdens on everyone in the county especially real estate owners adjacent to the selected path of the proposed lines. This consequence could easily be greater than the additional costs associated with solving this problem with an environmentally and economically responsible way.
15	This project has been in the planning and talking stage too long. It is high time the work begins. The plan presented a year ago in the fall of 2006 is the best one and this project should have stayed on schedule. Every delay just costs more.
16	This limited scope alternative (option C) would also require relocation of the Granby Substation to, the Willow Creek Sub to achieve loop transmission supply as well as require installation of two 25 kV lines from the relocated Granby Sub (at Willow Creek Sub) to connect with existing 25 kV line along Highway 34. Assuming easement availability along CR 40, these two 25 kV lines could be installed underground at an estimated cost under $500,000; cost for relocation of the Granby Substation is estimated to be minimal using existing major equipment. Although underground transmission lines are technically feasible, the initial cost of such facilities is 10-20 times that of comparable overhead transmission lines. Additionally, the environmental impact of constructing underground transmission lines is much greater, being comparable to construction of a pipeline or new roadway with extensive excavation and resulting surface disturbance. Vehicle access along an underground line route is also required for the life of the facility for operation and maintenance purposes. If underground transmission were to be seriously considered as an option, the replacement of cables in the Adams Tunnel would be a preferred alternative in my opinion. As a local property owner, I am opposed to paying for the higher cost of undergrounding these lines since the difference in costs would usually fall on the local community requesting such underground option.
17	When we built our home on our property we did not have overhead power lines installed. Although we incurred a higher cost, we buried our power. They say it starts with one person. I believe that your proposed project would destroy all that we've attempted to preserve and set us back monumentally. As people of this earth are becoming more aware of the impact we have on the environment, it is beyond my comprehension that you would even consider the idea of installing these huge towers in such a non-urban area. I realize that this method would save you lots of money. Are you telling me that money is worth the destruction of animal habitats? Not to mention the destruction of the mountain's natural beauty. This, by the way, is how many of us make our living. The beauty and peace of this area have brought tourists here, thus creating an income for all of us. The dollars tourists bring to Grand County affect all residents, from the independent shop owner to construction companies. Erecting towers to replace power to allow water naturally in this area to be diverted elsewhere? I can't even begin to tell you how selfish that sounds. We understand the need for the water in the metro area. And, we understand that the water diversion happened here long before I was a local resident. accept that fact. Although, I am quite disturbed when I make trips to the city to see the folks there misusing water and really having no understanding of where the water comes from and just how precious the resource is to all of us. But, erecting these towers to save yourselves money, while destroying our home is wrong. If you want to talk dollars, what happens to property values when y'all erect these unsightly towers in my backyard? Not to mention, the dollars J may have to spend in the future on medical expenses to try and preserve my health in the future from exposure to the EMFs. I believe from your mailing address that you are in Loveland In that case, Grand County is your backyard. Can you truly in good conscious destroy your own backyard to save a few dollars? Or is watering your sidewalk that important?
18	I realize that we the electric users will pay more for putting them underground. I am perfectly willing to trade higher power costs for elimination of such abhorrent eyesores.
19	Of THESE three alternatives we are in favor of Alternative C. However, we are interested in the burial proposal but do not understand

	the expense and environmental impacts that would be involved.
20	How this project is going to affect our power bills. How it will benefit Grand County in the future.
21	I agree with the conclusions stated in the Letter from Grand County and that the lines should be placed in water tunnels rather than build new towers and lines. With the Pine Beetle eliminating the trees that would help to hide these new towers and lines, it is in the best interest of everyone to put the lines into the water tunnels. This would also seem to be more cost effective in the long run, less maintenance and no need for construction of new towers.
22	Bury them. I realize this will increase your cost but if you do not bury them then I will be paying the cost by loss of views and decreased property value as well as possible health issues that we may not even be aware of.
23	If you truly care about human and environmental welfare, you must put financial costs below them.
24	How much of the bill for this project will be paid by front range users?
25	A project of this magnitude and environmental impact along with the economic consequences should receive broader review than has been possible to his point.
26	Economically, property values will decline. Real estate agents are having difficulty selling property near the proposed route already. Potential buyers will choose areas with more scenic views; tourists who value the peaceful undeveloped character now present will go elsewhere. We strongly resent WAPA's tactic of pitting residents against each other with respect to Alternative Routes Band C. It is an unconscionable divisive act by a Federal Government agency in a community that has traditionally been very cohesive. It is certainly understandable that residents in the Scanlock subdivision, who stand to have power lines removed from their property, would be pleased because they would be economically favored by the relocation of the power line through their subdivision. However, there are many other subdivisions with a larger total population (Idle Glen, Lake Forest, etc.) that will have taller towers and wires on their property or be within view of them. Communities facing new transmission lines have stated that no one property owner should suffer economic hardship.
27	Who needs the power? Who pays for it?
28	First choice would be no visible transmission lines. I don't imagine this would be a realized method of construction because there may be too many terrain and various logistical as well as economic obstacles with the economics being in the forefront of any consideration, Nonetheless it would have the least impact on the critical lakefront environment and scenic "views".
29	The EIS will address impacts from the proposed project and a range of reasonable alternatives that achieve that same purpose and need. This notice is to inform agencies and the public of the proposed project and solicit comments and suggestions for consideration in preparing the EIS. To help the public frame its comments, this notice contains a list of potential environmental issues Western has tentatively identified for analysis. These issues include… socioeconomic impacts and disproportionately high and adverse impacts to minority and low-income populations.
30	Grand County's bread and butter is tourism. Tourism depends upon maintaining the beauty of the area and the sense of being in the "wide open spaces out west". The area you are proposing to put these extremely high transmission poles is one of the premier dude ranch areas in the nation and it would have a negative visual impact on what makes Grand County special. There are other alternatives which could provide the same service, but would not have the visual impact you are proposing. Please do not use the 100 ft plus pole proposal and use others with less visual impact.
31	The technology is here to put the lines under ground or under water...why even consider in a beautiful and scenic area like Grand County, which is also partly dependent on tourism to build huge power lines and destroy what is most precious to us all??? I thought we live in an age to live forward and not backward. So many concerns about this issue should be considered. This is not something we can change in the next couple years. You cannot seriously consider to put them in an area where people come to live to get away from pollution in any kind just maybe because it is the cheapest way?? We chose to live in this healthy mountain region for a purpose and

	do not want to have huge power poles planted in front of us. Please consider the alternatives # 6 or 7 on your list.
32	For these people money is everything. Stop all construction of the East Slope.
33	Our main concerns have been loss of views with the line crossing in front of our house, as well as a potential decline in property values that could arise from this.
34	If the lines are not buried and ultimately are more unsightly than the existing lines, we would not be opposed to participating in legal action for diminished property values.
35	I understand the effort to increase reliability of electrical services. However, human real property values (safety, view, etc) and wildlife needs (safety, transit) militate against adding towers twice as tall as the existing problematic towers! Please re-use the existing towers and/or place/replace the in-tunnel electrical lines or bury the new lines underground with the absolute minimal surface disruption!
36	We find it more advantageous for Hot Sulfer Springs, and Grand County, to reap the rewards from the property values if the lines were to be removed away from the Granby, Scanloch Subdivision. It would entice a lot more land owners with vacant land to start building their dream homes. We have been land owners for 26Years, but hesitate to build on such a beautiful lot because of the existing power lines. We thank you for your time, as we truly believe Alternative C will be the right choice for everyone!!
37	This will decrease our property values as it goes directly in front of our views of Lake Granby and the ranches coming from county road 41.
38	As a local property owner, I am opposed to paying for the higher cost of undergrounding these lines since the difference in costs would usually fall on the local community requesting such underground option.
39	This area is very sensitive to "scenic views", lake scenes, and mountain scenes reflected by the market pricing of real estate, Any encroachment by power transmission lines as mentioned earlier should blend in well or the value of the adjacent properties usually are decreased. Neither I or any of my neighbors would want to experience a decrease in our property values.
40	With the elimination of No.1 because of practical, technical, and financial reasons, the second choice. if implemented, would still be the most desirable to us as adjacent land owners. However. No.3 could also be a fairly acceptable compromise especially if some consideration is given to terrain enhancement underneath the line.
41	I would hope that it would be done without raising local taxes.

VISUAL

Keywords searched: visual, visually, aesthetic, esthetic, scene, scenic, scenery, view, viewshed, visible, byway, scenic byway, VRM, visual resource management, VQO, visual quality objective

Number	***Comment***
1	There is absolutely no need to pollute the sky and people’s views with huge power lines.
2	First of all I am opposed to any proposal which would adversely affect wildlife and any existing scenic corridors. The line currently in place has visual detractions; however, we have become used to it. I also do not want any increase in height of power lines. I feel increase height only negatively impacts wildlife. Then you add markers which would be in place for aircraft and there are visual impacts.
3	Secondary to health is the visual impact. We can't look outside now without power lines in all directions.
4	The 138kv lines are likely a health hazard as well as a visual detraction. If the lines are not buried and ultimately are more unsightly than the existing lines, we would not be opposed to participating in legal action for diminished property values.

5	This project also has the potential to impact wildlife, native vegetation and visual resources. Impacts to visual resources associated with the proposed power poles and lines should be thoroughly assessed for each alternative. As feasible, the placement of transmission lines underground should be considered in any areas with high scenic value.
6	The visual, health and recreational resource issues could all be avoided by burying the lines or putting them in the existing water tunnel. Why should the residents and visitors to Grand County have to put up with visual pollution caused by front range power needs. The transmission line installed through Church Park from Fraser to the Williams Fork is an example of gross visual damage to our public lands resource that could have been avoided by alternative routing or burial of the lines. Don't do it to us again! Bury the lines! There is no way that above ground transmission lines benefits the residents of Grand County. The high recreational and residential use of the area should preclude even the thought of above ground lines. Just bury them!! I
7	I feel that visual impacts of 120' towers will destroy the rural flavor of the area and we should strongly consider the use of existing tunnels to carry the transmission lines. I live in Granby on a street that buried the power lines and we have enjoyed the views by not having to look through towers and lines.
8	Grand County has concerns regarding the direct consequences of the proposed installation in overall impact and impairment to visual resources, and wildlife in the area within and adjacent to the Arapaho National Recreation Area. The Grand County Zoning Regulations require electric utilities to minimize the visual degradation of the landscape caused by power lines and towers. However, Staff believes that there may be another option that would meet the same intent of an 'underground installation'. Staff requests that Western evaluate an option for use of the existing pipeline between Windy Gap and Lake Granby for the installation of a cable system to carry the proposed electrical transmission lines. Joint use of the pipeline for both conveyance of water and installation of the electrical lines would be a more sustainable alternative. Use of this pipeline as a 'chase' would eliminate the need for new construction, and would be more aesthetically compatible. It would allow easy access for maintenance to the electrical lines since the pipeline is not in continuous use for the conveyance of water. Materials and installation methods for underwater electrical cabling is technically feasible. We do not believe that Western has fully analyzed the impact of the proposed tower structures on the landscape within the Three Lakes Area. The key element of design criteria in this area is a harmonious and appropriate design. The proposed tower structures, at 120- ft. are intrusive to the overall panoramic mountain and scenic view shed and don't easily blend into the natural, surrounding landscape. With regards to the proposal using aboveground facility, we encourage Western to limit site disturbance and vegetation clearing that is visible from residential developments and public roads by means of minimizing clear-cut widths and other established landscape techniques, such as a revegetation plan. The proposed option of a single pole tower does not minimize this impact. Comments were made at the public meeting related to the potential of underground construction of the electric transmission lines.
9	Visual effects, Proximity to residences, Noise, Health and safety, I believe that these power lines should be buried, for all the reasons above as well as for the land value. These big power lines hurt real estate values.
	Many other mountain towns/areas have declined to have these huge towers erected as they mar our landscape - makes them sound rather ugly. There are alternatives being presented by Western (much appreciated) – makes it sound as if Western is well aware there will be a public outcry about the propose towers and route. We need to look toward the future and not toward costs - please consider your alternative option of burying the cables rather than erecting them along the highway. This proposal sounds safer, much more aesthetically pleasing and hey, it makes you guys look good - everyone wins.
10	We are all very fortunate to live in such a beautiful place with so many uses. With each new development project, the views and the uses decrease. We need to become more aware in our planning, so that we are able to grow as a community while preserving the way of life that has attracted everyone here.
11	The area you are proposing to put these extremely high transmission poles is one of the premier dude ranch areas in the nation and it

	would have a negative visual impact on what makes Grand County special..There are other alternatives which could provide the same service, but would not have the visual impact you are proposing. Please do not use the 100 ft plus pole proposal and use others with less visual impact.
12	Please seriously consider the underground placement of these power lines to eliminate scenic pollution, wildlife disturbances, potential health impacts and overall disruption of the quality of our outdoor experiences.
13	Damage to the viewshed from the Property, along with the likely spreading of noxious weeds caused by the proximity of the Property to new surface disturbance, will result in adverse economic impacts to the Property. This Property is currently valued at approximately five and one-half million dollars ($5,500,000.00). The economic impacts to the Ranch and the Preserves by virtue of the visual imposition of a powerline in a currently pristine viewshed would be substantial. The Ranch and the Preserves are concerned that WAPA has not fully considered or taken into account the economic value of the Property and the resultant additional compensation due to landowners if WAPA implements Alternative C.
14	I found the visual analysis to be misleading. Examining the visual impacts of Alternative A, it appears that there are several areas where 40+ towers are visible. Examining Alternative B, there are very few locations where 40+ towers are visible, yet the towers in Alternative B could be up to twice as tall as the towers in Alternative A. I realize that there will be a few less towers in Alternative B, but it is counter intuitive to believe that towers that are twice as tall will be less visible. Please redefine how you "slice" the categories (i.e., the number of towers that are visible) to fairly represent the visual impact. To reduce reflected sunlight from the transmission line itself, please use low spectral line (i.e., line with low reflectivity). When removing and trimming trees within the right-of-way, please avoid clear-culling a straight line through forested areas. Please vary the edge and "feather" in the cut.
15	We do want to know if there will be potential visual impacts from key vantage points within the park. One vantage point that specifically comes to mind is the historic Shadow Mountain lookout tower, which is a popular destination near Grand Lake.
16	We do not want the huge power poles impacting our land and country-side. We expect WAPA to respect our county's beauty and the need to keep it that way. We now have tall poles and lines that are intrusive. Now you want to increase the height of the poles, the width of the poles and the amount of power through the lines. Our visitors don't like the poles we have to put with now. We are recommending that you put the power lines underground. Environmentally this is the green thing to do. That would mean you could then remove the ugly poles. We expect you to do the very best for us and not just make it less expensive for the eastern slope
17	The technology is here to put the lines under ground or under water...why even consider in a beautiful and scenic area like Grand County, which is also partly dependent on tourism to build huge power lines and destroy what is most precious to us all??? I thought we live in an age to live forward and not backward. So many concerns about this issue should be considered. This is not something we can change in the next couple years. You cannot seriously consider to put them in an area where people come to live to get away from pollution in any kind just maybe because it is the cheapest way?? We chose to live in this healthy mountain region for a purpose and do not want to have huge power poles planted in front of us. Please consider the alternatives # 6 or 7 on your list.
18	I would like to know the price difference in placing the transmission line underground versus erecting above ground towers 120 feet in the air. 120 foot towers would definitely have an adverse visual effect when contrasted against the backdrop of the mountain ranges.
19	The overall visual beauty of the county and its natural resources are the reason this county and the people and business in it are here. Degradation of this visual beauty is at an all-time high due to the massive death of our forests. Further degradation caused by the installation of huge poles and lines could cause financial burdens on everyone in the county especially real estate owners adjacent to the selected path of the proposed lines.
20	Additionally there seems to be some local opposition to proposed overhead transmission lines due to potential visual impacts…. Following the route of Option C from Windy Gap to Willow Creek Sub would minimize visual impacts of the transmission line portion of such a project…. This would leave the existing (overhead, unshielded) 69 kV line from Willow Creek Sub along Highway 34 to

	Stillwater Tap and beyond as a radial line once the Adams Tunnel cables fail. The remaining 69 kV line could be rebuilt as an H-frame single-circuit overhead line in the existing route with lower height than proposed double circuit line in Option B to minimize visual impact changes… This eliminates additional visual and other impacts of Alternative C from the Willow Creek Pump Plant to Granby Pump Plant. Such an alternative would have the added benefit of removing the visual impact of the existing Granby Sub from view of the scenic byway on Highway 34.
21	It is evident to me that alternative C is the best choice. Moving the lines to the west of Table Mountain will keep the visual effects out of the Recreation Area as much as possible and fewer residences will be affected.
22	The thought of higher lines that would further mar the beauty of our surroundings distresses me. Surely there are better alternatives.
23	You need to come up with more constructive ideas that preserve the remaining landscapes without industrial scars. Bury the darn line or scrap the line idea all together!!
24	High voltage electric transmission lines, structures, and termination equipment, to the best of my knowledge, do not ever provide any enhancement to the visual or environment of any landscape or terrain and are there only because of a necessity--the necessity of carrying electrical energy from point A to point B, and the further distribution according to the needs. Keeping this in mind and maintaining a good and aceeptac1e balance between the necessity and environment, Tam submitting the following for your consideration, and hopefully the eventual implementation. First choice would be no visible transmission lines. I don't imagine this would be a realized method of construction because there may be too many terrain and various logistical as well as economic obstacles with the economics being in the forefront of any consideration, Nonetheless it would have the least impact on the critical lakefront environment and scenic "views". Second choice would be construction of the new line in place of the existing westernmost line of the two now existing. This would place it farther away from the homes in the neighborhood and visually partially mask its presence because of the trees in the campground between it and C.R.64. Third choice is the placement of the towers on the immediate west side of C.R. 64. This placement would keep all of the wiring to the pumphouse on the west side ofC.R,64 and there would be no crossover of the roadway. Fourth and last, which involves the placement of the new towers to be on the east side ofC.R.64, would be the least acceptable to me, and 1believe, most of my neighbors, when there are other three other more favorable options. Acknowledging that the visual or scenic aspect of any considerations regarding placement of power transmission lines is unfortunately too often almost at the bottom of priorities when determining the location of structures I don't agree with this philosophy but I understand why it persists. The visual can also be just as important a criteria as avian habitat. In some situations the visual concerns could be much lower while in other circumstances much higher. A better and more comprehensive analysis of any location could conceivably produce more acceptable and pleasing results. Maybe this is the case now in progress on this project--·I surely hope so. The visual impact of anyone turning onto C.R.64 from Hwy 34 would be greatly improved by having the lines placed over the campground as described in NO.2. This campground is in most cases a weekend campground by reservation only and I doubt there is anyone using the campgrounds who would ever pay the slightest attention to any power lines above or towers erected on the ground. There is already in place an existing clear cut area under the existing lines in the middle of the campground. Since there is only one access road, (C,R,64). to my home and all of my neighbors properties, whatever the final configuration or location of the line may become, everyone going to and from their homes in the valley via the C.R.64 intersection at the firehouse, will be subjected to the visual encroachment of the lines and towers, It would be wise to do it right, visually, environmentally, and culturally(?) acceptable to the homeowners in the immediate area as well as fulfill the requirements of the WAPA electrically. I am going to contact directly or indirectly as many of my neighbors as possible and try to create more interest now that a little more is known about the scope of the project so they may be contacting your office for some possible additional information. Removing the old wood poles requires the replacement with new 90 to 95 ft, towers. I would like to see the use of the pre-rusted single tubular mono-tower which blends into the landscape reasonably well and no consideration be given to the four-legged lattice style, galvanized or coated steel structures so often used on many lines. This area is

	very sensitive to "scenic views", lake scenes, and mountain scenes reflected by the market pricing of real estate, Any encroachment by power transmission lines as mentioned earlier should blend in well or the value of the adjacent properties usually are decreased. Neither I or any of my neighbors would want to experience a decrease in our property values. One observation 1have recently made of the e)listing 65 foot +/- wood poles is the compatibility of their appearance next to lodge pole pine trees. Steel mono pedestal towers do not have the natural quality took that wood poles have but if they are prerusted they are much preferred over the lattice structures.
25	We, as property owners, experience the visual impact of the towers daily whereas campers camp in the campground because of the lake views and shoreline exposure, fishing, facilities, and privacy requiring reservations to use the campground, They pay no attention to what's up in the sky above them or how many wires arc overhead and because of their one or two day stays in the campground, they concentrate only on their camp-out. We, as neighbors to the campground, have a much broader interest in the surrounding area and are much more aware and expect more of what's around us.
26	The EIS will address impacts from the proposed project and a range of reasonable alternatives that achieve that same purpose and need. This notice is to inform agencies and the public of the proposed project and solicit comments and suggestions for consideration in preparing the EIS. To help the public frame its comments, this notice contains a list of potential environmental issues Western has tentatively identified for analysis. These issues include: visual impacts.
27	We live now with the shortsighted "savings" of constructing utility poles and wires across every stretch of land in our country because people did not put their collective foot down to require buried utility lines from the beginning. We must now do the right thing before our only scenery is metal and wire! If for no other reason, couldn't you have pity on Grand County where we've lost so much of our forests to not overpower what's left of our neighborhood with utility structures and power lines? Even if we had our beautiful trees back we don't want them to be dwarfed by +100' metal structures. You might want to consider your long-term benefits of burying the lines: not only would it show your responsibility for the environments of your customers but it would also ensure growth of your customer base by attracting buyers and builders to an area kept pure, undefiled by mass of metal. I understand that burying the lines will be more expensive at the outset, but I beg you to factor in the long-range benefits to residents and tourists, wildlife, environment and commerce as well as the good will to and gratitude of current and future generations.
28	Expert Harry Orton, Orton Consulting Engineers International Ltd., indicates underground lines are safer, preserve scenic beauty and cost nearly the same as overhead lines over the long term. Economically, property values will decline. Real estate agents are having difficulty selling property near the proposed route already. Potential buyers will choose areas with more scenic views; tourists who value the peaceful undeveloped character now present will go elsewhere.
29	I also agree with Grand County's comments regarding the need to not interfere with Wildlife, nor scenic views.
30	The degradation of the scenic corridor is too high a price to pay for this “back-up” power. Continue to use the tunnel route, or consider going underground to windy gap.
31	The Property enjoys rich and valuable environmental resources. Conservation values associated with the Property include scenic and open space values, agricultural values, natural habitat, native vegetation, rare plant communities, and riparian and wetland values. These values are discussed further in Section 3, below. Colorado law recognizes the importance of these natural elements and ecological values and has created conservation easements as a key tool to facilitate private efforts to preserve natural systems. See C.R.S. §§ 38-30.5-101 - 38-30.5-111. These values have been identified throughout the Property and warranted protection through the placement of conservation easements on various parcels in favor of The Nature Conservancy. Copies of these deeds of conservation easement already in place were provided with our January 17, 2007 letter. Many of these same values are now threatened by Alternative C.
32	Your plan will essentially amount to an unlawful "taking" of our views, wildlife habitat, radio and TV reception, and a quiet and safe environment. The huge towers and transmission lines as planned will also have a severe negative impact on the tourist economy of our

	area. As it seems unlikely that we need double the power locally, we assume your plan is for more power for the pumping of water out of Grand County and to the Northern Colorado Water Conservancy District. Should you be able to prove a need for the powerful, 138kV lines to replace the existing lines, the solution to all the above would be to bury them underground, reducing EMF exposure and preserving scenic beauty.
33	Economically, property values will decline (just ask the real estate agents now trying to sell property near the proposed route). Potential buyers will choose areas with more scenic views; tourists who value the peaceful unworldly character now present will go elsewhere. Economically, as a community we stand to suffer. Who profits?
34	We strongly believe that the area's beauty affected by these lines receive the greatest influence. This is a residential community which depends heavily on tourists. These unsightly power lines should be underground to avoid the detrimental impact that the unsightly lines would have on the tourists coming to view and enjoy the area, and spend their money.
35	We do not want the view spoiled, in addition to the many other contributing factors that make these 105-foot towers a terrible idea.
36	Views are impacted with the existing line and options Band C have location view issues to either selection. There is a priority to views within the 3 lakes Design Review sub area. Given the legislated mandate to have extra concern over views in the 3 Lakes area and that Relationship with the southern portions of Rocky Mountain National Park, it would seem view considerations favor option C over either A or B.
37	I understand the effort to increase reliability of electrical services. However, human real property values (safety, view, etc) and wildlife needs (safety, transit) militate against adding towers twice as tall as the existing problematic towers!
38	It took us three and a half years to locate our property with its magnificent view; abundant wildlife; quiet tranquil mountain charm; excellent TV, radio, and wireless internet reception without interference; and no 105',138kV transmission towers with 8 wires and accompanying "noise." Our property is south-sloping. Our entire home is oriented to the south with incredible views from nearly every room. The front of our home is practically all widows to take advantage of the view. We buried the electric line to our home so we they would not obstruct that view. WAPA's proposed 138kV transmission lines in our view corridor, which extends all the way to the Winter Park ski slopes, would mar the beautiful mountains and valleys that we enjoy every day. We will see them from our dining area, bedrooms, living room, study, hot tub, deck and driveway. They will annoy us when we awake, at breakfast, lunch and dinner; as we garden and do other chores, when we try to relax on our deck, as we hike our property and in the Arapaho National Forest immediately behind our home, and as we depart and arrive at our home every day. They will annoy our children and grandchildren and will be obstacles for the next 50 years or more until they are replaced with undergrounding technology that now exists. Currently, there are no power lines of any kind behind Table Mountain, so WAPA would be introducing them into a pristine area. We and others hike in the National Forest lands on Table Mountain and would look down on unsightly towers and wires. WAPA's use of brown painted towers would not help. For over half the year they would be obtrusive beyond anyone's imagination against the white snow.
39	Because Alternative C would locate a portion of the transmission line near the top Of a ridge line just south of the Property, it would have significant adverse impacts to the Property. These impacts include, but are not limited to, new surface disturbance and the potential for the spreading of noxious weeds, disruption of the viewshed from the Property (as well as from Highways 34 and 40), and impacts to the economic value of the Property.
40	Location of the powerline just south of the southern edge of the Property unnecessarily places the powerline near a ridge line. This location will undoubtedly result in adverse viewshed impacts to both the Property and to Highways 34 and 40 that would otherwise be reduced if the Willow Creek Pipeline ROW were used. It is our understanding that one of WAPA's major considerations in determining alternative alignments was to reduce the viewshed impacts associated with the powerline. An alignment near a ridge line will have precisely the adverse viewshed impacts that WAPA claims to be seeking to avoid. These impacts must be fully considered and appropriate mitigation measures proposed in the EIS.

41	This will decrease our property values as it goes directly in front of our views of Lake Granby and the ranches coming from county road 41.
42	Alternative C unnecessarily reroutes the transmission line on previously undisturbed lands, will have significant adverse impacts on sensitive species and habitats, will adversely affect the viewshed (including the view from Table Mountain and the Arapahoe National Recreation Area), will have significant negative economic impacts on the Property, and may degrade the conservation easement values present on the Property.
43	The existing power lines running along Highway 34 (Mountain Parks Electric) are ugly. Adding tall steel poles at the height proposed to this view would be intolerable. Moving the power lines to the west side of Table Mountain Seems to be the only choice to limit the sight of them from the public view. Once relocated, the higher poles should be painted a color to help them blend with the background.
44	We have a beautiful valley-please don't distort it!
45	Every day when I turn on to CR 64 from US 34 I am confronted with the most distracting eyesore to our beautiful mountains surrounding Lake Granby, your present power transmission lines. To increase the size of this sight would be devastating.
46	Beetle kill has made everything above the ground highly visible.
47	We moved to the Stillwater area because of the pristine views and natural beauty. That would be destroyed if the lines are not buried.
48	Our main concerns have been loss of views with the line crossing in front of our house, as well as a potential decline in property values that could arise from this.
49	The height of new poles if installed in the existing easement would make them visible from all areas of the Arapahoe Recreation Area.
50	The proposed towers will emit a constant "noise" and be very visible, especially now that we are losing all of our tall trees to beetle kill, which provided cover for much of the existing single circuit, 69kV, 50' wood pole, H-frame design.
51	We are in the process of putting in a small subdivision just west of the Cherrington Meadow and it appears that your transmission line will run right in front of it. Now that Hwy 34 is a designated scenic byway, it seems ridiculous to put a big ugly power line the length of that meadow, which is (other than the lake) about the only scenic thing between Grand Lake and Coffee Divide! Any thought given to burying the line across that meadow?
52	The land belongs to all of us and our progeny; therefore all uses must be in our best interests for the long term. When I drive to Grand Lake I want to see the mountains, not power lines. When I boat on Lake Granby I want to see the expanse of the lake, not power lines. When I sit on the deck I expect to wave to and chat with neighbors, not look across power lines. When I drive by the Willow Creek road I enjoy seeing antelope running free, not avoiding power line structures.
53	As Grand County expands, with more development, we must upgrade our image. Overhead power lines are one of the most unattractive and devaluing additions to our county. We should be moving toward burying existing power lines .. certainly not adding more and larger lines.

LAND USE

Keywords searched: land use, conservation, easement, existing land use, future land use, zoning, zoning code, zoning regulation, master plan, plat, development

Number	***Comment***
1	Western's staff has proactively sought out current land use applications in the area where the proposed service will be located. In addition, there is a segment of the existing transmission line that will be relocated from existing development where Western operates with limited right of way. They have attempted to minimize conflict with existing and planned land uses.

2	I see no benefit to clearing public land to put powerlines through these woods and meadows when they are in place now.
3	This firm represents Fairbanks Daily News-Miner, Inc., Hudler Holdings LLC and Rick A. Pederson, LLC (collectively, the "Ranch Owners"), owners of approximately 980 acres of land formerly known as the East Hudler Ranch and now known as the E Diamond H Ranch (the "Property"). The Property is rich in environmental resources and was purchased by the Ranch Owners in 2003 with the intent to conserve the Property. To date, conservation easements have been placed on approximately 210 acres out of the total 980 acres in an effort to preserve significant environmental and conservation values present on and around the Property. As discussed in greater detail herein, placement of an additional 560 acres (including approximately 315 acres in 2007) in conservation easements is planned in the coming years. The Ranch Owners are very concerned about WAPA's persistent pursuit of Alternative C, despite the significant adverse impacts that this alternative will have on the environmental and conservation values. Alternative C unnecessarily reroutes the transmission line on previously undisturbed lands, will have significant adverse impacts on sensitive species and habitats, will adversely affect the viewshed (including the view from Table Mountain and the Arapahoe National Recreation Area), will have significant negative economic impacts on the Property, and may degrade the conservation easement values present on the Property. If Alternative C were implemented, the damage to the Property, including the existing and planned conservation easements, could well be in the millions of dollars. WAPA would be required to pay compensation for such damage. Because of these adverse impacts, the Ranch Owners continue to vigorously oppose any attempt to reroute the transmission line on or near the Property, which would disrupt the conservation values for which this Property has been protected. The Property enjoys rich and valuable environmental resources. Conservation values associated with the Property include scenic and open space values, agricultural values, natural habitat, native vegetation, rare plant communities, and riparian and wetland values. These values are discussed further in Section 3, below. Colorado law recognizes the importance of these natural elements and ecological values and has created conservation easements as a key tool to facilitate private efforts to preserve natural systems. *See* C.R.S. §§ 38-30.5-101 - 38-30.5-111. These values have been identified throughout the Property and warranted protection through the placement of conservation easements on various parcels in favor of The Nature Conservancy. Copies of these deeds of conservation easement already in place were provided with our January 17, 2007 letter. Many of these same values are now threatened by Alternative C. In 2003, the Property was platted and divided into 28 parcels of35 acres each, known as the C Lazy U Preserves. The C Lazy U Preserves was platted as a covenant controlled ranch preservation community with special emphasis placed on maintaining the agricultural and conservation values of the Property. To this end, conservation easement donations have already been placed on some of these parcels. Moreover, conservation easements for 16 of the remaining parcels (approximately 560 acres) are planned for the coming years. Due to the nature of state and federal tax laws that govern conservation easement donation, in order for the Ranch Owners to obtain the full tax benefits for the value of the conservation easement donations, the total value that may be donated in any given year is limited. This means that the number of parcels that can be placed into a conservation easement per year is also limited, making the placement of the Property into conservation easements a multi-year process. Following completion of extensive environmental baseline studies and appraisals, six parcels were placed into three separate conservation easements in 2006. An additional nine parcels are planned for conservation easement donations to The Nature Conservancy for 2007. The Ranch Owners plan to donate conservation easements for the majority of remaining parcels in following years. The existing and planned conservation easements function to preserve and protect, and to enhance and restore, the open space and significant natural features and values of the Property. The specific purposes identified in the existing conservation easements include conservation of important habitat for wildlife, protection of rare or unique native plants, and conservation of the diverse forest, meadow, and riparian vegetative communities and the wildlife inhabiting these communities. These easements recognize that protection of the Property will contribute to the conservation of habitat for wildlife and plants and place affirmative restrictions on activities that may occur on the protected parcels. Alternative C threatens these values and is inconsistent with the uses allowed under the existing conservation easements. Moreover, the adverse impacts resulting from implementation of Alternative C

	threatens to degrade the very values that the Ranch Owners are seeking to protect, thereby jeopardizing the conservation easement future of these parcels. WAPA must, at a minimum, recognize and account for the potential loss of these conservation values and adverse impact to the value of these conservation easements, if Alternative C were to be implemented. Damage to the Property's conservation values may adversely affect the value of the planned conservation easements and consequently may result in impacts to the donation value that could be claimed by the Ranch Owner under federal and state law. It is estimated that the value to the Ranch Owners of the existing and planned conservation easement donations for the Property will ultimately be in the millions of dollars. If Alternative C is implemented, WAPA would be required to compensate the Ranch Owners to the full extent of the lost economic value to the Property and related existing and future conservation easements. There is a strong likelihood that significant adverse impacts affecting unique characteristics on and near the Property would result from Alternative C. It is precisely these values that the Ranch Owners and The Nature Conservancy have sought to protect through placement of conservation easements on the Property.
4	It appears to me the cost of increasing capacity would be higher with option B as the land values, small lot sizes and multiplicity of owners will force many of the expansion easements into the creation of unusable remainders. There are several cases where existing structures would be within the new easement and additional properties will have significant easements to be purchased. It appears easement costs would be less expensive across agricultural and public land as opposed to residential or commercial properties. This should favor option Cover B. While not expressed by Grand County, there is an economic downside to County assessments and taxes by removing or devaluating residential properties as would occur under option B. I am unable to evaluate the reduction in assessed valuation impact to entities such as the Fire District, Recreation District and School District, but clearly residential and vacant residential properties are taxed at a higher rate than agricultural land and public lands bear no tax burden.
5	I have owned and lived in Scanloch Subdivision for 35 years. It is my primary residence. The possibility of widening the existing 30' easement to 100' would render much of my property unusable and some existing buildings would have to be removed. It would be a "taking". The height of new poles if installed in the existing easement would make them visible from all areas of the Arapahoe Recreation Area.
6	We appreciate the opportunity to comment. We support that objective to improve system reliability and understand the benefits to the citizens of Grand; however, we do believe that there are elements of the project that are inconsistent with criteria in the Three Lakes Design Review Area (Section 14.5) of the Grand County Zoning Regulations. The Grand County Zoning Regulations require electric utilities to minimize the visual degradation of the landscape caused by power lines and towers. Again, staff requests that Western evaluate the use of the existing water pipeline between Windy Gap and Lake Granby to carry the proposed electrical transmission lines. Joint use of the pipeline for both conveyance of water and installation of the electrical lines is a sustainable alternative that would eliminate a portion of the 12- mile project to currently be only evaluated in an aboveground option. As stated above, we believe this process should include an evaluation of the use of underwater electrical cabling to carry the proposed electrical service from Windy Gap to Lake Granby.
7	GRAND COUNTY ZONING REGULATIONS - SECTION 14.5 THREE LAKES DESIGN REVIEW, The Three Lakes Design Criteria was developed to support the enabling legislation of the Arapaho National Recreation Area. It is the intent of these standards to foster sensitive and creative solutions for facilities located in this area. It is utilized in review for all projects located within the area. We encourage Western to fully analyze the impact of the proposed tower structures on the landscape within the Three Lakes Area. The key element of design criteria in this area is a harmonious and appropriate design. The proposed tower structures at 120 feet, are intrusive to the overall panoramic mountain and scenic view shed and do not easily blend into the natural, surrounding landscape. The Grand County Zoning Regulations require electric utilities to minimize the visual degradation of the landscape caused by power lines and towers. Again, staff requests that Western evaluate the use of the existing water pipeline between Windy Gap and Lake Granby to carry the proposed electrical transmission lines. Joint use of the pipeline for both conveyance of water and installation of the electrical

	lines is a sustainable alternative that would eliminate a portion of the 12 mile project to currently be only evaluated in an aboveground option. As stated above, we believe this process should include an evaluation of the use of underwater electrical cabling to carry the proposed electrical service from Windy Gap to Lake Granby.
8	We have evaluated the proposed project under the appropriate goals from the Grand County Master Plan: MAINTAINING OPEN SPACE AND WILDLIFE HABITAT: We have concerns that the proposed alternative may have an adverse impact on the wildlife habitat, particularly with critical wintering habitat and migration routes. It is our understanding that studies are underway, and Western will present findings with regards address this concern. Upon completion of this analysis, Western shall incorporate mitigation that will minimize side effects such as wildlife habitat disruption in their final proposal. PROTECTING THE COUNTY'S RURAL CHARACTER WHILE MAINTAINING THE ECONOMY: Reliable, cost-effective electrical services are a basic need for the citizen's of Grand County. Mountain Parks Electric is responsible for this service to Grand County. Mountain Parks Electric will receive a direct benefit from Western's proposed upgrade. We appreciate their ability to provide cost effective, dependable electrical service to the varied topography, remote areas and diverse ecosystems within Grand County. We also commend their proactive outlook to identify current and future service needs of the community, and to identify appropriate capital improvements to meet those needs. IMPROVING THE QUALITY OF NEW DEVELOPMENT AND MINIMIZING ITS IMPACT: We acknowledge that system reliability will be improved with the looped transmission. The delivery of reliable, cost-effective electrical service will support the needs of existing and future customers in an area extending from Rocky Mountain National Park, south to the YMCA Snow Mountain Ranch, between Byers Canyon and the Continental Divide. With regards to the proposal using aboveground facility, we encourage Western to limit site disturbance and vegetation clearing that is visible from residential developments and public roads by means of minimizing clear-cut widths and other established landscape techniques, such as a revegetation plan. The proposed option of a single pole tower does not minimize this impact. Comments were made at the public meeting related to the potential of underground construction of the electric transmission lines. We understand that there are on-going studies to evaluate the proposed alignment on historic and archeological sites. We encourage that you share any information about potential alignment/historic site conflicts. Western's staff has proactively sought out current land use applications in the area where the proposed service will be located. In addition, there is a segment of the existing transmission line that will be relocated from existing development where Western operates with limited right of way. They have attempted to minimize conflict with existing and planned land uses. 2 Grand County staff has received several comments from concerned citizens regarding the question of underground installation and why it was not evaluated. This comment is directed on the installation of a new underground facility. Staff understands that there are issues with line separation, line protection, safety and right-of-way with an underground system. However, Staff believes that there may be another option that would meet the same intent of an 'underground installation'. Staff requests that Western evaluate an option for use of the existing pipeline between Windy Gap and Lake Granby for the installation of a cable system to carry the proposed electrical transmission lines. Joint use of the pipeline for both conveyance of water and installation of the electrical lines would be a more sustainable alternative. Use of this pipeline as a 'chase' would eliminate the need for new construction, and would be more aesthetically compatible. It would allow easy access for maintenance to the electrical lines since the pipeline is not in continuous use for the conveyance of water. Materials and installation methods for underwater electrical cabling is technically feasible. ENSURING THAT NEW DEVELOPMENT IS SERVED BYADEQUATE INFRASTRUCTURE. The main objective of this project is to enhance system reliability by providing a looped transmission system. Currently there is concern with the potential loss of the 69- kV cable in the Alva B. Adams Tunnel. This cable supplies a secondary source of electrical power for a major share of the citizens of Grand County. It allows looped transmission service between Estes Park and the Windy Gap Substations. As you have indicated, this cable is antiquated and in need of replacement. There is a direct beneficial impact of this project with the provision for a second source of power to the area between Grand Lake south to Granby, from the Continental Divide west to Byers Canyon. The proposed rebuild will provide residents of Grand County a reliable,

	looped power supply.
9	The alignments presented for the power line rebuild cross and run parallel to portions of Lake Granby and several streams in the Willow Creek Valley. Line construction, removal, and maintenance activities, including access roads, can impact surface waters, wetlands, fens and riparian areas. The runoff of sediments and pollutants along the ROW and the potential disruption of established drainage patterns may require mitigation to minimize impacts. To the extent practicable, impacts to wetlands should be avoided and work near lakes or streams should be carefully managed to avoid impacts to surface water quality and aquatic life. If transmission line construction or removal involves the deposition of dredged or fill material in waters of the United States, including wetlands, the U.S. Army Corps of Engineers should be contacted to determine if a 404 permit under the Clean Water Act. Storm water permits for this project may also be required from both EPA and the State of Colorado. These permits generally require the development a Storm Water Pollution Prevention Plan (SWPP) that may be applicable to both permits. Such plans require the use of best management practices to protect surface waters and wetlands, endangered species and historic properties. For information on securing a federal permit, contact Greg Davis in EPA's Storm Water program at 303-312-6314. For the State of Colorado, contact Nathan Moore at 303-692-3555.
10	WAPA has produced little evidence to convince us that there is a real need to double the power for our 6750 or so local users. What is apparent from the location of the line leading directly to the Granby Pumping Station is that the Northern Colorado Water Conservancy District needs more power to pump water out of the county for East Slope development. The water in Windy Gap reservoir belongs to the East Slope. In 2003 they submitted plans to improve, or "firm," their water reliability by requesting two additional reservoirs with capacities of 100,000 and 30,000 acre-feet of water. It is hard to believe there is no connection between these projects. Shadow Mountain Lake and Grand Lake are already polluted with toxic algae. The idea of taking more water out of the county and erecting unsightly towers to do so at our expense is simply preposterous. Moreover, on good authority, we have recently learned that the lines in the Adams Tunnel have not been used to transmit power back to Grand County for several years, as the switch is locked out. In that light, we further question the premise for the entire project which is based on the fact that these existing lines in the Adams Tunnel are nearing the end of their useful life.
11	In addition, the Orvis Golf Course and large proposed development around it would be adversely impacted by the erection of such towers and lines so close to this development.
12	I believe we can grow and develop responsibly, and that there is a finite amount of resources available for all growth, both in the mountains and on the front range. We cannot allow the unlimited, blind destruction of our resources for unlimited growth.
13	Living near or under such lines presents many unfavorable outcomes for residents and tourists - views, noise, radio and TV interference, and exposure to EMFs. Pilots face higher risk for accidents. Hawks, eagles and other migrating birds will be impacted. Herds of 100+ elk and moose will have their migratory route, along the proposed route, disrupted. With more and more development, this is their only path. Ranchers have reported that after transmission lines were run, cows died at a higher rate. And when our ranchers become frustrated with the 138kV transmission lines and sell out, we lose the pleasurable vistas their lands provide every day.

WILDLIFE

Keywords searched: wildlife, threatened, endangered, candidate, sensitive, boreal toad, big game

Number	***Comment***
1	The proposed transmission line rebuild will have both direct and cumulative impacts to the greater sage grouse in the area. The project

	lies within occupied range of the greater sage grouse as defined by the Colorado Division of Wildlife. Greater sage grouse utilize this area year round for breeding, brood-rearing, summer and winter habitats. The greater sage grouse is a state species of special concern and has been petitioned multiple times for listing under the Endangered Species Act. The Middle Park Greater Sage Grouse Conservation Plan (2001) will provide more detailed information on greater sage grouse in Middle Park. Currently a comprehensive Colorado Greater Sage Grouse Conservation Plan is in its final draft stages and should be available later this year. Additionally, this area is the southeastern most range for the greater sage grouse, and has been significantly compromised by surrounding developments, habitat fragmentation, and human disturbance. Current information does not support any exchange between North Park or other western Middle Park greater sage grouse populations and is isolated. The transmission line rebuild will place the disturbance in closer proximity to this breeding area. Greater sage grouse collision potential and increased predation is likely to occur with the proposed rebuild alternative. Overall, the existing route imposes the least impact to greater sage grouse and minimizes cumulative impacts already in place with other significant habitat losses in the area. The area of Table Mountain and the surrounding habitats are defined as winter range for elk and mule deer. All human activities associated with any construction and maintenance of this transmission line within winter range should not take place between November and April. This will help maintain the viability of this severely limited seasonal habitat. Human disturbance in this area may displace elk to adjacent private lands and cause conflicts. The invasion and spread of non-native plants and noxious weeds within the rerouted alignment are of concern. These plants reduce the density of native vegetation and can out compete native plants that many wildlife species are dependent on. Precautions should be taken to reduce the introduction or spread of these plants. Cleaning vehicles before introducing them to a new area and having a comprehensive plan to control weeds after construction takes place is imperative. A variety of migratory birds occur in the area. These include a variety of raptors including eagles and osprey. Ospreys also have attempted to utilize other utility poles in the area for nesting. Impacts from collisions and electrocutions may increase mortality with these species especially considering the increased height and number of lines associated with the new transmission line. The CDOW is very concerned about the wildlife impacts that re routing and increasing the size of the structures will have on wildlife in the area. In addition to direct effects, this preferred alternative will also contribute to cumulative impacts to wildlife.
2	First of all I am opposed to any proposal which would adversely affect wildlife and any existing scenic corridors. I also do not want any increase in height of power lines. I feel increase height only negatively impacts wildlife.
3	If you truly care about human and environmental welfare, you must put financial costs below them. I understand that burying the lines will be more expensive at the outset, but I beg you to factor in the long-range benefits to residents and tourists, wildlife, environment and commerce as well as the good will to and gratitude of current and future generations.
4	This project also has the potential to impact wildlife, native vegetation and visual resources. The DEIS should specifically evaluate impacts and appropriate measures that will be employed to protect habitat for sage grouse, deer, elk, raptors, fish and other species that may be impacted by transmission line construction, removal and maintenance activities. Provisions for the management and control of noxious weeds and invasive plant species along ROW corridors should be included in project alternatives. EPA recommends that any disturbed areas be revegetated with native, weed-free vegetation and monitored as part of the ROW maintenance provisions following construction.
5	The impact of the project on wildlife during and after construction will need to be carefully assessed.
6	I understand the effort to increase reliability of electrical services. However, human real property values (safety, view, etc) and wildlife needs (safety, transit) militate against adding towers twice as tall as the existing problematic towers! Please re-use the existing towers and/or place/replace the in-tunnel electrical lines or bury the new lines underground with the absolute minimal surface disruption!
7	It took us three and a half years to locate our property with its magnificent view; abundant wildlife; quiet tranquil mountain charm; excellent TV, radio, and wireless internet reception without interference; and *no* 105',138kV transmission towers with 8 wires and

	accompanying "noise." Our property is south-sloping. Our entire home is oriented to the south with incredible views from nearly every room. The front of our home is practically all widows to take advantage of the view. We buried the electric line to our home so we they would not obstruct that view. Our property is on the route of antelope, moose, and hundreds of elk who winter here and migrate south on the proposed power line route behind Table Mountain. With fall approaching we will have moose and herds of elk bedded down on our hillsides and right next to our house. Every day we use our binoculars to spot wildlife behind our house and in front of our house in the valley. The proposed route will disrupt wildlife migration and interfere with our sightings.
	Grand County has concerns regarding the direct consequences of the proposed installation in overall impact and impairment to visual resources, and wildlife in the area within and adjacent to the Arapaho National Recreation Area. MAINTAINING OPEN SPACE AND WILDLIFE HABITAT: We have concerns that the proposed alternative may have an adverse impact on the wildlife habitat, particularly with critical wintering habitat and migration routes. It is our understanding that studies are underway, and Western will present findings with regards address this concern. Upon completion of this analysis, Western shall incorporate mitigation that will minimize side effects such as wildlife habitat disruption in their final proposal.
8	I also agree with Grand County's comments regarding the need to not interfere with Wildlife, nor scenic views.
9	This letter is to express strong opposition to building 138kV towers and transmission lines from the Granby Pumping plant to Windy Gap. These have no place In this valley. They would destroy the character of this mountain resort area and pose unnecessary threat to the wildlife in the valley. Of special concern would be the danger to migratory birds such as the bald eagles that winter in the area, the breeding white pelican colonies and ospreys. Camouflage of the towers would not take away the danger, especially during potential heavy wet spring snows. The proposed alternatives such as replacing the Adams Tunnel cable or burying the lines and then following the Windy Gap tunnel make much better environmental sense.
10	Please seriously consider the underground placement of these power lines to eliminate scenic pollution, wildlife disturbances, potential health impacts and overall disruption of the quality of our outdoor experiences.
11	The existing and planned conservation easements function to preserve and protect, and to enhance and restore, the open space and significant natural features and values of the Property. The specific purposes identified in the existing conservation easements include conservation of important habitat for wildlife, protection of rare or unique native plants, and conservation of the diverse forest, meadow, and riparian vegetative communities and the wildlife inhabiting these communities. These easements recognize that protection of the Property will contribute to the conservation of habitat for wildlife and plants and place affirmative restrictions on activities that may occur on the protected parcels. Alternative C threatens these values and is inconsistent with the uses allowed under the existing conservation easements. Moreover, the adverse impacts resulting from implementation of Alternative C threatens to degrade the very values that the Ranch Owners are seeking to protect, thereby jeopardizing the conservation easement future of these parcels. WAPA must, at a minimum, recognize and account for the potential loss of these conservation values and adverse impact to the value of these conservation easements, if Alternative C were to be implemented. Alternative C could significantly affect unique environmental characteristics of the Property and could affect sensitive and threatened or endangered species habitat. As identified in the Walsh report and outlined in our prior comments, Alternative C could significantly adversely affect valuable environmental resources on the Property as a result of both long and short-term surface disturbance to previously undisturbed areas. Aquatic resources, water quality, wetlands, and fens, as well as other important ecological values present on the Property, may be adversely impacted by Alternative C. Because fens take thousands of years to development and are therefore essentially irreplaceable and cannot be mitigated, these potential impacts are particularly troubling. In addition, it is probable that Alternative C could adversely affect threatened, endangered, and sensitive species habitat. As of2003, the Colorado Natural Heritage Program was tracking 29 elements of biological significance within 20 kilometers of the Property. Walsh has concluded that appropriate habitat for some of these elements exists in the area and the potential for short-term, long-term and cumulative impacts to these resources associated with Alternative C is "highly probable."

	Other sensitive and threatened or endangered species and their habitat present on or near the Property may also be adversely affected by Alternative C. WAPA's lack of knowledge about the potential impacts of the Project on these environmental resources does not excuse consideration by the agency, but rather requires the agency to do the necessary work to obtain relevant information. *See Nat'[Parks and Conservation Ass'n* v. *Babbitt, 241* F.23d 722,733 (9th Cir. 2001). Finally, WAPA must take into account the adverse environmental effects of Alternative C caused by the spreading of noxious weeds onto currently pristine lands that surround the proposed ROW. Undertaking new surface disturbance to construct the Project in a new ROW will undoubtedly contribute to noxious weeds being introduced and spreading onto both the Property and areas of the Arapahoe National Recreation Area. Such impacts must be addressed and appropriate mitigation measures developed. There is a strong likelihood that significant adverse impacts affecting unique characteristics on and near the Property would result from Alternative C. It is precisely these values that the Ranch Owners and The Nature Conservancy have sought to protect through placement of conservation easements on the Property. Reasonable alternatives that WAPA should fully analyze include, but are not necessarily limited to: (1) replacement of the Adams Tunnel power cable, which is an inherently reasonable alternative given that there is currently a power cable located in the Adams Tunnel that currently provides a second source of electric power to the area; (2) installation of an underground transmission line along all or portions of the existing route (Alternative B), which would avoid new surface disturbance outside of the existing ROW; and (3) installation of an underwater submarine cable under Lake Granby for portions of the route, which would avoid essentially all impacts to the Arapahoe National Recreation Area. Each of these possible alternatives would avoid significant environmental impacts. Visibility impacts (including those to Table Mountain and the Arapahoe National Recreation Area) would be minimized or totally eliminated and surface disturbance would be temporary, rather than permanent. These alternatives would also lessen any potential impacts to birds and wildlife.
12	Although information has been provided regarding living near high voltage lines, there is no conclusive proof that high voltage doesn't cause illness. The wildlife in the area of Table Mountain is currently more threatened by the mountain lions in residence than by moving the power lines. It is evident to me that alternative C is the best choice. Moving the lines to the west of Table Mountain will keep the visual effects out of the Recreation Area as much as possible and fewer residences will be affected.
13	My family and I have always had a deep respect for preserving the beauty of the natural landscape of Grand County. Where we have control, we do our best to maintain what nature has given us and respect not just the land, but the wildlife as well. We have a deer trail that runs through our property. Although we have just 2.4 acres, we have made it a point to not disturb the area of the deer trail. In addition, when we built our home on our property we did not have overhead power lines installed. Although we incurred a higher cost, we buried our power. They say it starts with one person. I believe that your proposed project would destroy all that we've attempted to preserve and set us back monumentally. As people of this earth are becoming more aware of the impact we have on the environment, it is beyond my comprehension that you would even consider the idea of installing these huge towers in such a non-urban area. I realize that this method would save you lots of money. Are you telling me that money is worth the destruction of animal habitats? Not to mention the destruction of the mountain's natural beauty. This, by the way, is how many of us make our living. The beauty and peace of this area have brought tourists here, thus creating an income for all of us.
14	Your plan will essentially amount to an unlawful "taking" of our views, wildlife habitat, radio and TV reception, and a quiet and safe environment. The huge towers and transmission lines as planned will also have a severe negative impact on the tourist economy of our area. As it seems unlikely that we need double the power locally, we assume your plan is for more power for the pumping of water out of Grand County and to the Northern Colorado Water Conservancy District.
15	Please do not destroy our views, interfere with our health and safety, disturb our land and wildlife, and please don’t put powerlines above ground.
16	I have attached, for your convenience, the most recent federal species list for Colorado. (see list)

17	Our wildlife is struggling as it is because of beetle kill and changes to their migration, let's not run them out completely.
18	Living near or under such lines presents many unfavorable outcomes for residents and tourists - views, noise, radio and TV interference, and exposure to EMFs. Pilots face higher risk for accidents. Hawks, eagles and other migrating birds will be impacted. Herds of 100+ elk and moose will have their migratory route, along the proposed route, disrupted. With more and more development, this is their only path. Ranchers have reported that after transmission lines were run, cows died at a higher rate. And when our ranchers become frustrated with the 138kV transmission lines and sell out, we lose the pleasurable vistas their lands provide every day.

RECREATION

Keywords searched: recreation, tourism

Number	***Comment***
1	We own 9 lots in Scanloch on Table Mountain. The current power towers are unsightly and diminish the recreational value of the Granby/Grand Lake corridor. Evidently the newly proposed plan will be worse. It is unfathomable to us that Western Area Power Authority has no sense of the need for Grand County to be appealing as a tourist and vacation home destination, separate from the numerous new subdivisions that are burying their lines. The economy of Grand County needs the assistance of governmental entities to enhance the quality of life rather than be a detriment. There is no reason that Grand County doesn't compete with Summit County as a resort community as it has more natural amenities. The 138kv lines are likely a health hazard as well as a visual detraction.
2	The visual, health and recreational resource issues could all be avoided by burying the lines or putting them in the existing water tunnel. Why should the residents and visitors to Grand County have to put up with visual pollution caused by front range power needs. The transmission line installed through Church Park from Fraser to the Williams Fork is an example of gross visual damage to our public lands resource that could have been avoided by alternative routing or burial of the lines. Don't do it to us again! Bury the lines! Additional issues There is no way that above ground transmission lines benefits the residents of Grand County. The high recreational and residential use of the area should preclude even the thought of above ground lines. Just bury them!
3	Grand County has concerns regarding the direct consequences of the proposed installation in overall impact and impairment to visual resources, and wildlife in the area within and adjacent to the Arapaho National Recreation Area. The Arapaho National Recreation Area (ANRA) is comprised of 36,000 acres located within the upper reaches of the Colorado River Valley. Established by Congress in 1978, the enabling legislation, Pub. L. 95-450 states that the area was established not only due to the high quality recreation, but to protect and conserve the scenic and historic values.
4	Please note that there is a model airfield located southwest of the Willow Creek Pumping Plant. This airfield is an outdoor recreation facility that accommodates radio controlled model aircraft. The Alternative C powerline will be located close to this airfield. There are two concerns: First, model aircraft could strike the lines. Second, the powerline may interfere with radio transmissions and a pilot could lose control of an aircraft which poses a safety risk. The Grand County Commissioners were involved several years ago in securing funding for the airfield. I do not know who administers it.
5	I would like to see the actual cost/benefits of this project applied directly to Grand County. Since the pumping of water thru shadow mountain is causing the lake waters of Grand Lake to be polluted and have a growth of algae that affects drinking water as well as adverse affects for people swimming or recreating in the lakes, this may require a completely new design of the way the water is transferred to Adams tunnel.
6	More than most other communities, the scenery IS Grand County. Most people are here because they appreciate it, tourism depends

	on it.
7	Grand County's bread and butter is tourism. Tourism depends upon maintaining the beauty of the area and the sense of being in the "wide open spaces out west". The area you are proposing to put these extremely high transmission poles is one of the premier dude ranch areas in the nation and it would have a negative visual impact on what makes Grand County special..There are other alternatives which could provide the same service, but would not have the visual impact you are proposing. Please do not use the 100 ft plus pole proposal and use others with less visual impact.
8	The technology is here to put the lines under ground or under water...why even consider in a beautiful and scenic area like Grand County, which is also partly dependent on tourism to build huge power lines and destroy what is most precious to us all??? I thought we live in an age to live forward and not backward. So many concerns about this issue should be considered. This is not something we can change in the next couple years. You cannot seriously consider to put them in an area where people come to live to get away from pollution in any kind just maybe because it is the cheapest way?? We chose to live in this healthy mountain region for a purpose and do not want to have huge power poles planted in front of us. Please consider the alternatives # 6 or 7 on your list.
9	You may recall when we first met, I was breaking ground for our mountain home. At that time, I expressed concerns about impact of the proposed project on: The value of our property, Health and safety (EMF), Loss of view, Loss of tourism. My concerns remain unchanged although, since meeting, other concerns have arisen.

AQUATICS

Keywords searched: aquatic, fish, creek, stream, trout, riparian, wetland

Number	***Comment***
1	The alignments presented for the power line rebuild cross and run parallel to portions o Lake Granby and several streams in the Willow Creek Valley. Line construction, removal, and maintenance activities, including access roads, can impact surface waters, wetlands, fens and riparian areas. The runoff of sediments and pollutants along the ROW and the potential disruption of established drainage patterns may require mitigation to minimize impacts. To the extent practicable, impacts to wetlands should be avoided and work near lakes or streams should be carefully managed to avoid impacts to surface water quality and aquatic life. If transmission line construction or removal involves the deposition of dredged or fill material in waters of the United States, including wetlands, the U.S. Army Corps of Engineers should be contacted to determine if a 404 permit under the Clean Water Act. Storm water permits for this project may also be required from both EPA and the State of Colorado. These permits generally require the development a Storm Water Pollution Prevention Plan (SWPP) that may be applicable to both permits. Such plans require the use of best management practices to protect surface waters and wetlands, endangered species and historic properties. This project also has the potential to impact wildlife, native vegetation and visual resources. The DEIS should specifically evaluate impacts and appropriate measures that will be employed to protect habitat for sage grouse, deer, elk, raptors, fish and other species that may be impacted by transmission line construction, removal and maintenance activities.
2	Alternative C could significantly affect unique environmental characteristics of the Property and could affect sensitive and threatened or endangered species habitat. As identified in the Walsh report and outlined in our prior comments, Alternative C could significantly adversely affect valuable environmental resources on the Property as a result of both long and short-term surface disturbance to previously undisturbed areas. Aquatic resources, water quality, wetlands, and fens, as well as other important ecological values present on the Property, may be adversely impacted by Alternative C. Because fens take thousands of years to development and are therefore essentially irreplaceable and cannot be mitigated, these potential impacts are particularly troubling.

3	Let's see if we can do an underwater pipeline to take the water from the pumping plant intake into the Adams Tunnel and down in elevation in the tunnel to such a level, if possible, that the water will siphon out of Lake Granby. If the drop in elevation is not adequate to create the siphon, maybe a one-way Intake valve can be Installed to pull the water into the pipe. If the siphon could be created to take the water from the Lake Granby intake, a pumping station would not be necessary. It could all be done via siphon! A wye could be installed in the pipe with a one way intake valve to send the water Into the Colorado River below the Shadow Mountain Dam during times when the natural downstream flow was not enough to make up the required stream fiow.
4	In addition any construction in wetland and riparian habitats should be avoided if at all possible. The impact of the project on wildlife during and after construction will need to be carefully assessed.
5	The Property enjoys rich and valuable environmental resources. Conservation values associated with the Property include scenic and open space values, agricultural values, natural habitat, native vegetation, rare plant communities, and riparian and wetland values. These values are discussed further in Section 3, below. Colorado law recognizes the importance of these natural elements and ecological values and has created conservation easements as a key tool to facilitate private efforts to preserve natural systems. The existing and planned conservation easements function to preserve and protect, and to enhance and restore, the open space and significant natural features and values of the Property. The specific purposes identified in the existing conservation easements include conservation of important habitat for wildlife, protection of rare or unique native plants, and conservation of the diverse forest, meadow, and riparian vegetative communities and the wildlife inhabiting these communities. These easements recognize that protection of the Property will contribute to the conservation of habitat for wildlife and plants and place affirmative restrictions on activities that may occur on the protected parcels. Alternative C threatens these values and is inconsistent with the uses allowed under the existing conservation easements. Moreover, the adverse impacts resulting from implementation of Alternative C threatens to degrade the very values that the Ranch Owners are seeking to protect, thereby jeopardizing the conservation easement future of these parcels. WAPA must, at a minimum, recognize and account for the potential loss of these conservation values and adverse impact to the value of these conservation easements, if Alternative C were to be implemented.

HUMAN HEALTH AND SAFETY

Keywords searched: health, human health, public health, safety, public safety, human safety, EMF, electromagnetic field

Number	***Comment***
1	My home is right in the area where you are looking into running these lines. We already have line running and these will only make the views worse. I did not move the area to look at wires. Bury them. I realize this will increase your cost but if you do not bury them then I will be paying the cost by loss of views and decreased property value as well as possible health issues that we may not even be aware of.
2	I would like to know if you will absolutely guarantee my family & future generations will NOT have health issues from a line such as you are proposing. I don't think you can.
3	The 138kv lines are likely a health hazard as well as a visual detraction.
4	It seems to us the real impact issues to be evaluated are; 1) Costs, 2) Views, 3) Health, and in that order. While there is some debate over the health impacts to human beings of electromagnetic radiation, that debate does continue. As an example, the December 2006 issue of Scientific American reports a University of Zurich study that found transcranial magnetic stimulation altered decision-making on the part of human beings. It would seem the fewer persons living around high voltage lines would be the most desirable option given equality in the rest of the issues (option C.)

5	The visual, health and recreational resource issues could all be avoided by burying the lines or putting them in the existing water tunnel.
6	While your literature indicates EMF exposure is safe, Google searches on the internet reveal that state governors and communities throughout the United States are vehemently opposing 138kV transmission lines. They are banned near schools because of the increased incidence of brain tumors and cancer. At this time it is simply unknown how much exposure is safe. A study conducted by the State of Rhode Island indicated that putting transmission lines underground reduces EMF exposure by more than 99% at a distance of as little as 25 feet. If we really need these powerful, 138kV lines to replace the existing 69kV lines, it would obviously be prudent to bury them for health related reasons. Expert Harry Orton, Orton Consulting Engineers International Ltd., indicates underground lines are safer, preserve scenic beauty and cost nearly the same as overhead lines over the long term.
7	The Grand County Board of County Commissioners is responsible for planning for the health, safety and well being of Grand County both now and in the future. We support that need to provide reliable, cost-effective electrical services for the citizen of Grand County.
8	Please seriously consider the underground placement of these power lines to eliminate scenic pollution, wildlife disturbances, potential health impacts and overall disruption of the quality of our outdoor experiences.
9	Another one of my neighbors has the line within 20 to 30' of his house creating some health concerns not to speak of the detrimental effect on property values.
10	The Alternate C affects grazing land, and goes right over another new subdivision planned in the area of County road 41. I would like to see the actual cost/benefits of this project applied directly to Grand County. Since the pumping of water thru shadow mountain is causing the lake waters of Grand Lake to be polluted and have a growth of algae that affects drinking water as well as adverse affects for people swimming or recreating in the lakes, this may require a completely new design of the way the water is transferred to Adams tunnel.
11	The current line is less than 100 feet from my home. For health reasons as well as looks I strongly support moving it to the other side of Table Mountain.
12	There appears to be no firm evidence of the need for the new transmission lines. If it is determined that they are actually necessary, then it is imperative that the lines be buried. Windy Gap and the other places along the proposed area are special, beautiful places that must be preserved. It would be irresponsible to threaten the health of our environment and our children.
13	Although information has been provided regarding living near high voltage lines, there is no conclusive proof that high voltage doesn't cause illness.
14	If you want to talk dollars…what happens to my property values when y'all erect these unsightly towers in my backyard? Not to mention, the dollars I may have to spend in the future on medical expenses to try and preserve my health in the future from exposure to the EMF's.
15	Human real property values (safety, view, etc) and wildlife needs (safety, transit) militate against adding towers twice as tall as the existing problematic towers! Please re-use the existing towers and/or place/replace the in-tunnel electrical lines or bury the new lines underground with the absolute minimal surface disruption!
16	Another safety related issue concerns our local pilots. Our airport is very close to the proposed route of the power lines. Local pilots fly over the proposed route every day taking off and landing, and would face higher risks if the much taller power line towers and lines were built.
17	Grand County staff has received several comments from concerned citizens regarding the question of underground installation and why it was not evaluated. This comment is directed on the installation of a new underground facility. Staff understands that there are issues with line separation, line protection, safety and right-of-way with an underground system. However, Staff believes that there may be another option that would meet the same intent of an 'underground installation'. Staff requests that Western evaluate an option for

	use of the existing pipeline between Windy Gap and Lake Granby for the installation of a cable system to carry the proposed electrical transmission lines. Joint use of the pipeline for both conveyance of water and installation of the electrical lines would be a more sustainable alternative. Use of this pipeline as a 'chase' would eliminate the need for new construction, and would be more aesthetically compatible. It would allow easy access for maintenance to the electrical lines since the pipeline is not in continuous use for the conveyance of water. Materials and installation methods for underwater electrical cabling is technically feasible.
18	Please note that there is a model airfield located southwest of the Willow Creek Pumping Plant. This airfield is an outdoor recreation facility that accommodates radio controlled model aircraft. The Alternative C powerline will be located close to this airfield. There are two concerns: First, model aircraft could strike the lines. Second, the powerline may interfere with radio transmissions and a pilot could lose control of an aircraft which poses a safety risk.
19	One of the properties of power transmission lines is the creation of a magnetic field surrounding the wires when voltage is applied and flows through the lines. The question has been asked of me as to the consequences or effects caused by the more concentrated array of cables, height of the proposed towers, and the voltages involved. I can speak with firsthand experience on a related medical subject, AICD's, (automatic implanted cardio-defibrillators). The manual provided with the units from a manufacturer explains what an electromagnetic field is and how a strong electromagnetic field can cause EMI, or electromagnetic interference. A strong electromagnetic field can temporarily block the functions of an AICD, either preventing it from providing required treatment or causing an inappropriate delivery of a shock. To ensure proper functioning of the AICD they list, in addition to other things, the following to avoid: large generators and power plants, large TV or radio transmitting towers and power lines carrying more than 100,000 volts. The critical distance from power lines for those with implanted medical devices and other possible electrical side effects of the lines varies depending on the source of interference and strength. In reviewing this data, a person having an implanted AICD medical device should follow the instructions of his doctor or manufacturer. This particular characteristic of high voltage power lines and associated towers is a factor to some persons but the primary concern at this time is the location of the new lines and their support structures.
20	Should you be able to prove a need for the powerful, 138kV lines to replace the existing lines, the solution to all the above would be to bury them underground, reducing EMF exposure and preserving scenic beauty.
21	Living near or under such lines presents many unfavorable outcomes for residents and tourists - views, noise, radio and TV interference, and exposure to EMFs. Pilots face higher risk for accidents. Hawks, eagles and other migrating birds will be impacted. Herds of 100+ elk and moose will have their migratory route, along the proposed route, disrupted. With more and more development, this is their only path. Ranchers have reported that after transmission lines were run, cows died at a higher rate. And when our ranchers become frustrated with the 138kV transmission lines and sell out, we lose the pleasurable vistas their lands provide every day.
22	You may recall when we first met, I was breaking ground for our mountain home. At that time, I expressed concerns about impact of the proposed project on: The value of our property, Health and safety (EMF), Loss of view, Loss of tourism. My concerns remain unchanged although, since meeting, other concerns have arisen.

Appendix B
Cooperating Agency Correspondence

United States Department of Agriculture
Forest Service
Arapaho and Roosevelt National Forests and Pawnee National Grassland
2150 Centre Avenue, Building E
Fort Collins, CO 80526-8119
Voice: (970) 295-6600 TDD: (970) 295-6794
Web: www.fs.usda.gov/arp
Fax: (970) 295-6696

File Code: 1950
Date: February 13, 2013

Jim Hartman
Natural Resources Office
Western Area Power Administration
PO Box 28123
Lakewood, CO 80228

Dear Mr. Hartman:

Thank you for providing the anticipated pole locations and routing of the replacement Granby Pumping Station to Windy Gap transmission line, relative to the Cutthroat Bay Group Campground. We are pleased that, there will only be one pole located near the eastern portion of the campground and that the existing ROW across the campground will be vacated.

As sited on the map you provided (attached), the one pole on the eastern edge of the campground (New Pl-10) is proposed to be located immediately adjacent to a campground volleyball court and covered camping pavilion. A location that better meets the requirements to manage the Arapaho National Recreation Area for public recreation and enjoyment, and conservation of the scenic, natural and pastoral values of the area, would be approximately 200 feet further south, to the south edge of the access road into the campground.

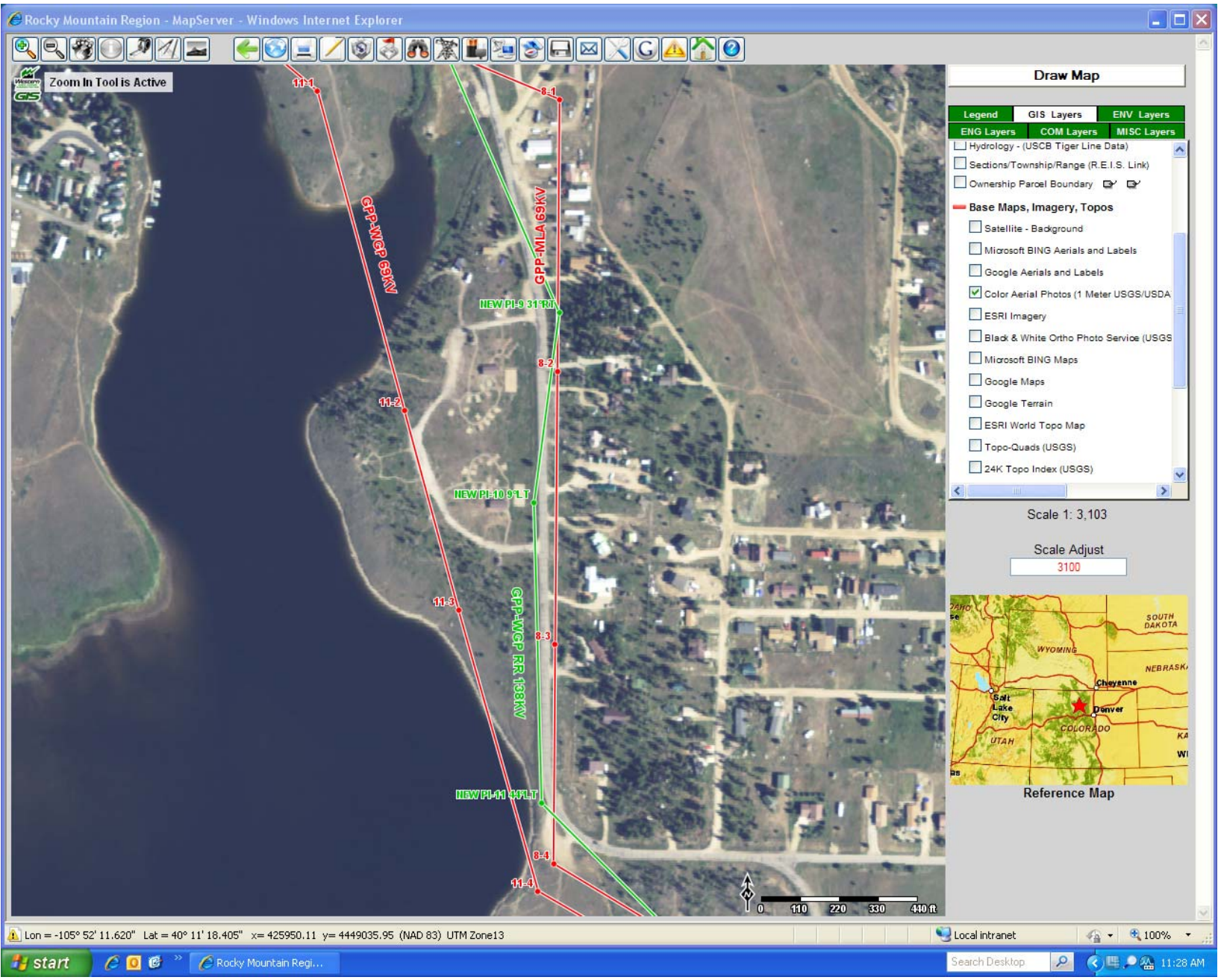
My recommendation is that the proposed pole location be moved south to the south edge of the access road to the campground and that vegetative screening be placed to reduce the visual impact of the pole.

Once again, thank you for coordinating with the Forest by providing the map and proposed pole locations. If you would like to discuss this recommendation or additional details for vegetative screening of the pole, please contact Carol Kruse, at (970) 295-6663, or by email at ckruse@fs.fed.us.

Sincerely,

RON J. ARCHULETA
Acting Forest Supervisor

cc: Craig Magwire, Gregory D Smith, Carol Kruse


Rocky Mountain Region - MapServer - Windows Internet Explorer
Zoom In Tool is Active
11-1
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GPP-WGP 69kV
GPP-MLA 69kV
NEW PI-9 31°RT
8-2
11-2
NEW PI-10 9°LT
11-3
GPP-WGP RR 138kV
8-3
NEW PI-11 44°LT
8-4
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Draw Map
Legend
GIS Layers
ENV Layers
ENG Layers
COM Layers
MISC Layers
Hydrology - (USCB Tiger Line Data)
Sections/Township/Range (R.E.I.S. Link)
Ownership Parcel Boundary
Base Maps, Imagery, Topos
Satellite - Background
Microsoft BING Aerials and Labels
Google Aerials and Labels
Color Aerial Photos (1 Meter USGS/USDA
ESRI Imagery
Black & White Ortho Photo Service (USGS
Microsoft BING Maps
Google Maps
Google Terrain
ESRI World Topo Map
Topo-Quads (USGS)
24K Topo Index (USGS)
Scale 1: 3,103
Scale Adjust
3100
SOUTH DAKOTA
WYOMING
NEBRASKA
Cheyenne
Salt Lake City
Denver
COLORADO
UTAH
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LURLINE UNDERBRINK CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

January 24, 2006

Mr. Rodney D. Jones
Western Area Power Administration, Rocky Mountain Region
5555 E. Crossroads Blvd.
P.O. Box 3700
Loveland, CO 80539-3003

Re: Western Area Power Administration (Western), Granby Pumping Plant – Windy Gap Transmission Line Rebuild Project

Dear Mr. Jones:

Grand County appreciates the update you and your staff presented at the December 20, 2005, meeting of the Grand County Board of County Commissioners. The update provided additional details on the proposed project that will upgrade twelve miles of the existing 69- kV transmission line, to a double circuit operating at 69- kV and 138-kV. It is our understanding that the existing 'H-frame' structure will be replaced with a single tower structure of a height up to 120- ft high. These modifications are needed at both the Granby Pumping Plant Switchyard, and the Windy Gap Substation to accommodate the second line. The latter facility will be a joint project with Western, Tri-State General, Mountain Parks Electric, and the Northern Water Conservancy District.

At the December 2005 Board meeting, a concern was raised regarding the relationship between Western Area Power Administration (WAPA), the U.S. Bureau of Reclamation (USBOR), and the Northern Colorado Water Conservation District (NCWCD) as it relates to the water levels in Lake Granby, power generated by water generated between the Windy Gap-and the Three Lakes water system.

The first concern relates to relationships of the three agencies. Grand County was a participant in a weed control study to determine the best method of controlling weeds in Shadow Mountain Reservoir. The USBOR determined that the best method of weed control in is a drawdown. Grand County will participate in the proposed drawdown, and is being requested to pay a portion of the "lost revenue" to both WAPA and USBOR because power cannot be produced during the drawdown. However, WAPA has pre-sold that power, and must go to the open market to replace the "power lost" during the drawdown period. We agree that this is a legitimate cost for this project; however, it raises the question to the relationship of WAPA, USBOR and NCWCD with regard to water storage. This is an even greater concern with the proposed pre-positioning for the Windy Gap Firming Project. The USBOR has admitted that pre-positioning will allow more power production. The question remains as to who will benefit from the additional power revenues, and who will pay for any costs associated with the proposed pre-positioning identified as part of the Windy Gap Firming project? We are concerned that these direct impacts are not being considered in the Environmental Assessment of this project, as well as the Environmental Impact Study for the Windy Gap Firming project.

The second concern relates to the original project objective used to develop the project scope. The existing 69- kV transmission line is being significantly upgraded to a double circuit operating at 69- kV and 138-kV. The rationale given for the upgrade has been to provide redundancy to the system; however, we again are concerned that the increased capacity is tied to the relationship of WAPA, USBOR and NCWCD with regard to water storage, changes to pumping rates, and ultimately, power production. This again raises the question of the direct impacts and benefits each agency will possibly gain from the improvements, especially when pre-positioning is being considered. It is our concern that the improvements are not just for "maintenance and redundancy of the existing line" but are in fact, related to increased power generation. We again believe that these impacts should be analyzed in both the Environmental Assessment for this project, as well as the on-going Windy Gap firming project.

Concerns regarding the benefits received from all the three agencies, as well as all direct impacts from the proposed projects, are not being captured and analyzed in either the Granby Pumping Plat – Windy Gap Transmission Line Rebuild Project Environmental Assessment or the Windy Gap Firming Project Environmental Impact Statement.

The Grand County Board of County Commissioners is responsible for planning for the health, safety and well being of Grand County both now and in the future. Although we support that need to provide long-term, reliable, cost-effective electrical services for the citizen of Grand County, we have strong concerns with the direct impacts and benefits from this project as it relates to pre-positioning water storage, and power generation.

If you have further questions on these issues, please contact Debra Campbell, with the Grand County Department of Planning and Zoning, 725-3347. Thank you.

Sincerely,

Nancy Stuart	Duane E. Dailey	James L. Newberry
Chairman	Commissioner	Commissioner

NS:dc

cc: County Manager
Mr. Joe Pandy, Mountain Parks Electric
Mr. Les Shankland, Mountain Parks Electric
Ms. Patricia Hesch, U.S. Forest Service
Chandler Peters, US Army Corps of Engineers
Will Tully, U.S. Bureau of Reclamation
Don Carlson, Northern Colorado Water Conservation District
Hank Ipsen,
Barney White
Glen Porzak
Mark Hernanstad
Lane Wyatt, Northwest Colorado Regional Council of Governments
Jeff Clark,
Stan Cazier

Department of Energy
Western Area Power Administration
Rocky Mountain Customer Service Region
P.O. Box 3700
Loveland, CO 80539-3003

JUL 31 2006

Granby County Board of Commissioners
c/o L. Nancy Stuart, Chairman
P.O. Box 264
Hot Sulphur Springs, CO 80451-0264

Dear Ms. Stuart:

This letter is in response to the Grand County Board of Commissioners' letter to Western Area Power Administration's (Western) Rodney Jones dated January 24, 2006. Western appreciates the Commissioners' concerns about the proposed Granby-Windy Gap Transmission Line project and apologizes for the delay in responding to your letter.

Western's Granby-Windy Gap Transmission Line project is an independent project, not connected with the Northern Colorado Water Conservancy District's (District) Windy Gap Firming project. Water storage decisions for the District's Windy Gap Project and for the Bureau of Reclamation's Colorado-Big Thompson Project are made by those agencies. The agencies do consult with Western on the impacts of their storage decisions, but are under no obligation to modify their water requirements to meet Western's power needs. The Commissioners correctly identify that the costs related to the Shadow Mountain drawdown are legitimate power costs. However, without the coordinated planning of all the entities involved, the cost of replacement power for the drawdown could have been significantly higher.

Western expects no additional revenue from the Granby-Windy Gap Transmission Line project. Under certain conditions, the existing high-voltage system will not adequately serve the growing loads in the area resulting in overloads, voltage problems, and potential customer outages. The purpose of the Granby-Windy Gap Transmission Line project is to replace portions of the existing system, some of which were placed in service in the 1930s, to increase power reliability and quality to the electrical consumers in the region.

Western looks forward to continuing to work with you and the other Commissioners on this important project. If you have any questions – please feel free to call me at (970) 461 7322.

Sincerely,

Ron Steinbach

Ron Steinbach
Federal Power Programs Manager

cc:

Mr. Will Tully
Bureau of Reclamation
11056 West County Road 18-E
Loveland, CO 80537-9711

Mr. Don Carlson
Northern Colorado Water Conservancy District
220 Water Avenue
Berthoud, CO 80513-9245

Ms. Lurline Underbrink Curran
County Manager
Grand County
P.O. Box 264
Hot Sulphur Springs, CO 80451-0264

Ms. Debra Campbell
Grand County Department of Planning and Zoning
P.O. Box 264
Hot Sulphur Springs, CO 80451-0264

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LURLINE UNDERBRINK CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

October 24, 2006

Mr. Rodney D. Jones
Western Area Power Administration
Rocky Mountain Region
5555 E. Crossroads Blvd.
P. O. Box 3700
Loveland, CO. 80539-3003

Re: Western Area Power Administration (Western), Granby Pumping Plant/Windy Gap Transmission Line Rebuild Project

Dear Mr. Jones:

Thank you for the ability to comment. First of all, we take exception to this project being referred to as a "rebuild". Twelve miles of single 69kV transmission line will be replaced with a double circuit operating at 69kV and 138kV held by 120 ft. high single tower structures instead of the existing "H" frame structures. Additional capacity is not a rebuild, but an upgrade. While we do not discount the need for your project, we believe it must be appropriately defined.

In our letter of January 24, 2006, we detailed the connection between the Colorado Big Thompson project (CB-T), the Windy Gap Project, and the proposed Windy Gap Firming project, and what we believe is a direct tie to your project. According to Senate Document 80, which is the guiding Federal Legislation that directs the operation of the CB-T project, there are five primary purposes of the project:

1. To preserve the vested and future rights in irrigation.
2. To preserve the fishing and recreational facilities and the scenic attractions of Grand Lake, the Colorado River, and the Rocky Mountain National Park.
3. To preserve the present surface elevations of the water in Grand Lake and to prevent a variation in these elevations greater than their normal fluctuation.
4. To conserve and make use of these waters for irrigation, power, industrial development, and other purposes, as to create the greatest benefit.

P.O. BOX 264 HOT SULPHUR SPRINGS CO 80451-0264

5. To maintain conditions of river flow for the benefit of domestic and sanitary uses of this water.

Power production was a secondary benefit of the CB-T project, and was used to reduce the indebtedness incurred for its construction.

Since the January letter, Grand County, the U. S. Forest Service, Northern Colorado Water Conservancy District, the Bureau of Reclamation, and **Western Area Power Administration** (WAPA) have entered into an agreement which facilitated the drawdown of Shadow Mountain Reservoir for aquatic weed control. This drawdown, which began October 15, 2006, was necessary to meet primary purpose #2 as weed growth in Shadow Mountain Reservoir was heavily impacting recreational facilities, fishing, and the scenic attractions of Grand Lake and Rocky Mountain National Park. According to a specific study conducted by the Bureau of Reclamation in 2004/2005, drawdown was the most effective and efficient method of addressing this issue.

This was not the first time that Grand County has participated with the other agencies to drawdown Shadow Mountain Reservoir to address aquatic weed growth. This same action occurred twice in the 1990's.

Each time a drawdown has occurred, Western Area Power Administration required payment for power interruption. It is our understanding that WAPA premarkets power, and when power generation from the CB-T project is interrupted, WAPA must go to the open market to purchase power that has been presold. In 1991 the cost of this interruption was $32,000. In 2006 the cost was $137,000. Grand County's portion of that cost was $44,000, as was the U. S. Forest Service and Northern Colorado Water Conservancy District. WAPA did not share in the cost. The Bureau of Reclamation will provide some funds for post monitoring ($30,000) as will Northern Colorado Water Conservancy District ($22,000).

The drawdown is a temporary fix to an ongoing problem, and one that will have to be addressed at some future date in order to somewhat control aquatic weed growth and its associated problems.

The power produced by the CB-T project is the same power that is marketed by WAPA, and the same power that must be repaid. The Windy Gap Firming project, if approved, will most likely include prepositioning, and that additional component will allow the production of more power. This will allow the marketing of additional power by WAPA, and as aquatic weed control is done in the future, greater cost sharing by those assisting in addressing the issue.

Grand County strongly believes that the EIS developed for your project must address this issue. We further believe that any future actions to address the weed control that include the interruption of power production should NOT require any repayment to WAPA by any agency other than the Bureau of Reclamation or any agency operating its facilities. This cost should be

considered as part of your upgrade and any agreement that WAPA has with the Bureau of Reclamation of for sale of this power.

Although Grand County supports the need to provide long term, reliable, cost-effective electrical services for the citizens of Grand County, we have strong concerns with the direct impacts of your current operation and the CB-T facilities as they relate the purposes of Senate Document 80. We have even greater concerns with the Windy Gap Firming Project, prepositioning and the direct connection of your proposal to this proposed project. These issues must be addressed in your EIS process.

Again, thank you for the ability to comment.

Sincerely,

Lurline Underbrink Curran

Lurline Underbrink Curran,
Grand County representative under Senate Document 80 and
County Manager

cc: Board of County Commissioners
U. S. Forest Service, Craig Maguire
Northern Colorado Water Conservancy District
Middle Park Water Conservancy District
Colorado River Water Conservation District
Mountain Parks Electric
Deb Campbell, Director of Planning
Fred Ore, Bureau of Reclamation
Will Tully, Bureau of Reclamation
Chandler Peter, Corp of Engineers
Three Lakes Water Shed Association
Barbara Green
Hank Ipsen

Department of Energy
Western Area Power Administration
Rocky Mountain Customer Service Region
P.O. Box 3700
Loveland, CO 80539-3003

DEC 04 2006

Ms. Lurline Underbrink Curran
Grand County Manager
P.O. Box 264
Hot Sulphur Springs, CO 80451-0264

Dear Ms. Underbrink Curran:

This letter is in response to your letter to Western Area Power Administration (Western) dated October 24, 2006. Western appreciates your feedback about the proposed Granby - Windy Gap Pumping Plant Transmission Line Project (Project).

Western understands Granby County's concerns about the name of the project; however, the Project description in the Project Environmental Assessment accurately identifies the Project as a proposed rebuild and upgrade of the existing transmission line.

As Western has stated in prior discussions and communications with Grand County officials, the Windy Gap Firming Project and the Shadow Mountain Lake Weed Reduction Project are not "connected actions" as that term is defined by the Council on Environmental Quality. Actions are connected if they: (1) automatically trigger other actions which may require environmental impact statements (EIS); (2) cannot or will not proceed unless other actions are taken previously or simultaneously; or (3) are independent parts of a larger action and depend on the larger action for their justification. In addition, the Windy Gap Firming Project and the Shadow Mountain Weed Reduction Project are not related to the purpose and need, and are outside the scope of, the Project. Thus, it is Western's position that the Windy Gap Firming Project and the Shadow Mountain Lake Weed Reduction Project are not connected actions that warrant consideration in the Project Environmental Assessment.

The Project and the Windy Gap Firming Project will continue to be evaluated independently. Since Grand County is a cooperating agency with the Bureau of Reclamation in preparation of the Windy Gap Firming Project EIS, you are already involved in that process. The Bureau of Reclamation expects to release a draft EIS on that project in the spring of 2007. The Forest Service completed its environmental review of the Shadow Mountain Lake Weed Reduction Project and issued a decision memo for the project on September 11, 2006, and the project is almost complete.

RECEIVED
BY JA | DATE 13 Dec 2010

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LURLINE UNDERBRINK CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

December 6, 2010

Mr. Roy Gearhart
Project Manager
Department of Energy
Western Area Power Administration
Rocky Mountain Customer Service Region
P.O. Box 3700
Loveland, CO. 80539-3003

Re: Preliminary Draft Environmental Impact Statement (PDEIS) for Granby Pumping Plant-Windy Gap Substation Transmission Line Rebuild

Dear Mr. Gearhart:

I am in receipt of a copy of a letter dated November 12, 2010, addressed to our Long Range Planner, Mr. Ed Moyer. This letter addresses comments made by Grand County as a Cooperating Agency but that Western Area Power Administration (WAPA) considers outside the scope of the EIS or inaccurate and therefore will not be addressed in the draft EIS. Grand County does not agree with WAPA's determination in most instances, and will clarify others. Your letter addresses each of your positions numerically, and this letter will respond to the numbered listed paragraphs.

1. Tri-State owns one the lines being replaced or rebuilt. Regardless of whether any of WAPA's federal preemption arguments are valid, WAPA is required to comply with the spirit of our regulations, and mere cooperation is not sufficient to comply with the spirit of the local regulations. The visual protection of the Three Lakes area is of paramount concern to the county. Grand County, in conjunction with the formation of the Arapaho National Recreation Area (ARNA), adopted regulations that protect the visual quality of the area.

2. Regardless of whether WAPA does or does not comply with local regulations, it does not enjoy immunity from other federal statutes. In this case, Senate Document 80 which authorizes the Colorado Big Thompson Project, imposes requirements on project

features. Importantly, SD 80 requires aesthetic protection of Grand Lake and Rocky Mountain National Park. WAPA cannot ignore the federal mandates that placed the Colorado Big Thompson (CB-T) project in place, established the ARNA, and designated Rocky Mountain National Park. I agree that WAPA has taken steps to minimize the visual impact as you have described in #8 of your letter, and this is appreciated. However, visual impact should be addressed in the Draft EIS and open for debate by the public. How will public need be assessed if one of the desires of the public, strongly expressed in the past, is not open for review and comment?

WAPA contends that the Primary Purpose #2 of Senate Document 80 is not being compromised by the proposed project because the project does not change the manner of operation of existing CB-T facilities and auxiliary features. The Purpose and Need of the project includes a list titled "The proposed project is needed to" and three of those needs are not only specific to the CB-T project's reliability in the future, but also to minimize maintenance costs for WAPA and Northern Colorado Water Conservancy District (NCWCD).

Under Senate Document 80, Grand County, a specifically named beneficiary of the CB-T project, and NCWCD, the only other specifically named beneficiary, are to be provided benefits from the C-BT project. NCWCD's specific benefit is in #4 of the primary purposes which states "to conserve and make use of these waters for irrigation, power, industrial development and other purposes, as to create the greatest benefits." The benefits afforded to Grand County are listed in items (a) through (l) which define how to accomplish the purposes of the project in a "fair and efficient manner, equitable to all parties having interests therein." In order to protect Grand County, the most affected party to the C-BT, the County was allowed to have a "representative that is recognized as the official spokesman for the county in all matters dealing with the project operations affecting Grand County." I am that designated representative.

WAPA has chosen to propose a project that benefits NCWCD, one of the parties identified in Senate Document 80 while ignoring the interests of Grand County that also are protected by Senate Document 80.

WAPA has also chosen to dismiss the replacement of the cable in the Adams Tunnel, a project that would not compromise the aesthetic value of Grand Lake and Rocky Mountain National Park. The cable replacement could also minimize the long-term transmission line maintenance costs as well as an above ground system, in our opinion. In addition, the cable is not as vulnerable to acts of mother nature such as wild land fire.

3. You are correct that the proposed WAPA project does not provide additional power to the CB-T project at this time, but provides reliability in case of failure of the Adams Tunnel cable, "regardless of future growth in the valley." This statement would seem to indicate more power is necessary in the future and this project would be able to handle that load. Growth not only equates to the need for more "electrical" power but for more water. The Granby Reservoir has a storage capacity of 539,758 af. of which there is a dead storage pool of 74,190 af. However, on average, the CB-T has only delivered about 230,000 af. per year through the Adams Tunnel. If

CB-T pumps its full delivery allowance in the future, plus the WG and WGFP needs, I do not believe you are able to state that no additional power will not be needed for the CB-T. Therefore, if you are proposing the project to prevent an anticipated future failure of the power source which serves the CB-T project, you must also consider anticipated changes in operation, which growth and additional need could require.

The Bureau of Reclamation currently has an Amendatory Contract for Introduction, Storage, Carriage, and Delivery of Water for the Municipal Subdistrict, Northern Colorado Conservancy District, Colorado Big-Thompson Project, Colorado dated March 1, 1990, among Reclamation, the Subdistrict and NCWCD. The storage and "carriage" of water from the WGFP project requires an amendment to this contract. Therefore, the CB-T project is operating today over its historic operation in addition to the possible future need for more CB-T project water. It will also have additional pumping or "carriage" demand from both WG and WGFP. The construction of Chimney Hollow Reservoir, which is the main component of the WGFP, allows CB-T water to be transported and stored in Chimney Hollow under what is termed as "prepositioning." If approved, the CB-T project would pump more water, require more electrical load, and change its historic operation.

4. As stated above, while the historic and current pump requirement of the CB-T project may be unchanged, the future requirements could be greater due to increased demand on the CB-T system. Your project anticipates future failure and "growth" but does not recognize that some of the "growth" anticipated is associated with the CB-T project, which not only produces power as a component part but provides water for growth. You state there is no correlation between the proposed project and any water development project, and in that you are incorrect. The WGFP will increase power production for the CB-T project and consequently for WAPA sale on the open market. WAPA is a direct beneficiary of the proposed water development project.

5. Grand County disagrees with your statement that the project does not impact - even incrementally- the aquatic resources, cumulative effects since the project would not affect reservoir water level fluctuations. You deny that the project has any connection with water development projects, yet power production will be increased by the WGFP and has been increased by the WG project. The WG project had aquatic resource effects, and the WGFP definitely will have aquatic resource effects as well as cumulative effects when considered with Denver Water's Moffat Firming Project. Turning Grand Lake, Colorado's largest natural lake, pea green during July, August and September, a high volume pumping season, is an aquatic resource impact. WAPA is gaining additional power production by both the WG project and by the proposed WGFP. WAPA has a direct tie to these projects, and the project to deliver and support the CB-T and its associated needs is direct.

6. WAPA will have more resource, however slight, by more water being pumped through the CB-T project and its component generation stations to support the proposed WGFP if approved.

7. We have explained above the connection with your project, the CB-T project, and other Northern needs and projects. However, in this numbered statement you say that schedules will not be altered. With the proposed WGFP, scheduling of water deliveries will be changed, therefore power needs may also change.

8. Grand County appreciates WAPA's efforts to minimize the visual impact of the project and the changes made to do so.

In conclusion, Grand County does not agree that WAPA has correctly considered our comments as a cooperating agency, and its determination that issues highlighted previously are outside the scope of the project and should not be addressed in an EIS are wrong. We feel that WAPA should coordinate with the Bureau of Reclamation and its review of the WGFP and consider all impacts of both projects cumulatively. We feel it unconscionable that one federal agency, in championing a project for its benefit, chooses to ignore the federal directives and intents of other federal projects.

Thank you for the opportunity to respond. We hope this letter will generate further discussions.

Sincerely,

Lurline Underbrink Curran

Lurline Underbrink Curran,
Senate Document 80 Representative and
County Manager

Senator Mark Udall
Senator Michael Bennett
Board of County Commissioners
Mr. Jim Hartman
Mr. Michael Collins
Mr. Michael Ryan
Mr. Michael Conner
Mr. Hank Ipsen, Holmes Roberts
Ms. Barbara Green, Sullivan, Green, Seavy
Ms. Kristin Manguso
Mr. Ed Moyer

DEPARTMENT OF PLANNING AND ZONING

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April 21, 2010

VIA EMAIL: rjones@wapa.gov
Mr. Rodney D. Jones, Environmental Specialist
Western Area Power Administration, Rocky Mountain Region
5555 E. Crossroads Blvd.
PO Box 3700
Loveland, CO 80539-3003

Re: Grand County Cooperating Agency Comments: Preliminary Draft Environmental Impact Statement (PDEIS) Western Area Power Administration (WAPA), Granby Pumping Plant - Windy Gap Substation Transmission Line Rebuild

Dear Mr. Jones,

Grand County appreciates the opportunity to provide cooperating agency comments on the above referenced PDEIS. It is our understanding that the project will be removing approximately 13.6 miles of existing single circuit 69-kV transmission line and constructing approximately 12 miles of new 138-kV double circuit transmission line, operating at 69-kV and 138-kV, and adding a second power transformer. The existing system is an 'H-frame' wood pole line with heights approximately 60-ft and located within a 30'ROW; they will be replaced with rusted colored Cor-Ten steel monopoles with a height up to 105-ft within a 100'ROW. Modifications will be needed at both the Granby Pumping Plant Switchyard (including a second power transformer) and the Windy Gap Substation to accommodate the second line. Grand County regulations require a Special Use Permit for the aforementioned activity.

Grand County previously provided a Comment Letter dated August 15, 2005. Grand County has concerns related to the Adams Tunnel cable, as well as direct consequences of the proposed installation and the overall impacts and impairments to visual resources within and adjacent to the Arapaho National Recreation Area and Three Lakes Design Review Area, including Rocky Mountain National Park (and its recent Wilderness Act) and the Indian Peaks Wilderness.

The Colorado Big Thompson Project (CB-T) was approved by the 75th Congress, First Session, June 15, 1937. The landmark legislation that created this Bureau of Reclamation project guaranteed certain things would be protected. One of the issues of grave concern to Grand County at the time was the scenic and recreational value of the area. Primary purpose #2 of the C-BT project set out in the 1937 legislation was "To preserve the fishing and recreational facilities and the scenic attractions of Grand Lake, the Colorado River and Rocky Mountain National Park." Primary purposed #2 is being compromised by a proposed taller transmission line that will have significant long-term, permanent visual effects.

The Arapaho National Recreation Area (ANRA) comprises over 36,000 acres located within the upper reaches of the Colorado River Valley and Three Lakes Area. Established by Congress in 1978, the

enabling legislation, Pub. L. 95-450, states that the area was established not only due to the high quality recreation, but to protect and conserve the scenic and historic values.

Consistent with the enabling legislation and to protect these significant aesthetic values, Grand County adopted the Three Lakes Design Regulations on February 2, 1981 for "the protection and perpetuation of a certain panoramic mountain and scenic views from parks and public spaces within the Design Review Area is required in the interests of pride, enjoyment, environmental enrichment and maintenance of a major economic assets for residents and visitors alike. This concern and the pressure of physical development has established the "visual landscape" as a basic resource that needs to be conserved". These regulations require protection of the aesthetics of the area through land use regulations that regulates height, color, placement, water quality protection, visual protection, design, setbacks, and glare.

We support the objective to improve system reliability and we understand the benefits to the citizens and visitors of Grand County. We acknowledge that system reliability will be improved with the looped transmission if the Adams Tunnel cable goes off-line. The delivery of reliable, cost-effective electrical service will support the needs of existing and future customers in an area extending from Rocky Mountain National Park, south to the YMCA Snow Mountain Ranch, between Byers Canyon and the Continental Divide. However, we also believe there are elements of the project that are inconsistent with criteria in the Three Lakes Design Review Area (Section 14.5) of the Grand County Zoning Regulations, as well as the Grand County Master Plan, Senate Document 80 and the establishment of the ANRA and Rocky Mountain Park Wilderness designation. We trust that our comments will be addressed and articulated in the DEIS and that WAPA can examine other options, and complete additional evaluation in order to determine how these concerns can be mitigated.

PURPOSE AND NEED

The purpose of the project is intended to address the electrical deficiencies anticipated due to the eventual failure of the Adams Tunnel cable and the antiquated line configuration in the Project Area. The combination of the eventual failure of the Adams Tunnel cable, increasing residential and commercial load demands in the study area, and antiquated structures, creates a high risk scenario and a potentially jeopardized power supply for all electric customers in the service area.

However, and although the project "need" is stated to be for current customers and future customer load growth, this project is needed to provide additional power to the pumping plants so they do not exceed voltage sag criteria when increasing West Slope water diversions in the future. Cumulative effects associated with reservoir water level fluctuations and proposed water development projects, including increased West Slope diversions, were identified as present and foreseeable future actions (PDEIS 5.11, pg.5-2). Grand County would assume that these comments and identified actions are directly correlated with a reliable power supply that would also allow increased diversions as part of the Windy Gap Firming Project. However, those actions and cumulative effects were not discussed within Aquatic Resources - Cumulative Effects Assessment and therefore, water quality effects on aquatic habitat was considered to be negligible. The correlation between West Slope diversions and degraded water quality, aquatic habitat impacts to fish and aquatic invertebrates is becoming more and more apparent, both physically and visually. Grand County requests that the water quality, aquatic habitat impacts and scenic visual impacts associated with reservoir water level fluctuations and proposed water development projects, including increased West Slope diversions be made part of the Aquatic Resources - Cumulative Effects.

ADAMS TUNNEL CABLE

The main objective of the project is to enhance system reliability by providing a looped transmission system. Grand County still has concerns with the potential loss of the 69-kV cable in the Adams Tunnel. This cable currently provides the only secondary source of electrical power to the Grand Lake-Granby area, a major share of the citizens of Grand County. This source of power is provided by hydroelectric on the east slope, is green and sustainable, and allows looped transmission service between Estes Park (Mary's Lake) and the Windy Gap Substations. While future reliability of the cable is a valid concern, replacement of the cable would seem to be a viable option. The cable has been reliable for over five decades, does not provide any visual impact, and can be accessed for repair through the tunnel. Grand County believes that replacement of this green power conduit should be the preferred alternative.

The PDEIS states that the project will comply with applicable requirements, including the statutes, regulations, and permit requirements list in Section 1.11. Senate Document No. 80 (referenced in PDEIS 1.11, line 7, pg.1-17) is the legal basis of the Colorado-Big Thompson Project (C-BT) and controls its construction, operation and maintenance. It was adopted by Congress to embody agreements and commitments negotiated by representatives of the eastern (Northern Colorado Water Users' Association) and western slopes (The Western Slope Protective Association – of which Grand County was a representative) in Colorado. Senate Document No. 80 includes stipulations related to power project operations, power and pumping systems and transmission lines, all of which are directly linked, interconnected and impacted by this proposed project.

The proposed project is a change in C-BT operations, interconnections, power generation and transmission. The construction of power plant no. 1, located along the Big Thompson River, just below Estes Park, was a necessary development in order to secure power for pumping purposes at the Granby pumping plant. Power plant no.1's hydro power is generated by utilizing west slope water. Power plant no. 5 (Green Mountain Reservoir hydro), Granby pumping plant and power plant no. 1 were to be interconnected. The transmission system consists of connecting power plant no.5 with the Granby pumping plant and a permanent 69,000-volt line to power plant no.1. Power plants nos. 1 through 4-A (down the Big Thompson Canyon) were also to be interconnected by two 115,000-volt lines and continuing to the market.

Senate Document No. 80 concluded that the power produced in the six power plants will produce a large quantity of "cheap" hydroelectric power that will materially benefit Colorado and that the revenues from the commercial power generated at power plant no.1 will pay for the power features as set up under the initial power development, in addition to the power required for pumping at Granby pumping plant (SD 80, Conclusions, pg.33). Grand County understands that the revenues, once the project was paid off, would sustain the long-term operation and maintenance of the project. The Adams Tunnel cable is part of the operation and Grand County requests that the DEIS contain more information regarding the Adams Tunnel cable maintenance.

Without a continued transmission connection between Granby pumping plant and power plant no.1, the east slope will be benefiting by having "cheap" hydroelectric power generated with west slope water. Grand County will no longer have the benefit of green hydro power from power plant no.1 and there has been no mention of mitigation for this. Hydroelectric is green power that exists today and should continue to provide sustainable power to the Granby pumping plant as always contemplated by the C-BT Project. The relationship between the loss of green power and the proposed project needs to be disclosed and analyzed in the DEIS.

Senate Document No. 80 states that the Granby pumping plant and Granby pump canal were designed at150% of the capacity of the Adam's tunnel to permit the operation of the pumping plant at full capacity with off-peak power, and reduce the amount of pumping with firm power (SD 80, Power Project Operation, pg.22). The PDEIS states that NCWCD has an interest in extending the 138-kV transmission line directly to the C-BT projects facilities at Granby pumping plant switchyard in order to allow operational flexibility for motor starting at Granby and Willow Creek pumping plants, both on a daily and seasonal basis. Granby pumping plant has the ability to use reduced voltage starting protocols to minimize system impacts and voltage sags during motor starting. However, Willow Creek pumping plant does not have this capability and with full voltage motor starting, it impacts the power system more than the Granby pumping plant does with reduced voltage starting, sometimes exceeding the 6% voltage sag criteria. Again, this proposed project is a change in operation of the C-BT that directly benefits its pumping plants, without remaining interconnected to hydroelectric power.

Any changes in operations would require an agreement among all project beneficiaries due to the unique status of the C-BT Project and the mandates of Senate Document 80. Therefore, Grand County's agreement is required for changes in C-BT project operations. Thus, that the operational changes related to the C-BT and compliance with Senate Document 80 should be discussed and analyzed in the PDEIS.

Visual Impacts

The Three Lakes Design Review Area (Section 14.5 of the Grand County Zoning Regulations) was developed in 1981 to support the enabling legislation of the Arapaho National Recreation Area (ANRA). These standards are intended to foster sensitive and creative solutions for facilities located in this area. These standards apply to all projects located within and adjacent to the ANRA, including Lake Granby, Shadow Mountain Lake and unincorporated areas of Grand Lake. It should also be noted that the Town of Grand Lake adopted Design Review Standards in 1985, as well as Shoreline and Surface Water Regulations that address design and environmental impacts within the incorporated areas adjacent to Grand Lake.

The key element of design criteria in this area is a harmonious and appropriate design that protects the panoramic mountain and scenic views from parks and public spaces within the Design Review Area in the interests of pride, enjoyment, environmental enrichment and maintenance of major economic assets for residents and visitors alike. The visual landscape is a basic resource that needs to be conserved. The Grand County Zoning Regulations also require electric utilities to minimize the visual degradation of the landscape caused by power lines and towers.

In reviewing the 18 Key Observation Points within the Visual Simulation Contrast Ratings and Photographic Simulations (PDEIS, Appendix O), the proposed height and location of the proposed monopoles dominate the landscape character, are intrusive to the overall panoramic mountain and scenic view shed and don't easily blend into the natural, surrounding landscape. There are major impacts to locations adjacent to the Colorado River Headwaters Scenic Byway (US Highway 34), with some mitigation near County Road 64 proposed. The DEIS should disclose these impacts and their relationship to the County standards.

It was also noted that in reviewing the Viewshed Alternatives (Maps 4-1 – 4-7), the preferred Alternative D (Options 1 & 2) actually generated new "high" impacts to outlying residential properties and subdivisions that aren't currently in its existing sight line. These areas include portions of the

Granby mesa adjacent to the Airport, the Scenic Byway corridor below Lake Granby, portions of Bussy Hill, Sunnyside, Sunset Point, and areas north and south of CR 41. Although it is stated that "Because the closest designated wilderness area is located approximately 5.0 miles away, this project does not have the potential to affect, either directly or indirectly, any wilderness resources. Wilderness resources are therefore not described in the following direct and indirect effects discussion" (PDEIS 4.10.2, pg.4-74, line 34), portions of Indian Peaks Wilderness and Rocky Mountain National Park (&Wilderness) are located less than 5.0 miles from the project and people will still see the project impacts from those areas. Additionally, Lake Granby was not included in the viewshed analysis. There could be significant visual impacts to various recreation activities and public enjoyment on Lake Granby. The DEIS needs to disclose these impacts.

Table 4-12 (Effects to US Highway 34), the preferred Alternative D (Options 1 & 2) has significant more distance of the Scenic Byway that are highly visible (more than 3.5 miles of line), moderately visible (1.5 – 3.5 miles) than that existing today. Also, the distance of low visibility (under 1.5 miles of line) decreased, which is worse.

The Comparison of Alternative Effects for Visual Resources (PDEIS Table 2-7, pg.2-54) states that: "Taller Structures and associated disturbances result in moderate to significant long-term visual effects at sensitive locations". As well, the Cumulative Effects Assessment of Land Use (PDEIS 5.7.2, pg.5-7, line 13) states that "a decline in scenic quality associated with the construction of taller transmission structures could contribute to the adverse development climate in Grand County". In addition, Visual Resources (PDEIS 5.8.2, pg.5-8, line 15) state the long-term presence of the new line will incrementally contribute to adverse visual character changes in the region, with reduced effects due to the existing transmission line, and cumulative effects being adverse, but minor.

Grand County requests that WAPA further evaluate "Alternatives to above-ground structures, including undergrounding, reusing the Adams Tunnel cable, or laying the transmission line on the bed of Lake Granby" (PDEIS 1.8, pg.1-15, line11).

Grand County has received several comments from concerned citizens regarding underground installation and why it was not evaluated. Issues with line separation, line protection, safety and right-of-way are understood with a double circuit underground system. Grand County previously suggested alternative options and requested that WAPA evaluate: 1- an option for use of the existing pipeline between Windy Gap and Lake Granby for the installation of a cable system to carry the proposed electrical transmission lines, and 2- laying the transmission line on the bed of Lake Granby, enabling sections of the proposed electrical service from Windy Gap to Lake Granby to the Granby pumping plant to be underground and visually mitigated. The PDEIS stated that these options (Alternatives #7 & #8), in addition to the rebuilding and upgrading the Adams Tunnel cable (Alternative #6), were eliminated, primarily due to operational and maintenance difficulties, potential safety concerns and cost issues (PDEIS 2.5.6 - 2.5.8, pg.2-44 and 2-45). Although, cost was not identified as a reason Alternative #8 (submarine power cable below Lake Granby) was eliminated and Grand County requests that this option be further evaluated.

Senate Document No. 80 also states that the C-BT must be operated in such a manner as to most nearly affect 5 primary purposes. One of those primary purposes of Senate Document No. 80 that concerns Grand County related to this project is No. 2: "to preserve the fishing and recreational facilities and the scenic attractions of Grand Lake, the Colorado River, and Rocky Mountain National Park". In addition, Senate Document No. 80 states "The project and all of its features shall be operated in a manner

determined by the Secretary of the Interior as necessary to provide the water to preserve at all times that section of the Colorado River between the reservoir to be constructed near Granby and the mouth of the Fraser River as a live stream, and also to insure an adequate supply of irrigation, for sanitary purposes, for the preservation of scenic attractions, and for the preservation of fish life."

This primary purpose of preserving scenic attractions, including water, is being compromised by a proposed transmission line with heights nearly double than those existing and located in areas that will have significant long-term, permanent visual effects to the ANRA, Three Lakes Design Review Area, Colorado River Headwaters Scenic Byway and new impacts to outlying residential properties and subdivisions that aren't currently in its sight line. From recreation-based tourism to services, accommodations and real estate development, Grand County's economy thrives on its visual scenic beauty, including water, particularly in direct proximity to this project.

CONCLUSION

In conclusion, the Grand County Board of County Commissioners is responsible for planning for the health, safety and well being of Grand County both now and in the future. We support providing reliable, cost-effective electrical services for the citizens of Grand County and its visitors, but not in a manner that:

- Affects our visual scenic beauty and livelihood by increasing visual impacts without proposing underground alternatives, reusing the Adams Tunnel cable, and laying the transmission line on the bed of Lake Granby.
- Does not address operational changes to C-BT outlined in Senate Document No. 80.
- Removes historical interconnection with green sustainable hydroelectric power from Big Thompson power plants for continued pumping plant power.
- Allows the use of West Slope water to be used for production of green sustainable energy on the East Slope without benefit or mitigation to West Slope or Grand County.
- Contributes to present and foreseeable future actions associated with reservoir water level fluctuations and proposed water development projects, including increased West Slope diversions, without addressing those cumulative effects to visual scenic beauty, water quality and aquatic habitat.

Grand County requests that our comments be addressed and articulated in the PDEIS and that WAPA examine other options, and complete additional evaluation in order to determine how these concerns can be mitigated.

If you have further questions on these issues, please contact me at (970)725-3347.

Sincerely,

Edward T. Moyer
Long Range Planner

Cc: Grand County Board of County Commissioners
Lurline Underbrink Curran, County Manager
Kristen Manguso, Director of Planning

Department of Energy
Western Area Power Administration
Rocky Mountain Customer Service Region
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NOV 1 2 2010

Mr. Edward T. Moyer
Long Range Planner
Grand County Department of Planning and Zoning
308 Byers Avenue
P.O. Box 239
Hot Sulfur Springs, CO 80451

SUBJECT: GRAND COUNTY COOPERATING AGENCY COMMENTS: PRELIMINARY DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE GRANBY PUMPING PLANT-WINDY GAP SUBSTATION TRANSMISSION LINE REBUILD

Dear Mr. Moyer:

Thank you for your letter dated April 21, 2010, that contains Grand County Department of Planning and Zoning's (Grand County) comments on the Preliminary Draft Environmental Impact Statement (PDEIS) for the Granby Pumping Plant-Windy Gap Substation Transmission Rebuild (Project).

While many of Grand County's comments will be addressed in the Draft Environmental Impact Statement (EIS), comments that are outside the scope of the EIS will not be addressed in the Draft EIS. The purpose of this letter is to provide Western Area Power Administration's (Western) responses to out-of scope comments and offer additional information relative to some inaccurate assumptions and statements made in the April 21, 2010, letter.

1. Grand County's statement that its regulations require a Special Use Permit before the Project can go forward comes as a surprise, as Grand County--as far back as 2004--has acknowledged that it does not seek procedural compliance with its regulations. As we point out later in this letter, Western has substantively complied with Grand County's regulations by working cooperatively with Grand County officials and taking measures to minimize the visual impacts of the Project. Ultimately, however, the Supremacy Clause (Article VI, Clause 2) of the U.S. Constitution precludes Grand County from requiring Western to obtain a Special Use Permit and from obstructing the accomplishment of Western's congressionally authorized objective to deliver Federal power in a safe and reliable manner.

2. Grand County contends that Primary Purpose #2 of Senate Document 80 is being compromised by the proposed Project. Primary Purpose #2 requires that the Colorado-Big Thompson (C-BT) project be operated in a manner that most nearly effects the preservation of the fishing and recreational facilities and the scenic attractions of Grand Lake, the

Colorado River, and Rocky Mountain National Park. As the Project does not change the manner of operation of existing C-BT facilities and auxiliary features, Western respectfully disagrees with Grand County's conclusion. The new transmission line structures that will replace the existing 1950s-era structures will not affect C-BT operations in any manner.

3. Grand County's statement that "this project is needed to provide additional power to the pumping plants" is incorrect. The existing transmission system already serves the power requirements for the motors of the C-BT pumping plants. The power required by the pumping plants' motors and any other electrical device doesn't change because of alterations to the transmission system. All electrical equipment (motors, household appliances, HVAC systems, etc.) have the same power requirements regardless of transmission voltage. The pump capacities for C-BT pumping plants were established in the original C-BT design based upon the capacity of the Adams Tunnel, and this Project does not change pump capacity.

4. Regarding Grand County's comments of cumulative effects associated with reservoir water level fluctuations and proposed water development projects identified in Chapter 5 of the PDEIS, Grand County assumes "that these comments and identified actions are directly correlated with a reliable power supply that would also allow increased diversions as part of the Windy Gap Firming Project." This is an incorrect assumption. There is no correlation between the purpose and need for the proposed Project and any water development project. Because the facilities constructed by this Project would serve the existing C-BT pump motors, the power requirements for the pump motors are unchanged. The existing transmission system already serves the power requirements for the pump motors.

5. The stated purpose of Chapter 5 of the PDEIS is to show "the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." Since the Project would not affect reservoir water level fluctuations and proposed water development projects, it does not impact--even incrementally--Aquatic Resources – Cumulative Effects.

6. Grand County's statement that it will "no longer have the benefit of green hydro power" is not correct. This Project does not change Western's generation resources or its marketing plan. Western will continue to provide the same resources as it currently does. The loss of the Adams Tunnel cable does not require the use of "non-green" generation to serve west side pumping plant loads. East side C-BT generation is still interconnected to C-BT loads in Grand County through transmission paths that did not exist when the C-BT was authorized.

7. Grand County's statement that "this proposed project is a change in operation of the C-BT that directly benefits its pumping plants" is not accurate. This Project does not change the operation of the C-BT. Connecting the 138-kV transmission line at either Willow Creek or Granby Pumping Plant both provided acceptable solutions to the voltage sag criteria. Extending the transmission rebuild project from Willow Creek Reservoir to Granby Pumping Plant provided additional benefits for Western by replacing 6 more miles of a 70-plus-year-old transmission line, addressing right-of-way inadequacies, and, by using the existing

switchyard at Granby Pumping Plant, thus eliminating the need for a new, large substation near Willow Creek. While having the 138-kV line at Granby Power Plant will provide the Northern Colorado Water Conservancy District with flexibility to change motor starting procedures at the plant, starting the motors at full voltage versus reduced voltage is not a change to the operation of Granby Pumping Plant. How motors are started is strictly an electrical issue and does not change water pumping capacity or schedules at either Granby Pumping Plant or Willow Creek Reservoir.

8. Regarding Grand County's comment that Grand County zoning regulations require electric utilities to minimize the visual degradation of the landscape caused by power lines and towers, Western has substantively complied with these requirements. Western has made every effort to minimize the visual impacts of this Project. First and foremost is Western's decision to combine the new transmission circuit desired by Tri-State Generation and Transmission Association, Inc., with the rebuild of Western's existing 69-kV line onto a single right-of-way. This decision avoided two transmission lines on separate rights-of-way in the area. Further, Grand County had direct input on design criteria such as structure type, structure color, and the use of non-specular conductors and wires. Western also minimized visual impacts by carefully considering changes to right-of-way alignments. For example, Western proposed to configure the final transmission system to combine the two existing lines between Stillwater Tap and Granby Pumping Plant into a single transmission line. Western also proposed to use the more northern right-of-way along this segment, thus eliminating the line along Granby Reservoir shoreline and through the Cutthroat Bay campground. Western is sensitive to Grand County's comments regarding visual resources and will continue to look for ways to reduce visual impacts by making reasonable efforts to minimize structure heights during the design phase of the Project.

We hope the information provided in this letter is helpful and that it will serve to correct some misunderstandings about the Project. Please feel free to contact me at (970) 461-7333 if you have any questions or would like to discuss this Project further.

Sincerely,

Roy Gearhart
Project Manager

cc:
Grand County Board of County Commissioners
ATTN: Mr. James Newberry, Ms. Nancy Stuart, and Mr. Gary Bumgarner
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Appendix C
Western Area Power Administration Orders: Right-of-Way Management Guidance for Vegetation, Encroachments, and Access Routes

U.S. Department of Energy

ORDER

WAPA O 430.1A

DATE: 03-18-08

SUBJECT: RIGHT-OF-WAY MANAGEMENT GUIDANCE FOR VEGETATION, ENCROACHMENTS, AND ACCESS ROUTES

1. PURPOSE. This Order delegates and clarifies responsibilities and establishes Right of Way (ROW) guidance and organizational support for the safe and reliable operation of the power system owned and/or maintained by the Western Area Power Administration (Western).

2. CANCELLATION. This Order cancels WAPA Order 430.1, Right-of-Way Management Guidance for Danger Trees, Encroachments, and Access Routes, dated 11-21-01.

3. SCOPE. The provisions of this Order apply to all organizational elements of Western.

4. DEFINITIONS.

   a. Danger Trees. Trees located within or adjacent to the easement or permit area that present a hazard to employees, the public, or power system facilities. Characteristics used in identifying a danger tree include but are not limited to the following:

      - encroachment within the safe distance to the conductor as a result of the tree bending, growing, swinging, or falling toward the conductor;
      - deterioration or physical damage to the root system, trunk, stem or limbs and/or the direction and lean of the tree;
      - vertical or horizontal conductor movement and increased sag as a result of thermal, wind, and ice loading;
      - exceeding facility design specifications;
      - fire risk;
      - other threats to the electric power system facilities or worker/public safety.

b. Emergency Situations. An emergency situation occurs when a danger tree or encroachment poses an immediate danger to Western's facility as well as the welfare of the public and Western's maintenance personnel. For these situations it is not necessary to notify a landowner or government entity prior to removing the danger tree or encroachment.

c. Encroachments. Encroachments are conditions or developments that occur within the transmission line ROW that impair Western's rights to operate and maintain the facilities or present a hazard to the safe operation of the power system. Examples of potential encroachments are houses, businesses, signs, light structures, outbuildings, landfills, roadways, vegetation, etc.

d. Maintenance Manager. The individual located in the Regional or Field Office who is accountable for managing maintenance and/or operations functions. For example, in the Rocky Mountain Region this would be the Maintenance Manager; in the Bismarck Office this would be the North Dakota Maintenance Manager.

e. Right-Of-Way (ROW). Western acquires easements across State and private lands, is issued grants, permits or easements across Federal lands, and assumed the Bureau of Reclamation (Reclamation) responsibilities set forth in various agreements historically negotiated between Reclamation and other Federal agencies, such as the Bureau of Land Management, Bureau of Indian Affairs, National Park Service and U.S. Forest Service. As applied to a specific situation, ROW refers to rights acquired by Western as set forth in the applicable granting document.

f. Western Authorized Representative. The Western field representative in the Region who has the authority to take a maintenance action (this will be the Regional Manager or his designee).

5. POLICY. Maintenance Managers have the authority and responsibility for implementing and overseeing the proper maintenance of Western's ROWs. This includes all activities within ROWs that ensure the safe and reliable operation of the power system, as well as protection of the environment, the public, and Western's maintenance personnel. These activities include routine maintenance of access routes; vegetation management; identification of potential encroachments; and development of positive landowner relations. Regional Realty Officers, Environmental Managers, and Safety Managers, and, when necessary, the Corporate Services Office (CSO) Office of General Counsel (OGC) and CSO Natural Resources Office (NRO), will provide support to Maintenance Managers.

6. BACKGROUND. Western acquires easements across State and private lands, is issued grants, permits or easements across Federal lands, and assumed the Bureau of Reclamation (Reclamation) responsibilities set forth in various agreements

historically negotiated between Reclamation and other Federal agencies, such as the Bureau of Land Management, Bureau of Indian Affairs, National Park Service and U.S. Forest Service. Western's rights to maintain vegetation, to challenge a use that is considered to impair or encroach upon Western's rights, and to access the power facilities are dictated by the language contained in these agreements.

a. State and Private Land. Generally, the easement agreement provides for the perpetual right to access, construct, operate, and maintain the power system facility in a manner that ensures safe operation and system integrity.

(1) Vegetation Management and Control. Responsibility for these functions is often Western's and may, based upon the terms of the easement contract, or other agreements, require compensation to the landowner for damages to crops or trees. Contracts are generally reviewed by the Regional Realty Officers to determine the extent of Western's right to maintain or clear vegetation.

(2) Landowner's Use of the Easement Area. Easement provisions specify Western's rights to operate and maintain the power facilities. Where landowners add uses or developments in the easement area, the Maintenance Managers must determine, through the review of the easement contract, whether the use or development must cease, or be removed or mitigated some other way to protect Western's rights.

(3) General Access Rights Language. Language defining Western's access rights is usually provided in the easement agreement. To ensure that open and safe access is available across private land, the easement agreement must be thoroughly researched and verified to identify access routes and any restrictions that regulate their use.

b. Federal Land. ROW agreements are sometimes limited to a specific term and specify stipulations or conditions associated with vegetation management, compatible land uses, and access rights.

(1) Vegetation Management and Control. Responsibility for these functions is Western's, but is affected by land and resource plans, resource management plans, or other planning instruments approved by the land management agency, and these dictate tree removal or trimming criteria within and adjacent to the ROW, as well as other uses allowed on the same lands traversed by the power facility.

(2) ROW Use and Development. Uses or developments within Western's ROWs are authorized by the government entity managing the land and are usually reviewed and concurred upon by a Western authorized representative prior to the use being authorized.

(3) Access Routes. Access routes can be authorized in the same ROW agreement or in a separate permit or agreement. These authorizations may contain specific terms and conditions that restrict the season of use and/or construction or road improvement activities allowed on the authorized access routes.

7. RESPONSIBILITIES.

a. Regional Managers. Provide oversight of the ROW maintenance program in their respective Regions.

b. Regional Maintenance Managers. Develop long-term strategies and programs, in coordination with Regional safety, environment, and realty personnel, to resolve vegetation, encroachment, and access problems in and along Western's transmission line ROWs.

c. Regional Safety Managers. Support the Maintenance Managers in providing guidance for resolution of safety concerns as well as ensuring the Regional ROW program meets Western's safety goals and objectives.

d. Regional Environmental Managers. Support the Maintenance Managers in ensuring that maintenance activities employed to resolve vegetation, encroachment, and access problems comply with environmental laws and regulations.

e. Regional Realty Officers. Support the Maintenance Managers in the identification and resolution of vegetation, encroachment, public relations, and access problems. The Regional Realty Officers also provide coordination in working with the landowners and have the responsibility of identifying land rights, including vegetation control rights.

f. Office of General Counsel (OGC). Provides legal advice, counsel, and representation.

g. CSO Natural Resources Office (NRO). Provides advice and support to the Regional Maintenance Managers, Realty Officers and Environmental Managers in order to resolve vegetation, encroachment, and access problems.

8. GENERAL GUIDANCE. As a component of each Regional Office's routine maintenance activities, Maintenance Managers will develop a ROW management program, including performance measures and will coordinate its development and implementation with Regional safety, environment, and realty personnel as well as CSO NRO and OGC, when necessary. This program will include a long-term strategy to inventory Western's rights as they pertain to vegetation management,

use restrictions, encroachments and access. The program will identify potential problem areas or situations to be resolved and the resolution process.

a. Vegetation Management. It shall be the responsibility of the Regional Realty Officers to inventory the vegetation management rights, including any compensation rights to landowners, for a power facility on an as needed basis. The following guidance is provided for vegetation management practices within and adjacent to the ROW. Prior to vegetation management activities, an effort will be made to notify landowners. Such notifications or attempts to notify landowners shall be documented.

(1) Easements on State and Private Lands.

(a) Where provided in the easement agreement, Maintenance Managers shall manage the vegetation within and adjacent to the easement in accordance with WAPA Order 450.3A (latest version).

(b) Where the easement agreement does not provide for the rights to manage vegetation in or adjacent to the easement area, or if the rights are limited, the following shall apply in accordance with each Region's Vegetation Management Plan:

1) Emergency Situations. If the vegetation is creating an emergency situation, the Maintenance Managers have the discretion to address emergency situations, including removing danger trees.

2) Non-Emergencies. If vegetation is not causing an emergency situation, Western will work with the landowner to conduct the required vegetation management activity. If necessary, Western will expand its land rights to manage the vegetation within or adjacent to the easement.

(c) CSO OGC and NRO will provide assistance and consultation to support the Maintenance Managers and support the future expansion of easement rights to include all required vegetation management activities.

(2) ROW Agreements on Federal Lands.

(a) Where provided in the ROW agreement, the Maintenance Managers shall manage vegetation within the ROW.

(b) Where land use plans or terms contained in the agreement with the Federal land management agency and Western dictate trees may only be trimmed (sides or on top) within the ROW, the NRO will assist the

Maintenance Manager and Realty Officer in obtaining modifications to the ROW agreement to allow for all required vegetation management activities.

(c) Where the ROW agreement does not provide for the removal of trees in or adjacent to the ROW, the Maintenance Managers have discretion in removing danger trees without notification to the Federal land managers. Western will contact the Federal agency following removal of danger trees. The CSO NRO will provide assistance to the Maintenance Managers to expand ROW rights to allow more extensive vegetation management activities consistent with current industry standards and requirements as provided for in Western's Transmission Vegetation Management Program.

(3) Tree Removal Criteria. Criteria that will be used to determine the need for tree removal activities include either of the following two conditions:

(a) Any tree classified as being a "Danger Tree" as defined in 4a above.

(b) Requirements established in WAPA Order 450.3A (latest version).

(4) Vegetation Management Clearances. The following table provides the minimum clearance distances (lateral and vertical) to be achieved at the time of transmission vegetation management work as required by the North American Electric Reliability Council (NERC) Standard FAC-003-1 ("Clearance 1" values). However, it is Western's policy to proactively manage to a desired condition of much lower growth and low vegetation density. The desired condition considers the reduction of fuel loading to reduce the risk and intensity of wildfire on and adjacent to the ROW. It is also Western's policy to encourage the land management agencies to manage lands adjacent to the ROWs in a manner which further reduces vegetation and wildfire hazards that are a threat to the safe and reliable operation of the power facility.[1]

[1] The minimum clearance is based on the OSHA 29 CFR § 1910.333 minimum approach distance for non-electrical workers (rounded up to the nearest foot) plus 5 feet to account for conductor and tree movement due to wind and ice loading or increased conductor sag as a result of thermal loading. In addition, another 5 feet is added to allow for an average tree growth of 12 inches per year and a re-treatment interval of not less than 5 years. In situations where more rapid tree growth can be expected because of species or better than average growing conditions, a distance (either horizontal or vertical) greater than 5 feet is required.

TRANSMISSION LINE ROW MINIMUM CLEARANCE[1] REQUIREMENTS FOR VEGETATION AFTER TREATMENT	
Line Voltage	Minimum Clearance[1] Between Conductor and Vegetation
69 kV	20 feet
115 kV	21 feet
138 kV	22 feet
161 kV	22 feet
230 kV	23 feet
345 kV	26 feet
500 kV	29 feet

(5) Customer Focus. It is Western's policy that landowners are our customers. Maintenance Managers have the responsibility to ensure early notification to the private landowner or government entity prior to the vegetation management or encroachment removal activities within or adjacent to the ROW. Where emergency removal of danger trees is necessary within or adjacent to the ROW and prior notice is not possible, the Maintenance Manager is responsible for initiating or coordinating notification after the fact. The Regional Realty Officers will provide support in mitigating such actions.

b. Encroachments.

(1) State and private land. The Maintenance Managers shall be accountable for identifying potential encroachments. The Regional Realty Officer is accountable for verification and resolution. Where encroachments are found to be compatible with Western's rights, a license will be issued by the Western authorized representative. Where the encroachment is found to be incompatible, the Realty Officer shall coordinate the removal or mitigate the use or development. The Regional Realty Officer may consult or ask assistance from the NRO and OGC in those cases involving complex legal issues and landowner investments.

(2) Federal land. For situations where uses or developments are located within ROWs on Federal lands that appear to impair Western's rights to operate and maintain its facilities, the Regional Realty Officer will be responsible for contacting the government entity and resolving the problem. If necessary, the Regional Realty Officer may consult with or ask assistance from the NRO and OGC.

c. Access Routes.

(1) To ensure safe, reliable access to Western's facilities for maintenance purposes, it shall be the responsibility of the Maintenance Managers to

identify and locate access routes in support of facility maintenance programs across private, State and Federal lands, where necessary. Maintenance Managers have the discretion to reopen blocked access routes where Western's right of access is being impeded. Regional Realty Officers will be responsible to respond to the Maintenance Managers when requested to coordinate the reopening of such routes with the landowners and/or land management agency and will be supported by the NRO and OGC, when necessary.

(2) Where new access is needed across State or private land, the Regional Realty Officer must consult with the Environmental Manager and the NRO to develop an acquisition plan to obtain access easements. Where access is needed across Federal lands, the Regional Realty Officer shall perform the same coordination as for State or private lands except that Western will obtain an amendment to its ROW authorization. In either case, Western will strive to obtain access routes with the fewest restrictions as to season of use or impacts to resources.

9. REFERENCES.

a. WAPA 450.1B, Environmental Considerations in the Planning, Design, Construction, and Maintenance of Power Facilities and Activities, latest version.

b. WAPA Engineering Manual (EM) 6460.3, Property Damage Investigation Appraisal and Settlement, latest version.

c. WAPA EM 6404, Construction Management Practices and Procedures, Chapter V, Real Estate, of 02-20-90, latest version.

d. Transmission Line Right-of-Way Handbook, latest version.

e. WAPA Order 450.3A, Transmission Vegetation Management Program, latest version.

f. www.arborday.org/treeguide

g. Code of Federal Regulations (CFR) 29 CFR § 1910.333.

h. Alcoa Conductor Accessories Sag 10, version 3.0 Software.

i. National Electric Safety Code (NESC).

10. CONTACT. Questions concerning this Order should be addressed to the CSO NRO at (720) 962-7272.

Timothy J. Meeks
Administrator

U.S. Department of Energy

ORDER

WAPA O 450.3A

DATE: 03-13-08
Page Change: 02-23-09

SUBJECT: TRANSMISSION VEGETATION MANAGEMENT PROGRAM

1. OBJECTIVES. The objective of this Order is to define the Transmission Vegetation Management Program (TVMP) for the Western Area Power Administration (Western); to ensure the safe and reliable operation of the electrical transmission system in an environmentally sensitive, cost effective, and socially responsible manner.

2. CANCELLATION. This Order cancels WAPA Order 450.3, Transmission Vegetation Management Program, dated 05-10-07.

3. BACKGROUND. This Order is in accordance with the requirements defined in the North American Electric Reliability Council (NERC) Standard FAC-003-1.

4. APPLICABILITY.

   a. Western Program Areas. This Order applies to all Western programs involved with vegetation management beneath and adjacent to transmission lines and associated facilities that make up the transmission system maintained by Western. At a minimum, this standard shall apply to all 200 kV and above transmission lines and to any lower voltage lines designated by the Regional Reliability Organization (RRO) as critical to the reliability of each Region's electric system.

   b. Contractors. Contractors in support of Western's TVMP are responsible for ensuring full compliance with the requirements set forth in applicable Contracts and are also responsible for any subcontractor's compliance.

5. POLICY. It is Western's policy to identify and perform maintenance management activities in support of obtaining a desired condition for transmission line rights-of-way (ROW) and associated facilities. Western will apply the concept of Integrated Vegetation Management (IVM) as a practice for creating and maintaining a desired condition. Western's IVM Guidance Manual (see paragraph 13 of this Order) provides guidance for these practices.

6. RESPONSIBILITIES.

   a. Chief Operating Officer. Ensures full compliance with NERC and RRO reliability standards

   b. CSO Engineering. Provides oversight in the development of Engineering and Maintenance policies and standards.

   c. CSO Natural Resources Office. Provides support to the Regions relative to environment and lands programs. Serves as a point of contact with DOE Headquarters offices for the purpose of policy development, reporting, regulatory review, Native American issues, and other requirements.

   d. Office of General Counsel. Provides legal advice, counsel, and representation.

   e. Regional Managers. Provide oversight of the maintenance and safety policy and programs in their respective regions.

   f. Regional Maintenance Managers. Develop long-term strategies and programs, in coordination with Regional safety, environmental, and realty personnel, to address vegetation issues in and along all Western maintained transmission lines and associated facilities.

   g. Regional Environmental Managers. Support the Maintenance Managers in ensuring that the maintenance activities employed to manage Western's TVMP are in compliance with environmental laws and regulations.

   h. Regional Safety Managers. Support the Maintenance Managers in advising supervisors and foremen on the applications of the Power System Safety Manual and applicable safety and health regulations.

   i. Regional Reality Officers. Support the Maintenance Managers in the resolution of vegetation management problems by working with landowners in identifying and enforcing vegetation control rights

7. DESIRED CONDITION. Western's desired condition beneath and adjacent to its transmission line facilities is characterized by stable, low growth plant communities free from noxious or invasive plants. These communities will typically be comprised of herbaceous plants and low growing shrubs which ideally are native to the local area. Vegetation on the bordering areas of transmission line easements/ROWs can be managed so that increased tree height is allowed in relation to an increasing distance from the transmission line. Accumulations of vegetation debris from intensive or repetitive vegetation treatments may require mitigation to reduce risks from wildfire and enhance the fire survivability of the transmission facility. The

density of the remaining vegetation will also be a consideration in assessing overall fire risk. Adequate access routes are required and must be maintained to provide for efficient, cost effective vegetation treatment activities.

a. Areas of Concern. The desired condition will allow Western to manage vegetation such that it does not threaten power system safety or reliability. Vegetation management activities will be undertaken to the maximum extent that is reasonable and practical within three main areas of concern:

   (1) Vegetation within the defined boundary of a facility (ROW, fence line, etc.);
   (2) Vegetation adjacent to the facility; and
   (3) Prevention of wildfire on and off the facility.

b. Guidance. On-the-ground conditions can be extremely variable and specific for each transmission facility or unique section of a facility. In general, it is Western's practice to perform vegetation management activities in support of achieving the desired condition of low, stable growth plant communities. However, reasonable accommodations can be made in consideration of other critical resources or management issues. The principal purpose of the transmission facility is for the safe and reliable operation of the power system and all other resource and management issues are considered secondary. When constraints do not allow for the immediate removal of trees and other taller vegetation, the desired condition should identify the maximum tree height and density thresholds allowed. American National Standards, ANSI A300, part 7, *Tree, Shrub, and Other Woody Plant Maintenance - Standard Practices (Integrated Vegetation Management, a. Electrical Utility Rights-of-way),* may be used for additional guidance and reference.

c. Objective. Western's intent is to secure and maintain a manageable landscape that minimizes vegetative threats to transmission system reliability and safety, and ultimately does not require frequent re-treatments. Achieving a desired condition is a process that may take several iterations over an extended period of time. However, once defined, the desired condition will serve as the guide for future vegetation management decisions. All subsequent vegetation treatment activities should consistently move toward achieving and maintaining the desired condition. Once achieved, the desired condition will be proactively maintained by occasional re-treatments.

8. PRACTICES. Western's TVMP practices are guided by internal manuals, handbooks, guidelines, orders, and standards outlining objectives, practices, approved procedures, and work specifications set forth in paragraph 14. These various formal documents are kept current through internal working committees from the functional organizations where the document resides.

9. REQUIREMENTS.

a. Maintenance Schedule. Aerial and ground patrol schedules for each transmission facility are developed and maintained by each regional maintenance organization. Maintenance schedules are based on requirements and procedures set forth in Western's maintenance program. Other conditions where additional inspections may be necessary are those where catastrophic results could occur. Aerial or ground patrols may be conducted after an outage occurrence.

b. Vegetation clearance levels for each transmission line. Clearance 1 distances required by NERC FAC-003-1 are provided in Western Order 430.1A, Right-of-Way Management Guidance for Vegetation, Encroachments, and Access Routes. Western's desired condition is a condition of low growth plant communities; these values represent the maximum but not preferred vegetation height thresholds allowed. NERC FAC-003-1, Clearance 2 distances are provided in Western's Power System Safety Manual (PSSM), Table A-1.

c. Qualifications and Training. Personnel involved in the design, implementation, and execution of the TVMP shall be qualified and trained as provided in individual position descriptions and contract language. The Western Transmission Vegetation Management Committee was established to design and provide oversight of the TVMP, and committee membership qualifications are outlined in the charter. Western staff involved in the preparation and implementation of annual plans discussed in paragraph 9 of this Order shall be included. PSMM Chapter 11 also addresses field crew training requirements for trimming and felling trees and brush near power lines. Contractors hired by Western must be fully qualified with respect to all certifications, licenses, training, and other skills and requirements as presented in the most recent version of Western's statement of work.

d. Mitigation Measures. WAPA Order 430.1A and the Regional Transmission Vegetation Management Program Statements provide mitigation measures and processes to achieve sufficient clearances for the protection of the transmission systems in identified locations where Western is restricted from attaining the clearances specified in paragraph 9b.

e. Inspections and Emergency Procedures. Transmission line maintenance personnel are responsible for inspection of Western's transmission facilities from vehicles, on foot or from aircraft. Routine inspections of vegetation are made during scheduled ground and aerial line patrols. Any encroachments, including vegetation, are documented and forwarded to the proper functional organization for assessment and resolution. Typical patrol reports will describe the

encroachment, clearance between the conductor and encroachment, and other pertinent information, such as when the reading was taken, and why there is a problem. If an imminent threat of a transmission line outage is identified and requires action (such as switching the line out of service), the threat shall immediately be reported verbally for resolution.

Western's craft personnel and IVM contractors are responsible for complying with prescribed clearance and safety rules and regulations, are qualified to recognize safety hazards and unsafe conditions, and are required to initiate action to alleviate or eliminate the hazards. Duties include the immediate reporting of safety hazards and unsafe conditions and initiating action to correct the safety hazard. Line crew members are required to report potential power system troubles to their Foreman. While on patrol, they are qualified to make on-the-spot decisions as to the urgency for immediate communication of vegetation conditions that present an imminent threat of a transmission system outage so that action may be taken.

10. ANNUAL PLANS FOR VEGETATION MANAGEMENT WORK. Each Regional Maintenance Organization shall create and implement an annual plan for vegetation management activities to ensure the reliability of the power system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may have an impact on the reliability of the transmission systems. Adjustments to the plan shall be documented as they occur. The plan should take into consideration the time required to obtain permissions or authorizations from landowners or regulatory authorities and also to conduct the appropriate environmental review. Each maintenance organization shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work is completed according to work specifications

11. REPORTING REQUIREMENTS. Each Region will report quarterly to their RRO, and upon request, will also report sustained transmission line outages determined to have been caused by vegetation. If there are no sustained transmission line outages for the quarter, the report shall be submitted indicating full compliance. Multiple sustained outages on an individual line, if caused by the same vegetation, shall be reported as one outage regardless of the actual number of outages within a 24-hour period.

    a. Western is not required to report to the RRO, or the RRO's designee, certain sustained transmission line outages caused by vegetation. These outages are: (1) vegetation-related outages that result from vegetation falling into lines from outside the ROW that result from natural disasters (examples of disasters that

could create non-reportable outages include, but are not limited to, earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defined either by Western or an applicable regulatory body, ice storms, and floods); and (2) vegetation-related outages due to human or animal activity (examples of human or animal activity that could cause a non-reportable outage include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural, horticultural, agricultural activities, or removal or digging of vegetation).

b. The outage information provided by Western to the RRO, or the RRO's designee, shall include at a minimum: the name of the circuit(s) experiencing the outage, the date, time and duration of the outage; a description of the cause of the outage; other pertinent comments; and any countermeasures taken by Western.

c. An outage shall be categorized as one of the following:

- Category 1 — Grow-ins: Outages caused by vegetation growing into lines from vegetation inside and/or outside of the ROW;

- Category 2 — Fall-ins: Outages caused by vegetation falling into lines from inside the ROW;

- Category 3 — Fall-ins: Outages caused by vegetation falling into lines from outside the ROW.

12. DOCUMENTATION. All documentation required in this section shall be retained for a minimum period of 5 years.

a. Each Region shall document that they have performed the vegetation inspections identified in 8a above. This information shall be retained in Western's maintenance management databases (Maximo, TAMIS, SIMS, TLDB, etc.).

b. Western shall retain documentation that describes the clearances identified in 8b above. This information shall be retained in Western's PSSM, Table A1 (Clearance 2), and WAPA Order 430.1A (Clearance 1).

c. Western shall retain documentation that describes the qualifications of personnel directly involved in the design, implementation, and execution of the TVMP as required in 8c. This information shall be retained in the employee's position descriptions and training records maintained by Western and the Corporate Human Resource Information System (CHRIS).

d. Each Region shall document any areas identified as not meeting this Order for vegetation management and any mitigating measures taken to address these deficiencies as identified in 8d. This information shall be retained by each

Regional Lands Office and attached to the appropriate authorizing document (easement, permit, etc.). It should also be noted in the geographic information system (GIS) database so that it is available to the maintenance organization responsible for planning and completing vegetation management activities.

e. Western shall maintain a documented process for the immediate communication of imminent threats by vegetation as required in 8e above. This information shall be retained in the employee's position description and the Standard Operating Procedures.

f. Each Region shall document that the annual work plan identified in paragraph 9 has been implemented. This will be documented in the appropriate procurement records (for contract work) and in Western's maintenance management databases (Maximo, TAMIS, SIMS, TLDB, etc.).

g. Each Region shall retain copies of all quarterly reports and additional outage reports submitted to the RRO, or the RRO's designee, as identified in paragraph 10.

h. Each Region shall develop a Transmission Vegetation Management Program statement which identifies Regional specific practices.

13. CERTIFICATION. Each Region shall demonstrate compliance through self-certification submitted to the compliance monitor (RRO or RRO's designee) in accordance with the requirements of NERC FAC-003-1.

14. REFERENCES.

a. North American Electric Reliability Council (NERC) Reliability Standard FAC-003-1.

b. Western Area Power Administration Integrated Vegetation Management Guidance Manual, latest version.

c. American National Standards, ANSI A300 (part 7)-2006 IVM for Tree Care Operations – Tree, Shrub, and Other Woody Plant Maintenance – Standard Practices (Integrated Vegetation Management, a. Electrical Utility Rights-of-Way).

d. Chapter 13, Power System Maintenance Manual (PSMM), latest revision.

e. WAPA Order 430.1A, Right-of-Way Management Guidance for Vegetation, Encroachments, and Access Routes, latest revision.

f. Chapter 11, PSMM, Trimming and Felling of Trees and Brush Near Power Lines, latest revision.

g. Chapter 1, Power System Operations Manual (PSOM), Power System Switching Procedure, latest revision.

h. Chapter 4, PSOM, Power System Operating Guidelines, latest revision.

i. Power System Safety Manual (PSSM), latest revision.

j. Regional Transmission Vegetation Management Program Statements.

k. ANSI A300, (Part 1) – 2001 Pruning for Tree Care Operations – Tree, Shrub, and Other Woody Plant Maintenance.

l. ANSI Z133.1 – 2000, for Arboricultural Operations – Pruning, Repairing, Maintaining, and Removing Trees, and Cutting Brush – Safety Requirements.

m. Western Transmission Vegetation Management Committee (TVMC) Charter.

15. CONTACT. Questions concerning this Order should be addressed to the CSO Engineering Office at (720) 962-7296.

Timothy J. Meeks
Administrator

U.S. Department of Energy

PAGE CHANGE

WAPA O 450.3A

DATE: 03-13-08
Change 1: 02-23-09

SUBJECT: TRANSMISSION VEGETATION MANAGEMENT PROGRAM

1. PURPOSE. To transmit revised pages 3 and 4 to WAPA O 450.3A, Transmission Vegetation Management Program, dated 03-13-08.

2. EXPLANATION OF CHANGES. To correct the references to the paragraph numbers identified in paragraph 8 and paragraph 9d.

3. LOCATION OF CHANGES.

Page	Paragraph
3	8
4	9d

After filing the attached pages, this transmittal may be discarded.

Timothy J. Meeks
Administrator

Appendix D
Colorado Division of Wildlife Raptor Buffer Guidelines

RECOMMENDED BUFFER ZONES AND SEASONAL RESTRICTIONS FOR COLORADO RAPTORS

Tolerance limits to disturbance vary among as well as within raptor species. As a general rule, Ferruginous Hawks and Golden Eagles respond to human activities at greater distances than do Ospreys and America Kestrels. Some individuals within a species also habituate and tolerate human activity at a proximity that would cause the majority of the group to abandon their nests. Other individuals become sensitized to repeated encroachment and react at greater distances. The tolerance of a particular pair may change when a mate is replaced with a less tolerant individual and this may cause the pair to react to activities that were previously ignored. Responses will also vary depending upon the reproductive stage. Although the level of stress is the same, the pair may be more secretive during egg laying and incubation and more demonstrative when the chicks hatch.

The term "disturbance" is ambiguous and experts disagree on what actually constitutes a disturbance. Reactions may be as subtle as elevated pulse rate or as obvious as vigorous defense or abandonment. Impacts of disturbance may not be immediately evident. A pair of raptors may respond to human intrusion by defending the nest, but well after the disturbance has passed, the male may remain in the vicinity for protection rather than forage to feed the nestlings. Golden eagles rarely defend their nests, but merely fly a half mile or more away and perch and watch. Chilling and over heating of eggs or chicks and starvation of nestlings can result from human activities that appeared not to have caused an immediate response.

A ‘holistic’ approach is recommended when protecting raptor habitats. While it is important for land managers to focus on protecting nest sites, equal attention should focus on defining important foraging areas that support the pair's nesting effort. Hunting habitats of many raptor species are extensive and may necessitate interagency cooperation to assure the continued nest occupancy. Unfortunately, basic knowledge of habitat use is lacking and may require documentation through telemetry investigations or intensive observation. Telemetry is expensive and may be disruptive so a more practical approach is to assume that current open space is important and should be protected.

Although there are exceptions, the buffer areas and seasonal restrictions suggested here reflect an informed opinion that if implemented, should assure that the majority of individuals within a species will continue to occupy the area. Additional factors, such as intervening terrain, vegetation screens, and the cumulative impacts of activities should be considered.

These guidelines were originally developed by CDOW raptor biologist Gerald R. Craig (retired) in December 2002. To provide additional clarity in guidance, incorporate new information, and update the conservation status of some species, the guidelines were revised in January 2008. Further revisions of this document may become necessary as additional information becomes available.

RECOMMENDED BUFFER ZONES AND SEASONAL RESTRICTIONS

BALD EAGLE

Nest Site:

No surface occupancy (beyond that which historically occurred in the area; see 'Definitions' below) within ¼ mile radius of active nests (see 'Definitions' below). Seasonal restriction to human encroachment (see 'Definitions' below) within ½ mile radius of active nests from October 15 through July 31. This closure is more extensive than the National Bald Eagle Management Guidelines (USFWS 2007) due to the generally open habitat used by Colorado's nesting bald eagles.

Winter Night Roost:

No human encroachment from November 15 through March 15 within ¼ mile radius of an active winter night roost (see 'Definitions' below) if there is no direct line of sight between the roost and the encroachment activities. No human encroachment from November 15 through March 15 within ½ mile radius of an active winter night roost if there is a direct line of sight between the roost and the encroachment activities. If periodic visits (such as oil well maintenance work) are required within the buffer zone after development, activity should be restricted to the period between 1000 and 1400 hours from November 15 to March 15.

Hunting Perch:

Diurnal hunting perches (see 'Definitions' below) associated with important foraging areas should also be protected from human encroachment. Preferred perches may be at varying distances from human encroachment and buffer areas will vary. Consult the Colorado Division of Wildlife for recommendations for specific hunting perches.

GOLDEN EAGLE

Nest Site:

No surface occupancy (beyond that which historically occurred in the area) within ¼ mile radius of active nests. Seasonal restriction to human encroachment within ½ mile radius of active nests from December 15 through July 15.

OSPREY

Nest Site:

No surface occupancy (beyond that which historically occurred in the area) within ¼ mile radius of active nests. Seasonal restriction to human encroachment within ¼ mile radius of active nests from April 1 through August 31. Some osprey populations have habituated and are tolerant to human activity in the immediate vicinity of their nests.

FERRUGINOUS HAWK

Nest Site:

No surface occupancy (beyond that which historically occurred in the area) within ½ mile radius of active nests. Seasonal restriction to human encroachment within ½ mile radius of active nests from February 1 through July 15. This species is especially prone to nest abandonment during incubation if disturbed.

RED-TAILED HAWK

Nest Site:

No surface occupancy (beyond that which historically occurred in the area) within 1/3 mile radius of active nests. Seasonal restriction to human encroachment within 1/3 mile radius of active nests from February 15 through July 15. Some members of this species have adapted to urbanization and may

tolerate human habitation to within 200 yards of their nest. Development that encroaches on rural sites is likely to cause abandonment.

SWAINSON'S HAWK

Nest Site:

No surface occupancy (beyond that which historically occurred in the area) within ¼ mile radius of active nests. Seasonal restriction to human encroachment within ¼ mile radius of active nests from April 1 through July 15. Some members of this species have adapted to urbanization and may tolerate human habitation to within 100 yards of their nest.

PEREGRINE FALCON

Nest Site:

No surface occupancy (beyond that which historically occurred in the area) within ½ mile radius of active nests. Seasonal restriction to human encroachment within ½ mile of the nest cliff(s) from March 15 to July 31. Due to propensity to relocate nest sites, sometimes up to ½ mile along cliff faces, it is more appropriate to designate 'Nesting Areas' that encompass the cliff system and a ½ mile buffer around the cliff complex.

PRAIRIE FALCON

Nest Site:

No surface occupancy (beyond that which historically occurred in the area) within ½ mile radius of active nests. Seasonal restriction to human encroachment within ½ mile radius of active nests from March 15 through July 15.

NORTHERN GOSHAWK

No surface occupancy (beyond that which historically occurred in the area) within ½ mile radius of active nests. Seasonal restriction to human encroachment within ½ mile radius of active nests from March 1 through September 15.

BURROWING OWL

Nest Site:

No human encroachment within 150 feet of the nest site from March 15 through October 31. Although Burrowing Owls may not be actively nesting during this entire period, they may be present at burrows up to a month before egg laying and several months after young have fledged. Therefore it is recommended that efforts to eradicate prairie dogs or destroy abandoned towns not occur between March 15 and October 31 when owls may be present. Because nesting Burrowing Owls may not be easily visible, it is recommended that targeted surveys be implemented to determine if burrows are occupied. More detailed recommendations are available in a document entitled “Recommended Survey Protocol and Actions to Protect Nesting Burrowing Owls” which is available from the Colorado Division of Wildlife

Recommended Buffer Zones and Seasonal Restrictions Around Raptor Use Sites

Species and Use	Buffer	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Bald Eagle													
ACTIVE NEST - No Surface Occupancy	¼ Mile												
ACTIVE NEST - No Human Encroachment	½ Mile												
ACTIVE WINTER NIGHT ROOST without a direct line of sight- No Human Encroachment	¼ Mile												
ACTIVE WINTER NIGHT ROOST with a direct line of sight - No Human Encroachment	½ Mile												
HUNTING PERCH - No Human Encroachment	Contact CDOW												
Golden Eagle													
ACTIVE NEST - No Surface Occupancy	¼ Mile												
ACTIVE NEST - No Human Encroachment	½ Mile												
Osprey													
ACTIVE NEST - No Surface Occupancy	¼ Mile												
ACTIVE NEST - No Human Encroachment	¼ Mile												
Ferruginous Hawk													
ACTIVE NEST - No Surface Occupancy	½ Mile												
ACTIVE NEST - No Human Encroachment	½ Mile												
Red-tailed Hawk													
ACTIVE NEST - No Surface Occupancy	1/3 Mile												
ACTIVE NEST - No Human Encroachment	1/3 Mile												
Swainson's Hawk													
ACTIVE NEST - No Surface Occupancy	¼ Mile												
ACTIVE NEST - No Human Encroachment	¼ Mile												
Peregrine Falcon													
ACTIVE NEST - No Surface Occupancy	½ Mile												
ACTIVE NEST - No Human Encroachment	½ Mile												
Prairie Falcon													
ACTIVE NEST - No Surface Occupancy	½ Mile												
ACTIVE NEST - No Human Encroachment	½ Mile												
Northern Goshawk													
ACTIVE NEST - No Surface Occupancy	½ Mile												
ACTIVE NEST - No Human Encroachment	½ Mile												
Burrowing Owl													
ACTIVE NEST - No Human Encroachment	150 feet												
		= time period for which seasonal restrictions are in place.											

DEFINITIONS

Active nest – Any nest that is frequented or occupied by a raptor during the breeding season, or which has been active in any of the five previous breeding seasons. Many raptors use alternate nests in various years. Thus, a nest may be active even if it is not occupied in a given year.

Active winter night roost – Areas where Bald Eagles gather and perch overnight, and sometimes during the day in the event of inclement weather. Communal roost sites are usually in large trees (live or dead) that are relatively sheltered from wind and are generally in close proximity to foraging areas. These roosts may also serve a social purpose for pair bond formation and communication among eagles. Many roost sites are used year after year.

Human encroachment – Any activity that brings humans in the area. Examples include driving, facilities maintenance, boating, trail access (e.g., hiking, biking), etc.

Hunting perch – Any structure on which a raptor perches for the purpose of hunting for prey. Hunting perches provide a view of suitable foraging habitat. Trees are often used as hunting perches, but other structures may also be used (utility poles, buildings, etc.).

Surface occupancy – Any physical object that is intended to remain on the landscape permanently or for a significant amount of time. Examples include houses, oil and gas wells, tanks, wind turbines, roads, tracks, etc.

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Appendix E
Soil Types Crossed

Appendix E – Soil Types Crossed

Alternatives	MUName	MUSYM	Miles Crossed
Alternative A - Existing	Aaberg clay loam, 15 to 30 percent slopes	2	0.1
	Binco clay loam, 15 to 35 percent slopes	9	0.2
	Binco clay loam, 6 to 15 percent slopes	8	0.6
	Cimarron loam, 15 to 35 percent slopes	14	0.2
	Cimarron loam, 2 to 6 percent slopes	12	0.4
	Cimarron loam, 6 to 15 percent slopes	13	0.9
	Cowdrey loam, 15 to 45 percent slopes	21	0.1
	Cumulic Cryaquolls, nearly level	25	1.1
	Frisco-Peeler gravelly sandy loams, 25 to 65 percent slopes	33	1.0
	Gateway loam, 15 to 50 percent slopes	35	1.4
	Harsha loam, 15 to 50 percent slopes, eroded	39	0.1
	Leavitt loam, 15 to 55 percent slopes	47	0.6
	Mayoworth clay loam, 15 to 50 percent slopes	53	0.4
	Quander stony loam, 15 to 55 percent slopes	66	0.5
	Rock outcrop-Cryoborolls complex, extremely steep	68	1.0
	Uinta sandy loam, 2 to 15 percent slopes	86	0.7
	Waybe clay loam, 10 to 55 percent slopes	90	1.0
	Woodhall loam, 15 to 50 percent slopes	92	0.8
	Youga loam, 15 to 45 percent slopes	95	0.6
	Youga loam, 2 to 6 percent slopes	93	1.1
	Youga loam, 6 to 15 percent slopes	94	0.8
	Total		**13.6**

Alternatives	MUName	MUSYM	Miles Crossed
Alternative B1	Aaberg clay loam, 15 to 30 percent slopes	2	0.1
	Binco clay loam, 15 to 35 percent slopes	9	0.2
	Binco clay loam, 6 to 15 percent slopes	8	0.6
	Cimarron loam, 15 to 35 percent slopes	14	0.2
	Cimarron loam, 2 to 6 percent slopes	12	0.4
	Cimarron loam, 6 to 15 percent slopes	13	0.9
	Cowdrey loam, 15 to 45 percent slopes	21	0.1
	Cumulic Cryaquolls, nearly level	25	1.0
	Frisco-Peeler gravelly sandy loams, 25 to 65 percent slopes	33	0.5
	Gateway loam, 15 to 50 percent slopes	35	1.3
	Harsha loam, 15 to 50 percent slopes, eroded	39	0.1
	Leavitt loam, 15 to 55 percent slopes	47	0.5
	Mayoworth clay loam, 15 to 50 percent slopes	53	0.4
	Quander stony loam, 15 to 55 percent slopes	66	0.6
	Rock outcrop-Cryoborolls complex, extremely steep	68	0.9
	Uinta sandy loam, 2 to 15 percent slopes	86	0.4
	Waybe clay loam, 10 to 55 percent slopes	90	1.0
	Woodhall loam, 15 to 50 percent slopes	92	0.8
	Youga loam, 15 to 45 percent slopes	95	0.5
	Youga loam, 2 to 6 percent slopes	93	0.5
	Youga loam, 6 to 15 percent slopes	94	0.8
	Total		**11.9**

Alternatives	MUName	MUSYM	Miles Crossed
Alternative C1	Aaberg clay loam, 15 to 30 percent slopes	2	0.2
	Binco clay loam, 15 to 35 percent slopes	9	0.4
	Binco clay loam, 6 to 15 percent slopes	8	0.2
	Cimarron loam, 15 to 35 percent slopes	14	0.1
	Cimarron loam, 2 to 6 percent slopes	12	0.6
	Cimarron loam, 6 to 15 percent slopes	13	1.2
	Cowdrey loam, 15 to 45 percent slopes	21	0.2
	Cumulic Cryaquolls, nearly level	25	0.9
	Frisco-Peeler gravelly sandy loams, 25 to 65 percent slopes	33	0.5
	Gateway loam, 15 to 50 percent slopes	35	0.2
	Harsha loam, 15 to 50 percent slopes, eroded	39	0.4
	Leavitt loam, 15 to 55 percent slopes	47	0.8
	Leavitt loam, 6 to 15 percent slopes	46	0.2
	Mayoworth clay loam, 15 to 50 percent slopes	53	0.9
	Quander stony loam, 15 to 55 percent slopes	66	0.1
	Rock outcrop-Cryoborolls complex, extremely steep	68	0.5
	Tine cobbly sandy loam, 15 to 55 percent slopes	83	0.0
	Uinta sandy loam, 2 to 15 percent slopes	86	0.4
	Waybe clay loam, 10 to 55 percent slopes	90	1.1
	Woodhall loam, 15 to 50 percent slopes	92	1.8
	Woodhall loam, 6 to 15 percent slopes	91	0.4
	Youga loam, 15 to 45 percent slopes	95	0.3
	Youga loam, 2 to 6 percent slopes	93	0.5
	Youga loam, 6 to 15 percent slopes	94	0.6
	Total		**12.3**

Alternatives	MUName	MUSYM	Miles Crossed
Alternative C2 - Option 1	Aaberg clay loam, 15 to 30 percent slopes	2	0.2
	Binco clay loam, 15 to 35 percent slopes	9	0.4
	Binco clay loam, 6 to 15 percent slopes	8	0.2
	Cimarron loam, 15 to 35 percent slopes	14	0.1
	Cimarron loam, 2 to 6 percent slopes	12	0.6
	Cimarron loam, 6 to 15 percent slopes	13	1.1
	Cowdrey loam, 15 to 45 percent slopes	21	0.2
	Cumulic Cryaquolls, nearly level	25	0.9
	Frisco-Peeler gravelly sandy loams, 25 to 65 percent slopes	33	0.5
	Gateway loam, 15 to 50 percent slopes	35	0.2
	Harsha loam, 15 to 50 percent slopes, eroded	39	0.4
	Leavitt loam, 15 to 55 percent slopes	47	0.8
	Leavitt loam, 6 to 15 percent slopes	46	0.2
	Mayoworth clay loam, 15 to 50 percent slopes	53	0.9
	Quander stony loam, 15 to 55 percent slopes	66	0.1
	Rock outcrop-Cryoborolls complex, extremely steep	68	0.5
	Tine cobbly sandy loam, 15 to 55 percent slopes	83	0.0
	Uinta sandy loam, 2 to 15 percent slopes	86	0.4
	Waybe clay loam, 10 to 55 percent slopes	90	1.2
	Woodhall loam, 15 to 50 percent slopes	92	1.7
	Woodhall loam, 6 to 15 percent slopes	91	0.2
	Youga loam, 15 to 45 percent slopes	95	0.2
	Youga loam, 2 to 6 percent slopes	93	0.5
	Youga loam, 6 to 15 percent slopes	94	0.6
	Total		**11.9**

Alternatives	MUName	MUSYM	Miles Crossed
Alternative C2 - Option 2	Aaberg clay loam, 15 to 30 percent slopes	2	0.1
	Binco clay loam, 15 to 35 percent slopes	9	0.4
	Binco clay loam, 6 to 15 percent slopes	8	0.2
	Cimarron loam, 15 to 35 percent slopes	14	0.0
	Cimarron loam, 2 to 6 percent slopes	12	0.7
	Cimarron loam, 6 to 15 percent slopes	13	1.0
	Cowdrey loam, 15 to 45 percent slopes	21	0.2
	Cumulic Cryaquolls, nearly level	25	0.9
	Frisco-Peeler gravelly sandy loams, 25 to 65 percent slopes	33	0.5
	Gateway loam, 15 to 50 percent slopes	35	0.2
	Harsha loam, 15 to 50 percent slopes, eroded	39	0.4
	Leavitt loam, 15 to 55 percent slopes	47	0.8
	Leavitt loam, 6 to 15 percent slopes	46	0.2
	Mayoworth clay loam, 15 to 50 percent slopes	53	0.9
	Quander stony loam, 15 to 55 percent slopes	66	0.1
	Rock outcrop-Cryoborolls complex, extremely steep	68	0.8
	Tine cobbly sandy loam, 15 to 55 percent slopes	83	0.0
	Uinta sandy loam, 2 to 15 percent slopes	86	0.4
	Waybe clay loam, 10 to 55 percent slopes	90	1.4
	Woodhall loam, 15 to 50 percent slopes	92	0.9
	Youga loam, 15 to 45 percent slopes	95	0.5
	Youga loam, 2 to 6 percent slopes	93	0.5
	Youga loam, 6 to 15 percent slopes	94	1.0
	Total		**11.9**

Alternatives	MUName	MUSYM	Miles Crossed
Alternative D - Option 1	Aaberg clay loam, 15 to 30 percent slopes	2	0.2
	Binco clay loam, 15 to 35 percent slopes	9	0.2
	Binco clay loam, 6 to 15 percent slopes	8	0.4
	Cimarron loam, 15 to 35 percent slopes	14	0.2
	Cimarron loam, 2 to 6 percent slopes	12	0.3
	Cimarron loam, 6 to 15 percent slopes	13	1.1
	Cowdrey loam, 15 to 45 percent slopes	21	0.1
	Cumulic Cryaquolls, nearly level	25	0.9
	Frisco-Peeler gravelly sandy loams, 25 to 65 percent slopes	33	0.5
	Gateway loam, 15 to 50 percent slopes	35	1.4
	Harsha loam, 15 to 50 percent slopes, eroded	39	0.2
	Leavitt loam, 15 to 55 percent slopes	47	0.6
	Mayoworth clay loam, 15 to 50 percent slopes	53	0.3
	Mayoworth clay loam, 6 to 15 percent slopes	52	0.1
	Quander stony loam, 15 to 55 percent slopes	66	0.6
	Rock outcrop-Cryoborolls complex, extremely steep	68	0.5
	Tine cobbly sandy loam, 15 to 55 percent slopes	83	0.0
	Uinta sandy loam, 2 to 15 percent slopes	86	0.4
	Waybe clay loam, 10 to 55 percent slopes	90	0.6
	Woodhall loam, 15 to 50 percent slopes	92	1.7
	Woodhall loam, 6 to 15 percent slopes	91	0.2
	Youga loam, 15 to 45 percent slopes	95	0.2
	Youga loam, 2 to 6 percent slopes	93	0.5
	Youga loam, 6 to 15 percent slopes	94	0.6
	Total		**11.8**

Alternatives	MUName	MUSYM	Miles Crossed
Alternative D - Option 2	Aaberg clay loam, 15 to 30 percent slopes	2	0.2
	Binco clay loam, 15 to 35 percent slopes	9	0.2
	Binco clay loam, 6 to 15 percent slopes	8	0.4
	Cimarron loam, 15 to 35 percent slopes	14	0.1
	Cimarron loam, 2 to 6 percent slopes	12	0.4
	Cimarron loam, 6 to 15 percent slopes	13	1.0
	Cowdrey loam, 15 to 45 percent slopes	21	0.1
	Cumulic Cryaquolls, nearly level	25	0.9
	Frisco-Peeler gravelly sandy loams, 25 to 65 percent slopes	33	0.5
	Gateway loam, 15 to 50 percent slopes	35	1.4
	Harsha loam, 15 to 50 percent slopes, eroded	39	0.2
	Leavitt loam, 15 to 55 percent slopes	47	0.6
	Mayoworth clay loam, 15 to 50 percent slopes	53	0.3
	Mayoworth clay loam, 6 to 15 percent slopes	52	0.1
	Quander stony loam, 15 to 55 percent slopes	66	0.6
	Rock outcrop-Cryoborolls complex, extremely steep	68	0.8
	Tine cobbly sandy loam, 15 to 55 percent slopes	83	0.0
	Uinta sandy loam, 2 to 15 percent slopes	86	0.4
	Waybe clay loam, 10 to 55 percent slopes	90	0.7
	Woodhall loam, 15 to 50 percent slopes	92	0.9
	Youga loam, 15 to 45 percent slopes	95	0.5
	Youga loam, 2 to 6 percent slopes	93	0.5
	Youga loam, 6 to 15 percent slopes	94	1.0
	Total		**11.8**

Appendix F
Potential Fossil Yield Classification System

Appendix F – Potential Fossil Yield Classification System

Occurrences of paleontological resources are closely tied to the geologic units (i.e., formations, members, or beds) that contain them. The probability for finding paleontological resources can be broadly predicted from the geologic units present at or near the surface. Therefore, geologic mapping can be used for assessing the potential for the occurrence of paleontological resources.

Using the PFYC system, geologic units are classified based on the relative abundance of vertebrate fossils or scientifically significant invertebrate or plant fossils and their sensitivity to adverse impacts, with a higher class number indicating a higher potential. This classification is applied to the geologic formation, member, or other distinguishable unit, preferably at the most detailed mappable level. It is not intended to be applied to specific paleontological localities or small areas within units. Although significant localities may occasionally occur in a geologic unit, a few widely scattered important fossils or localities do not necessarily indicate a higher class; instead, the relative abundance of significant localities is intended to be the major determinant for the class assignment.

The PFYC system is meant to provide baseline guidance for predicting, assessing, and mitigating paleontological resources. The classification should be considered at an intermediate point in the analysis, and should be used to assist in determining the need for further mitigation assessment or actions.

The descriptions for the classes below are written to serve as guidelines rather than as strict definitions. Knowledge of the geology and the paleontological potential for individual units or preservational conditions should be considered when determining the appropriate class assignment. Assignments are best made by collaboration between land managers and knowledgeable researchers.

Class 1 – **Very Low**. Geologic units that are not likely to contain recognizable fossil remains.

- Units that are igneous or metamorphic, excluding reworked volcanic ash units.
- Units that are Precambrian in age or older.

(1) Management concern for paleontological resources in Class 1 units is usually negligible or not applicable.

(2) Assessment or mitigation is usually unnecessary except in very rare or isolated circumstances.

The probability for impacting any fossils is negligible. Assessment or mitigation of paleontological resources is usually unnecessary. The occurrence of significant fossils is non-existent or extremely rare.

Class 2 – **Low**. Sedimentary geologic units that are not likely to contain vertebrate fossils or scientifically significant nonvertebrate fossils.

- Vertebrate or significant invertebrate or plant fossils not present or very rare.
- Units that are generally younger than 10,000 years before present.
- Recent aeolian deposits.
- Sediments that exhibit significant physical and chemical changes (i.e., diagenetic alteration).

(1) Management concern for paleontological resources is generally low.

(2) Assessment or mitigation is usually unnecessary except in rare or isolated circumstances.

The probability for impacting vertebrate fossils or scientifically significant invertebrate or plant fossils is low. Assessment or mitigation of paleontological resources is not likely to be necessary. Localities containing important resources may exist, but would be rare and would not influence the classification. These important localities would be managed on a case-by-case basis.

Class 3 – **Moderate** or **Unknown**. Fossiliferous sedimentary geologic units where fossil content varies in significance, abundance, and predictable occurrence; or sedimentary units of unknown fossil potential.

- Often marine in origin with sporadic known occurrences of vertebrate fossils.
- Vertebrate fossils and scientifically significant invertebrate or plant fossils known to occur intermittently; predictability known to be low.

(or)

- Poorly studied and/or poorly documented. Potential yield cannot be assigned without ground reconnaissance.

Class 3a – **Moderate Potential.** Units that are known to contain vertebrate fossils or scientifically significant nonvertebrate fossils, but these occurrences are widely scattered. Common invertebrate or plant fossils may be found in the area, and opportunities may exist for hobby collecting. The potential for a project to be sited on or impact a significant fossil locality is low, but is somewhat higher for common fossils.

Class 3b – **Unknown Potential.** Units exhibit geologic features and preservational conditions that suggest significant fossils could be present, but little information about the paleontological resources of the unit or the area is known. This may indicate the unit or area is poorly studied, and field surveys may uncover significant finds. The units in this class may eventually be placed in another class when sufficient survey and research is performed. The unknown potential of the units in this class should be carefully considered when developing any mitigation or management actions.

(1) Management concern for paleontological resources is moderate; or cannot be determined from existing data.

(2) Surface-disturbing activities may require field assessment to determine appropriate course of action.

This classification includes a broad range of paleontological potential. It includes geologic units of unknown potential, as well as units of moderate or infrequent occurrence of significant fossils. Management considerations cover a broad range of options as well, and could include pre-disturbance surveys, monitoring, or avoidance. Surface-disturbing activities will require sufficient assessment to determine whether significant paleontological resources occur in the area of a proposed action, and whether the action could affect the paleontological resources. These units may contain areas that would be appropriate to designate as hobby collection areas due to the higher occurrence of common fossils and a lower concern about affecting significant paleontological resources.

Class 4 – **High**. Geologic units containing a high occurrence of significant fossils. Vertebrate fossils or scientifically significant invertebrate or plant fossils are known to occur and have been documented, but may vary in occurrence and predictability. Surface disturbing activities may adversely affect paleontological resources in many cases.

Class 4a – Unit is exposed with little or no soil or vegetative cover. Outcrop areas are extensive with exposed bedrock areas often larger than two acres. Paleontological resources may be susceptible to adverse impacts from surface disturbing actions. Illegal collecting activities may impact some areas.

Class 4b – These are areas underlain by geologic units with high potential but have lowered risks of human-caused adverse impacts and/or lowered risk of natural degradation due to moderating circumstances. The bedrock unit has high potential, but a protective layer of soil, thin alluvial material, or other conditions may lessen or prevent potential impacts to the bedrock resulting from the activity.

- Extensive soil or vegetative cover; bedrock exposures are limited or not expected to be impacted.
- Areas of exposed outcrop are smaller than two contiguous acres.
- Outcrops form cliffs of sufficient height and slope so that impacts are minimized by topographic conditions.
- Other characteristics are present that lower the vulnerability of both known and unidentified paleontological resources.

(1) Management concern for paleontological resources in Class 4 is moderate to high, depending on the proposed action.

(2) A field survey by a qualified paleontologist is often needed to assess local conditions.

(3) Management prescriptions for resource preservation and conservation through controlled access or special management designation should be considered.

(4) Class 4 and Class 5 units may be combined as Class 5 for broad applications, such as planning efforts or preliminary assessments, when geologic mapping at an appropriate scale is not available. Resource assessment, mitigation, and other management considerations are similar at this level of analysis, and impacts and alternatives can be addressed at a level appropriate to the application.

The probability for impacting significant paleontological resources is moderate to high, and is dependent on the proposed action. Mitigation considerations must include assessment of the disturbance, such as removal or penetration of protective surface alluvium or soils, potential for future accelerated erosion, or increased ease of access resulting in greater looting potential. If impacts to significant fossils can be anticipated, on-the-ground surveys prior to authorizing the surface disturbing action will usually be necessary. On-site monitoring or spot-checking may be necessary during construction activities.

Class 5 – **Very High**. Highly fossiliferous geologic units that consistently and predictably produce vertebrate fossils or scientifically significant invertebrate or plant fossils, and that are at risk of human-caused adverse impacts or natural degradation.

Class 5a – Unit is exposed with little or no soil or vegetative cover. Outcrop areas are extensive with exposed bedrock areas often larger than two contiguous acres. Paleontological resources are highly susceptible to adverse impacts from surface disturbing actions. Unit is frequently the focus of illegal collecting activities.

Class 5b – These are areas underlain by geologic units with very high potential but have lowered risks of human-caused adverse impacts and/or lowered risk of natural degradation due to moderating circumstances. The bedrock unit has very high potential, but a protective layer of soil, thin alluvial material, or other conditions may lessen or prevent potential impacts to the bedrock resulting from the activity.

- Extensive soil or vegetative cover; bedrock exposures are limited or not expected to be impacted.
- Areas of exposed outcrop are smaller than two contiguous acres.
- Outcrops form cliffs of sufficient height and slope so that impacts are minimized by topographic conditions.
- Other characteristics are present that lower the vulnerability of both known and unidentified paleontological resources.

(1) Management concern for paleontological resources in Class 5 areas is high to very high.

(2) A field survey by a qualified paleontologist is usually necessary prior to surface disturbing activities or land tenure adjustments. Mitigation will often be necessary before and/or during these actions.

(3) Official designation of areas of avoidance, special interest, and concern may be appropriate.

The probability for impacting significant fossils is high. Vertebrate fossils or scientifically significant invertebrate fossils are known or can reasonably be expected to occur in the impacted area. On-the-ground surveys prior to authorizing any surface disturbing activities will usually be necessary. On-site monitoring may be necessary during construction activities.

Appendix G
Plant Species Observed in Alternative Right-of-Ways

Appendix G: Plant Species Observed in Alternative Right-of-Ways

Scientific Name	Common Name	Community Type
	Trees	
Acer glabrum	Rock mountain maple	Sagebrush
Alnus incana subsp. tenuifolia	Alder	Sagebrush
Betula fontinaus	Water Birch	Riparian
Padus virginiana	Chokecherry	Sagebrush
Picea engelmannii	Engelmann spruce	Mixed Conifer
Picea pungens	Blue spruce	Mixed Conifer, Riparian
Pinus contorta ssp. *Latifolia*	Lodgepole pine	Lodgepole
Pinus flexilis	Limber pine	Mixed Conifer
Populus angustifolia	Narrowleaf cottonwood	Riparian
Populus tremuloides	Aspen	Aspen
Pseudotsuga menziesii	Douglas-fir	Mixed Conifer
	Shrubs	
Amelanchier alnifolia	Serviceberry	Aspen, Sagebrush
Arcostaphylos uva-ursi	Kinnikinnick	Aspen, Sagebrush
Artemisia frigida	Fringed sage	Sagebrush, Grassland
Artemisia ludoviciana	White sagebrush	Grassland
Chrysothamnus nauseosus	Rubber rabbitbrush	Sagebrush
Chrysothamnus viscidiflorus	Green rabbitbrush	Sagebrush
Distegia involucrata	Bush honeysuckle	Lodgepole
Juniperus communis	Common juniper	Aspen, Lodgepole
Mahonia repens	Oregon-grape	Aspen, Lodgepole
Oligosporus pacificus	Pacific sagewort	Grasslands, Sagebrush
Pentaphylloides floribunda	Shrubby cinquefoil	Wetlands
Purshia tridentata	Bitterbrush	Aspen, Lodgepole, Sagebrush
Ribes aureum	Golden currant	Wetland, Riparian
Ribes cereum	Wax currant	Lodgepole, Aspen
Ribes lacustre	Prickly currant	Wetland, Riparian
Rosa woodsii	Woods' Rose	Riparian
Salix bothii	Booth's willow	Wetlands
Salix drummondiana	Blue willow	Wetland, Riparian
Salix exigua	Coyote willow	Wetland, Riparian
Salilx monticola	Rocky Mountain willow	Wetland, Riparian
Salix scouleriana	Scouler's willow	Lodgepole
Seriphidium canum	Silver sagebrush	Sagebrush
Seriphidium tridentata	Big sagebrush	Sagebrush
Seriphidium vaseyanum	Mountain sagebrush	Sagebrush
Sheperdia canadensis	Buffaloberry	Lodgepole
Symphoricarpos rotundifolius	Snowberry	Lodgepole
Tetradymia canescens	Spiny horsebrush	Sagebrush
	Grasses and Grass-Like Species	
Achnatherum hymenoides	Indian ricegrass	Sagebrush
Achnatherum lettermanii	Letterman's needlegrass	Sagebrush
Alopecurus aequalis	Meadow foxtail	Wetlands, Wet meadows
Agrostis stolonifera	Creeping bentgrass	Wetlands
Anisantha tectorum	Cheatgrass	Disturbed Areas
Aristida purpurea	Purple three-awn	Sagebrush
Beckmannia syzigachne	Sloughgrass	Wetlands
Blepharoneuron tricholepis	Pine dropseed	Lodgepole
Bromopsis canadensis	Canada brome	Aspen, Lodgepole

Scientific Name	Common Name	Community Type
Bromposis inermis	Smooth brome	Disturbed areas, Lodgepole, Sagebrush
Calamagrostis canadensis	Bluejoint reedgrass	Wetlands
Carex aquatilis	Water sedge	Wetlands
Carex douglasii	Douglas' sedge	Aspen
Carex filifolia	Threadleaf sedge	Grasslands
Carex geyeri	Elk sedge	Lodgepole
Carex lanuginosa	Woolly sedge	Wetlands
Carex pensylvanica subsp. heliophila	Sun-loving sedge	Sagebrush
Carex nebrascensis	Nebraska sedge	Wetlands
Carex petasata	Liddon sedge	Sagebrush
Carex stenophylla	Needleleaf sedge	Sagebrush, Grasslands
Carex utriculata	Beaked sedge	Wetlands
Cicuta douglasii	Water hemlock	Wetlands, Riparian
Cirsium scariosum	Colorado thistle	Wetlands
Conioselinum scopulorum	Hemlock parsley	Wetlands, Riparian
Critesion jubatum	Foxtail barley	Disturbed lands
Danthonia parryi	Timber oatgrass	Lodgepole, Mixed Conifer
Daucus carota	Wild carrot	Disturbed Lands
Deschampsia cespitosa	Tufted hairgrass	Sagebrush, Wetlands
Eleocharis macrostachya	Creeping spikerush	Wetlands
Elymus canadensis	Canada wildrye	Grasslands
Elymus elymoides	Bottlebrush squirreltail	Lodgepole
Festuca idahoensis	Idaho fescue	Lodgepole
Festuca thurberi	Thurber's fescue	Lodgepole, Mixed Conifer
Glyceria grandis	American mannagrass	Wetlands, Riparian
Hesperostipa comata	Needle-and-thread	Grasslands, Sagebrush
Juncus arcticus ssp. ater	Arctic rush	Wetlands
Juncus longistylis	Longstyle rush	Wetlands
Juncus torreyi	Torrey's rush	Wetlands
Koeleria macrantha	Prairie junegrass	Lodgepole, Sagebrush
Leucopoa kingii	Spike fescue	Lodgepole
Muhlenbergia montana	Mountain muhly	Lodgepole, Sagebrush, Grasslands
Nasella viridula	Green needlegrass	Grasslands
Oryzopsis hymenoides	Indian ricegrass	Sagebrush
Panicum virgatum	Switchgrass	Wetlands, Grasslands
Pascopyrum smithii	Western wheatgrass	Grasslands, Sagebrush
Phalaroides arundinacea	Reed canarygrass	Wetlands, Riparian
Phleum pratense	Timothy	Sagebrush, Wetlands/Wet Meadow
Phragmites australis	Common Reed	Riparian
Piptatherum micranthum	Ricegrass	Aspen
Poa agassizensis	Agassiz bluegrass	Lodgepole
Poa fendleriana ssp. longiligula	Muttongrass	Aspen. Lodgepole, Sagebrush
Poa pratensis	Kentucky bluegrass	Wetlands, Grasslands
Poa secunda	Sandberg bluegrass	Sagebrush
Pseudoroegneria spicata ssp. *spicata*	Bluebunch wheatgrass	Lodgepole, Sagebrush
Vulpia octoflora	Sixweeks fescue	Grasslands
Forbs		
Acetodella vulgaris	Sheep sorrel	Wetland
Achillea lanulosa	Yarrow	Aspen. Lodgepole, Wetland/Riparian
Adenolinum lewisii	Wild blue flax	Sagebrush, Developed/Disturbed
Agoseris aurantiaca	Orange agoseris	Sagebrush
Agoseris glauca	False dandelion	Lodgepole, Sagebrush

Scientific Name	Common Name	Community Type
Anaphalis margaritacea	Pearly everlasting	Sagebrush, Lodgepole
Androsace occidentalis	Northern rockjasmine	Sagebrush
Anenome multifida ssp. *globosa*	Windflower	Lodgepole, Sagebrush
Antennaria pulcherrima ssp. anaphaloides	Pussytoes	Lodgepole
Antennaria rosea	Pussytoes	Sagebrush
Anthemis cotula	Mayweed chamomile	Disturbed areas
Aphyllon fasiculatum	Purple broomrape	Sagebrush
Apocynum androsaemifolium	Spreading dogbane	Aspen, Sagebrush
Aquilegia coerulea	Colorado columbine	Aspen, Lodgepole
Arabis hirsuta	Hairy rockcress	Lodgepole, Sagebrush
Argentina anserina	Silverweed	Wetlands
Arnica cordifolia	Heartleaf arnica	Aspen, Lodgepole
Aster laevis var. *geyeri*	Smooth aster	Aspen, Lodgepole
Astragalus drummondii	Drummond's milk vetch	Sagebrush
Astragalus kentrophyta	Spiny milk vetch	Sagebrush
Astragalus miser var. *oblongifolius*	Weedy milk vetch	Lodgepole
Balsamorhiza sagittata	Arrowleaf balsamroot	Aspen, Sagebrush
Boechera drummondii	False arabis	Lodgepole
Boechera retrofracta	Reflexed rockcress	Aspen
*Botrychium hesperium**	Western moonwort	Dist. Aspen and Limber Pine
Botrychium minganense*	Mingan moonwort	Dist. Aspen and Limber Pine
Breea arvense	Canada thistle	Wetlands, Disturbed lands
Calypso bulbosa	Fairy slipper orchid	Lodgepole
Calochortus gunnisonii	Mariposa lily	Sagebrush
Campanula rotundifolia	Harebell	Lodgepole, Sagebrush
Capsella bursa-pastoris	Shepard's purse	Disturbed lands
Cardaria draba	Whitetop	Distrubed lands
Castilleja integra	Orange paintbrush	Lodgepole
Castilleja occidentalis	Western paintbrush	Sagebrush
Cersatium strictum	Mouse-eared chickweed	Lodgepole, Sagebrush
Chamerion danielsii	Fireweed	Aspen, Lodgepole, Sagebrush
Chimaphila umbellate ssp. *occidentalis*	Pipsissewa	Lodgepole
Cirsium eatonii	Eaton thistle	Aspen, Lodgepole
Cirsium scariosum	Meadow thistle	Wetland
Collinsia parviflora	Blue-eyed Mary	Sagebrush, Wetlands
Collomia linearis	Linearleaf collomia	Sagebrush
Comandra umbellata ssp. pallida	Bastard toadflax	Sagebrush
Corallorhiza maculata	Spotted coralroot orchid	Aspen, Lodgepole
Corydalis aurea	Golden smoke	Lodgepole, Sagebrush
Coriflora hirsutissima	Leatherflower	Aspen
Cynoglossum officinale	Houndstongue	Disturbed lands
Delphinium nuttallianum	Early larkspur	Lodgepole, Sagebrush
Draba aurea	Golden Whitlow-wort	Lodgepole
Drymocallis fissa	Bigflower cinquefoil	Aspen, Sagebrush
Epilobium ciliatum	Willowherb	Wetlands
Equisetum arvense	Field horsetail	Riparian, Wetlands
Eremogone fendleri	Sandwort	Sagebrush
Erigeron compositus	Fleabane	Sagebrush
Erigeron divergens	Spreading fleabane	Sagebrush
Erigeron speciosus	Showy fleabane	Sagebrush
Erigeron subtrinervis	Three-nerved fleabane	Mixed Conifer
Eriogonum umbellatum	Sulphur flower	Sagebrush
Erythrocoma triflora	Prairie smoke	Lodgepole, Sagebrush, Wetlands

Scientific Name	Common Name	Community Type
Fragaria virginiana ssp. *glauca*	Strawberry	Aspen, Lodgepole, Sagebrush
Frasera speciosa	Green gentian	Aspen, Lodgepole, Sagebrush
Gayophytum diffusum ssp. parviflorum	Spreading groundsmoke	Sagebrush
Galium septentrionale	Northern bedstraw	Aspen, Lodgepole, Sagebrush, Wetlands
Geranium richardsonii	Richardson's geranium	Aspen
Geum macrophyllum	Large-leaved avens	Wetlands
Heracleum sphondylium	Cow parsnip	Wetlands
Heterotheca villosa	Hairy goden aster	Sagebrush, grasslands
Heuchera parvifolia	Littleflower alumroot	Sagebrush
Hippochaete laevigata	Scouring-rush	Wetlands
Hyoscyamus niger	Black henbane	Disturbed areas
Ipomopsis aggregata	Scarlet gilia	Sagebrush
Lesquerella ludoviciana.	Bladderpod	Sagebrush, Rocky hillsides
Ligusticum porteri	Porter's lovage	Wetlands
Limnorchis hyperborea	Bog orchid	Wetlands
Lithophragma parviflorum	Star saxifrage	Wetlands/Wet Meadows
Lithospermum incisum	Narrow-leaved puccoon	Sagebrush
Lithospermum multiforum	Puccoon	Aspen
Lupinus argenteus	Silver lupine	Lodgepole
Lupinus lepidus ssp. caespitosus	Dwarf lupine	Sagebrush, Wetlands
Lupinus prunophilus	Chokecherry lupine	Aspen, Sagebrush
Maianthemum stellatum	False Solomon's Seal	Lodgepole, Wetlands, Riparian
Medicago sativa	Alfalfa	Developed/Disturbed areas (Ag fields)
Melilotus officinale	Yellow sweetclover	Disturbed areas
Mentha arvensis	Fieldmint	Wetlands
Mertensia ciliata	Mountain Chiming bells	Wetlands
Mertensia lanceolata	Lanceleaf chiming bells	Sagebrush
Micranthes odontoloma	Saxifrage	Sagebrush
Micranthes rhomboidea	Saxifrage	Sagebrush
Nasturtium officinale	Watercress	Riparian
Oenothera caespitosa	Stemless evening primrose	Sagebrush
Oreobroma pygmaea	Pygmy bitterroot	Sagebrush, sparse Grasslands
Oreocarya virgata	Miners candle	Sagebrush, Grasslands
Oreochrysum parryi	Parry’s goldenbush	Aspen
Orthilia secunda	One-sided wintergreen	Aspen, Lodgepole
Orthocarpos luteus	Owl clover	Sagebrush
Oxytrtopis lambertii	Purple locoweed	Sagebrush
Oxytropis sericea	White locoweed	Sagebrush
Packera multilobata	Multilobe groundsel	Aspen, Sagebrush
Packera neomexicana	Groundsel	Sagebrush
Packera werneriifolia	Groundsel	Lodgepole
*Penstemon cyathophorus**	Cupped penstemon	Sagebrush, Grasslands
Penstemon rydbergii	Rydberg's penstemon	Sagebrush
Penstemon strictus	Rocky Mountain penstemon	Sagebrush
Pedicularis groenlandica	Little elephant head	Wetlands
Phacelia sericea	Purple fringe	Wetlands
Phlox hoodii ssp. *canescens*	Cushion phlox	Sagebrush
Phlox multiflora	Long-leaved phlox	Lodgepole
Polemonium ccaeruleum	Jacob's ladder	Mixed Conifer forest
Polygonum douglasii	Douglas knotweed	Sagebrush
Potentilla hippiana	Horse cinquefoil	Sagebrush
Potentilla pensylvanica	Pennsylvania cinquefoil	Lodgepole
Pseudocymopterus montanus	Mountain parsley	Aspen, Lodgepole, Sagebrush

Scientific Name	Common Name	Community Type
Pterospora andromedea	Pinedrops	Lodgepole
Pulsatilla ludoviciana	Pasqueflower	Lodgepole
Pyrola chlorantha	Shinleaf	Lodgepole
Rorippa palustris ssp. hispida	Yellowcress	Wetland
Rosa woodsii	Woods' rose	Aspen, Lodgepole, Wetlands
Rumex crispus	Curly dock	Wetlands
Sagittaria latifolia	Arrowhead	Wetlands
Senecio integerrimus	Lambstongue groundsel	Lodgepole, Sagebrush
Solidago missouriensis	Missouri goldenrod	Sagebrush
Stellaria longipes	Long-stalked starwort	Sagebrush
Swertia perennis	Star gentian	Wetlands
Taraxacum officinale	Common dandelion	Aspen, Lodgepole, Sagebrush, Wetlands
Thlaspi arvense	Pennycress	Sagebrush
Thalictrum fendleri	Fendler meadowrue	Wetlands
Thermopsis montana	Golden banner	Lodgepole, Wetlands
Tradescantia occidentalis	Spiderwort	Lodgepole
Tragopogon pratensis	Salsify	Sagebrush, Grasslands
Trifolium gymnocarpum	Hollyleaf clover	Sagebrush
Trifolium hybridum	Alsike clover	Lodgepole, Sagebrush
Trifolium pratense	Red clover	Wetlands
Trifolium repens	White Dutch clover	Wetlands
Urtica gracilis ssp. *gracilis*	Stinging nettle	Lodgepole
Vaccinium caespitosum	Dwarf bilberry	Lodgepole
Valeriana capitata ssp. *acutiloba*	Valerian	Lodgepole
Valeriana edulis	Valerian	Sagebrush
Viola adunca	Mountain blue violet	Aspen, Lodgepole
Viola nuttallii	Yellow violet	Lodgepole
Wyethia amplexicaule	Mules ears	Sagebrush
Succulents		
Amerosedum lanceolatum	Yellow stonecrop	Lodgepole, Sagebrush
Opuntia polyacantha	Plains pricklypear	Grassland, Sagebrush
*Pediocactus simpsonii**	Mountain ball cactus	Sagebrush
Lichens		
Aspicilia hispida	Vagabond lichen	Sagebrush
Dermatocarpon reticulatum "vagrant form"*	Reticulate earth lichen	Sagebrush
Xanthoparmelia chlorochroa	Tumbleweed shield lichen	Sagebrush

*species of local concern

Appendix H
Correspondence with Wildlife Agencies

Department of Energy
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

JAN 11 2012

Ms. Susan Linner
Colorado Field Supervisor
U.S. Fish and Wildlife Service, Ecological Services
Colorado Field Office
P.O. Box 25486, DFC (65412)
Denver, CO 80225-0486

Re: Determination of No Effect to Federally Listed Species: Granby Pumping Plant Switchyard - Windy Gap Substation Transmission Line Rebuild, Grand County, CO

Dear Ms. Linner:

Western Area Power Administration (Western), a power marketing administration within the United States (U.S.) Department of Energy (DOE), is proposing to rebuild and upgrade the Granby Pumping Plant Switchyard-Windy Gap Substation 69-kilovolt (kV) transmission line in Grand County, Colorado. The proposed project involves rebuilding and upgrading the existing single-circuit line, currently on a 30-foot right-of-way (ROW), as a double-circuit transmission line on a 100-foot ROW and adding a second power transformer to the Granby Pumping Plant Switchyard. The existing 69-kV, H-frame wood pole line would be removed. One circuit would replace the existing 69-kV line; the other circuit would be a new 138-kV line. The new ROW width would be 100-feet wide. The Granby Pumping Plant Switchyard would be expanded to accommodate the second circuit and power transformer. Windy Gap Substation would be modified to accommodate the second circuit. Western is preparing an environmental impact statement for this project. The U.S. Forest Service, Bureau of Land Management, and Grand County are cooperating agencies. Additional project background information is located at: http://ww2.wapa.gov/sites/western/transmission/infrastruct/Pages/GranbyPumpingPlant.aspx. The draft environmental impact statement is scheduled to be released before the end of January 2012.

The preferred alternative (Alternative D, Option 1) would remove the existing single-circuit 69-kV line and construct approximately 11.8 miles of 138-kV double-circuit line using single-pole steel structures. Most of the alignment for Alternative D, Option 1 follows either the existing transmission line alignment or the Windy Gap Water Pipeline ROW, with the exception of a new 1.3-mile alignment on the east side of Table Mountain (just inside the Arapahoe National Recreation Area (ARNA) boundary). This would avoid affecting houses in the Scanloch Subdivision. Where the alternative would be located on the existing alignment, the 30-foot ROW would be expanded to 100 feet to accommodate requirements for construction, operation, and maintenance.

Threatened and Endangered Species in the Project Area

Western consulted The US Fish and Wildlife Service Threatened and Endangered Species List for Grand County, Colorado (July 2010) to determine federally listed species that may occur within the project area. Those species are listed in Table 1 below. Species retained for analysis included Penland's beardtongue (*Penstemon penlandii*), Osterhout milkvetch (*Astragalus osterhoutii*), and the Canada lynx (*Lynx canadensis*). Because aquatic habitats would be avoided

and buffered, fish species were not carried forward for analysis (Table 1). A copy of the biological report is included on the enclosed CD and can also be downloaded from: http://ww2.wapa.gov/sites/western/transmission/infrastruct/Documents/gpp-wgp/Final_Biological_Report_30-Sept-11.pdf.

Federally listed species, including the Colorado butterfly plant (*Gaura neomexicana ssp. Coloradensis*), Ute ladies'- tresses orchid (*Spiranthes diluvialis*), and the western prairie fringed orchid (*Platanthera praeclara*), were also excluded from analysis because no suitable habitat occurs in the project area and there would be no water depletions.

Table 1. Federally Listed Species with the Potential to Occur in Grand County

Common Name	Scientific Name	Federal Status*	Species Retained for Analysis?	Reason for Exclusion
MAMMALS				
Canada lynx	*Lynx canadensis*	T	Yes	Retained, although no suitable habitat in project area
FISH				
Bonytail chub	*Gila elegans*	E	No	Aquatic habitats will be avoided and buffered
Colorado pikeminnow	*Ptychocheilus lucius*	E	No	Aquatic habitats will be avoided and buffered
Greenback cutthroat trout	*Oncorhynchus clarkii stomias*	T	No	Aquatic habitats will be avoided and buffered
Humpback chub	*Gila cypha*	E	No	Aquatic habitats will be avoided and buffered
Razorback sucker	*Xryauchen texanus*	E	No	Aquatic habitats will be avoided and buffered
PLANTS				
Osterhout milkvetch	*Astragalus osterhoutii*	E	Yes	
Penland's beardtongue	*Penstemon penlandii*	E	Yes	

Effects to Federally Listed Species

Western reviewed potential effects to federally listed species within the project area and made the following determinations:

Mammals

Canada Lynx – The project area is below 9,000-feet in elevation, does not occur in lynx habitat, and is over two miles from the closest Lynx Analysis Unit (LAU). The proposed action would have **no effect** on the Canada lynx or its habitat.

Plant Species

Osterhout milk-vetch - The proposed action, is not expected to have direct or indirect effects on this species or its habitat. There would be **no effect** to Osterhout milk-vetch from the proposed action for the following reasons:

A review of existing information shows no known occurrences of this species in the project area.

Field surveys were conducted within the proposed ROW in 2008 and again in July 2009 by qualified specialists using the USFWS standard protocol for federally listed plant species.

No Osterhout milk-vetch were observed during field surveys.

Penland's Beardtongue - The proposed action is not expected to have direct or indirect effects on this species or its habitat. There will be **no effect** to Penland's beardtongue from the proposed action for the following reasons:

A review of existing information shows no known occurrences of this species in the project area.

Field surveys for this species were conducted within the ROW in 2008 and again in 2009 by qualified specialists using the USFWS standard protocol for federally listed plant species.

No Penland's Beardtongue were observed during field surveys.

Determinations Summary

Based on the information above, Western determined that the proposed action would have no effect on federally listed species. If you have questions or require additional information, please call or e-mail me at (720) 962-7255 or hartman@wapa.gov.

Sincerely,

Jim Hartman
NEPA Project Coordinator

Enclosure

cc:
Ms. Carol Kruse
Arapaho and Roosevelt National Forest
2150 Centre Avenue, Building E
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United States Department of the Interior

FISH AND WILDLIFE SERVICE
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ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES COLORADO COUNTIES

February 2008

Symbols:
* - Water depletions in the Upper Colorado River and San Juan River Basins, may affect the species and/or critical habitat in downstream reaches in other states.
▲ - Water depletions in the South Platte River may affect the species and/or critical habitat in downstream reaches in other states.
© - There is designated critical habitat for the species within the county.
T - Threatened
E - Endangered
P - Proposed
X - Experimental
C - Candidate

Species	Scientific Name	Status
ADAMS		
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
ALAMOSA		
Black-footed ferret	Mustela nigripes	E

Canada lynx	Lynx canadensis	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
Southwestern willow flycatcher	Empidonax traillii extimus	E
Yellow-billed cuckoo	Coccyzus americanus	C
ARAPAHOE		
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
ARCHULETA		
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Mexican spotted owl	Strix occidentalis lucida	T
Pagosa skyrocket	Ipomopsis polyantha	C
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Yellow-billed cuckoo	Coccyzus americanus	C
BACA		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Lesser prairie chicken	Tympanuchus pallidicinctus	C
BENT		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)	Sternula antillarum	E
Lesser prairie chicken	Tympanuchus pallidicinctus	C
Piping plover	Charadrius melodus	T
BOULDER		
Canada lynx	Lynx canadensis	T
Colorado butterfly plant	Gaura neomexicana spp. coloradensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Least tern (interior population) ▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T

Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
BROOMFIELD		
Black-footed ferret	Mustela nigripes	E
Colorado butterfly plant	Gaura neomexicana spp. coloradensis	T
Least tern (interior population) ▲	Sternula antillarum	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
CHAFFEE		
Canada lynx	Lynx canadensis	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
Uncompahgre fritillary butterfly	Boloria acrocnema	E
CHEYENNE		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Lesser prairie chicken	Tympanuchus pallidicinctus	C
CLEAR CREEK		
Canada lynx	Lynx canadensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Least tern (interior population) ▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Whooping crane▲	Grus americana	E
CONEJOS		
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
Southwestern willow flycatcher	Empidonax traillii extimus	E
Yellow-billed cuckoo	Coccyzus americanus	C

COSTILLA		
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
Southwestern willow flycatcher	Empidonax traillii extimus	E
Yellow-billed cuckoo	Coccyzus americanus	C
CROWLEY		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)	Sternula antillarum	E
Lesser prairie chicken	Tympanuchus pallidicinctus	C
Piping plover	Charadrius melodus	T
CUSTER		
Canada lynx	Lynx canadensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
DELTA		
Black-footed ferret	Mustela nigripes	E
Bonytail	Gila elegans	E
Canada lynx	Lynx canadensis	T
Clay-loving wild buckwheat	Eriogonum pelinophilum	E
Colorado pikeminnow©	Ptychocheilus lucius	E
Humpback chub	Gila cypha	E
Razorback sucker©	Xyrauchen texanus	E
Uinta Basin hookless cactus	Sclerocactus glaucus	T
Yellow-billed cuckoo	Coccyzus americanus	C
DENVER		
Least tern (interior population) ▲	Sternula antillarum	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
DOLORES		
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E

Humpback chub*	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
DOUGLAS		
Black-footed ferret	Mustela nigripes	E
Colorado butterfly plant	Gaura neomexicana spp. coloradensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Least tern (interior population) ▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Pawnee montane skipper	Hesperia leonardus montana	T
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse©	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
EAGLE		
Black-footed ferret	Mustela nigripes	E
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Yellow-billed cuckoo	Coccyzus americanus	C
ELBERT		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Least tern (interior population) ▲	Sternula antillarum	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Whooping crane▲	Grus americana	E
EL PASO		
Arkansas darter	Etheostoma cragini	C

Black-footed ferret	Mustela nigripes	E
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Least tern (interior population) ▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
FREMONT		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
GARFIELD		
Bonytail	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow©	Ptychocheilus lucius	E
De Beque phacelia	Phacelia submutica	C
Humpback chub	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Parachute beardtongue	Penstemon debilis	C
Razorback sucker©	Xyrauchen texanus	E
Uinta Basin hookless cactus	Sclerocactus glaucus	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Yellow-billed cuckoo	Coccyzus americanus	C
GILPIN		
Canada lynx	Lynx canadensis	T
Least tern (interior population) ▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Whooping crane▲	Grus americana	E
GRAND		
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E

Osterhout milkvetch	Astragalus osterhoutii	E
Penland beardtongue	Penstemon penlandii	E
Razorback sucker*	Xyrauchen texanus	E
Yellow-billed cuckoo	Coccyzus americanus	C
GUNNISON		
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Gunnison's prairie dog	Cynomys gunnisoni	C
Humpback chub*	Gila cypha	E
Razorback sucker*	Xyrauchen texanus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
HINSDALE		
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Gunnison's prairie dog	Cynomys gunnisoni	C
Humpback chub*	Gila cypha	E
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
HUERFANO		
Arkansas darter	Etheostoma cragini	C
Canada lynx	Lynx canadensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
JACKSON		
Canada lynx	Lynx canadensis	T
Least tern (interior population) ▲	Sternula antillarum	E
North Park phacelia	Phacelia formosula	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Whooping crane▲	Grus americana	E
JEFFERSON		
Canada lynx	Lynx canadensis	T
Colorado butterfly plant	Gaura neomexicana spp. coloradensis	T

Gunnison's prairie dog	Cynomys gunnisoni	C
Least tern (interior population) ▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Pawnee montane skipper	Hesperia leonardus montana	T
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse©	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
KIOWA		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)	Sternula antillarum	E
Lesser prairie chicken	Tympanuchus pallidicinctus	C
Piping plover	Charadrius melodus	T
KIT CARSON		
Black-footed ferret	Mustela nigripes	E
LAKE		
Canada lynx	Lynx canadensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Penland alpine fen mustard	Eutrema penlandii	T
Uncompahgre fritillary butterfly	Boloria acrocnema	E
LA PLATA		
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Knowlton cactus	Pediocactus knowltonii	E
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
LARIMER		
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Colorado butterfly plant	Gaura neomexicana spp. coloradensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Least tern (interior population)▲	Sternula antillarum	E

Mexican spotted owl	Strix occidentalis lucida	T
North Park phacelia	Phacelia formosula	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse©	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
LAS ANIMAS		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
New Mexico meadow jumping mouse	Zapus hudsonius luteus	C
LINCOLN		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)▲	Sternula antillarum	E
Lesser prairie chicken	Tympanuchus pallidicinctus	C
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Whooping crane▲	Grus americana	E
LOGAN		
Least tern (interior population)▲	Sternula antillarum	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover	Charadrius melodus	T
Whooping crane▲	Grus americana	E
MESA		
Bonytail©	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow©	Ptychocheilus lucius	E
De Beque phacelia	Phacelia submutica	C
Humpback chub©	Gila cypha	E
Razorback sucker©	Xyrauchen texanus	E
Uinta Basin hookless cactus	Sclerocactus glaucus	T
Yellow-billed cuckoo	Coccyzus americanus	C
MINERAL		
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E

Gunnison's prairie dog	Cynomys gunnisoni	C
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
MOFFAT		
Black-footed ferret	Mustela nigripes	E
Bonytail©	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow©	Ptychocheilus lucius	E
Humpback chub©	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker©	Xyrauchen texanus	E
Ute ladies'-tresses orchid (Yampa River floodplain)	Spiranthes diluvialis	T
Yellow-billed cuckoo	Coccyzus americanus	C
MONTEZUMA		
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Mancos milkvetch	Astragalus humillimus	E
Mesa Verde cactus	Sclerocactus mesae-verdae	T
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Sleeping Ute milkvetch	Astragalus tortipes	C
Southwestern willow flycatcher	Empidonax traillii extimus	E
Yellow-billed cuckoo	Coccyzus americanus	C
MONTROSE		
Black-footed ferret	Mustela nigripes	E
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Clay-loving wild buckwheat	Eriogonum pelinophilum	E
Colorado pikeminnow*	Ptychocheilus lucius	E
Gunnison's prairie dog	Cynomys gunnisoni	C
Humpback chub*	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Uinta Basin hookless cactus	Sclerocactus glaucus	T
Yellow-billed cuckoo	Coccyzus americanus	C
MORGAN		

Black-footed ferret	Mustela nigripes	E
Least tern (interior population)	Sternula antillarum	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
OTERO		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)	Sternula antillarum	E
Piping plover	Charadrius melodus	T
OURAY		
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E
Razorback sucker*	Xyrauchen texanus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
PARK		
Canada lynx	Lynx canadensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Gunnison's prairie dog	Cynomys gunnisoni	C
Least tern (interior population)▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Pawnee montane skipper	Hesperia leonardus montana	T
Penland alpine fen mustard	Eutrema penlandii	T
Piping plover▲	Charadrius melodus	T
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Whooping crane▲	Grus americana	E
PHILLIPS		
None		
PITKIN		
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E

Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Yellow-billed cuckoo	Coccyzus americanus	C
PROWERS		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)	Sternula antillarum	E
Lesser prairie chicken	Tympanuchus pallidicinctus	C
Piping plover	Charadrius melodus	T
PUEBLO		
Arkansas darter	Etheostoma cragini	C
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Greenback cutthroat trout	Oncorhynchus clarki stomias	T
Mexican spotted owl	Strix occidentalis lucida	T
RIO BLANCO		
Black-footed ferret	Mustela nigripes	E
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow©	Ptychocheilus lucius	E
Dudley Bluffs bladderpod	Lesquerella congesta	T
Dudley Bluffs twinpod	Physaria obcordata	T
Humpback chub*	Gila cypha	E
Razorback sucker*	Xyrauchen texanus	E
White River beardtongue	Penstemon scariosus var. albifluvis	C
Yellow-billed cuckoo	Coccyzus americanus	C
RIO GRANDE		
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Gunnison's prairie dog	Cynomys gunnisoni	C
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
ROUTT		
Bonytail*	Gila elegans	E

Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E
Razorback sucker*	Xyrauchen texanus	E
Yellow-billed cuckoo	Coccyzus americanus	C
SAGUACHE		
Black-footed ferret	Mustela nigripes	E
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Gunnison's prairie dog	Cynomys gunnisoni	C
Humpback chub*	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
SAN JUAN		
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
SAN MIGUEL		
Black-footed ferret	Mustela nigripes	E
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Razorback sucker*	Xyrauchen texanus	E
Southwestern willow flycatcher	Empidonax traillii extimus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
SEDGWICK		
Least tern (interior population)	Sternula antillarum	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover	Charadrius melodus	T
Whooping crane▲	Grus americana	E

SUMMIT		
Bonytail*	Gila elegans	E
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E
Mexican spotted owl	Strix occidentalis lucida	T
Penland alpine fen mustard	Eutrema penlandii	T
Razorback sucker*	Xyrauchen texanus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
TELLER		
Gunnison's prairie dog	Cynomys gunnisoni	C
Least tern (interior population)▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Pawnee montane skipper	Hesperia leonardus montana	T
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse©	Zapus hudsonius preblei	T
Whooping crane▲	Grus americana	E
WASHINGTON		
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)▲	Sternula antillarum	E
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Whooping crane▲	Grus americana	E
WELD		
Black-footed ferret	Mustela nigripes	E
Colorado butterfly plant	Gaura neomexicana spp. coloradensis	T
Least tern (interior population)▲	Sternula antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
YUMA		
None		T

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Colorado Field Office
755 Parfet Street, Suite 361
Lakewood, Colorado 80215

IN REPLY REFER TO:
ES/CO: T&E/Species list
Mail Stop 65412

JUL 13 2006

Mr. Rodney Jones
Western Area Power Administration
Rocky Mountain Region
5555 E. Crossroads Boulevard
Loveland, Colorado 80539-3003

Dear Mr. Jones:

The U.S. Fish and Wildlife Service (Service) received your letter dated June 30, 2005, regarding the proposed rebuild of the Granby Pumping Plant to Windy Gap 69-kV Transmission Line, located near Grand Lake and the town of Granby, Grand County, Colorado. These comments have been prepared under the provisions of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 et. seq.), the Bald and Golden Eagle Protection Act of 1940 (BGEPA), as amended (16 U.S.C. 668 et. seq.), and the Migratory Bird Treaty Act of 1918 (MBTA), as amended (16 U.S.C. 703 et. seq.).

For your convenience, we have enclosed a list of Colorado's threatened and endangered species, as well as the counties in which they are known to occur. We cannot provide site-specific details.

If questions regarding the presence of an endangered species, the extent of its habitat, or the effects of a particular action need to be resolved, the Service recommends that a knowledgeable consultant be contacted to conduct habitat assessments, trapping studies, or to provide recommendations regarding options under the ESA. Due to staffing constraints, the Colorado Field Office cannot provide you with these services.

Along with the ESA, please be aware of the potential application of the MBTA and the BGEPA to your transmission line project. Protective measures to help reduce possible impacts to migratory birds and other raptors should be installed. 7 CFR § 1724.52 allows for deviations from construction standards for raptor protection, provided that structures are designed and constructed in accordance with *Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996* published by the Edison Electric Institute/Raptor Research Foundation. The regulation requires that such structures be in accordance with the National Electrical Safety Code and applicable State and local regulations.

If the Service can be of further assistance, please contact Sandy Vana-Miller of my staff at (303) 275-2370.

Sincerely,

Susan C. Linner
Colorado Field Supervisor

Enclosure: Species List

cc: FWSR6, S. Vana-Miller

Colorado Field Office County List
Updated February 2005

Symbols:
* Water depletions in the Upper Colorado River and San Juan River Basins, may affect the species and/or critical habitat in downstream reaches in other states.
▲ Water depletions in the South Platte River may affect the species and/or critical habitat in downstream reaches in other states.
© There is designated critical habitat for the species within the county.
T Threatened
E Endangered
P Proposed
X Experimental
C Candidate

For additional information contact: U.S. Fish and Wildlife Service, Colorado Field Office, 755 Parfet Street, Suite 361, Lakewood, Colorado 80215, telephone 303-275-2370
U.S. Fish and Wildlife Service, Western Colorado Field Office, 764 Horizon Drive, Building B, Grand Junction, Colorado 81506, telephone 970-243-2778

Species	Scientific Name	Status
ADAMS		
Bald eagle	Haliaeetus leucocephalus	T
Black-footed ferret	Mustela nigripes	E
Least tern (interior population)▲	Sterna antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon▲	Scaphirhynchus albus	E
Piping plover▲	Charadrius melodus	T
Preble's meadow jumping mouse	Zapus hudsonius preblei	T
Ute ladies'-tresses orchid	Spiranthes diluvialis	T
Whooping crane▲	Grus americana	E
ALAMOSA		
Bald eagle	Haliaeetus leucocephalus	T
Black-footed ferret	Mustela nigripes	E
Canada lynx	Lynx canadensis	T
Gunnison sage-grouse	Centrocercus minimus	C
Mexican spotted owl	Strix occidentalis lucida	T
Southwestern willow flycatcher	Empidonax traillii extimus	E
Yellow-billed cuckoo	Coccyzus americanus	C
ARAPAHOE		
Bald eagle	Haliaeetus leucocephalus	T

Parachute beardtongue	Penstemon debilis	C
Razorback sucker©	Xyrauchen texanus	E
Uinta Basin hookless cactus	Sclerocactus glaucus	T
Yellow-billed cuckoo	Coccyzus americanus	C
GILPIN		
Boreal toad	Bufo boreas boreas	C
Canada lynx	Lynx canadensis	T
Least tern (interior population) ▲	Sterna antillarum	E
Mexican spotted owl	Strix occidentalis lucida	T
Pallid sturgeon ▲	Scaphirhynchus albus	E
Piping plover ▲	Charadrius melodus	T
Whooping crane ▲	Grus americana	E
GRAND		
Bald eagle	Haliaeetus leucocephalus	T
Bonytail*	Gila elegans	E
Boreal toad	Bufo boreas boreas	C
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Humpback chub*	Gila cypha	E
Osterhout milkvetch	Astragalus osterhoutii	E
Penland beardtongue	Penstemon penlandii	E
Razorback sucker*	Xyrauchen texanus	E
Slender moonwort	Botrychium lineare	C
Yellow-billed cuckoo	Coccyzus americanus	C
GUNNISON		
Bald eagle	Haliaeetus leucocephalus	T
Bonytail*	Gila elegans	E
Boreal toad	Bufo boreas boreas	C
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E
Gunnison sage-grouse	Centrocercus minimus	C
Humpback chub*	Gila cypha	E
Razorback sucker*	Xyrauchen texanus	E
Uncompahgre fritillary butterfly	Boloria acrocnema	E
Yellow-billed cuckoo	Coccyzus americanus	C
HINSDALE		
Bald eagle	Haliaeetus leucocephalus	T
Bonytail*	Gila elegans	E
Boreal toad	Bufo boreas boreas	C
Canada lynx	Lynx canadensis	T
Colorado pikeminnow*	Ptychocheilus lucius	E

STATE OF COLORADO

Bill Ritter, Jr., Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

Mark B. Konishi, Acting Director
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 297-1192
wildlife.state.co.us

For Wildlife-
For People

September 11, 2007

Rodney Jones
Western Area Power Administration
Rocky Mountain Region
5555 East Crossroads Boulevard
Loveland, CO 80539-3003

Mr. Jones,

The Colorado Division of Wildlife (CDOW) has previously commented in regards to the wildlife impacts that the Granby Pumping Plant to Windy Gap Transmission Line Rebuild project will have on wildlife in a letter dated August 2005. This letter identified several significant wildlife impacts to big game winter range, sage grouse, and raptors/migratory birds. The current alignment as opposed to the proposed reroute, presents fewer wildlife impacts considering the significant habitat losses and fragmentation within the area.

The proposed transmission line rebuild will have both direct and cumulative impacts to the greater sage grouse in the area. The project lies within occupied range of the greater sage grouse as defined by the Colorado Division of Wildlife. Greater sage grouse utilize this area year round for breeding, brood-rearing, summer and winter habitats. The greater sage grouse is a state species of special concern and has been petitioned multiple times for listing under the Endangered Species Act. The Middle Park Greater Sage Grouse Conservation Plan (2001) will provide more detailed information on greater sage grouse in Middle Park. Currently a comprehensive Colorado Greater Sage Grouse Conservation Plan is in its final draft stages and should be available later this year.

Additionally, this area is the southeastern most range for the greater sage grouse, and has been significantly compromised by surrounding developments, habitat fragmentation, and human disturbance. Current information does not support any exchange between North Park or other western Middle Park greater sage grouse populations and is isolated. The transmission line rebuild will place the disturbance in closer proximity to this breeding area. Greater sage grouse collision potential and increased predation is likely to occur with the proposed rebuild alternative. Overall, the existing route imposes the least impact to greater sage grouse and minimizes cumulative impacts already in place withother significant habitat losses in the area.

The area of Table Mountain and the surrounding habitats are defined as winter rangefor elk and mule deer. All human activities associated with any construction and maintenance of this transmission line within winter range should not take place between November and April. This will help maintain the viability of this severely limited seasonal habitat. Human disturbance in this area may displace elk to adjacent private lands and cause conflicts.

The invasion and spread of non-native plants and noxious weeds within the rerouted alignmentare of concern. These plants reduce the density of native vegetation and can out compete native plants that many wildlife species are dependent on. Precautions should be taken to reduce the introduction or spread of these plants. Cleaning vehicles before introducing them to a new area and having a comprehensive plan to control weeds after construction takes place is imperative.

A variety of migratory birds occur in the area. These include a variety of raptors including eagles and osprey. Ospreys also have attempted to utilize other utility poles in the area for nesting. Impacts from collisions and electrocutions may increase

DEPARTMENT OF NATURAL RESOURCES, Harris D. Sherman, Executive Director
WILDLIFE COMMISSION, Tom Burke, Chair • Claire O'Neal, Vice Chair • Robert Bray, Secretary
Members, Dennis Buechler • Brad Coors • Jeffrey Crawford • Tim Glenn • Roy McAnally • Richard Ray
Ex Officio Members, Harris Sherman and John Stulp

mortality with these species especially considering the increased height and number of lines associated with the new transmission line.

The CDOW is very concerned about the wildlife impacts that re routing and increasing the size of the structures will have on wildlife in the area. In addition to direct effects, this preferred alternative will also contribute to cumulative impacts to wildlife. If the CDOW can be of further assistance in further addressing the wildlife impacts that this project will have, please contact Kirk Oldham, District Wildlife Manager at (970) 725-6200.

Sincerely

Lyle H. Sidener
Area Wildlife Manager

cc. Kirk Oldham (CDOW), Ron Velarde (CDOW); Susan Linner (USFWS), Craig Magwire (USFS)

STATE OF COLORADO

Bill Owens, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

Bruce McCloskey, Director
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 297-1192

For Wildlife-
For People

August 24, 2005

Rodney Jones
Western Area Power Administration
Rocky Mountain Region
5555 East Crossroads Boulevard
Loveland, CO 80539-3003

Mr. Jones,

The Colorado Division of Wildlife (CDOW) has had the opportunity to review the project description of the Granby Pumping Plant - Windy Gap Transmission Line Rebuild project. There are several wildlife impacts that the preliminary review of the project has presented. These include impacts to big game winter range, sage grouse, and raptors/migratory birds.

The area of Table Mountain and the surrounding habitats are utilized as winter range for elk and deer. Maintenance and construction of this line in this winter range between the months of November through April may reduce the use of this limiting habitat. Elk may be displaced to other adjacent private lands with activities associated with the power line.

Other parts of the alternative may be built on areas utilized by sage grouse. Impacts to sage grouse nesting areas, brooding areas, and possible breeding areas may occur by the addition and utilization of the new alignment. The significant increase in height of the proposed power line may also increase sage grouse predation due to raptor perches at a greater distance from the power line.

The CDOW concurs with the United State Fish and Wildlife Service (USFWS) on its comments received on July 13, 2005 with respect to the Migratory Bird Treaty Act of 1918 (MBTA) and the Bald and Golden Eagle Protection Act of 1940 (BGEPA) and the protective measures that the USFWS may require. The area is regularly used by a variety of raptors including golden eagle, bald eagle, red tailed hawk, osprey, goshawk, Swainsons hawk, coopers hawk, kestrel, prairie falcon and great horned owl. These species also may be affected as a result of collisions with guy wires and lines.

If the CDOW can be of further assistance in further addressing the wildlife impacts that this project will have, please contact Kirk Oldham, District Wildlife Manager at (970) 627-3775.

Sincerely

Tom Kroening
Acting Area Wildlife Manager

DEPARTMENT OF NATURAL RESOURCES, Russell George, Executive Director
WILDLIFE COMMISSION, Jeffrey Crawford, Chair • Tom Burke, Vice Chair • Ken Torres, Secretary
Members, Robert Bray • Rick Enstrom • Philip James • Claire O'Neal • Richard Ray • Robert Shoemaker
Ex Officio Members, Russell George and Don Ament

cc. Kirk Oldham (CDOW), Ron Velarde (CDOW), John Bredehoft (CDOW), Lyle Sidener,(CDOW), Patricia Hesch (USFS), Sandy Van-Miller (USFWS)

Appendix I
Electric and Magnetic Field Calculation Results

Table A-1. Summary of Electric Field Calculations

Distance from Centerline (Feet)	Calculated Electric Field (kV/m) Existing Configuration	Calculated Electric Field (kV/m) Proposed Configuration
-100	0.029	0.019
-98	0.031	0.020
-96	0.033	0.020
-94	0.035	0.021
-92	0.037	0.021
-90	0.039	0.022
-88	0.042	0.022
-86	0.044	0.022
-84	0.047	0.023
-82	0.051	0.024
-80	0.054	0.024
-78	0.058	0.025
-76	0.062	0.025
-74	0.067	0.026
-72	0.072	0.027
-70	0.078	0.028
-68	0.084	0.029
-66	0.091	0.030
-64	0.099	0.031
-62	0.108	0.033
-60	0.117	0.035
-58	0.128	0.037
-56	0.140	0.040
-54	0.154	0.043
-52	0.169	0.047
-50	0.187	0.052
-48	0.206	0.057
-46	0.228	0.064
-44	0.253	0.072
-42	0.281	0.082
-40	0.313	0.093
-38	0.349	0.107
-36	0.390	0.122
-34	0.436	0.140
-32	0.487	0.161
-30	0.543	0.184
-28	0.605	0.210
-26	0.670	0.239
-24	0.738	0.269
-22	0.805	0.300
-20	0.867	0.332
-18	0.917	0.361
-16	0.949	0.387
-14	0.956	0.409
-12	0.931	0.430
-10	0.872	0.456
-8	0.782	0.502
-6	0.670	0.582
-4	0.548	0.698
-2	0.434	0.838
0	0.344	0.988

Distance from Centerline (Feet)	Calculated Electric Field (kV/m) Existing Configuration	Calculated Electric Field (kV/m) Proposed Configuration
0	0.344	0.988
2	0.434	1.132
4	0.548	1.256
6	0.670	1.348
8	0.782	1.399
10	0.872	1.406
12	0.931	1.373
14	0.956	1.305
16	0.949	1.211
18	0.917	1.101
20	0.867	0.982
22	0.805	0.862
24	0.738	0.746
26	0.670	0.638
28	0.605	0.539
30	0.543	0.451
32	0.487	0.373
34	0.436	0.305
36	0.390	0.247
38	0.349	0.197
40	0.313	0.154
42	0.281	0.119
44	0.253	0.089
46	0.228	0.065
48	0.206	0.046
50	0.187	0.031
52	0.169	0.021
54	0.154	0.026
56	0.140	0.032
58	0.128	0.037
60	0.117	0.041
62	0.108	0.045
64	0.099	0.049
66	0.091	0.051
68	0.084	0.053
70	0.078	0.054
72	0.072	0.055
74	0.067	0.055
76	0.062	0.056
78	0.058	0.056
80	0.054	0.055
82	0.051	0.055
84	0.047	0.054
86	0.044	0.053
88	0.042	0.052
90	0.039	0.051
92	0.037	0.050
94	0.035	0.049
96	0.033	0.048
98	0.031	0.047
100	0.029	0.046

Table A-2. Summary of Magnetic Field Calculations for Existing Configuration

Distance from Centerline (Feet)	Calculated Magnetic Field (mG) Existing Configuration Normal Load	Max Load
-100	1.3	4.4
-98	1.3	4.6
-96	1.4	4.8
-94	1.4	5.0
-92	1.5	5.2
-90	1.6	5.4
-88	1.6	5.6
-86	1.7	5.9
-84	1.8	6.2
-82	1.9	6.5
-80	1.9	6.8
-78	2.0	7.1
-76	2.2	7.5
-74	2.3	7.9
-72	2.4	8.3
-70	2.5	8.8
-68	2.7	9.3
-66	2.8	9.8
-64	3.0	10.4
-62	3.2	11.0
-60	3.4	11.7
-58	3.6	12.5
-56	3.8	13.4
-54	4.1	14.3
-52	4.4	15.3
-50	4.7	16.5
-48	5.1	17.7
-46	5.5	19.1
-44	5.9	20.7
-42	6.4	22.4
-40	7.0	24.4
-38	7.6	26.6
-36	8.4	29.1
-34	9.2	31.9
-32	10.1	35.1
-30	11.1	38.7
-28	12.3	42.7
-26	13.6	47.3
-24	15.0	52.4
-22	16.6	57.9
-20	18.4	64.0
-18	20.2	70.5
-16	22.1	77.1
-14	24.0	83.7
-12	25.8	90.0
-10	27.4	95.5
-8	28.7	100.2
-6	29.8	103.8
-4	30.5	106.3
-2	30.9	107.7
0	31.0	108.2

Distance from Centerline (Feet)	Calculated Magnetic Field (mG) Existing Configuration Normal Load	Max Load
0	31.0	108.2
2	30.9	107.7
4	30.5	106.3
6	29.8	103.8
8	28.7	100.2
10	27.4	95.6
12	25.8	90.0
14	24.0	83.7
16	22.1	77.1
18	20.2	70.5
20	18.4	64.0
22	16.6	57.9
24	15.0	52.4
26	13.6	47.3
28	12.3	42.7
30	11.1	38.7
32	10.1	35.1
34	9.2	31.9
36	8.4	29.1
38	7.6	26.6
40	7.0	24.4
42	6.4	22.4
44	5.9	20.7
46	5.5	19.1
48	5.1	17.7
50	4.7	16.5
52	4.4	15.3
54	4.1	14.3
56	3.8	13.4
58	3.6	12.5
60	3.4	11.7
62	3.2	11.0
64	3.0	10.4
66	2.8	9.8
68	2.7	9.3
70	2.5	8.8
72	2.4	8.3
74	2.3	7.9
76	2.2	7.5
78	2.0	7.1
80	1.9	6.8
82	1.9	6.5
84	1.8	6.2
86	1.7	5.9
88	1.6	5.6
90	1.6	5.4
92	1.5	5.2
94	1.4	5.0
96	1.4	4.8
98	1.3	4.6
100	1.3	4.4

Table A-3. Summary of Magnetic Field Calculations for Proposed Configuration

Distance from Centerline (Feet)	Calculated Magnetic Field (mG) Proposed Configuration Normal Load	Max Load
-100	0.4	2.1
-98	0.4	2.2
-96	0.4	2.3
-94	0.5	2.4
-92	0.5	2.5
-90	0.5	2.6
-88	0.5	2.7
-86	0.6	2.9
-84	0.6	3.0
-82	0.6	3.2
-80	0.6	3.3
-78	0.7	3.5
-76	0.7	3.7
-74	0.8	3.9
-72	0.8	4.1
-70	0.8	4.3
-68	0.9	4.6
-66	0.9	4.9
-64	1.0	5.1
-62	1.1	5.5
-60	1.1	5.8
-58	1.2	6.2
-56	1.3	6.6
-54	1.4	7.0
-52	1.5	7.5
-50	1.6	8.0
-48	1.7	8.6
-46	1.8	9.3
-44	1.9	9.9
-42	2.1	10.7
-40	2.2	11.5
-38	2.4	12.4
-36	2.6	13.4
-34	2.8	14.5
-32	3.0	15.7
-30	3.3	17.0
-28	3.6	18.4
-26	3.9	19.9
-24	4.2	21.5
-22	4.5	23.2
-20	4.8	24.9
-18	5.2	26.6
-16	5.5	28.3
-14	5.8	29.9
-12	6.1	31.2
-10	6.3	32.3
-8	6.4	33.0
-6	6.5	33.3
-4	6.4	33.2
-2	6.3	32.5
0	6.1	31.5

Distance from Centerline (Feet)	Calculated Magnetic Field (mG) Proposed Configuration Normal Load	Max Load
0	6.1	31.5
2	5.8	30.0
4	5.5	28.3
6	5.1	26.3
8	4.7	24.2
10	4.3	22.0
12	3.9	19.8
14	3.5	17.8
16	3.1	15.8
18	2.7	14.1
20	2.4	12.5
22	2.2	11.1
24	1.9	9.9
26	1.7	8.8
28	1.5	7.8
30	1.4	7.0
32	1.2	6.3
34	1.1	5.7
36	1.0	5.1
38	0.9	4.7
40	0.8	4.2
42	0.8	3.9
44	0.7	3.6
46	0.6	3.3
48	0.6	3.0
50	0.5	2.8
52	0.5	2.6
54	0.5	2.5
56	0.4	2.3
58	0.4	2.2
60	0.4	2.1
62	0.4	1.9
64	0.4	1.8
66	0.3	1.8
68	0.3	1.7
70	0.3	1.6
72	0.3	1.5
74	0.3	1.5
76	0.3	1.4
78	0.3	1.4
80	0.3	1.3
82	0.2	1.3
84	0.2	1.2
86	0.2	1.2
88	0.2	1.2
90	0.2	1.1
92	0.2	1.1
94	0.2	1.0
96	0.2	1.0
98	0.2	1.0
100	0.2	1.0

Table A-4. Summary of Radio Stations Near Granby, Colorado

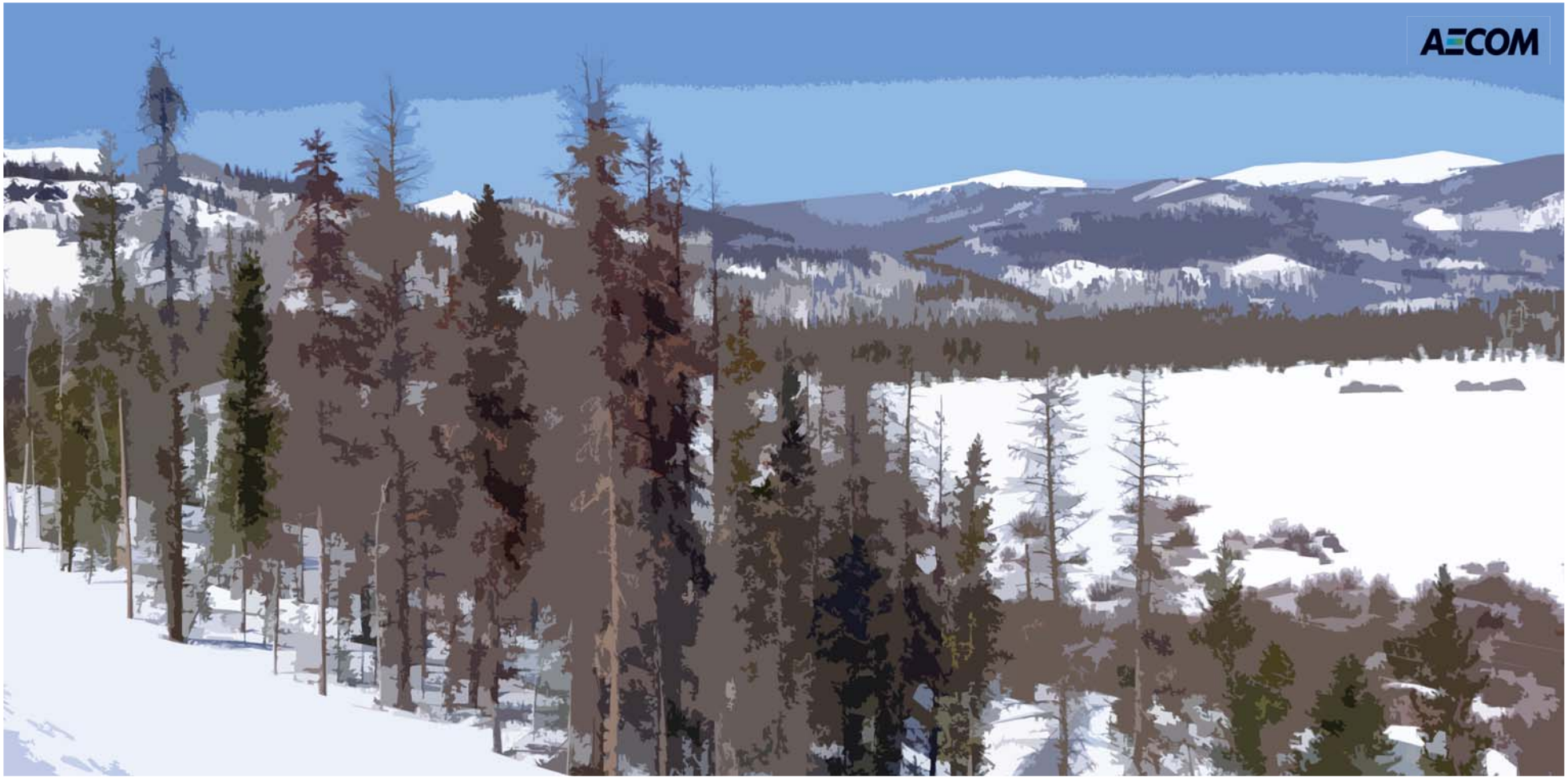
AM RADIO STATIONS

Station	Freq-kHz	Dist- Mi.	Signal-dB
KCOL (Daytime)	600 AM	60	68.0
KCOL (Nighttime)	600 AM	60	59.6
KHOW (Daytime)	630 AM	55	74.2
KHOW (Nighttime)	630 AM	55	68.0
KLTT (Daytime)	670 AM	55	123.6
KLTT (Nighttime)	670 AM	55	61.0
KKZN (Daytime)	760 AM	45	120.9
KKZN (Nighttime)	760 AM	45	62.9
KLVZ (Daytime)	810 AM	48	63.8
KLVZ (Nighttime)	810 AM	48	30.0
KOA	850 AM	75	72.5
KRKY (Daytime)	930 AM	24	110.5
KRKY (Nighttime)	930 AM	24	340.0
KMXA (Daytime)	1090 AM	76	64.4
KMXA (Nighttime)	1090 AM	76	52.6

FM RADIO STATIONS

Station	Freq-kHz	Dist- Mi.	Signal-dB
KCOL (Daytime)	600 AM	60	68.0
KCOL (Nighttime)	600 AM	60	59.6
KHOW (Daytime)	630 AM	55	74.2
KHOW (Nighttime)	630 AM	55	68.0
KLTT (Daytime)	670 AM	55	123.6
KLTT (Nighttime)	670 AM	55	61.0
KKZN (Daytime)	760 AM	45	120.9
KKZN (Nighttime)	760 AM	45	62.9
KLVZ (Daytime)	810 AM	48	63.8
KLVZ (Nighttime)	810 AM	48	30.0
KOA	850 AM	75	72.5
KRKY (Daytime)	930 AM	24	110.5
KRKY (Nighttime)	930 AM	24	340.0
KMXA (Daytime)	1090 AM	76	64.4
KMXA (Nighttime)	1090 AM	76	52.6

Appendix J
Visual Simulation Contrast Ratings and Photographic Simulations



Western AREA POWER ADMINISTRATION

Granby Pumping Plant Windy Gap Transmission Line Rebuild Project

Appendix J. Contrast Ratings and Photographic Simulations

October 2011

1: Existing Conditions Looking Northwest (March 2009)

1: Existing Conditions Looking Northeast (March 2009)

KOP 1: U.S. Highway 34 - Transmission Line Crossing

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

2: Existing Conditions Looking Southwest (March 2009)

2: Simulation of Alternatives B1, C1, C2, D (Options 1 and 2)

KOP 2: U.S. Highway 34 / CR 64

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

3: Existing Conditions Looking Northwest (March 2009)

3: Simulation of Alternatives B1, C1, C2, D (Options 1 and 2)

KOP 3 : CR 64 at Cutthroat Trout Bay Campground

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

4: Existing Conditions Looking Southeast (October 2005)

4: Simulation of Alternative C1, Optional C2

KOP 4: CR 41 - Two Miles West of U.S. Highway 34

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

5: Existing Conditions Looking Northeast (March 2009)

5: Simulation of Alternatives B1, C1, C2, D (Options 1 and 2)

KOP 5: Stillwater Campground

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

6: Existing Conditions Looking Northwest (October 2005)

6: Simulation of Alternative B1, D (Options 1 and 2)

6: Simulation of Alternative C1, C2

KOP 6: U.S. Highway 34 / CR 41

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

7: Existing Conditions Looking North (March 2009)

7: Simulation of Alternative B1, D (Options 1 and 2)

7: Simulation of Alternatives C1, C2

KOP 7: CR 41 - One Mile West of U.S. Highway 34

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

8: Existing Conditions Looking West (March 2009)

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

KOP 8: CR 4106 - East of Three Lakes Wastewater Facility

9: Existing Conditions Looking West (March 2009)

9: Simulation of Alternative B1, D (Options 1 and 2)

KOP 9: Sunset Point Campground

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

10: Existing Conditions Looking East (January 2006)

10: Simulation of Alternative C1, C2

KOP 10: Willow Creek Road - One Mile East of Willow Creek Pumping Plant

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

11: Existing Conditions looking East (January 2006)

11: Simulation of Alternative B1, D (Options 1 and 2)

11: Simulation of Alternative C1, C2

KOP 11: Willow Creek Pumping Plant

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

12: Existing Conditions Looking North (March 2009)

12: Simulation of Alternative B1

12: Simulation of Alternative D (Options 1 and 2)

KOP 12: Granby Substation: U.S. Highway 34 / Willow Creek Road

GRANBY PUMPING PLANT WINDY GAP TRANSMISSION LINE REBUILD PROJECT

13: Existing Conditions Looking North (March 2009)

13: Simulation of Alternatives B1, C1, C2, D (Options 1 and 2)

KOP 13: Windy Gap Watchable Wildlife Area

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

14: Existing Conditions Looking North (March 2009)

KOP 14: U.S. Highway 34 - 1 1/2 Miles North of U.S. Highway 34 / 40

GRANBY PUMPING PLANT WINDY GAP TRANSMISSION LINE REBUILD PROJECT

15: Existing Conditions Looking Southwest (March 2009)

15: Alternative B1 and D (Options 1 and 2)

KOP 15: Lake Granby (Norton) Marina

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

16: Existing Conditions Looking Southwest (March 2009)

16: Simulation of Alternative B1

16: Simulation of Alternatives C1, C2, D (Options 1 and 2)

KOP 16: U.S. Highway 34 / Colorado River Crossing Near CR 620

GRANBY PUMPING PLANT WINDY GAP TRANSMISSION LINE REBUILD PROJECT

17: Existing Conditions Looking Northwest (March 2009)

17: Simulation of Alternative B1, C2 - Option 2, D - Option 2

KOP 17: U.S. Highway 34 at the former Shorefox Development

GRANBY PUMPING PLANT WINDY GAP TRANSMISSION LINE REBUILD PROJECT

17: Simulation of Alternative C1

17: Simulation of Alternative C2 - Option 1, D - Option 1

KOP 17: U.S. Highway 34 at the former Shorefox Development

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

18: Existing Conditions Looking West (March 2009)

KOP 18: U.S. Highway 34, One Mile South of CR 41

GRANBY PUMPING PLANT WINDY GAP
TRANSMISSION LINE REBUILD PROJECT

Appendix K
SHPO Correspondence

HISTORY Colorado

March 29, 2011

Ree R. Rodgers
Rocky Mountain Region
Preservation Officer
Department of Energy
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

Re: Proposed Plan to Rebuild the Granby to Windy Gap 69-kilovolt (kV) Transmission Line near Lake Granby, Granby County, Colorado and Addendum to Western Area Power Windy Gap Substation to Granby Pumping Plant 69kV Transmission Line Rebuild Project, Grand County, Colorado (CHS # 59259)

Dear Ms. Rodgers:

Thank you for your correspondence dated March 16, 2011 (received by our office on March 17, 2011) and the documentation regarding the subject project.

Following our review of the documentation provided, we offer the following comments:

- We concur with your determination that the following sites are **eligible** for the National Register of Historic Places (NRHP): 5GA3600, 5GA680, 5GA122, 5GA128, 5GA151, 5GA165, 5GA2398, 5GA2401 (supporting linear segment).
- We concur that a finding of **need data** is appropriate for the following sites: 5GA3585, 5GA3586, 5GA3589, 5GA3593, 5GA3595, 5GA3599, 5GA241, 5GA2774, 5GA673, 5GA2772, 5GA119, 5GA245, 5GA2312, 5GA671, 5GA219, and 5GA2398.
- We concur with your determination that the following sites are **not eligible** for the NRHP: 5GA3583, 5GA3584, 5GA3587, 5GA3588, 5GA3590, 5GA3592, 5GA3594, 5GA3596, 5GA3597, 5GA3598, 5GA3601, 5GA156, 5GA205, 5GA123, 5GA127, 5GA149, 5GA150, 5GA2055, 5GA2054, 5GA2049, 5GA152, 5GA666, 5GA163, 5GA2399, 5GA2400, 5GA2056, 5GA3241.2 (entire linear resource [5GA3241] is not eligible), 5GA3887.1 (entire linear resource [5GA3887] is not eligible), and 5GA3888.

In addition, we offer the following site-specific comments:

- 5GA120: We received a site map and vicinity map for site 5GA120 but no additional site documentation (Management Data form, Component form, etc.). Also, it is not listed in the Management Information Summary at the beginning of the inventory report. We would greatly appreciate having the documentation for this site and will need that before commenting on its eligibility.
- 5GA121: Our records indicate that this site is noted as likely a part of a large complex of sites which includes 5GA120, 5GA121, 5GA241, 5GA680, 5GA686, and 5GA687. This is

documented in GA.WC.R5 – "Windy Gap Water Development Project Data for Determinations of Eligibility on Six Prehistoric Cultural Resources" or GA.WC.R2 – "Windy Gap Archeological Report." We would greatly appreciate additional information about the possible relationship between these sites and recommend a finding of **need data** for this site at present.

- We did not receive any of the isolated find forms for the subject undertaking.
- 5GA238: We have no record that the site was officially determined not eligible in 1981, as stated within the reevaluation form provided. Additionally, we have no record of the testing that was conducted at the site in 2001. Finally, our records indicate that several radiocarbon dates have been obtained from this site, which suggests that it may be eligible under Criterion D as it "has yielded, or may be likely to yield, information important in history or prehistory." We recommend a finding of **need data** for the site at this time until these issues can be addressed.
- 5GA239: We have no record of the site recording conducted in 2001 as indicated on the reevaluation form. Additionally, our records indicate that several radiocarbon dates have been obtained from this site, which suggests that it may be eligible under Criterion D as it "has yielded, or may be likely to yield, information important in history or prehistory." We recommend a finding of **need data** for the site at this time until these issues can be addressed.
- 5GA243: The 2005 recording submitted for the original report recommends a determination of not eligible for this site, but the 2008 recording submitted along with the addendum report recommends a determination of eligible. The two recordings arrived concurrently within the same consultation package. We recommend a finding of **need data** for this site until this discrepancy can be addressed.
- 5GA245 and 5GA673: While we concur that a finding of **need data** is appropriate for these sites, we have no record of the site recordings conducted in 2001 as indicated on the reevaluation forms. We would greatly appreciate having this documentation for our records.
- 5GA2051: We recommend a finding of **need data** for this site. We have no record of the site recording conducted in 2001 as indicated on the reevaluation form. The most recent documentation of the site in 2003 actually recommended a finding of need data and stated, "testing was inconclusive because the majority of the site occurs on private property…The southern portion of the site especially needs more data to accurately assess the site's NRHP eligibility." It is unclear why the site was entered into our database as not eligible; however, we believe this to be in error. We agree with the recommendation that the site be tested to accurately assess its NRHP eligibility. We have no record of the statement that "previous testing indicates deposits are thin and eroded."
- 5GA2772, 5GA2774, 5GA2775, 5GA2776, 5GA2777: We have no record of the site recordings conducted in 2001 as indicated on the reevaluation forms. We recommend a finding of **need data** for these sites at this time.
- 5GA2773.1: While we concur that a finding of **need data** is appropriate for this linear resource (and segment) at this time, we have no record of the site recording conducted in 2001 as indicated on the reevaluation form.

A number of the sites documented for the subject project are noted as having been recorded in 2001, however, our office has never received the 2001 documentation. Additionally, the list of sites within the Management Information Summary form at the beginning of the report appears to be in no particular order. Finally, the site forms for those site recorded in association with the Addendum report were bound. These issues generally complicate and delay our review.

At this time, although there are a number of outstanding issues and questions as detailed above, we concur that a finding of **adverse effect** is appropriate for the proposed project. As such we look forward to further consultation regarding the development of a Memorandum of Agreement (MOA) to mitigate this adverse effect, as stipulated in 36 CFR 800.6. Please note that as stipulated in 36 CFR 800.6(1), the lead agency shall notify the Advisory Council of the adverse effect finding.

Thank you for the opportunity to comment. We look forward to continued consultation on the subject project. If we may be of further assistance, please contact Shina duVall, Section 106 Compliance Manager, at (303) 866-4674 or shina.duvall@chs.state.co.us.

Sincerely,

Richard H Wilson, for

Edward C. Nichols
State Historic Preservation Officer
ECN/SAD

Appendix L
Draft EIS Public Comments and Responses

Commentor	Comment number(s)
Cooperating Agencies & Project Partners	
Grand County Department of Planning & Zoning	A-1-1; A-1-2; A-1-3; A-1-4
Grand County Board of County Commissioners	A-2-1; A-2-2
Mountain Parks Electric, Inc.	A-3-1
Federal and State Agency Comments	
U.S. Environmental Protection Agency (EPA)	A-4-1; A-4-2; A-4-3; A-4-4; A-4-5
U.S. Department of Interior (DOI)	A-5-1; A-5-2
Colorado Parks & Wildlife	A-6-1; A-6-2
Letters from Individuals	
Bondi, Deb	I-1-1; I-1-2
Burgett, Rob and Sarah	I-2-1; I-2-2
Cook, Glenna Bliss	I-3-1
Dines, Bruce	I-4-1; I-4-2
Fournier, Ardyth	I-5-1
Gerhart, Alicia	I-6-1
Gerhart, Jack	I-7-1
Gerhart, Suzanne M.	I-31-1; I-31-2; I-31-3; I-31-4; I-31-5; I-31-6; I-31-7; I-31-8; I-31-9; I-31-10; I-31-11; I-31-12; I-31-13; I-31-14
Kauber, Rod	I-8-1
Klees, Paul (C Lazy U Ranch)	I-9-1; I-9-2; I-9-3; I-9-4
Lawn, Carla	I-10-1
Lindgren, Irene	I-11-1
Linton, Sally and Robert	I-12-1
Malia, Gavin (CLP Granby)	I-13-1; I-13-2; I-13-3; I-13-4; I-13-5; I-13-6; I-13-7; I-13-8
Michael, Stanley Cordell	I-14-1; I-14-2
Nelson, John and Darlene	I-15-1; I-15-2
Pederson, Rick (E Diamond Ranch)	I-16-1; I-16-2; I-16-3; I-16-4
Person, Patricia	I-17-1; I-17-2; I-17-3; I-17-4; I-17-5; I-17-6; I-17-7; I-17-8; I-17-9
Raney, Patricia D. and John F.	I-31-1; I-31-3; I-31-6; I-31-8; I-31-9; I-31-10; I-31-11; I-31-14
Reeve, Kayleen S.	I-18-1; I-18-2; I-31-1; I-31-2; I-31-3; I-31-4; I-31-5; I-31-6; I-31-7; I-31-8; I-31-9; I-31-10; I-31-11; I-31-12; I-31-13; I-31-14
Rossi, Larry & Michaela	I-19-1; I-19-2; I-19-3; I-19-4; I-19-5; I-19-6; I-19-7; I-19-8; I-19-9; I-19-10; I-19-11; I-19-12; I-19-13; I-19-14; I-19-15
Schoenebeck, Sandra	I-20-1
Shankland, Les and Rutila, Clare Beth	I-21-1; I-21-2
Shetler, Paul L. and Judy C.	I-31-1; I-31-2; I-31-3; I-31-4; I-31-5; I-31-6; I-31-7; I-31-8; I-31-9; I-31-10; I-31-11; I-31-12; I-31-13; I-31-14
Sidofsky, Carol & Hazelrigg, Dave	I-22-1; I-22-2; I-22-3; I-22-4; I-31-1; I-31-2; I-31-3; I-31-4; I-31-5; I-31-6; I-31-7; I-31-8; I-31-9; I-31-10; I-31-11; I-31-12; I-31-13; I-31-14
Strauss, Paul	I-23-1

Commentor	Comment number(s)
Sugg, Steve and Elizabeth	I-24-1
Timmerman, June & Jim	I-25-1; I-25-2; I-25-3
Tomasek, Bill and Sue	I-26-1; I-26-2; I-26-3
Ward, Jim (Alpine Wings, LLC)	I-27-1
Watts, Frank and Jane	I-28-1; I-28-2
Wunder, Tom	I-29-1; I-29-2; I-29-3; I-30-1; I-30-2; I-30-3; I-30-4; I-30-5; I-30-6
Comments Made by Telephone	
Alesandra, Robert	I-32-1
Burbach, Joe	I-33-1; I-33-2; I-33-3; I-33-4; I-33-5
McGrail, Daniel	I-34-1
O'Connor, Tom	I-35-1
Public Hearing Transcript	
Schoenebeck, Richard	T-1-1; T-1-2
Public Meeting Transcript	
Manguso, Kristen (Grand County)	T-2-2
Miller, Steve	T-2-5
Potts, Pat	T-2-9
Schoenebeck, Sandra	T-2-6
Stuart, Nancy (Grand County)	T-2-1; T-2-10
Stuart, Nancy & Manguso, Kristen (Grand County)	T-2-3; T-2-4
Verlo, Pat	T-2-7; T-2-8

Commentor Name	Comment Number	Comment	Response
Major Comment Themes (Comments Made by Multiple Commentors)			
(Multiple)	GCR-1: Under-grounding Alternatives	General Comment: The transmission line should be installed underground in its entirety or for specific segments.	Underground construction is discussed in the EIS. See Section 2.5.4. Although there are benefits of underground construction, primarily reduced adverse effects on visual resources, there are other considerations that were evaluated in the EIS. For example, there are greater impacts to other resources such as cultural, soils, vegetation, and some wildlife species from increased disturbance by continuous trench and associated excavation and ground disturbance. Directional drilling to install the transmission lines would not be used because the lines must be appropriately separated and insulated. In addition, there are cost, maintenance, project life, and operational requirements associated with underground transmission lines. The EIS discusses these considerations. To provide more information on the requirements for undergrounding a project such as this, Western posted an overview prepared by the State of Wisconsin that explains the construction requirements for undergrounding high voltage transmission lines. The overview is located on Western's project website at http://go.usa.gov/E4a or at http://psc.wi.gov/thelibrary/publications/electric/electric11.pdf. This document provides additional information on the typical requirements that would be used for this project and presents a factual, reasonable explanation that supplements the information in the EIS. This project has additional challenges associated with the terrain and amount of rock that would have to be excavated.

Commentor Name	Comment Number	Comment	Response
(Multiple)	GCR-2: Impacts along CR 64, All Action Alternatives	General Comment: All action alternatives parallel County Road 64 from US 34 to the Granby Pumping Plant. Land on both sides of the northern portion of CR 64 is privately owned. At Cutthroat Bay Campground to the terminus at the Granby Pumping Plant, the west side of CR 64 is owned and managed by the U.S. Forest Service (USFS). Residential property owners on the east side of CR 64 are concerned that placing the transmission lines on the east side of CR 64 near their homes would increase impacts to property values and visual resources and increase electric and magnetic field effects and noise. Because Cutthroat Bay Campground is a seasonal day and weekend group site and not a permanent residential use, residents prefer that action alternatives be sited on the west side of CR 64.	The Forest Service provided this perspective on the Cutthroat Bay Group Campground in response to Western's request for consideration of looking for an alternative to move the preferred route to the campground side of CR 64. *"The referenced campground is the only group campground in the Arapaho National Recreation Area to "…provide for...public recreation and enjoyment [and]…the conservation and development of the scenic, natural, historic, and pastoral values of the area. The Secretary of Agriculture is directed to manage other uses in the area to be "compatible with" and not "substantially impair" those purposes.* *Related documents (such as Senate Document 80, Bureau of Reclamation/US Forest Service Memorandum of Understanding, Arapaho National Recreation Area Management Plan) reinforce the management of the ANRA to sustain or improve recreation and related facilities on and around Grand Lake, Shadow Mountain Lake, and Lake Granby and throughout the ANRA.* *The purpose of the ANRA legislation may be met by routing a portion of the line along the west side of CR64 if mitigation at this campground or elsewhere in the ANRA were sufficient to improve the public recreation and enjoyment of the area."* The proposed alternatives along CR 64 provide some improvements to the existing condition. Primarily by combining two existing transmission lines on separate ROWs into one double circuit line. The existing transmission line that is located further west, closest to the lake shore would be removed. This eliminates overwater crossing of Cutthroat Bay and improves views from CR 64, public land and the campground, which focus on the lake. Although consolidating the two existing transmission lines into a double circuit configuration would improve some land use and recreational values and have other benefits, the EIS acknowledges that the new line would be approximately 40' taller than the structures on the existing lines. The increased structure heights and diameter would partially offset the benefits of consolidating the two existing transmission lines. Even with an increased voltage, the double circuit configuration of the proposed project would have lower EMF levels at the edge of the right of way than currently exists. (See Sections 3.6 and 4.6 of the EIS for a detailed discussion of EMF.) In response to requests from residents along CR 64, and in consideration of the USFS position, Western is proposing to modify the alignment between HWY 34 and the south end of the campground. The proposed revised route would be approximately as shown on Map 2-3 in the EIS. This alignment is the Project preferred alignment in the vicinity of CR 64. Section 2.2.5 of the EIS describes factors that influence the modification, such as the residence on the north east edge of the campground, the desire to maximize the use of Federal land, the desire to avoid having houses and other private structures within the transmission line easement, and the request from the FS to reduce the effects of having the two existing transmission lines on the campground. The revised alignment is expected to lower the level of noise from the transmission line near permanent residences and not increase effects on property values.

Commentor Name	Comment Number	Comment	Response
(Multiple)	GCR-3: Purpose and Need, Load Growth	General Comment: Grand County is adequately served by the existing transmission system and the need for additional power has not been demonstrated.	The Purpose and Need statement is in Section 1.2 of the EIS. The main purposes and needs being addressed by the proposed project are to rebuild lines that are beyond their designed lives and exhibit unacceptable structural deficiencies; ensure that the transmission lines meet applicable safety codes; ensure reliable electrical service by providing redundancy when the Adams Tunnel conduit fails; upgrade the voltage to ensure that the local system will continue to operate within acceptable voltage criteria while accommodating future load growth and the continued operation of the Farr and Willow Creek Pumping Plants; and minimize long-term transmission line maintenance costs. The need for the voltage increase is based on engineering studies that examined if the addition of a 138-kV transmission line would be sufficient voltage support to ensure adequate electrical service for all customers in the area when the pumping plants start and with the Adams's Tunnel cable out of service. Source: Western Area Power Administration. 2003. *Granby Area Pumping Plants Voltage Study.*
(Multiple)	GCR-4: Visual Impacts	General Comment: Lake Granby, Colorado River, and the Arapahoe National Recreation Area of Grand County are highly valued for their scenery and views from residential properties. The project is undesirable as the structures are considered unsightly and visual impacts would potentially affect the recreational activities and amenities that contribute to Grand County's recreational and tourist destination appeal.	The project would replace a transmission line that has been in place in the Granby area since 1939. Effects on visual resources were carefully evaluated. A series of Key Observation Points (KOP's) were identified and evaluated. Visual simulations showing both the existing condition and post project construction condition are in the EIS. As documented in the EIS, this evaluation indicated that visual resource objectives would be met at all but 4 of the 18 KOPs. Visual resource objectives refer to the management guidance adopted by the USFS and BLM for public lands in the project area. At the 4 KOPs where the visual resource objectives would not be met, it should be noted that these objectives are not currently being met due to the presence of the existing transmission line. Overall, the No Action Alternative has a similar but slightly lower level of long term impacts than the Proposed Action. See Section 4.8 of the EIS for more information on the visual impact analysis.

Commentor Name	Comment Number	Comment	Response
(Multiple)	GCR-5: Impacts to Property and Property Values	Property values could potentially be affected by views of the rebuilt transmission line, whether located directly on the property, within line of sight of their property, or in the general vicinity. The marketability of their property could be diminished from visual impacts, physical and health hazards, and increase the risk that insurance companies will not insure residences located within the ''fall zone."	The proposed project is to re-build and upgrade portions of an existing transmission system. It would not place a new line near existing residences that are not already located near an existing transmission line. No residences would be located within the project right of way. In some locations; for example, the Scanloch Subdivision, the line would be moved further from residences and located just within the boundary of adjacent National Forest lands. Along CR 64, the proposal is to modify the alignment to the extent practicable in response to local landowners. The project would be designed to minimize effects to adjacent land uses with sufficient right of way to assure that residences or structures would not be located on the easement and the project would meet applicable National Electric Safety Codes. Western has not encountered situations in which homeowners were unable to obtain insurance because of the presence of one of its transmission lines. The comment may refer to a requirement by the Federal Housing Administration. In situations where overhead high voltage transmission towers and lines, radio/TV transmission towers, cell phone towers, microwave relay dish or tower and similar structures are located on a property that is evaluated for an FHA loan; the appraiser must indicate whether the dwelling or related property improvements are located within the easement serving the transmission tower or line, or other structure. The requirements are: 1) if the dwelling or related property improvement is located within such an easement, the DE Underwriter must obtain a letter from the owner or operator indicating that the dwelling and related property improvements are not located within the towers (engineered) fall distance to waive the requirement, or 2) If the dwelling is located outside the easement, the property is considered eligible and no further action is necessary. Source: HUD. *HUD FHA HOC Reference Guide*. Chapter 1, Appraisal and Property Requirements, Page 1-18F. Section 4.9 of the EIS, Socioeconomics and Environmental Justice, contains information on the potential for effects of transmission lines on property values. Generally, the effect is variable and depends on many factors.

Commentor Name	Comment Number	Comment	Response
(Multiple)	GCR-6: Replace Adams Tunnel	The existing transmission conduit through the Adams Tunnel should be replaced to continue providing looped service between Estes Park and the Windy Gap substations rather than any of the action alternatives. Reasons cited include: • The transmission conduit in the Adams Tunnel and the professional expertise to service it exists and has been a proven source of power for 65 years. • Power through the tunnel is not at risk to severe weather (rain, sleet, snow, wind, freezing temperatures). • "Green" hydropower generated through the Colorado Big Thompson Project can return to Grand County through the Adams Tunnel. • Reduced environmental impacts.	The alternative of replacing the cable through the Adams Tunnel was considered in the EIS. See Section 2.5.6 of the EIS, 1994 Windy Gap-Estes Park Area Planning Study, and 2006 Black & Veatch feasibility studies. Although the Adams Tunnel alternative would reduce some environmental impacts, it was determined to not be feasible. Not only is the cost more than 10 times that of the proposed action and other action alternatives, the proposal also presents difficult technical and operational challenges. These challenges include a risk of prolonged outages because only one month per year would be available for inspections and repairs. During the other 11 months of the year, the tunnel delivers water to communities and agricultural users. It would take several years to replace the Adams Tunnel cable, an unacceptably long period for the Granby area to depend upon a single transmission connection with no backup available. The proposed project would have no effect on hydropower production, which would continue to be distributed through the electrical grid. Tri-State and MPEI deliver power to Grand County customers. They obtain power from a variety of renewable and non-renewable sources, one of which is an allocation of power from Western. The resource mix would not be modified by this project.
Cooperating Agencies and Project Partners			
Grand County Dept. of Planning and Zoning	A-1-1	It is understood that the main objective of the project is to enhance system reliability by providing a second source of power. There are only two alternatives within the DEIS that comply with the intent of the Three Lakes Design regulations, protecting Grand County's critical and unique view corridors in this area. They are either burying the power lines or rebuilding the Adams Tunnel Cable. It seems the main reason for eliminating both of these alternatives is cost. Grand County believes it is impossible to place a monetary figure on the loss of these critical view-sheds, and strongly recommends the DEIS re-evaluate these two options.	See responses to comments GCR-1 and GCR-6.

Commentor Name	Comment Number	Comment	Response
Grand County Dept. of Planning and Zoning	A-1-2	The height and location of the proposed monopoles would dominate the landscape in this visually sensitive area. As proposed, they are intrusive to the overall panoramic mountain and scenic view-shed and don't easily blend into the natural, surrounding landscape. The DEIS states that alternatives were located to avoid, where possible, sensitive receptors such as existing homes and the Scenic Byway. Where possible, alternatives follow the path of existing transmission line or pipeline right-of-way. This is clearly not a line re-build, but a new line in many areas, that will affect not only existing residents but future residential developments. Further, the proposed power line is located in areas where extensive mountain pine beetle infestations have affected large portions of lodgepole tree stands. As mitigation removes many of the infested trees, the DEIS accepts that the existing landscape character "would likely transition from a densely forested, evergreen condition to a mosaic of open patches of grasses, shrubs, deciduous trees, and evergreen forests of varying age classes. Openings within forested areas from large-scale die-off, forest succession, planned treatments, and residential and commercial uses may also potentially increase visibility of the project." The DEIS acknowledges that this would create 'minor' adverse visual impact to this area. This is not an acceptable impact to Grand County.	Visual effects were an important consideration throughout the planning process for this project and these impacts were carefully analyzed in the EIS. The proposed action follows existing rights of way for nearly its entire length. At locations where the proposed alignment is not adjacent to the existing transmission line, it is located further away from the Scenic Byway (US 34) than the existing line. At the north end of the project area, the proposed action would consolidate two existing lines onto a single set of structures. See also response to comment GCR-4.
Grand County Dept. of Planning and Zoning	A-1-3	An additional idea that Grand County requested WAPA consider was an option for use of the existing pipeline between Windy Gap and Lake Granby for the installation of a cable system to carry the proposed electrical transmission lines. Joint use of the pipeline for both conveyance of water and installation of the electrical lines would be a sustainable alternative. Use of this pipeline as a 'chase' would be more aesthetically compatible and eliminate monopole ridge lining impacts. It would also allow easy access for maintenance since the pipeline is not in continuous use for the conveyance of water. This is a practical alternative that is being used throughout the country, and should be explored as an alternative for this transmission line.	The Windy Gap Water Pipeline was not designed to accommodate electrical power cables. It was designed to deliver drinking and irrigation water. It is technically infeasible to construct and maintain a double circuit high voltage transmission line within the pipeline.

Commentor Name	Comment Number	Comment	Response
Grand County Dept. of Planning and Zoning	A-1-4	In conclusion, the DEIS does not sufficiently address the concerns raised by Grand County, or adequately explore the available options. Although we support providing reliable, cost-effective electrical services for the citizens of Grand County and its visitors, we cannot agree the preferred alternative is the best option for Grand County, nor does it comply with the Three Lakes Design Review Area regulations. WAPA should re-evaluate the above options, and the preferred alternative needs to protect the unique scenic beauty of Grand County, while maintaining the historical green power that exists today. The DEIS should be required to provide adequate reasons not to utilize the existing Adams Tunnel, bury the power lines, or use the existing pipeline between Windy Gap and Lake Granby that are not cost related. Again, the "cost" of installing large monopole towers in this critically sensitive view area is more than just financial, and should not be dismissed.	See prior responses, including the above and GCR-1 and GCR-6.
Grand County Board of Commissioners	A-2-1	Removal of these infected and dead trees has made the visual impact of this proposed project more troublesome. 110' to 120' towers on this denuded landscape will look like the skyscrapers on the surface of the moon. This visual landscape will not inviting to citizens and visitors. It is very likely that these towers will be visible from portions of Shadow Mountain Reservoir and possibly portions of Grand Lake. The information you have provided makes the full extent of the visual impact impossible to determine.	See response to comment GCR-4.

Commentor Name	Comment Number	Comment	Response
Grand County Board of Commissioners	A-2-2	Grand County has suggested replacement of the line through the Adams Tunnel as an answer to the countries "green energy" mandate by the President. With that statement, water delivery has been given more importance than the guarantees given to the west slope and particularly Grand County. This is not the intent of Senate Document 80. The guarantees to the beneficiaries of the CBT project were to be balanced and that balance is obtained through an unaffected third party, which in this instance is the Bureau of Reclamation. The transmission line in the tunnel has functioned for over 40 years, and while there is great concern about it continued reliability, replacing it with more modern technology would not only be a wise and green solution, it would address the visual concerns of the county as well as provide a more secure connection, free from wildfire and other natural disasters that face above ground facilities. The County also suggested undergrounding along the visual portion of Highway 34 but was again met with the statement 'too expensive'. Grand County is a cooperating agency for the above referenced project, and has made these suggestions and comments a number of times since 2006. To date those comments and concerns have been given little, if any, consideration and have been answered with the "too expensive" statement. The power that is currently being generated by the CBT project is the very power that WAPA can offer on the futures market and provide revenue not only for the operation and maintenance of the CBT facilities, but also additional revenue to the Federal coffers to pay for these ''too expensive" alternatives suggested. In addition, if the Windy Gap Firming Project is approved with prepositioning, there will be additional power generated with additional revenue. Grand County recognizes the need for enhanced reliability and its benefits not only to the county residents but to others in the service area. However, the sacrifice of the economic viability of the Three Lakes area should be of equal importance with reliability. The Three Lakes area, which is the western gateway to Rocky Mountain National Park, will be devastated all because the cost of alternatives that would both protect the County and meet the purpose and need of the project has been deemed "too expensive" and given no further consideration. In addition, the administration's "green energy" policies have been totally disregarded. As Grand County's Senate Document 80 representative, I request a more in-depth consideration of replacement of the line through the Adams Tunnel. This alternative, regardless of cost, would overcome political and public opposition while meeting the purpose and need of the proposed project.	Senate Document 80 states that “The project, therefore, must be operated in such a manner as to most nearly effect the following primary purposes;” with one of the five purposes being “To preserve the fishing and recreational facilities and the scenic attractions of Grand Lake, the Colorado River, and the Rocky Mountain National Park.” Western respectfully disagrees with the contention that the transmission project will affect the manner in which Reclamation operates the Colorado-Big Thompson Project (CBT) as the project will not increase the existing capability to pump water from Granby Reservoir to Shadow Mountain Reservoir for delivery through the Adams Tunnel via Grand Lake. The power features of the CBT were integrated with the Pick-Sloan Missouri Basin Program (P-SMBP) in 1954 for power marketing, operations, and repayment purposes. Power revenues from the sale of CBT generation in excess of those needed to recover CBT construction costs allocated to power users, ongoing operation and maintenance expenses, as well as major equipment replacement are applied to the power repayment obligations of other P-SMBP projects. Reclamation Law mandates that Western sell P-SMBP generation at the lowest cost to consumers consistent with sound business principles. See Attachment 1 for an explanation of CBT repayment.

Commentor Name	Comment Number	Comment	Response
Mountain Parks Electric, Inc.	A-3-1	Loss of either of these facilities results in MPEI's service area being left with a one-way, or radial transmission supply; approximately 7,000 customers would be affected, from the west side of Rocky Mountain National Park on the north, to YMCA Snow Mountain Ranch on the south, from Byers Canyon on the west, to the Continental Divide on the east, including the towns of Granby, Grand Lake, and Hot Sulphur Springs. Without a rebuild and upgrade of these existing transmission facilities, which range in age from 65 to 73 years, MPEI customers are at risk for extended power outages. MPEI expresses no preference among all of the alternatives. MPEI strongly urges that the Granby Pumping Plant Switchyard - Windy Gap Substation Transmission Line Rebuild, Grand County Colorado project be engineered and constructed at the earliest possible time in ·order to provide a more reliable source of electric transmission supply to the members of MPEI.	Thank you for your comment.
Federal and State Agency Comments			
EPA	A-4-1	The EPA is impressed with the thoroughness with which the DEIS document is written. The environmental impacts for each natural resource were clearly explained along with criteria to evaluate significant impacts including proposed mitigation measures for each natural/cultural resource.	Thank you for your comment.
EPA	A-4-2	1. Page ES-3. Section 1.4.4 lists two hydroelectric generation sources; however, the DEIS is silent on the energy source for the proposed 138-kV double circuit line. We recommend that the DEIS identify the source of electrical power that will replace the power currently provided through the Adams Tunnel power cable.	The project would have no effect on hydropower production. The power would continue to be distributed through the electrical grid to end users. MPEI receives power from a variety of sources and these would not be modified by this project.
EPA	A-4-3	2. As discussed in Chapter 1, Grand County is one of the fastest growing counties in Colorado, and yet the purpose and need for the project is focused primarily on the reliability of the power supply. Please address whether it is likely that a reasonable foreseeable future action will be the additional upgrading of the single-pole structures with additional transmission lines to accommodate population growth?	The proposed project would provide a reliable power supply for the area served that is adequate to meet reasonably foreseeable growth.
EPA	A-4-4	3. The Norton Marina is discussed in the alignment of the transmission line for the preferred alternative. Please label where the Norton Marina is located on Map 2-8.	A label for the Grand Elk (Norton) Marina has been added to Map 2-1 (All Alternatives).

Commentor Name	Comment Number	Comment	Response
EPA	A-4-5	4. Under the preferred alternative, the existing ROW north of the Granby Substation will be moved approximately 0.25 mile to the west just inside the Arapaho National Recreation Area. This new transmission line route will be within 0.25 mile of two golden eagle nests located on Table Mountain inside the Arapaho National Recreation Area. EPA recommends that Section 2.2.5 explain why the preferred transmission line route is moved approximately 0.25 mile west of the existing ROW north of the Granby Substation, which brings it closer to the nesting sites on Table Mountain located in the Arapaho National Recreation Area.	The realignment moves the proposed action a few hundred feet to the west on the opposite side of Table Mountain from where the active golden eagle nests are located. No impacts to these nests are anticipated.
DOI	A-5-1	After reviewing all of the action alternatives, it appears that most, if not all, wetland impacts can be avoided. Although the DEIS anticipates up to 0.1 acre wetland impact under each action alternative, we urge WAPA to use all practicable means to avoid impacts to wetland resources during project implementation.	Disturbance of wetlands will be avoided or minimized to the maximum extent practical.
DOI	A-5-2	We recommend that the Alternative B1 be selected as the preferred alternative. Alternative B1 uses the existing right-of-way for most of its length, and the realigned section(s) does not appear to result in additional effects to wetlands or Federally listed threatened or endangered species. Design criteria number nine (DC 9) appears to adequately addresses concerns of the U.S. Fish and Wildlife Service regarding take of migratory birds. In addition, this alternative avoids potential impacts to sage-grouse leks.	Disturbance of wetlands will be avoided or minimized to the maximum extent practical. For the reasons discussed in the EIS, the Preferred Alternative, D1, was selected to balance potential impacts to a variety of resources.
Colorado Parks and Wildlife	A-6-1	CPW is supportive of Alternative B1 or Alternative D (Option 2). The other alternatives and Alternative D (Option 1) place the transmission line in a location that is closer in proximity to the last known greater sage-grouse lek east of Highway 125.	See response to comment A-6-2.
Colorado Parks and Wildlife	A-6-2	Greater sage-grouse in Eastern Grand County have been significantly compromised by development, habitat fragmentation, and human disturbance. Sage-grouse collision and increased potential for predation is likely to occur if the transmission line is built in closer proximity to the lek site. The existing route (Alternative B1) or Alternative D (option2) place the transmission line in a location that is further from the lek, keeping the habitat more intact, and reducing the potential for collision and raptor predation.	The proposed alternative will parallel the existing MS-NCWCD water line and is located approximately 0.5 mile from the nearest lek. The project would consolidate rights of way, eliminating Western's existing right of way and combine it with the MS-NCWCD right of way. The proposed action represents a careful effort to minimize impacts to planned development as well as wildlife resources located just north of the property boundary. Western will work with Colorado Parks and Wildlife to minimize impacts on wildlife, including avoiding construction during sensitive periods and other appropriate mitigation.

Commentor Name	Comment Number	Comment	Response
Letters from Individuals			
Deb Bondi	I-1-1	This campground is used for day groups/weekend groups. Being a resident the proposed site is on the east side much closer to residential property; impacting the daily lives of the residents with accelerated noise levels etc. whereby if it was in the campground it would not be as prevalent.	See the response to comment GCR-2.
Deb Bondi	I-1-2	Why not put these lines at this CR64 site underground?	See response to comment GCR-1.
Rob and Sarah Burgett	I-2-1	We oppose to this being done as I have been informed that should this occur, we run the risk of our homeowners insurance being canceled and therefore we could potentially lose our home.	See response to comment GCR-5.
Rob and Sarah Burgett	I-2-2	This also proposes health risk to my family as well as others in the line of your project and would decrease the value of our homes and others around us. I ask that you consider another alternative to your current plan as this affects us in many ways.	Even with an increased voltage and double circuit construction, the proposed project would have a lower EMF level at the edge of the right of way than currently exists. A detailed discussion of EMF is provided in Sections 3.6 and 4.6 of the EIS. Also, see the response to comment GCR-5 and information in Section 4.9 of the EIS on property values.
Glenna Bliss Cook	I-3-1	As a resident of Grand County I am very opposed for numerous reasons to the proposal for tall electrical towers between the Granby Pumping Plant and Windy Gap. The towers are costly, unsightly, and unnecessary. Please reconsider this proposal in light of the more recent occurrences since the economic boom in the early part of this century. It would be extremely foolish to invest so much money, destroy our resources, and create useless monstrosities without careful consideration.	Visual impacts were carefully considered. The project is needed to replace a transmission line constructed in 1939 and it is necessary to serve local needs. See response to comment GCR-4.
Bruce Dines	I-4-1	The main comment is on visual impacts to views from the property and properties surrounding the proposed project. Support efforts to move the location of the present transmission line further to the north and east of its present location and to look for opportunities to screen the structures using terrain. Look for opportunities to minimize the number of structures by maximizing the distance between structures.	Additional efforts to minimize visual impacts will be considered during the detailed design phase, including specific structure location and other efforts to reduce the visibility of project elements. The preferred route moves the existing transmission line further north and places it parallel to the existing water pipeline ROW. This would consolidate ROWs and move the line further from the Highway.

Commentor Name	Comment Number	Comment	Response
Bruce Dines	I-4-2	Support efforts to minimize the visual impact of roads and road construction. Suggestions include removing and reclaiming roads that are no longer needed if the existing line is moved to another ROW. Minimize the construction of new roads. Reclaim roads needed for construction that are not needed for ongoing maintenance. Reclaim and revegetate areas where the soil is exposed to reduce visible scars from construction and erosion. Whenever possible develop overland, vegetated routes for access for maintenance rather than constructing a road, which leave a visible scar and invites unauthorized use and travel. Share roads that already exist instead of building additional roads. Use the ROW of the water pipeline to access the transmission line, if possible.	See response to comment I-4-1. Existing roads and tracks will be used to the extent practical and construction of new roads will be minimized. Standard construction practice SCP 6 in Table 2.5 states: On completion of the work, work areas shall be scarified or left in a condition that would facilitate revegetation, provide for proper drainage, and prevent erosion. The contractor will repair damages resulting from the contractor's operations. Newly created access roads will be revegetated with vegetation that would reach a height that still allows maintenance access. Western would use existing access for construction whenever practical. In addition, the project would require a permit to comply with the Clean Water Act. This permit, known as the National Pollutant Discharge Elimination System, Construction Permit, would include requirements for revegetation to control erosion. Western would limit the construction of new access roads. Access roads needed only for construction would be reclaimed and revegetated with a seed mixture appropriate to the site.
Ardyth Fournier	I-5-1	My parents and now my daughter and I have owned property for more than 50 years and we are absolutely opposed to placing the towers on our property or immediately adjacent to that property. It was our understanding that the towers would be on the side of the road of the campground. Can you give us any idea what the placement of the Towers on our side of the road would do to our property values? I would very much appreciate an answer.	See responses to comments GCR-2 and GCR-5.
Alicia Gerhart	I-6-1	As a visitor I do not find it attractive to see tall metal towers with transmission lines destroying the landscape in Grand County. The best solution is to replace the cable in the Adams Tunnel.	See response to comment GCR-6.
Jack Gerhart	I-7-1	Please realize that transmission towers will dramatically impact tourism and the local economy, and that towers therefore represent a short sighted solution. You might also consider newer, low loss transmission technology currently under development, which buries transmission lines, but yields long term savings through reduction of power loss and through super-conduction technology. Such a project would attract government grants and public accolades. As a visitor I do not find it attractive to see tall metal towers with transmission lines destroying the gorgeous landscape in Grand County. The best solution is to replace the cable in the Adams Tunnel.	Such technologies, generally referred to as superconductive cables, have been demonstrated on short, test underground systems. The superconducting technology is not generally available commercially and it may not be for quite a while. Some of the technological hurdles in these types of conductors include the need for super cooling to very low temperatures close to 40 Kelvin (-388 degrees F) and the use of other conductor materials. Regardless, the undergrounding option was considered in the EIS and was not selected for reasons explained in Chapter 2. See responses to comments GCR-4 and GCR-6.
Rod Kauber	I-8-1	I would like to let you know I STRONGLY SUPPORT Suzanne Gerhart's letter to you RE: the above subject. Her research of the above situation clearly outlines my views also.	Thank you for your comment. See responses to S. Gerhart’s comments I-31-1 through I-31-14.

Commentor Name	Comment Number	Comment	Response
Paul Klees (C Lazy U Ranch)	I-9-1	We offer many great activities and amenities to our guests revolved around the ranching and wildlife experience; some of these activities are conducted on lands to the west of Table Mountain and would be negatively impacted if routing Alternatives C1 or C2 were pursued.	The EIS addresses the potential impacts associated with C1 and C2.
Paul Klees (C Lazy U Ranch)	I-9-2	Our guests travel from all over to enjoy a break from the modern hustle and bustle by riding horses, mountain biking, hiking, and hunting through country that has not been paved with today's growth. A transmission line through some of this property would be an immediate threat to the reason our guests travel to such a unique location.	Thank you for your comment. The EIS addresses the potential impacts associated with C1 and C2.
Paul Klees (C Lazy U Ranch)	I-9-3	Negative Species Impact: As reflected in the EIS draft, alternative routes C1 & C2 negatively impact the big game, bird, and plant species on some parts of this land. We would emphasize some of these through our personal experience: 1. Big Game: It is noted in the EIS, and we have seen it from our hunting operations onsite over the years, that the area is heavily concentrated with big game. Our business in the fall is revolved around hunting clientele and we need this land and the animals it supports to be able to continue a successful hunting operation. 2. Sage-grouse & Golden Eagles: After reading through the potential impacts to these animals, I took the opportunity on April 25 to drive the proposed C1 & C2 route with Scott Murdock, Colorado Parks & Wildlife Hot Sulphur Springs District Wildlife Manager, to fully understand the threats proposed. We found the sage-grouse leks mentioned in the draft, still very much in active use. We also observed two male sage-grouse within 900 feet of the C1-C2 route. Murdock advised that the previous count last year had been five males as well as the fact that these grouse leks are rare in this area. He also talked about the two golden eagle nests located on Table Mountain and their closeness in proximity (less than 1500 feet) from alternative C1 and C2. Murdock reiterated the real potential for flight collision with power lines to be newly located here.	Thank you for your comment. Alternatives CI and C2 are not the preferred alternative.
Paul Klees (C Lazy U Ranch)	I-9-4	While any expansion of the power lines will cause damage and disruption, in our opinion a location roughly along the existing lines corridor will minimize these impacts versus a largely new routing across untouched land. If this project must go forward and lines would be located on power poles (instead of buried or submerged alternatives) we are in favor of Alternative D as the appropriate route and strongly discourage your team to reconsider Alternatives C1 or C2.	Thank you for your comment. Alternatives CI and C2 are not the preferred alternative.

Commentor Name	Comment Number	Comment	Response
Carla Lawn	I-10-1	Please add my voice to those in opposition to construction of tall towers in Grand County. Have you been there? It is a unique and beautiful area, (with) unspoiled vistas of mountains and lakes. Please don't ruin this with your outdated technology.	Thank you for your comment. Impacts to visual resources are described in Section 4.8 of the EIS.
Irene Lindgren	I-11-1	I am a property owner in area where there is a proposal for towers to be built. My family has owned our property for greater than 50 years. There is no way I want those towers built on our easement. We use our property from April to October every year. It is sad enough to see the disappearance of our forest. The towers would be an insult and an assault to our senses. Thank you for considering my emphatic "NO".	Thank you for your comment.
Sally and Robert Linton	I-12-1	My husband and I live in the Scanloch area and we received an invitation to attend the public hearing for the transmission line on April 24. We will be out of town that week and will be sorry to miss the hearing. Due to the private property that the line currently runs along, we are in favor of moving the existing line to an alternative route. Upgrading the voltage and keeping it on existing location of line is of a great health concern to us and other neighbors. In addition to health issues, the line of sight impacts our property a great deal. We would prefer the other alternative routes that are proposed and at a minimum the preferred alternative is preferable to us.	The Preferred Alternative includes rerouting to avoid the present location through the Scanloch Subdivision. The Preferred Alternative reroutes the line onto Forest Service land.
Gavin Malia (CLP Granby)	I-13-1	CLP has great concern with these alternatives and their negative impact to the residential development in this area of the Property and to the Property generally. Further, the uncertainty of the final outcome of the Project is presenting undue challenges for CLP regarding the marketing and potential sale of land within the D1 and D2 areas of the Property.	See response to comment I-13-2.

Commentor Name	Comment Number	Comment	Response
Gavin Malia (CLP Granby)	I-13-2	D1 will require the acquisition of a new 100 foot wide easement through the Property. This new easement will directly impact approximately 16.5 acres of R-1 lands within the Property while also severely restricting the design layout of the R-1 lots and the necessary access roads, driveways and service utilities required to serve the R-1 lots.	The Preferred Alternative would parallel the existing MS-NCWCD water line. In this way, the project would consolidate rights of way, eliminating Western's existing right of way and locating it along the MS-NCWCD right of way. Of the proposed 100 foot ROW, approximately half would overlap MS-NCWCD's ROW. Figure 2-11 in the EIS showed the relationship between the two ROWs. Instead of two rights of way to work around, planned development will need to consider one area with ROWs. The proposed action would minimize impacts to planned development and wildlife resources located just north of the property boundary. Western worked with the prior property owner to move the alignment further north to avoid placing the line in the primary view-shed of a greater number of proposed building sites. The proposed alignment avoids areas of the site planned for higher density development and is located at the edge of an area planned for low density development. Moving the alignment further to the north, i.e. Alternative C1, would have greater impacts on wildlife due its proximity to sensitive wildlife habitat, particularly a sage-grouse lek that is the last active lek in eastern Grand County. Alternative C1 would also require another right of way and additional access roads construction.
Gavin Malia (CLP Granby)	I-13-3	Additionally, the D1 transmission line will create significant visual impacts to not only those lots within the D1 easement but also to the adjacent R-1 and Open Space lands within the Property.	See response to comment I-13-2.
Gavin Malia (CLP Granby)	I-13-4	D2 will require the acquisition of an additional 70 feet of easement to bring the existing 30 feet up to the required 100 feet. This additional easement will directly impact approximately 12 acres if R-1 land within the property. Similar to D1, this additional easement create significant visual impacts to the lots within D2 as well as surrounding lands within the Property. The cumulative effect of either the new D1 easement and transmission line or the expanded D2 easement will be the significantly diminished value of the Property.	See response to comment I-13-2.
Gavin Malia (CLP Granby)	I-13-5	It is also worth pointing out that the Town of Granby owns approximately 35 acres of land within the Property that intersects with D2. Easement acquisition negotiations, therefore, will need to include CLP and the Town of Granby for D2.	Thank you for your comment.

Commentor Name	Comment Number	Comment	Response
Gavin Malia (CLP Granby)	I-13-6	In addition to CLP's concerns of visual impact and diminished land values discussed above, CLP has great concern regarding potential damage to the extensive horizontal improvements already installed along the D1 and D2 lines. All of the roads depicted in the enclosed map are completed up to road base. Further, all major utilities are installed within the road rights of way along the D1 and D2 lines, including but not limited to, water and sewer mains and natural gas and electrical lines. The proposed alignments of D1 and D2 are adjacent to and/or intersect these improvements along their entire crossing of the Property resulting in substantial damage to these improvements.	Before construction, utilities will be located and transmission structures, which on average will be located approximately 600 feet apart, will be designed and constructed to avoid damage to utilities and other infrastructure. If damage to improvements occurs, Western will be responsible for repairing the damage.
Gavin Malia (CLP Granby)	I-13-7	Instead, CLP recommends that WAPA proceed with Alternative C1. It is in the best interest of WAPA and CLP to move the proposed line as far north as possible to avoid potential impacts to residential development and existing infrastructure within the Property. The land north of the Property is not zoned for residential development and is free of existing infrastructure.	Existing rights of way, including Western's existing 69-kV line and MS-NCWCD's water pipeline, already cross the property. To reduce impacts to planned development, Western agreed to eliminate its existing right of way through an area planned for higher density and move the alignment further north, parallel to the right of way of the MS-NCWCD pipeline. Western is willing to work with a landowner to consider alternative alignments but has a policy of not moving the alignment to benefit one landowner at the expense of the neighboring property. Further, an alignment further north would have greater impacts on wildlife, particularly sage-grouse; and it would require an additional new ROW and access roads.
Gavin Malia (CLP Granby)	I-13-8	Should Alternative C1 (C1) not be selected as the final alignment, CLP requests that a modified version of C1, Alternative C1-CLP (C1-CLP), be considered instead. As depicted in the enclosed map, C1-CLP moves the new line and easement as far north on the Property as possible. This reduces the visual impact and diminished value concerns of the R-1 lots, decreases the planning restrictions associated with developing the R-1 lots, and increases the distance of the new line from any existing infrastructure on the Property.	An alignment located along the north boundary of the property, i.e. the suggested C1-CLP, would still result in greater impacts to wildlife. These impacts would be sage-grouse similar to those described in the draft EIS, (see Section 4.16.3.3.), and would result in impacts to the last remaining active sage-grouse lek in eastern Grand County. Impacts resulting from an alignment along the north boundary of the property, which include the potential for increased predation by raptors, collision risk, and construction related disturbances, pose a serious risk to the continued use of an active sage-grouse lek, an important habitat component for a sensitive species that is listed as a species of concern by the Forest Service, BLM and Colorado Division of Parks and Wildlife. Also, in comparison to Alternative C1 or CLP's recommended variation, Western's preferred alternative would consolidate ROWs and avoid proliferation of additional ROWs, access roads, and impacts in less developed areas.

Commentor Name	Comment Number	Comment	Response
Stanley Cordell Michael II	I-14-1	My recommendation is to abandon any that require more space for development processes such as Alternative B1, and rerouting such as Alternatives C1 and C2. Alternatives D1 and D2 in essence combine Alternatives B and C in their land use. Alternatives C1, C2, D1, and D2 would create additional edge effects on top of the existing ones created by the existing line route and roads. If either of these alternatives were implemented they would further delineate natural ecological communities in the vicinity, which of course would have a negative impact.	The Preferred Alternative would have an increased right of way width and associated tree clearing to ensure that trees would not present a risk to the transmission line, and vice versa. Nearly the entire length of the proposed alignment for the line uses an existing right of way where an edge has already been created. Some species will benefit from the additional clearing while others may be adversely affected. Overall, the effects to wildlife are expected to be minor.
Stanley Cordell Michael II	I-14-2	As a solution to this dilemma I suggest that the new and improved power line be routed along the existing edge created by highways 34 and 49. The co-location of road and power increases efficient serviceability when needed, and decreases our environmental impact. The roads themselves are existing edges on natural communities that can be utilized for multiple purposes such as stacking power lines onto their footprints. In my mind there is no better solution. When it is shown that the benefits of uniting human impact footprints (ecological improvement and money saved through better accessibility) outweigh the costs of dispersing our impacts for greater species to bear, an overhead power line adjacent to the roadways is relatively nothing. We save money and species doing it this way, and it is the right thing to do. If we want luxuries we should be willing to look at what it takes to have them. Furthermore I firmly suggest that before you move forward with your plan to improve the power supply and transport in Granby, you conduct an EA of routing the lines along highways 34 and 40.	See response to comment I-14-1. There is a considerable difference of opinion among those who commented on the Draft EIS, on the potential benefits of locating additional portions of the project nearer to Highway 34. Many comments indicate that US 34, which is a scenic byway, is a visually sensitive corridor and that increasing visual impacts along this corridor could adversely impact Grand County's tourism-based economy. The proposed action uses existing rights of way at most locations and the proposed alignment was selected in an effort to minimize overall impacts on all resources. The Preferred Alterative includes co-locating part of the transmission line along the existing MS-NCWCD water pipeline. This would consolidate ROWs and avoid proliferation of additional ROWs, access roads, and impacts in less developed areas.
John and Darlene Nelson	I-15-1	I am vehemently opposed to the proposed plan to place the transmission lines for the above referenced project above ground. It is clear that ALL of the important parameters have not been considered in the EIS.	See responses to comments GCR-1 and GCR-6. A wide range of alternatives was considered in the EIS.

Commentor Name	Comment Number	Comment	Response
John and Darlene Nelson	I-15-2	First of all, the economy of Grand County relies very heavily on tourism, hunting and fishing. The "urbanization" of the area by placing the power lines above ground will destroy, never to come back, the pristine nature of our beautiful county. This will severely impact on the number of visitors to our county. Secondly, the EIS considered only the cost of construction in the cost - benefit analysis. However, the cost of lost economy must also be considered. Thirdly, what about just the consideration of the citizens of this fine county and their dislike of having to look at the cables and towers that will mar our fine landscape.	See responses to comments GCR-1 and GCR-4. Construction costs were part of the consideration. Additional factors that are considered and described in the EIS include environmental impacts, effects on project life, ability to respond to power interruptions and repair the facilities, and operational issues. Additional information is available in Chapter 2 of the EIS.
Rick Pederson, E Diamond Ranch	I-16-1	I agree with the EIS conclusion that Alternative D is the best routing of alternatives investigated.	Thank you for your comment.
Rick Pederson, E Diamond Ranch	I-16-2	Relocating the Windy Gap transmission lines according to the C1-C2 alignment, over and adjacent to or close to this land as a de novo project would in our opinion result in significant negative impact to the E Diamond H Ranch and thousands of acres of nearby private and public lands around it. The majority of E Diamond H Ranch acreage has been placed in a conservation easement with The Nature Conservancy (TNC). Moving ahead with Alternatives C1 or C2 would adversely impact many of the scientific criteria evaluated and acknowledged by TNC as the motivation for establishing this conservation easement.	Thank you for your comment. Alternatives CI and C2 are not the preferred alternative.
Rick Pederson, E Diamond Ranch	I-16-3	As the EIS concludes, the lands around the C1-C2 routes are home to a robust and diverse set bird, big game, small animals and plant species. We are particularly concerned about the potential for significant adverse impacts to the Greater sage-grouse and Golden Eagles - ranch owners and visitors have observed both of these species (and the specific grouse leks identified in the EIS) on or near the Ranch boundaries.	Thank you for your comment. Alternatives CI and C2 are not the preferred alternative.
Rick Pederson, E Diamond Ranch	I-16-4	The E Diamond H Ranch and adjacent lands are for the most part untouched, and cutting a de novo 12-mile-Iong double circuit power transmission corridor to the west of Table Mountain will cause aesthetic and visual damage materially greater than following the Alternative D existing right-of-way corridor near existing power lines. Of the options not eliminated in the EIS-0400, Alternative D is the route that will cause the least environmental damage. Do not reconsider Alternatives C1 or C2.	Thank you for your comment. Alternatives CI and C2 are not the preferred alternative.

Commentor Name	Comment Number	Comment	Response
Patricia Person	I-17-1	Preferred Alternative D - Options 1 and 2 that Western Area Power Administration (WAPA), and Tri-State Generation and Transmission (Tri-State), are proposing has severe negative impacts to the residents of Grand County, the customers of Mountain Parks Electric, Inc. (MPEI), and millions of visitors to Grand County. Further it does not recognize or state the real purpose of the project. Negative impacts to the residents of Grand County are the visual impacts to the views across Granby Reservoir, economic impacts, and potential health risks from electric and magnetic fields (EMF) to the property owners who live in houses in close proximity to the power lines.	See responses to comments GCR-3, GCR-4 and GCR-5.
Patricia Person	I-17-2	This project proposes to increase the height of the power poles that will severely impact the views from U.S. Highway 34, a Scenic Byway, across Granby Reservoir to the Indian Peaks and Never Summer Wilderness Areas, and within the Arapaho National Recreation Area (ANRA). Since millions of trees have been removed due to the Mountain Pine Beetle epidemic, the existing power line is quite visible. The pictures used at the public hearing on April 24, 2012 were at least 6-7 years old and did not accurately depict how the existing line looks, and artists' didn't accurately depict how the proposed power line would look. Anything that negatively impacts tourism and recreation will negatively impact our fragile economy in Grand County.	See the response to comment GCR-4.
Patricia Person	I-17-3	The potential health effects to humans from EMF living near high-voltage power lines have been debated at least since the 1970's. But, the fact that property values drop when the property is in close proximity to these lines is not debated. It has been repeatedly shown that there is a perceived health risk, in addition to the undesired view, that devalues property. This is another negative economic impact for people living in Grand County.	See response to comment GCR-5.
Patricia Person	I-17-4	Why didn't WAPA, Tri-State, MPE, and NCWCD replace it when no water was being pumped through the tunnel during drought years, for example 2002-2004? The Alternative not given any further consideration is the one to replace the AT cable because it is "too dangerous, infeasible, and too costly". If it wasn't too dangerous and infeasible in the 1940's, why is it too dangerous and infeasible now? This is the Alternative that should have been completed decades ago.	See response to comment GCR-6. Further, the flows in the Adams Tunnel are often higher during dry years than wet. For example, the amount of water delivered through the tunnel in 2002 and 2004 was 5 to 10% above average, which would have made it difficult to replace the cables during those years.

Commentor Name	Comment Number	Comment	Response
Patricia Person	I-17-5	A representative from WAPA stated at the public hearing that if this project is not completed, MPEI customers could be without power for weeks because there isn't enough capacity to bring power from the west. Why should we have to be without power? There's plenty of power if NCWCD stops using it and shuts down their pumps! Why shouldn't the real benefactors of this project, the water users east of the Continental Divide, have to bear the impacts of not replacing the AT cable? This is a clear example of WAPA and NCWCD bullying the western slope into accepting their project no matter what.	All of the electrical customers of MPEI would benefit from this project. The need for and benefits of this project are described in Chapters 1 and 2 of the EIS.
Patricia Person	I-17-6	NCWCD should also have to bear the total cost of the GPP-Windy Gap project. Why should our electric costs go up just to benefit the NCWCD water users? NCWCD customers should have to pay the true cost of getting the water to them. The costs of the project can be divided amongst millions of people in eastern Colorado. According to the 2010 Census, there are only about 14,000 people in Grand County. Due to the economic conditions, many people have left the county so there are probably fewer people than that to divide the costs.	The Northern Colorado Water Conservancy District does pay the entire cost of providing and delivering energy to the Windy Gap pumps. The Granby (a.k.a. Farr) Pumping Plant is a feature of the Colorado-Big Thompson Project (CBT) and, as such, the cost of providing and delivering energy to the Granby pumps is by statute included in the Western Area Power Administration's Loveland Area Projects (LAP) firm electric power rate as well as the Pick-Sloan Missouri Basin Eastern Division firm power rate. See Attachment 1 for an explanation of CBT repayment. Western's goal is to provide reliable power while keeping construction and long term maintenance costs as low as possible. MPEI sets the electrical rates for customers they serve. Many factors are incorporated into the MPEI electrical rate. MPEI customers are unlikely to see a rate increase as a direct result of the joint Western and Tri-State transmission improvement project.
Patricia Person	I-17-7	Provide a long-term plan to replace the AT cable so that the self-sustaining clean hydroelectric power can be restored to the CBT water diversion project and GPP as originally designed.	See response to comment GCR-6.
Patricia Person	I-17-8	If constructed as proposed, minimize the visual, economic, and potential health risks from the new lines by burying the new transmission lines from GPP along the west-side of Grand County Road 64 (through the Group Camping area in the ANRA), up to and across Highway 34. The U.S. Forest Service can move the group camping area if necessary.	See responses to comments GCR-1, GCR-2, and GCR-4.
Patricia Person	I-17-9	NCWCD and its customers should pay the entire cost of providing electricity for GPP and Windy Gap. There should be no increase in the electrical costs to the electric customers west of the Continental Divide.	See response to comment GCR-6
Kayleen S. Reeve	I-18-1	I agree wholeheartedly with what [Suzanne Gerhart] has to say in her well researched letter sent to you earlier.	Thank you for your comment. Note that responses to most of the remaining comments in the letter are addressed in the responses to S.M. Gerhart (I-31-1 through I-31-14).

Commentor Name	Comment Number	Comment	Response
Kayleen S. Reeve	I-18-2	I do not want any new electrical towers built between Windy Gap and the Farr Pumping Plan. I want the Alva B Adams Tunnel fixed, making it the way it was originally intended to be used, so that it will again provide us with "green power" (in Grand County).	See response to comment GCR-6.
Larry and Michaela Rossi	I-19-1	1) Had we known about the proposal we would not have purchased the property in January 2012. The impacts of these large structures are unacceptable and will interfere with our enjoyment of the property.	Thank you for your comment.
Larry and Michaela Rossi	I-19-2	2) We are concerned that the database used for the mailing list (Grand County assessor records) was outdated. We were not on the mailing list and did not know of the proposed project until recently.	Western used the Grand County Assessor Office database to identify landowners for notification of the public hearing and the availability of the Draft EIS for review and comment. We accessed the database in December of 2011. Western understands that your ownership was registered in the database toward the end of January 2012.
Larry and Michaela Rossi	I-19-3	3) The issue of health effects from electro-magnetic fields associated with lines is not fully known. I have been working in the area of radiologic technology fields for many years and think that there are potential health risks, especially with younger children who have rapidly growing cells, and older individuals.	See response to comment GCR-2.
Larry and Michaela Rossi	I-19-4	4) We are concerned that the larger transmission line structures will adversely affect our property values and there should be some compensation from the Project for this.	See response to comment GCR-5.
Larry and Michaela Rossi	I-19-5	5) We have heard about a "Fall Zone" for the transmission line structures. We have heard that banks would be unlikely to provide a mortgage since insurance companies will not insure residences located within this ''fall zone."	See response to comment GCR-5.
Larry and Michaela Rossi	I-19-6	6) The Project should go underground for that section of transmission line from about Hwy 34 to the Farr Pumping Plant to address visual impacts to local residences, hazardous above ground high voltage lines, close proximity to houses and camp grounds, noise pollution, and unsightliness of the transmission lines.	See response to comment GCR-1.

Commentor Name	Comment Number	Comment	Response
Larry and Michaela Rossi	I-19-7	7) We have been visiting the Granby Lake area for many years and we have not seen that the Cut Throat Bay Group Campground receives much use. In all of those years we recall that it was occupied on a half dozen or so occasions. These are temporary uses and we feel that the better route is through the campground, on the other side of the road. Local residents should not have to deal with the impacts of the transmission lines full time, when the impacts on the few users of the campground are temporary, very seasonal, and intermittent. There are many other areas to relocate the campgrounds but 20-40 residents cannot relocate their houses.	See response to comment GCR-2.
Larry and Michaela Rossi	I-19-8	8) While we understand that there might be a need to upgrade the electrical power in the area it is not fair that the local residents who own property near the lines should have to disproportionately put up with the impacts. This includes the visual impacts, any property value impacts, and physical and health hazards.	See responses to comments GCR-2, GCR-4 and GCR-6.
Larry and Michaela Rossi	I-19-9	9) The 100 foot easement requirement is just barely being met by the proposed alignment of the transmission lines. This is a minimum requirement for the location of houses but residents and people walking along county road 64, or working in their yards, will be in a potential danger zone much less than the 50 feet minimum from center line of the transmission line. It should be noted that county road 64 is a much utilized pathway for pedestrians in the area.	See response to comment GCR-2.
Larry and Michaela Rossi	I-19-10	10) No homeowner would be agreeable to having a 5 ft diameter metal post and surrounding support area near their house since it will be major eyesore for their house.	See response to comment GCR-5.
Larry and Michaela Rossi	I-19-11	11) We understand that part of this project is to provide more reliable power to Adams tunnel where there is an existing power cable which is near failure. The alternative to replace this cable has been abandoned because of safety, engineering, and cost considerations. We want this option back out on the table because it is the least disruptive to the environment, people, and homes in this area. The difficulties in placing a new cable in the tunnel cannot be more difficult than the original installation. This option has been thrown out prematurely and should be reconsidered.	See response to comment GCR-6. It should be noted that the original cable was placed before the tunnel was used for water delivery.

Commentor Name	Comment Number	Comment	Response
Larry and Michaela Rossi	I-19-12	12) We have noted that the proposed alignment goes to great lengths not to disturb Forest Service properties but only minimally addresses homeowner concerns. Forest service properties should also share the burden of having power lines traverse across them instead of forcing lines close to residential property to preserve forest lands.	See response to comment GCR-2.
Larry and Michaela Rossi	I-19-13	We oppose the Windy Gap Transmission Line Rebuild Project. The number of houses that will be in close proximity plus the unsightliness of the new powerlines in this pristine area make this project undesirable. This project will undermine property values and potentially negatively impact the health of residents of this area.	See response to comment GCR-2.
Larry and Michaela Rossi	I-19-14	The routing of the new power line near county road 64 is a significant concern since there is limited area for right away and the existing houses in this area are already too close to the present powerlines. We would like to all powerlines routed on National Park service lands where the occupancy is seasonal and intermittent. We are homeowners (near highway 64) that will be in very close proximity to new powerlines being proposed. We are concerned whether we can get acceptable homeowners insurance with the hazard of these powerlines near our house.	See responses to comments GCR-2 and GCR-5.
Larry and Michaela Rossi	I-19-15	Please let us know the status of this project and where we could access site plans of the final location of transmission line and poles.	Thank you for your comment. The final locations of structures are not determined until the final engineering design phase. This occurs after the route has been selected.
Sandra Schoenbeck	I-20-1	We would prefer that the line be put on the existing transmission that goes through Cutthroat Campground area and not along the ROW near residences. This is in the Cutthroat Bay Area in ANRA. The alternative lines go directly over the top of our residence and property. This will devalue that property. The campground offers no problems. Campers are there for one to two nights. They do not live there. Along county road 64 bury the line where there are residences.	See response to comment GCR-2.
Les Shankland and Clare Beth Rutila	I-21-1	At the Stillwater Tap, to minimize visual impact of tall dead-end angle structures with switches, please consider the option to build a low profile switching station at this site.	MPEI provided us with additional information on the need for additional switches at Stillwater Tap. Apparently there would not be a need for this equipment.

Commentor Name	Comment Number	Comment	Response
Les Shankland and Clare Beth Rutila	I-21-2	With removal of the old lines from Stillwater Tap to Granby Pump Plant, the existing right-of-way documents reference the centerline of the existing structures and locating boundaries will become more difficult to establish in the field. Please consider having a surveyor place pins/monuments at the crossing of the existing easements (northern and southern edge) boundaries at each property line to assure accurate locations in the future when existing lines are removed. We will see the Stillwater Tap structures from our property. The existing north of the existing powerline easement is already confusing at our lot, but will be more so once existing lines are removed. Thank you for considering our suggestions.	Western can provide limited staking or pins at the edge of the easement sufficient to determine the ROW boundary. Landowners may also consult existing records with the County and arrange with private surveyors for additional surveys if they require more information on their own property boundaries and encumbrances.
Carol Sidofsky and Dave Hazelrigg	I-22-1	We, Dave Hazelrigg and I, Carol Sidofsky, agree 100% with what Suzanne Gerhart told you, in her well researched and well written comments and suggestions that you can see copied below. We (Dave and I) want the Alva B. Adams tunnel fixed, making it the way it was originally intended to be used, so that it will again provide us in Grand County, with "green power".	See response to comment GCR-2.
Carol Sidofsky and Dave Hazelrigg	I-22-2	We don't want any new electrical towers built between Windy Gap and the Farr Pumping Plant, period.	Thank you for your comment.
Carol Sidofsky and Dave Hazelrigg	I-22-3	Grand County's income/economy comes mostly from tourism, skiing, outdoor activities, and ranching. We highly value our magnificent mountain and valley views, and so do the tourists who bring their tourist dollars into our county.	See response to comment GCR-4. The project was designed with awareness of and in accordance with the Three Lakes Design Review Area guidance. The degree of visual impact from the proposed project is not expected to influence the tourism economy of Grand County.
Carol Sidofsky and Dave Hazelrigg	I-22-4	The East Slope takes way too much water from us already, and we don't want them to steal any more water from us, just to decrease their own water costs. Let the East Slopers start to conserve their water instead. We don't want them to steal our economy either, by ruining our wonderful scenery. Just say "no" to building new power towers.	This project would not affect the amount of water delivered from the Farr Pumping Plant for the Colorado-Big Thompson Project. Note that responses to most of the remaining comments in the letter are addressed in the responses to S.M. Gerhart (I-31-1 through I-31-14).
Paul Strauss	I-23-1	I would greatly appreciate a map that was zoomed in on my property so I can see exactly how it would impact me one way or the other. I currently have a building permit for a 30x40 shop/garage that is directly impacted by an increase in easement size.	At your request, Western e-mailed you a map on March 22, 2012.
Steve and Elizabeth Sugg	I-24-1	The recent issue regarding power lines is disturbing. For what it's worth, we feel that putting in additional above-ground power lines is unnecessary and will be unsightly, decreasing the aesthetics of the area.	Thank you for your comment. Impacts to visual resources are described in Section 4.8 of the EIS.

Commentor Name	Comment Number	Comment	Response
June and Jim Timmerman	I-25-1	As home owners in Grand County Colorado, we strongly support our County a Commissioners' call, as well as that of numerous Grand County friends and neighbors for further study of what have been rejected alternatives to the currently planned Windy Gap Substation Transmission Line Rebuild Project. As we understand it, the primary rejected alternatives have been: 1. Burying the cable (either under land as well as under Lake Granby) 2. Replacement of the aging cable traveling through the Adams Tunnel. While other reasons for rejection of these two alternatives were given, the common rejection rationale for both was higher cost. So it's clear that Western has selected the cheapest alternative which benefits the Eastern Slope, even though it continually profits from Grand County-based resource for its hydroelectric power.	See responses to comments GCR-1 and GCR-6. MPEI's electrical customers will benefit from the proposed project. Western's goal is to provide reliable power while keeping construction and long term maintenance costs as low as possible. MPEI sets the electrical rates for customers they serve. Many factors are incorporated into the MPEI electrical rate. MPEI customers are unlikely to see a rate increase as a direct result of the joint Western and Tri-State transmission improvement project.
June and Jim Timmerman	I-25-2	However, we feel Western's current plan to go forward with the proposed 105' tall, 5' wide towers with multiple rows of transmission lines running from the Granby (Farr) Pumping Plant on Lake Granby to Windy Gap will result in unacceptable visual impacts to the area, given the vicinity to the Arapaho National Recreation Area, the Three Lakes Design Review area that has been county-regulated for 40 years, and the Colorado River Headwaters Scenic Byway.	See response to comment GCR-4.
June and Jim Timmerman	I-25-3	Therefore we strongly support our Grand County Commissioners' call for the draft environmental impact statement to include cumulative effects to aquatic and scenic resources in Grand County.	Cumulative effects of the proposed project are discussed in Section 5.11 of the EIS. Section 5.14 discusses cumulative effects on wetland resources. Section 5.8 of the EIS contains a discussion of cumulative effects to visual resources by the proposed project.
Bill and Sue Tomasek	I-26-1	We would like the residents, like us, to be considered when making the decision on where the location of these lines will be. We live here year round on the pumping plant road (county road 64) for the last 19 years. We live at 291 C.R. 64 which is across from the group camp ground. The present lines run directly above our front yard. We hope that when the time comes to move these lines the choice will be on the forest service property across the street. The people who camp there are only there a few days while they visit. Also, the camp ground is only open several months out of the year.	See response to comment GCR-2.
Bill and Sue Tomasek	I-26-2	However, we understand that a certain amount of energy is released from these lines and feel that this may be a health hazard after long term exposure. We also feel that it may decrease the value of our home.	See response to comment GCR-5.

Commentor Name	Comment Number	Comment	Response
Bill and Sue Tomasek	I-26-3	For these reasons along with the visual of one of these huge poles, possibly in our front yard, is a great concern. Please consider us, the permanent, full time residences in your decision.	Thank you for your comment.
Jim Ward (Alpine Wings, LLC)	I-27-1	I vote for the cable to be replaced in the existing tunnel.	Thank you for your comment. See response to comment GCR-6.
Frank and Jane Watts	I-28-1	Your web site given in our mailing is almost impossible to type in without error- and it appears that there is at least one error in the address - infrastruct???	During the comment period on the Draft EIS, two persons indicated that they had difficulty with accessing the Web address by typing in the Web address, which was long. The Web site can be addressed by going to http://go.usa.gov/E4a.
Frank and Jane Watts	I-28-2	In any event we don't need details to know that these power lines should be underground. (period) The technology is there and it is about time any projects in the mountains used it. You may not have the where with all to do underground power but you need to acquire it. Since we the taxpayers will end up paying for this project one way or another, we would more readily pay for getting the lines out of sight!	See response to comment GCR-1.
Tom Wunder	I-29-1	I do not believe a viable outcome regarding the transmission lines has been identified. The case for the power line is also questionable. The fact is I am wondering if the residents of Grand County are not being manipulated.	Thank you for your comment.
Tom Wunder	I-29-2	For instance, I understand underground transmission lines are expensive; a tunnel already connects Estes and Grand Lake. As far as I know, a cable runs through it. Even if the tunnel cable is reaching or exceeded its' life expectancy am I to understand that running a new cable through a preexisting tunnel is more expensive than putting up 100' power lines over 13 miles?	See response to comment GCR-6.
Tom Wunder	I-29-3	As Grand County is already blighted by the pine beetle, now WAPA wants to further spoil the beauty of our area that has an economic impact.	Thank you for your comment. Impacts to visual resources and socioeconomics are described in Sections 4.8 and 4.9, respectively.
Tom Wunder attachment	I-30-1	I am writing to express deep reservations about a federal project being considered for Grand County, Colorado-our back yard.	Thank you for your comment.
Tom Wunder attachment	I-30-2	This power line would replace existing lines that are about 40' tall with 105' towers-just the kind of thing to disrupt peoples' view corridors.	Thank you for your comment. Impacts to visual resources are described in Section 4.8 of the EIS.
Tom Wunder attachment	I-30-3	Grand County is already blighted with the tree beetle and now we are to have 100' power lines? And, why do we not retrofit the power line running in the tunnel between Estes Park and Grand Lake?	See response to comment GCR-6.

Commentor Name	Comment Number	Comment	Response
Tom Wunder attachment	I-30-4	I'm left wondering who has oversight of these federal and state agencies? Who ensures that the citizens of Grand County and our environment are protected? I believe that a 600+ page report is a tool that could confuse average voters banking on peoples' indifference or intimidation by the "government bureaucracy".	Thank you for your comment. An executive summary is included at the beginning of the EIS for stakeholders who do not want to read the EIS in its entirety.
Tom Wunder attachment	I-30-5	But, I then I began to wonder, does the Bureau of Reclamation want to keep water in Grand County? Could the Bureau be anxious to see water leave Grand County? And if the Bureau is our natural resource guardian for Grand County has the Bureau's mission been compromised?	Thank you for your comment.
Tom Wunder attachment	I-30-6	My understanding is that in the planning years ago for the Big Thompson Project (of which I believe this issue falls under) clearly intended that Grand County was not to have its' natural beauty jeopardized. It seems to me this value has been lost. And this is why I am contacting you. I am against the 100' power lines as I am against the continued depletion of our water resources in Grand County. I don't want to see the tree blight experienced in Grand County furthered by putting in 13 miles of giant power lines further adding to the degradation of our view corridors.	See response to comment GCR-4.
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-1	The proposed overhead towers represent obsolete technology that will mar our beautiful mountains and valleys for the next 80-90 years. Despite your massive report, you have not given adequate attention to the destruction of our gorgeous landscape and the damage to the breathtaking views in our area.	See response to comment GCR-4.
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-2	Based on the severe visual pollution and consequent economic impact this proposed project places on Grand County residents, businesses and tourists, we request a thorough analysis of burying the lines as well as replacing the Adams Tunnel Cable, completed by reputable engineering firms who do not have an interest in constructing surface power lines. Your unsupported statement that such alternatives are "too expensive" is completely inadequate especially compared with the enormous cost you intend to impose on us in Grand County.	See responses to comments GCR-1 and GCR-6.

Commentor Name	Comment Number	Comment	Response
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-3	Instead, this power was sold for a profit or replacing the cable would not be an issue. Power needed at the Farr Pumping Plant needs to come from the Adams Tunnel Cable, not from tall unsightly towers and 13 miles of wires erected on Grand County landscape.	Colorado-Big Thompson Project (CBT) generation is not sold for a profit. The power features of the CBT were integrated with the Pick-Sloan Missouri Basin Program (P-SMBP) in 1954 for power marketing, operations, and repayment purposes. Power revenues from the sale of CBT generation in excess of those needed to recover CBT construction costs allocated to power users, ongoing operation and maintenance expenses, as well as major equipment replacement are applied to the power repayment obligations of other P-SMBP projects. Reclamation Law mandates that the Western Area Power Administration sell P-SMBP generation at the lowest cost to consumers consistent with sound business principles. See Attachment 1 for an explanation of CBT repayment.
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-4	We strongly resent WAPA's tactic of pitting residents against each other with respect to "alternatives." It is an unconscionable divisive act by a Federal Government Agency in a community that has traditionally been very cohesive. Somehow, WAPA has tried to sidetrack us into choosing divisive alternatives rather than focusing on acceptable alternatives of burying the lines or replacing the Adams Tunnel Cable. The CBT Project was designed to provide power to the Farr Pumping Plant from the Adams Tunnel Cable, not from an unsightly defacement of our beautiful countryside.	See responses to comments GCR-1 and GCR-6.
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shelter.	I-31-5	The need for significantly more power is not demonstrated in the 600+ page EIS report. The report does not contain any data showing the projected growth of the county. County population nearly doubled from 1980 to 2010, but most of that growth was in the 1990's. Growth was under 20% in the last decade and the population actually declined from 2009 to 2010. The closure of Grand Lake Elementary reflects the trend in the area of the county to be "served" by the new power line.	See response to comment GCR-3.

Commentor Name	Comment Number	Comment	Response
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-6	With additional power the Farr Pumping Plant will have the capacity to pump more water out of Grand County. We are already witnessing what a lack of water does to our mountains. Shadow Mountain Lake and Grand Lake are already polluted with toxic algae; our rivers lack a sufficient flow of water to remain healthy. Regardless of the cause, global climate change predicts a dryer climate, leading to high fire danger. With lower water tables, will our wells go dry forcing us to vacate our homes and move? Section 1.9 of the report states: Front Range water use - The purpose of the project is to maintain and improve electrical power reliability for this portion of Grand County. It would not affect nor be affected by existing or proposed water collection delivery projects that serve the Front Range. This statement is simply disingenuous. The destination of the power lines TO THE FARR PUMPING PLANT says it all. The idea of taking more water out of the county and erecting unsightly towers to do so at our expense is unconscionable.	Providing a reliable power system, which is the purpose of this project, would not result in additional water being pumped by the CBT. The power lines terminate at the Farr Pumping Plant because the existing power lines that are proposed for upgrading terminate there. The upgraded transmission lines would allow continued service to the Farr Plant without causing negative impacts to the power service to the local customers of MPEI. There would be no change in the power load at the Farr Pumping Plant. The reliability of the power system needs to be improved to provide stable electrical service when the Adams Tunnel conduit fails.
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-7	Interestingly, at a 2007 meeting held by concerned Grand County residents, Jim Liles, reported that he learned from an engineer at the Estes Power Plant that the switch to send power to Grand County had been locked for years. If we have not been receiving power through the Adams Tunnel Cable, then we have been adequately served by a 69-kV line. A diagram in the EIS report shows the proposed project at the Windy Gap Substation will provide both a 69-kV and an additional 138-kV, which represents a huge increase in power. In addition, if power generated in Estes is not coming back to Grand County through the tunnel as initially intended, who is profiting?	The 69-kV Adams Tunnel circuit has been and will remain energized unless a clearance is required for transmission system maintenance. In the event that the 69-kV circuit is unavailable, east slope Colorado-Big Thompson Project (CBT) generation will still be interconnected to CBT loads in Grand County via transmission paths that did not exist when the CBT was constructed. Western could not substantiate the alleged statement attributed by the commentor to Mr. Liles. The Adams Tunnel Cable has been in use continuously except for short term outages for routine maintenance. The need for redundancy in a reliable power supply is described in Chapter 2 of the EIS.

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Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-10	As noted above, by its original design, power for the CBT Project in Grand County was self sustaining as the water flowing over the turbines in Estes Park produced electric power, which was sent back through the Adams Tunnel Cable and provided power to the Farr Pumping Station in Lake Granby. WAPA wants to change the original design and circumvent the legislated approvals for the project. Senate Document 80 granted Grand County aesthetic protection. Tall towers 100' tall and 5' in diameter with 13 miles of multiple layers of glistening wire are not aesthetic.	See response to comment GCR-6.
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-11	Federal legislation enabling the Colorado Big Thompson (CBT) Project clearly placed the burden for building and maintaining the facilities on the Project and its successors, namely, the Northern Colorado Water Conservancy. Under those circumstances, the Conservancy should bear the cost of replacing the Adams Tunnel line to assure our access to the "green power" produced with Grand County water. Data gathered from "Colorado-Big Thompson Project," Robert Autobee, Bureau of Reclamation, 1996, indicates that under the Colorado Water Conservancy Law, land owners and those who benefit from project development, must contribute to the project's cost and operation in proportion to those benefits. The sunk cost of building the tunnel was paid with almost 50 percent amortized by hydroelectric generation, a percentage of the Department of Energy's revenue. A replacement cable represents a fraction of the total cost to maintain the system as it was intended and should not be changed now.	See response to comment GCR-6 and Attachment 1 for a discussion of CBT repayment terms.

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Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-13	The basic Pareto criterion for decision-making, which is related to both economic efficiency of transfers and to equity, states: The only way to be sure that a new project is socially desirable is to be sure that no one is made worse off by the project. Thus, not only must aggregate benefits exceed aggregate costs, but compensation in the amount of losses must actually be paid to all losers. (See, MacDonnell, et al., "Guidelines for Developing Area-Origin Compensation, Completion Report No. 139") Has WAPA applied this basic Pareto criterion for decision-making?	Western understands that the comment refers to MacDonnell, L.J., Howe, Charles W., Corbridge, James N., and Ahrens, W. Ashley. 1985. Guidelines for Developing area-Origin Compensation, Colorado Water Resources research Institute. Completion Report 139. 60 pp. The document addresses transbasin water diversions. As described in the EIS, and in responses to letters received from Grand County; this project would not affect water delivery by the Colorado-Big Thompson Project.
Comment letter prepared and submitted by S. M. Gerhart. Letter reproduced, all or in part, and submitted by K.S. Reeve, C. Sidofsky and D. Hazelrigg, P.D. and J.F. Raney, P.L. and J.C. Shetler.	I-31-14	How will WAPA compensate Grand County, residents and businesses for every day we look at the tall towers and shiny lines draped across our sacred mountains so East Slope residents can have comparatively inexpensive water? In conclusion, please let me emphasize that a careful analysis and public report on the costs of what WAPA is considering, as well as the alternatives of burying the lines and replacing the Adams Tunnel cable, is absolutely essential before this project goes another step forward.	See response to comment GCR-6.

Commentor Name	Comment Number	Comment	Response
Comments Made by Telephone			
Robert Alesandra	I-32-1	Mr. Alesandra: His property is at the intersection of 41 and CR 410. The transmission line goes through his property. He plans to build on the property. He bought the property for his retirement place. He is angry that this project will affect his retirement home and plans. Mr. Alesandra expressed concerns: • The higher voltage worries him. He has concerns about the potential health effects from the electrical lines. • He would like the line to go around his neighborhood, not through lots.	See response to comment GCR-2.
Joe Burbach	I-33-1	Mr. Burbach purchased his residence because of the "sweeping views" of the Valley and part of Lake Granby. He is very concerned about the impact of the transmission lines on his views.	See response to comments GCR-2 and GCR-4.
Joe Burbach	I-33-2	He expressed concern for the electromagnetic field effects.	The level of electromagnetic fields will be lower at the edge of the right of way for the proposed project than it is for the old transmission lines. Section 4.6 of the EIS contains additional information on EMF, including a comparison of the calculated fields for the Proposed project and the existing transmission line.
Joe Burbach	I-33-3	He is concerned that the project will result in increased electrical rates. They have already had a recent increase in their rates.	Western's goal is to provide reliable power while keeping construction and long term maintenance costs as low as possible. MPEI sets the electrical rates for customers they serve. Many factors are incorporated into the MPEI electrical rate. MPEI customers are unlikely to see a rate increase as a direct result of the joint Western and Tri-State transmission improvement project.
Joe Burbach	I-33-4	He did not think that the project was justified, he has not experienced flickering lights or brown outs when the Farr Pumps started. He did not think that the justification for the two lines-especially to one that is much higher voltage was justified. He did not understand why the FARR Pumping Plant needed additional electricity or another circuit, if no addition water was going to be pumped. He did not feel that the load growth in the area (residences and commercial load) justified the much high voltage of the transmission line.	See response to comment GCR-3. The higher voltage (138-kV) is needed to improve system reliability and operating characteristics over the existing system. System modeling demonstrates that this improves the system operating and reliability by providing needed voltage support.
Joe Burbach	I-33-5	He wanted to know what would happen to the generation from the Mary's Lake area if it was not going to be provided to the Granby area via the Adams Tunnel Cable. Would that result in use of more coal generation being used in the Granby Area from the Craig Power Plant?	The proposed project would have no effect on hydropower production. The power would continue to be distributed through the electrical grid. Tri-State and MPEI deliver power to Grand County customers. They obtain power from a variety of renewable and non-renewable sources, one of which is an allocation of power from Western. The resource mix would not be modified by this project.

Commentor Name	Comment Number	Comment	Response
Daniel McGrail	I-34-1	Mr. McGrail requested information on the project. Wanted to know the proposal for the line that is now in the Scanloch Subdivision. He requested a map of the Project. Requested information on the earliest that construction would start. Stated that it was good that the project was moving forward.	Western provided a map to Mr. McGrail on May 14, 2012.
Tom O'Connor	I-35-1	Mr. O'Connor lives by Willow Creek in Granby, CO. The existing transmission line goes through his property and he would like to know how the project would impact the 4 or 5 houses in that area.	The Preferred Alternative would locate the transmission line closer to and parallel to the MS-NCWCD water pipeline as shown on Alternative D1.
Public Hearing Transcripts			
Richard Schoenebeck	T-1-1	There is some, I believe, alternatives other than following the existing power line that presently exists on county Road 64. I believe at that -- in that area of the cutthroat Bay campground why don't you consider running it across through the federal land which is across the road from 64, following the parallel path that already exists which does go across the lake. And I heard aesthetically-wise it's going -- it might not be the best for Granby. Well, that part of the lake we cross might represent maybe less than one percent of the lake, and I don't think it's going to be bothered. As for the campground, since they destroyed it by cutting all the trees down, I'm pretty sure not very many people use that campground, and it is a private campground for group camping. So -- and when I'm up there very few people during the summer use that campground. So put the power line through the campground. Take it off the residents. Thank you.	See response to comment GCR-2. The proposed alignment along CR 64 has been modified to try to accommodate landowner comments on the alignment and Forest Service comments.
Richard Schoenebeck	T-1-2	Another alternative rather than run the cable through the air for that section of residence, which from where the --from the Granby pump to 34, bury the cable. You can then bring it out of the ground and send it where you want. But at least you could dig the hole, bury it along the line. You're only talking about less than maybe, what is that length, about 100 feet? And about a mile, and that's all you have to do. Because that's the only place probably on this whole line that you have residents, and that's the only place you haven't considered were the residents within that area. All the other area I'm pretty sure is open land. That's my only other comment.	See response to comment GCR-1.

Commentor Name	Comment Number	Comment	Response
Public Meeting Transcripts			
Nancy Stuart, Grand County	T-2-1	I guess our concerns are the visual impact up 34. And then we also have some concerns about the electricity that's already in the Adams Tunnel that was put in there and is referred in senate Document 80 about making the loops. So if it made the loop, if that was the thing that connected everything, we sure don't need the visual impacts if we can avoid that. And it's a US national scenic byway that we're talking about here that comes down the 34 corridor and on down 40.	See response to comment GCR-6.
Kristen Manguso, Grand County	T-2-2	I'm here to reiterate Nancy Stuart's comment. Yes, Commissioner Stuart is correct. We are very concerned about the visual impacts on the Highway 34 corridor. We also realize that WAPA Power is traded on the futures market, and they have made significant financial gains off of this. And we believe that part of their responsibility is to mitigate the visual impacts and also the Grand Lake clarity issues. We believe that's part of this as well, the Adams Tunnel and everything that's happened in Grand County. IT's a pretty big deal for the County. I should have brought my notes. (A brief break was taken while Ms. Manguso retrieved her notes.) Grand County also had a visual impact map prepared, and we have requested GIS data be provided. We can't seem to get that GIS data to help us make sure that the visual impact map is accurate. So until we can get data from you guys to help us make informed decisions on the visual impacts of these towers, we have to use something that's inaccurate and probably encompasses a lot more area than it really should.	Western's power is not traded on the futures market. Surplus power is sold at spot market rates to commercial customers. Western's mission is to market and deliver reliable, renewable, cost-based hydroelectric power and related services. Western sets its firm-power, transmission and ancillary service rates to recover costs for annual operations and maintenance in addition to paying back the Department of the Treasury for the capital investments and annual interest costs associated with the hydropower we market. This power is sold to Federal and state agencies, cities and towns, rural electric cooperatives, public utility districts, irrigation districts and Native American tribes. Various laws, including the Reclamation Project Act of 1939, require Western to give preference to certain types of nonprofit organizations seeking to purchase Federal power They, in turn, provide retail electric service to millions of consumers in the West. The request for visual impact data was received by Western on April 18, 2012. Western provided GIS data to Grand County on April 30, 2012. The recipients of the e-mailed data were Ms. Manguso and Ms. Curran. Western received no additional studies or analysis from the County.

Commentor Name	Comment Number	Comment	Response
Nancy Stuart and Kristen Manguso, Grand County	T-2-3	Ms. Manguso: Another one is the fiscal responsibility these huge visual impacts can effect tourism in Grand County. You know, the Highway 34 corridor with the three lakes, and we instituted a design review area in 1981. These types of things really effect that. And with THE economic conditions today, it doesn't really make sense to impact our view corridors that could impact tourism in this area. Ms. Stuart: And it's the gateway to Rocky Mountain National Park, the west end of it, and the Indian Peaks Wilderness, so we have concerns about it meeting. Also, there is a three lakes design review area, and does it fit into -- the purpose of that was put in place and the impacts that it would cause. We also -- Lake Granby is part of the Arapahoe National Recreation Area, and it's 36,000 acres within the upper Colorado reaches of the Colorado River Valley. And all of this causes us great concern of the impacts, the visual impacts, that-- well, especially where it's going to cross 34 and go to the pumping plant. That's very, very visual on 34. I mean, I was at meetings before where they were going to run it up behind starting on where the -- more or less following the route of the tunnel that pumps it up to Lake Granby. But then when it gets up near the top of Coffey Divide, it's going to cut across, and it's -- I mean, it's right in, right along, the highway and crosses the highway, and then across to the pumping plant.	See GCR-4 for visual resource impacts to affected view-sheds, US Highway 34, and the Arapaho National Recreation Area. The project was designed with awareness of and in accordance with the Three Lakes Design Review Area guidance. The degree of visual impact resulting from the project is not expected to influence the tourism economy of Grand County.

Commentor Name	Comment Number	Comment	Response
Nancy Stuart and Kristen Manguso, Grand County	T-2-4	Ms. Stuart: And, like I say, one of our big concerns is the electricity in the tunnel, and that was part of the reason why the Bureau of Rec the purpose of their project was for electricity to be made and tunneled by the water passing through. And now they want to stop using that because they say that it would be such a greater cost to them to do that, but, yet, they were selling the electricity. And I think now there is $14,000,000 a year made off the electricity that goes through there and that the project has bought. And it was to pay for this project. The project has been paid for. So our thoughts are why couldn't part of that money go to pay for some of what Senate Document 80 was set forth by Congress to protect, which is the greening of Grand Lake. Because you can very well see the impacts of when they start pumping and the water goes from Shadow Mountain over into there. So with this is all electricity. And, like I say, when $14,000,000 is being made off of this, and the impacts are what they are, and the Senate Document 80 when this all went in said that it wouldn't cause any of impacts like the water quality and the quantity of fishery and the aesthetics and everything else that went along with it. It's a 400-page document, and now all of a sudden that's what we're finding is that these impacts are very real, and they are very much there. So it's a lot of our very much concerns in Grand County and the Grand County government. Do you have anything else to add? Ms. Manguso: I think that's going to be it, you know. Ms. Stuart: I'm sort of reiterating it over and over, but, like I say, there is-- we have been impacted to death, and we were promised in a Senate document that was created when the Bureau of Rec project went in that this wouldn't happen. And, you know, come visit us, come look at some pictures we got, and we can sure it tell you that there has been impacts, so we don't want any more.	The power features of the Colorado-Big Thompson Project (CBT) were integrated with the Pick-Sloan Missouri Basin Program (P-SMBP) in 1954 for power marketing, operations, and repayment purposes. Power revenues from the sale of CBT generation in excess of those needed to recover CBT construction costs allocated to power users, ongoing operation and maintenance expenses, as well as major equipment replacement are applied to the power repayment obligations of other P-SMBP projects. Reclamation Law mandates that the Western Area Power Administration sell P-SMBP generation at the lowest cost to consumers consistent with sound business principles. See Attachment 1 for an explanation of CBT repayment. The issue of Grand Lake water clarity is beyond the scope of this Environmental Impact Statement as the transmission project will not increase the existing capability to pump water from Granby Reservoir to Shadow Mountain Reservoir for delivery through the Adams Tunnel via Grand Lake.
Steve Miller	T-2-5	Mr. Miller: My name is Steve Miller. We were just advised of where the preferred line will be placed in Scanlock, and we just want to voice our support for that option. Well, here it says "preferred alternative." so it was just blue line, right? So yeah this blue line, and we're at the point of interchange of County Road 4051 in the Scanlock subdivision. And so the preferred alternative would be moved up the hill from there. And we view that as the most positive step. Ms. Miller: And our second one would be, second option-- (Reporter interruption) Mr. Miller: So our second preferred option would be to move it completely to the other side of Table Mountain.	Thank you for your comment.

Commentor Name	Comment Number	Comment	Response
Sandra Schoenbeck	T-2-6	Ms. Schoenbeck: Sandra, the last name is Schoenbeck. And I just wanted to add the comment to my comment previous one of saying that they should just condemn all the property along that if they can't move it, because of the emissions of those lines they are not health for the people that have to live under it. Ok, that ought to do it. I'm trying to think of a nice way of saying it. But they ought to just condemn all of that property.	See response to comment GCR-2.
Pat Verlo	T-2-7	Ms. Verlo: Pat Verlo. I am a resident with property value on County Road 64. And the line will go directly across my property which looks ugly, which brings down the value of my property. And even though they say the magnetic field is not detrimental to your health, I still question that. It will reduce any buyers I would ever want for that place.	See response to comment GCR-2.
Pat Verlo	T-2-8	And my other thing the Forestry Department -- we have huge empty campground right across the street, but the Forestry Service doesn't want it on that because it doesn't look good, but it should be on our personal property. So there is, like, three-quarters to a mile along 64 that has numerous homes that would just destroy our property value, make it look like crap, and it's right next to the lake, so it ruins our scenery. And so we are requesting that we have under-line, for just that mile anyway, on the way to the pump house, that we that put underground for aesthetic reasons. That's my point.	See responses to comments GCR-1 and GCR-2.
Pat Potts	T-2-9	And we were hoping against hope that you would go underground up here. This is a resort area. It's absolutely gorgeous, and then we have power lines. So that's all. We just would like to keep the beauty.	See response to comment GCR-1
Nancy Stuart, Grand County	T-2-10	I just overheard, and I don't know the lady's name, but she works for WAPA, I do believe, over there in the black suit. And she was saying that the $14,000,000 that has been generated I actually goes back into the lines and keeping the electricity going on this project. So I would like to know how much of that $14,000,000 has stayed on the Eastern Slope and how much of the $14,000,000 comes back to Grand County?	The power features of the CBT were integrated with the Pick-Sloan Missouri Basin Program (P-SMBP) in 1954 for power marketing, operations, and repayment purposes. Power revenues from the sale of CBT generation in excess of those needed to recover CBT construction costs allocated to power users, ongoing operation and maintenance expenses, as well as major equipment replacement are applied to the power repayment obligations of other P-SMBP projects. Reclamation Law mandates that the Western Area Power Administration sell P-SMBP generation at the lowest cost to consumers consistent with sound business principles. See Attachment 1 for an explanation of CBT repayment.

Attachment 1
Colorado-Big Thompson Project Power Repayment

The Colorado-Big Thompson Project (CBT) is a Federal trans-mountain diversion project designed and constructed by the Bureau of Reclamation (Reclamation) to divert up to 310,000 acre-feet annually from the Colorado River Basin. Water is diverted to the South Platte River Basin to supplement existing water rights within the State of Colorado via the 13.1 mile 9.75 foot diameter Alva B. Adams Tunnel under the Continental Divide and Rocky Mountain National Park. The CBT was approved for construction when President Roosevelt concurred with the Secretary of Interior's finding of feasibility on December 21, 1937. The President had previously signed the Interior Department Appropriation Act for Fiscal Year 1938 on August 9, 1937. The Appropriation Act, among other things, appropriated funds for the construction of the CBT in accordance with the plan described in Senate Document 80. The CBT development plan and cost estimate was prepared by Reclamation, presented to Congress by Senator Alva B. Adams, and printed as Senate Document No. 80 at the request of Congress. Senate Document 80 was incorporated as part of the legislative language of the Appropriation Act. Senate Document 80 required that the water users repay the portion of CBT construction costs chargeable to irrigation features, and revenues from power sales repay the portion chargeable to power features. The Appropriation Act also required that contracts be in place with water users to repay the construction costs of irrigation features before construction could begin. The Northern Colorado Water Conservancy District (District) was chartered under the State of Colorado's Water Conservancy Act of 1937 to repay the U.S. Treasury the construction costs chargeable to CBT irrigation features. The District signed a repayment contract with Reclamation on July 5, 1938. The District funds the repayment with a combination of water sales revenues and a one-mill ad valorem property tax levied within the District's boundaries.

The power features of the CBT were integrated with the Pick-Sloan Missouri Basin Program (P-SMBP) in 1954 for power marketing, operations, and repayment purposes. This happened before CBT construction was completed in 1956. The P-SMBP, originally called the Missouri River Basin Project, was authorized by the Flood Control Act of December 22, 1944. The P-SMBP is a multi-purpose program providing flood control, irrigation water, municipal and industrial water, navigation, recreation, preservation of fish and wildlife, and power generation on the Missouri River and its tributaries. There are P-SMBP power generation features operated by Reclamation and the U.S. Army Corps of Engineers (Corps) in Colorado, Montana, North Dakota, South Dakota, and Wyoming. Congress recognized that many P-SMBP beneficiaries would be unable to repay the total Federal investment in irrigation facilities so power revenues also repay that portion of the authorized irrigation investment that Reclamation deems is beyond the ability of irrigators to repay. This shifting of repayment responsibility from water users to power revenues is called "Aid to Irrigation." The Kendrick and Shoshone projects were also integrated with P-SMBP in 1954 along with the CBT. The North Platte Project was later combined in 1959. These projects that were authorized separately from the P-SMBP, but later financially integrated with the P-SMBP, are referred to as the "Integrated Projects." Reclamation's P-SMBP general description states that "In return for all the power generated surplus to project needs of the Integrated Projects, the program returns, to each project, revenues sufficient to cover the annual production

operating expenses and a reserve for replacement of facilities and to allow net operating revenue great enough to repay the power and irrigation construction costs obligated for repayment from power revenues."

While the P-SMBP includes both Corps and Reclamation powerplants, the Flood Control Act of 1944 assigned to Reclamation the responsibility to market all the P-SMBP electric power and energy not required for the operation of P-SMBP projects to preference power customers "in such manner as to encourage the most widespread use thereof at the lowest possible rates to consumers consistent with sound business principles." The Reclamation Project Act of August 4, 1939, defined preference customers as municipalities, other public corporations or agencies, and co-operatives and other non-profit organizations financed in whole or in part by loans made pursuant to the Rural Electrification Act of 1936. The DOE Organization Act of August 4, 1977, created the Western Area Power Administration (Western) and transferred the transmission and power marketing functions of Reclamation to Western along with the associated transmission lines, substations, and ancillary equipment in Colorado, Montana, North and South Dakota, Wyoming, Nebraska, Kansas, Iowa and Minnesota. Reclamation and the Corps retained ownership and operation and maintenance responsibilities for all P-SMBP powerplants.

The P-SMBP power features are divided into two divisions for administrative, transmission maintenance, and power marketing purposes. The P-SMBP Eastern Division includes six Corps powerplants and one Reclamation plant on the Main Stem of the Missouri River, in addition to two of the four generating units of the Yellowtail Powerplant on the Bighorn River. The Eastern Division is administered from Western's Upper Great Plains Region (UGP) office in Billings, Montana, and is operated out of the Watertown Control Center in Watertown, South Dakota. The P-SMBP Western Division includes two of the four Yellowtail units, the eight other Reclamation powerplants on Missouri River tributaries originally authorized as P-SMBP projects, and the nine plants of the Integrated Projects also on tributaries of the Missouri River. The Green Mountain plant is located on a tributary of the Colorado River, but it is included in the Western Division because it is a feature of the CBT which is one of the Integrated Projects. The Western Division is administered and operated from Western's Rocky Mountain Region (RMR) office in Loveland, Colorado, along with the Mt. Elbert pumped-storage powerplant on the Arkansas River that was authorized by the Fryingpan-Arkansas Project Acts of August 16, 1962, and October 27, 1974. Western integrated the Mt. Elbert plant with the Western Division plants in 1984 for rate-setting and operating purposes, but not for repayment. The integration of the Fry-Ark and P-SMBP Western Division is called the Loveland Area Projects (LAP).

The P-SMBP power rate-setting procedure is as complicated as the program's history. Under DOE Order RA 6120.2, Western performs a Pick-Sloan Power Repayment Study (PRS) every year using sound and consistent financial forecasting techniques. The total power revenue of the program must be sufficient to recover the original construction costs, aid to irrigation, ongoing operation and maintenance expenses, and replacements and additions. That power revenue requirement is then allocated to the two P-SMBP divisions in proportion to the firm energy sales of each division. The Eastern Division firm power rate is based on its portion of the updated P-SMBP power revenue requirement. Western's RMR office performs the Fry-Ark PRS in order to determine the Fry-Ark power revenue requirement and then

combines it with the Western Division power revenue requirement to determine the LAP firm power rate. This annual PRS process does not necessarily trigger annual Eastern Division and/or LAP firm power rate adjustments. The filed rates are typically approved for a 5-year period. If the revenues are insufficient to cover costs, Western may initiate a formal rate adjustment process.

The P-SMBP was authorized so that power revenues from all P-SMBP power features, including the CBT and other Integrated Projects, are applied to repayment of the program as a whole. The power repayment obligation includes all P-SMBP construction costs allocated to power repayment in addition to ongoing power operation and maintenance expenses and required replacements.

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DEPARTMENT OF PLANNING AND ZONING

308 Byers Ave • P.O. Box 239 • Hot Sulphur Springs • Colorado • 80451
970-725-3347 Ext 140 or Fax 970-725-3303

May 29, 2012

VIA EMAIL: gppwgp@wapa.gov
Mr. Jim Hartman, A7400
Natural Resources Office
Western Area Power Administration
PO Box 281213
Lakewood, CO 80228-8213

Re: Draft Environmental Impact Statement (DEIS) Western Area Power Administration (WAPA), Granby Pumping Plant - Windy Gap Substation Transmission Line Rebuild

Dear Mr. Hartman,

Grand County appreciates the opportunity to again provide comments on the above referenced DEIS. Comment letters have previously been provided, dated August 15, 2005, January 24, 2006, October 24, 2006, April 21, 2010 and December 6, 2010. All comment letters have expressed the same concerns related to the overall impacts and impairments to visual resources within and adjacent to the Arapaho National Recreation Area and Three Lakes Design Review Area, including Rocky Mountain National Park and the Indian Peaks Wilderness.

As stated in previous correspondence, the Colorado Big Thompson Project (CB-T) was approved in 1937, with a guarantee that certain things would be protected. One of the issues of grave concern to Grand County at the time was the scenic and recreational value of the area. In support of this legislation, Grand County adopted the Three Lakes Design Regulations on February 2, 1981 for "the protection and perpetuation of a certain panoramic mountain and scenic views from parks and public spaces within the Design Review Area is required in the interests of pride, enjoyment, environmental enrichment and maintenance of a major economic assets for residents and visitors alike".

A-1-1 It is understood that the main objective of the project is to enhance system reliability by providing a second source of power. There are only two alternatives within the DEIS that comply with the intent of the Three Lakes Design regulations, protecting Grand County's critical and unique view corridors in this area. They are either burying the power lines or rebuilding the Adams Tunnel Cable. It seems the main reason for eliminating both of these alternatives is cost. Grand County believes it is impossible to place a monetary figure on the loss of these critical viewsheds, and strongly recommends the DEIS re-evaluate these two options.

The installation of large overhead power transmission lines are creating concerns throughout the country, and WAPA should realize that the days of simply installing huge power poles in visually sensitive areas, and residential neighborhoods are gone. Clearly, instead of installing a new looped

system to prepare for the failure of an existing cable, reconstruction within the Adams Tunnel should be the preferred alternative. The cable has been reliable for over five decades, does not provide any visual impact, and can be accessed through the tunnel. Grand County believes that replacement of this green power conduit should be the preferred alternative.

In support of this idea, the following quote shows this to be a controversial topic throughout the United States at this time:

> "PSNH, Northeast Utilities' subsidiary in the Northern Pass project, has summarily dismissed suggestions to bury the planned 140 miles of lines. But Hydro Quebec, a partner in the project and the financier, recommends the burying of lines. That is because Hydro Quebec knows this it is the latest technology and that the initial costs for burying lines are eventually outweighed by lower maintenance costs and less likelihood of damage. Hydro Quebec's own literature states that the primary benefits of "undergrounding" transmission lines are aesthetics, or the lack of "visual impact;" and reduced impacts from the "electric field"(which some authorities claim is a link to childhood leukemia), both of which are major concerns of those of us who oppose the Northern Pass project." *Drinon, Joe, "Burying power lines is win-win for taxpayers", Concord Monitor, 26 Nov. 2011. Internet.*

A-1-2 The height and location of the proposed monopoles would dominate the landscape in this visually sensitive area. As proposed, they are intrusive to the overall panoramic mountain and scenic view shed and don't easily blend into the natural, surrounding landscape. The DEIS states that alternatives were located to avoid, where possible, sensitive receptors such as existing homes and the Scenic Byway. Where possible, alternatives follow the path of existing transmission line or pipeline right-of-way. This is clearly not a line re-build, but a new line in many areas, that will affect not only existing residents but future residential developments.

Further, the proposed power line is located in areas where extensive mountain pine beetle infestations have affected large portions of lodgepole tree stands. As mitigation removes many of the infested trees, the DEIS accepts that the existing landscape character "would likely transition from a densely forested, evergreen condition to a mosaic of open patches of grasses, shrubs, deciduous trees, and evergreen forests of varying age classes. Openings within forested areas from large-scale die-off, forest succession, planned treatments, and residential and commercial uses may also potentially increase visibility of the project." The DEIS acknowledges that this would create 'minor' adverse visual impact to this area. This is not an acceptable impact to Grand County.

A-1-3 An additional idea that Grand County requested WAPA consider was an option for use of the existing pipeline between Windy Gap and Lake Granby for the installation of a cable system to carry the proposed electrical transmission lines. Joint use of the pipeline for both conveyance of water and installation of the electrical lines would be a sustainable alternative. Use of this pipeline as a 'chase' would be more aesthetically compatible and eliminate monopole ridge lining impacts. It would also allow easy access for maintenance since the pipeline is not in continuous use for the conveyance of water. This is a practical alternative that is being used throughout the country, and should be explored as an alternative for this transmission line.

A-1-4 In conclusion, the DEIS does not sufficiently address the concerns raised by Grand County, or adequately explore the available options. Although we support providing reliable, cost-effective electrical services for the citizens of Grand County and its visitors, we cannot agree the preferred alternative is the best option for Grand County, nor does it comply with the Three Lakes Design Review

A-1-4 Area regulations. WAPA should re-evaluate the above options, and the preferred alternative needs to protect the unique scenic beauty of Grand County, while maintaining the historical green power that exists today. The DEIS should be required to provide adequate reasons not to utilize the existing Adams Tunnel, bury the power lines, or use the existing pipeline between Windy Gap and Lake Granby that are not cost related. Again, the "cost" of installing large monopole towers in this critically sensitive view area is more than just financial, and should not be dismissed.

If you have further questions on these issues, please contact me at (970)725-3347.

Sincerely,

Kristen Manguso

Kristen Manguso
Planning Director

Cc: Grand County Board of County Commissioners
Lurline Underbrink Curran, County Manager

BOARD OF COMMISSIONERS

JAMES L. NEWBERRY
District I, Winter Park 80482
L. NANCY STUART
District II, Granby 80446
DUANE E. DAILEY
District III, Hot Sulphur Springs 80451

PHONE: 970/725-3347
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LURLINE UNDERBRINK CURRAN
County Manager
ANTHONY J. DICOLA
County Attorney

May 22, 2012

Mr. Jim Hartman, A7400
Natural Resource Office
Western Area Power Administration
P.O. Box 281213
Lakewood, CO. 80228-8213

Re: Granby Pumping Plant Station Switch Yard/Windy Gap Substation Rebuild

To Whom It May Concern:

I am writing in my capacity as Grand County's representative under Senate Document 80, the authorizing legislation that created the Colorado Big Thompson Project (C-BT) and its related power production facilities. In creating the C-BT and the power generation facilities which paid for the project, Senate Document 80 also guaranteed the project beneficiaries, Northern Water Conservancy District, the west slope of Colorado, and specifically Grand County certain benefits. Of particular importance to Grand County was the aesthetic protection of Grand Lake and Rocky Mountain National Park.

While Grand Lake is Colorado's largest natural lake, Granby and Shadow Mountain Reservoirs were constructed features. Together these three water bodies are known as the Three Lakes and have become a magnet for tourism as their water features are destinations for countless residents and visitors alike. The location of these water bodies are adjacent to the Arapaho National Recreation Area, which adds to the aesthetic virtues as well as concerns. The Arapaho National Recreation Area was also created by an act of Congress.

P.O. BOX 264 HOT SULPHUR SPRINGS CO 80451-0264

Grand County had requested aesthetic protection when the C-BT project was negotiated, and had further supported the creation of the Arapaho National Recreation Area. In recognition of the beauty of this area and the economic value that beauty provided to the local economy, Grand County adopted design guidelines along the entire Three Lakes corridor in the 1970's. These guidelines are more stringent than in any other part of the county and were the product of a large study which helped to direct the proper regulations to assure the aesthetic protection of the area. Protections include height, color, use of natural materials, setbacks from waterways, sign limitations, length of boat docks, and restriction of living areas in boat houses. The Town of Grand Lake adopted similar regulations.

The sections of the proposed project that run parallel with State Highway #34 are of particular concern. Exchanging 40 to 50' poles for those of 110' to 120' is a substantial change, especially given the devastation the county has suffered with the Pine Beetle infestation. Grand County is the most impacted county in the State of Colorado for this infestation, which has caused deforestation in widespread areas as property owners and Federal land managers clear dead and

A-2-1 dying timber in order to prevent or control wildfire. Removal of these infected and dead trees has made the visual impact of this proposed project more troublesome. 110' to 120' towers on this denuded landscape will look like the skyscrapers on the surface of the moon. This visual landscape will not inviting to citizens and visitors. It is very likely that these towers will be visible from portions of Shadow Mountain Reservoir and possibly portions of Grand Lake. The information you have provided makes the full extent of the visual impact impossible to determine.

A-2-2 Grand County has suggested replacement of the line through the Adams Tunnel as an answer to the countries "green energy" mandate by the President. With that statement, water delivery has been given more importance than the guarantees given to the west slope and particularly Grand County. This is not the intent of Senate Document 80. The guarantees to the beneficiaries of the C-BT project were to be balanced and that balance is obtained through an unaffected third party, which in this instance is the Bureau of Reclamation.

The transmission line in the tunnel has functioned for over 40 years, and while there is great concern about it continued reliability, replacing it with more modern technology would not only be a wise and green solution, it would address the visual concerns of the county as well as provide a more secure connection, free from wildfire and other natural disasters that face above ground facilities. The County also suggested undergrounding along the visual portion of Highway 34 but was again met with the statement "too expensive".

Grand County is a cooperating agency for the above referenced project, and has made these suggestions and comments a number of times since 2006. To date those comments and concerns

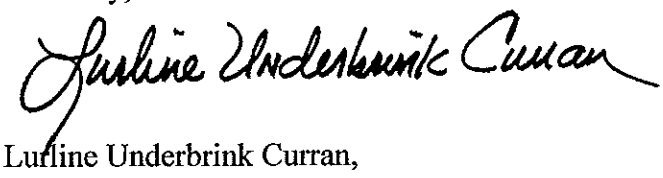
A-2-2 have been given little, if any, consideration and have been answered with the "too expensive" statement.

The power that is currently being generated by the C-BT project is the very power that WAPA can offer on the futures market and provide revenue not only for the operation and maintenance of the C-BT facilities, but also additional revenue to the Federal coffers to pay for these "too expensive" alternatives suggested. In addition, if the Windy Gap Firming Project is approved with prepositioning, there will be additional power generated with additional revenue.

Grand County recognizes the need for enhanced reliability and its benefits not only to the county residents but to others in the service area. However, the sacrifice of the economic viability of the Three Lakes area should be of equal importance with reliability. The Three Lakes area, which is the western gateway to Rocky Mountain National Park will be devastated all because the cost of alternatives that would both protect the County and meet the purpose and need of the project has been deemed "too expensive" and given no further consideration. In addition, the administration's "green energy" policies have been totally disregarded.

As Grand County's Senate Document 80 representative, I request a more in-depth consideration of replacement of the line through the Adams Tunnel. This alternative, regardless of cost, would overcome political and public opposition while meeting the purpose and need of the proposed project.

Sincerely,



Lurline Underbrink Curran,
Grand County Senate Document 80 Representative

Cc: Board of County Commissioners, Grand County
Mr. Mike Collins, Bureau of Reclamation
Mr. Joe Pandy, Mountain Parks Electric
Senator Mark Udall
Senator Michael Bennet
Colorado River Water Conservation District
Northern Colorado Water Conservation District
Town of Grand Lake
Kris Manguso
Suzanne Gerhart
Barbara Green

RECEIVED
11 · MAY · 2012

MOUNTAIN PARKS ELECTRIC, INC.

321 West Agate Ave. • P.O. Box 170 • Granby, CO 80446-0170

(970) 887-3378 • toll free (877) 887-3378 • fax (970) 887-3996 • mpei@mpei.com

4/23/12

Jim Hartman, A 7400
Natural Resources Office
Western Area Power Administration
P.O. Box 281213
Lakewood, Colorado 80228-8213

Re: DOE/EIS-0400
(MPEI Comments)

Mr. Hartman:

Mountain Parks Electric, Inc. (MPEI) hereby submits its comments on the draft Environmental Impact Statement, DOE/EIS-0400.

A-3-1 MPE has, since 1993, expressed its concerns relative to the reliability of electric supply via the Adams Tunnel 69 kV transmission line (which was energized in 1947), as well as the Bureau of Reclamation's 13.6 mile, 69kV single circuit wood pole line (which was constructed in 1939). Loss of either of these facilities results in MPEI's service area being left with a one-way, or radial transmission supply; approximately 7,000 customers would be affected, from the west side of Rocky Mountain National Park on the north, to YMCA Snow Mountain Ranch on the south, from Byers Canyon on the west, to the Continental Divide on the east, including the towns of Granby, Grand Lake, and Hot Sulphur Springs.

Without a rebuilt and upgrade of these existing transmission facilities, which range in age from 65 to 73 years, MPEI customers are at risk for extended power outages.

Sixteen alternatives were considered which address public, environmental, and social concerns, and meet the project purpose and reliability need, as well as engineering criteria for reconstruction of transmission facilities. Five alternatives were carried forward for analysis in the EIS, while eleven alternatives were considered but ultimately eliminated.

A-3-1 MPEI expresses no preference among all of the alternatives. MPEI strongly urges that the Granby Pumping Plant Switchyard – Windy Gap Substation Transmission Line Rebuild, Grand County Colorado project be engineered and constructed at the earliest possible time in order to provide a more reliable source of electric transmission supply to the members of MPEI.

Sincerely,

Joe Pandy

Joe Pandy

General Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

MAY 23 2012

Ref: 8EPR-N

Mr. Jim Hartman, A7400
Natural Resources Office
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

Re: Granby Pumping Plant Switchyard-Windy Gap Substation Transmission Line Rebuild, Grand County, Colorado
Draft Environmental Impact Statement
(CEQ#20120086)

Dear Mr. Hartman:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et. Seq., and Section 309 of the Clean Air Act, the Region 8 Office of the Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (DEIS) for the Granby Pumping Plant Switchyard-Windy Gap Substation Transmission Line Rebuild. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. The EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document.

The Western Area Power Administration (Western) is proposing to rebuild and upgrade an existing 13.6 mile, 69-kV electric transmission line originating from the Windy Gap Substation and ending at the Granby Pumping Plant Switchyard in Grand County, Colorado. The proposed project involves rebuilding and upgrading the existing single-circuit line, currently on a 30-foot right-of-way (ROW), as a double-circuit transmission line, and adding a second power transformer.

The original transmission line was built in 1935 on an H-frame wood pole line. The proposed new transmission line will incorporate a new 69-kV line as well as a new 138-kV double-circuit on a single-pole steel pole structure with concrete bases and a 100 foot ROW.

The purpose of the proposed project is to provide a reliable, second source of power to improve electrical reliability in the region, improve operating efficiency, and improve quality of service. The only secondary source of electrical power to the Grand Lake-Granby area is a cable that runs through a water diversion tunnel named the Adams Tunnel. The Adams Tunnel cable has exceeded its predicted useful life (40 years) and, upon failure, it would not be replaced.

Western's preferred alternative is to rebuild a new transmission line along the same route as the existing line (with options to use new ROWs for 1.8 miles); expand the existing ROW from 30 ft to 100 ft; install 90 foot tall steel poles in place of the 65 ft H-frame wooden poles, and remove and replace the existing 69-kV line with a new 69-kV line and an additional 138-kV line power line.

The DEIS considers four alternatives to accomplish the purpose and need for the project:

- Alternative A – This alternative would keep the existing transmission line, and therefore, serve as the no action alternative. Under this alternative, repairs and maintenance activities would still be performed; however, when the Adams Tunnel cable fails, the existing transmission line would be the only source of power for the Grand Lake-Granby area. For reliability, Western along with other electric providers would like to have a secondary power source if the first one (Adams Tunnel cable) fails.

- Alternative B1 – This alternative would rebuild and upgrade (install a new 69-kV line and a new 138-kV line) the transmission line on existing ROW with a small diversion around an existing residential area. The 1.3 mile diversion would create a new ROW just inside the Arapaho National Recreational Area. The existing ROW would be expanded from a width of 30 ft to 100 ft to accommodate requirements for construction, operation, and maintenance.

- Alternative C1 & C2 - This alternative would rebuild and upgrade the transmission line with a detour from the original ROW. The diversion would basically move the new transmission line north and west of the original ROW in order to improve scenic views and avoid residential developments. The western part of this alternative would parallel an existing ROW for the Windy Gap Water Pipeline.

- Alternative D (Options 1 and 2) – Option 1 of this alternative is the preferred alternative for the proposed project. Option 1 would share the Windy Gap Water Pipeline ROW for the western part of the transmission line rebuild and upgrade and then follow the currently existing transmission line ROW for the eastern portion of the proposed project. Option 2 would stay on the existing ROW for the first third of the improved line, and then share the Windy Gap Water Pipeline ROW to the Granby Substation location. The last part of the line would follow the currently existing line ROW. Alternative D would require a new ROW for a 1.8-mile reroute on Forest Service managed lands on the east side of Table Mountain.

General Comment:

A-4-1 The EPA is impressed with the thoroughness with which the DEIS document is written. The environmental impacts for each natural resource were clearly explained along with criteria to evaluate significant impacts including proposed mitigation measures for each natural/cultural resource.

Western's Standard Construction and Mitigation Practices presented in Table 2-5 as well as the project-specific environmental protection measures that are presented in Table 2-6 provide a clear picture of how environmental impacts will be avoided or mitigated. These two tables clearly state what actions will be followed to protect vegetation, wildlife, wetlands, soil resources, cultural and historic resources, paleontological resources, and visual resources.

Specific Comments:

A-4-2

1. Page ES-3. Section 1.4.4 lists two hydroelectric generation sources; however, the DEIS is silent on the energy source for the proposed 138-kV double-circuit line. We recommend that the DEIS identify the source of electrical power that will replace the power currently provided through the Adams Tunnel power cable.

A-4-3

2. As discussed in Chapter 1, Grand County is one of the fastest growing counties in Colorado, and yet the purpose and need for the project is focused primarily on the reliability of the power supply. Please address whether it is likely that a reasonable foreseeable future action will be the additional upgrading of the single-pole structures with additional transmission lines to accommodate population growth?

A-4-4

3. The Norton Marina is discussed in the alignment of the transmission line for the preferred alternative. Please label where the Norton Marina is located on Map 2-8.

A-4-5

4. Under the preferred alternative, the existing ROW north of the Granby Substation will be moved approximately 0.25 mile to the west just inside the Arapaho National Recreation Area. This new transmission line route will be within 0.25 mile of two golden eagle nests located on Table Mountain inside the Arapaho National Recreation Area. EPA recommends that Section 2.2.5 explain why the preferred transmission line route is moved approximately 0.25 mile west of the existing ROW north of the Granby Substation which brings it closer to the nesting sites on Table Mountain located in the Arapaho National Recreation Area.

Thank you for the opportunity to provide comments on the Granby Pumping Plant Switchyard-Windy Gap Substation Transmission Line Rebuild. The EPA rates this DEIS as an LO (Lack of Objections). The LO rating states that the EPA review has not identified any potential impacts requiring substantive changes to the proposal. If you have any questions or could like to discuss our comments, please contact Robert Edgar at 303-312-6669.

Sincerely,

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 67, Room 118
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007

May 22, 2012

9043.1
ER 12/202

Mr. Jim Hartman
Natural Resources Office
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

Dear Mr. Hartman:

The U.S. Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) for the Western Area Power Administration's (WAPA) Granby Pumping Plant-Windy Gap Transmission Line Rebuild Project dated March 20, 2012, and provides the following comments for your consideration.

These comments are provided pursuant to our authorities under the National Environmental Policy Act (NEPA); Migratory Bird Treaty Act (MBTA); Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds;" the Endangered Species Act (ESA) of 1973, as amended (16 USC 1531 et seq.); and the Fish and Wildlife Act of 1956.

COMMENTS

Wetlands

A-5-1 After reviewing all of the action alternatives, it appears that most, if not all, wetland impacts can be avoided. Although the DEIS anticipates up to 0.1 acre wetland impact under each action alternative, we urge WAPA to use all practicable means to avoid impacts to wetland resources during project implementation.

Recommendations

A-5-2 We recommend that the Alternative B1 be selected as the preferred alternative. Alternative B1 uses the existing right-of-way for most of its length, and the realigned section(s) does not appear to result in additional effects to wetlands or federally listed threatened or endangered species. Design criteria number nine (DC 9) appears to adequately addresses concerns of the U.S. Fish

A-5-2 and Wildlife Service regarding take of migratory birds. In addition, this alternative avoids potential impacts to sage grouse leks.

Thank you for the opportunity to review and comment on the DEIS. If you have questions regarding these comments, or for further assistance in project planning, please contact Kurt Broderdorp at the USFWS' Western Colorado Ecological Services office in Grand Junction at phone number (970) 243-2778, extension 24.

Sincerely,

Robert F. Stewart
Regional Environmental Officer

COLORADO PARKS & WILDLIFE

Hot Sulphur Springs Service Center
346 Grand County Road 362 • Hot Sulphur Springs, Colorado 80451
Phone (970) 725-6200 • FAX (970) 725-6217
wildlife.state.co.us • parks.state.co.us

May 23, 2012

Jim Hartman
NEPA Document Manager
Western Area Power Admin.
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228

RE: DEIS WAPA Transmission Line Rebuild Project

Jim,

Thank you for the opportunity to comment on draft environmental impact statement (DEIS) for the Western Area Power Administration (WAPA) transmission line rebuild project from Windy Gap to the Granby pumping plant. I have had the opportunity to review the DEIS and attended the public meeting on April 24th, 2012. Colorado Parks and Wildlife (CPW) (formerly known as Colorado Division of Wildlife (CDOW)) has previously commented on this project in 2005 and 2007.

After reviewing the DEIS, CPW wants to thank WAPA for incorporating many of the comments CPW and the United States Forest Service (USFS) provided into the DEIS. There are numerous project-specific design criteria and environmental protection measures that are outlined in Chapter 2.4.2 (Table 2.6) of the DEIS. CPW expects that these measures be followed and will work with WAPA if there are questions or concerns.

CPW had had the opportunity to review the alternatives that have been evaluated in the DEIS. The WAPA preferred alternative is Alternative D. Alternative D has two route options, option 1 and option 2. CPW is supportive of Alternative B1 or Alternative D (Option 2). The other alternatives and Alternative D (Option 1) place the transmission line in a location that is closer in proximity to the last known greater sage -grouse lek east of highway 125. A-6-1

Greater sage-grouse in Eastern Grand County have been significantly compromised by development, habitat fragmentation, and human disturbance. Sage-grouse collision and increased potential for predation is likely to occur if the transmission line is built in closer proximity to the lek site. The existing route (Alternative B1) or alternative D (option 2) place the transmission line in a location that is further from the lek, keeping the habitat more intact, and reducing the potential for collision and raptor predation. A-6-2

Thank you again for the opportunity to comment on this draft environmental impact statement (DEIS) for the WAPA transmission line rebuild project. Please do not hesitate

STATE OF COLORADO
John W. Hickenlooper, Governor • Mike King, Executive Director, Department of Natural Resources
Rick D. Cables, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: David R. Brougham • Gary Butterworth, Vice-Chair • Chris Castilian
Dorothea Farris • Tim Glenn, Chair • Allan Jones • Bill Kane • Gaspar Perricone • Jim Pribyl • John Singletary

to contact us with any other questions you might have. I can be reached by phone at (970) 531-3708 or by e-mail at scott.murdoch@state.co.us.

Sincerely,

Scott Murdoch
District Wildlife Manager

Cc: Ron Velarde-Regional Manager (CPW)
Lyle Sidener-Area Wildlife Manager (CPW)

Draft EIS Comment Form

Granby Pumping Plant Switchyard – Windy Gap Substation Transmission Line Project

Western AREA POWER ADMINISTRATION

Western Area Power Administration (WAPA) invites your comments on the Draft EIS for the Granby Pumping Plant Switchyard - Windy Gap Substation Transmission Line Project. Written comments may be mailed to Jim Hartman at WAPA Corporate Services Office, 12155 W. Alameda Parkway, Lakewood, CO 80228, or emailed to gppwgp@wapa.gov.

Contact Information (optional)

Please Print

[redacted]

Completing this form will automatically add you to the mailing list. If you prefer not to be on the mailing list, please check the box to the right. ☐ I do not wish to be on the project mailing list

Please print your comments below:

Issue - The proposed line on CR64 should be located over the

I-1-1 Campground. This campground is used for day groups / weekend groups. Being a resident the proposed site is on the east side much closer to residential property; impacting the daily lives of the residents with accellerated noise levels etc whereby if it was in the campground it would not be as prevalent.

I-1-2 Why not put these lines at this CR64 site underground.

COMMENTS MUST BE RECEIVED OR POSTMARKED BY MAY 29, 2012

[redacted]

[redacted] [redacted]
Sent: Tuesday, May 29, 2012 2:33 PM
[redacted] [redacted]

>>> "Sarah Burgett" [redacted] 5/29/2012 1:55 PM >>>
Mr. Hartman,
My name is Rob Burgett and I own a home off of County Road 64 in Grand Lake Colorado. This email is being sent as I am a very concerned homeowner. The proposed power line work to be
I-2-1 done at my area is of great concern to us. We oppose to this being done as I have been informed that should this occur, we run the risk of our homeowners insurance being canceled and therefore we could potentially lose our home. This is not my only concern. This also
I-2-2 proposes a health risk to my family as well as others in the line of your project and would decrease the value of our homes and others around us. I ask that you consider another alternative to your current plan as this affects us in many ways.

Would you be willing to due this in the area where you live?

Regards,
Rob & Sarah Burgett
[redacted]

P.S. I would like to be informed regarding any issues related to the Windy Gap Transmission Line project.

[redacted]

[redacted] [redacted]
Sent: Thursday, May 17, 2012 6:32 AM
[redacted] [redacted]
Subject: Fwd: Grand County - tall towers

>>> Glenna Cook [redacted] 5/16/2012 8:51 PM >>>
Mr. Jim Hartman,

I-3-1 As a resident of Grand County I am very opposed for numerous reasons to the proposal for tall electrical towers between the Granby Pumping Plant and Windy Gap. The towers are costly, unsightly, and unnecessary. Please reconsider this proposal in light of the more recent occurrences since the economic boom in the early part of this century. It would be extremely foolish to invest so much money, destroy our resources, and create useless monstrosities without careful consideration.

I appreciate your time and interest,
Glenna Bliss Cook
[redacted]

Dorothy H. Dines
[redacted]

4/3/12

Jim Hartman
U.S. Department of Energy
Western Area Power Administration
12155 West Alameda Parkway
Lakewood, CO. 80228

Dear Jim:

Thanks for your courtesy in discussing my thoughts regarding the replacement of the Windy Gap transmission lines above my family's property. The comments contained in your memo of 3/27/12 were precise and accurate; and as construction of the project matures I'd very much like to have my children involved with me. In the event I am not available here are their names and phone numbers.

Bruce E. Dines Jr.
[redacted]

Katherine Dines
[redacted]

Hildreth Dines Wold
[redacted]

I'm passing your information around to them all so that they will be up to date on what's going on. Thanks again.

Sincerely,
Bruce E. Dines

Project: Granby Pumping Plant to Windy Gap Transmission Line, Grand County, CO

Comments Submitted by

Mr. Bruce Dines, [redacted]

Property Location: [redacted]

I-4-1 The main comment is on visual impacts to views from the property and properties surrounding the proposed project.

Support efforts to move the location of the present transmission line further to the north and east of its present location and to look for opportunities to screen the structures using terrain. Look for opportunities to minimize the number of structures by maximizing the distance between structures.

I-4-2 Support efforts to minimize the visual impact of roads and road construction. Suggestions include removing and reclaiming roads that are no longer needed if the existing line is moved to another ROW. Minimize the construction of new roads. Reclaim roads needed for construction that are not needed for ongoing maintenance. Reclaim and revegetate areas where the soil is exposed to reduce visible scars from construction and erosion. Whenever possible develop overland, vegetated routes for access for maintenance rather than constructing a road, which leaves a visible scar and invites unauthorized use and travel. Share roads that already exist instead of building additional roads. Use the ROW of the water pipeline to access the transmission line, if possible.

[redacted]

[redacted]

Sent: Wednesday, May 16, 2012 3:53 PM

[redacted]

Subject: Fwd: Proposal High Towers--GPP-WGP comment and question received this afternoon.

>>> "Ardyth Fournier" [redacted] 5/16/2012 3:49 PM >>>

I-5-1 My parents and now my daughter and I have owned the property at 307 County Road 64 and 307 Grand County Rd Apt East-64 for more than 50 years and we are absolutely opposed to placing the towers on our property or immediately adjacent to that property. It was our understanding that the towers would be on the side of the road of the the campground. Can you give us any idea what the placement of the Towers on our side of the road would do to our property values? I would very much appreciate an answer.

Thank you, Ardyth Fournier

[redacted]

[redacted]

From: Alicia Ford[redacted]
Sent: Tuesday, May 29, 2012 7:32 AM
To: [redacted]
Subject: Granby

Dear Jim,

I-6-1 As a visitor I do not find it attractive to see tall metal towers with transmission lines destroying the landscape in Grand County. The best solution is to replace the cable in the Adams Tunnel.

Alicia Gerhart

[redacted]

From: John Gerhart [redacted]
Sent: Tuesday, May 29, 2012 6:56 AM
[redacted]
Subject: Please choose better options than towers for transmission

Dear Jim,

1-7-1 Please realize that transmission towers will dramatically impact tourism and the local economy, and that towers therefore represent a short sighted solution. You might also consider newer, low loss transmission technology currently under development, which buries transmission lines, but yields long term savings through reduction of power loss and through super-conduction technology. Such a project would attract government grants and public accolades. As a visitor I do not find it attractive to see tall metal towers with transmission lines destroying the gorgeous landscape in Grand County. The best solution is to replace the cable in the Adams Tunnel.

Regards,

Jack Gerhart

[redacted]

From: Jim Hartman [redacted]
Sent: Tuesday, May 29, 2012 1:47 PM
To: Meighen, Bruce; Copeland, Tanya; Carey Ashton; Travis Anderson
Subject: Fwd: Granby Pumping Plant-Windy Gap Substation Transmission Line Rebuild Project

>>> Rod Kauber [redacted] 5/29/2012 12:55 PM >>>
Dear Mr Hartman,

1-8-1 I would like to let you know I *STRONGLY SUPPORT *Suzanne Gerhart's letter to you re. the above subject. Her research of the above situation clearly outlines my views also.

Please take note of my position.

Rod Kauber
[redacted]

[redacted]

From: Paul Klees [redacted]
Sent: Monday, May 21, 2012 5:24 PM
To: [redacted]
Subject: C LAZY U RANCH DRAFT EIS COMMENT--Granby Pumping Plan-to-Windy Gap Transmission Line Project

Importance: High

Jim,

C Lazy U Ranch is a significant landowner in the vicinity of Willow Creek Reservoir, and have for several years and currently have leased the private lands on the west side of Table Mountain to access for hiking, horseback riding, hunting. Among the alternatives presented in the draft EIS-0400: Granby Pumping Plant Switchyard-Windy Gap Substation Transmission Line Rebuild Project, Grand County, CO the **Preferred Alternative D is correct.**

The C Lazy U Ranch has been around since 1919 offering a vacation destination for guests from all over the world. We
1-9-1 offer many great activities and amenities to our guests revolved around the ranching and wildlife experience; some of these activities are conducted on lands to the west of Table Mountain and would be negatively impacted if routing Alternatives C1 or C2 were pursued. These impacts include:

- **Business/Financial Impact:** The C Lazy U Ranch attributes its success to careful use of our property as well as
1-9-2 the surrounding untouched lands and the wildlife it supports. Our guests travel from all over to enjoy a break from the modern hustle and bustle by riding horses, mountain biking, hiking, and hunting through country that has not been paved with today's growth. A transmission line through some of this property would be an immediate threat to the reason our guests travel to such a unique location.

1-9-3
- **Negative Species Impact:** As reflected in the EIS draft, alternative routes C1 & C2 negatively impact the big game, bird, and plant species on some parts of this land. We would emphasize some of these through our personal experience:
    1. **Big Game:** It is noted in the EIS, and we have seen it from our hunting operations onsite over the years, that the area is heavily concentrated with big game. Our business in the fall is revolved around hunting clientele and we need this land and the animals it supports to be able to continue a successful hunting operation.
    2. **Sage Grouse & Golden Eagles:** After reading through the potential impacts to these animals, I took the opportunity on April 25th to drive the proposed C1 & C2 route with Scott Murdock, Colorado Parks & Wildlife Hot Sulphur Springs District Wildlife Manager, to fully understand the threats proposed. We found the sage grouse leks mentioned in the draft, still very much in active use. We also observed two male sage grouse within 900 feet of the C1-C2 route. Murdock advised that the previous count last year had been five males as well as the fact that these grouse leks are rare in this area. He also talked about the two golden eagle nests located on Table Mountain and their closeness in proximity (less than 1500 feet) from alternative C1 and C2. Murdock reiterated the real potential for flight collision with power lines to be newly located here.

1-9-4 While any expansion of the power lines will cause damage and disruption, in our opinion a location roughly along the existing lines corridor will minimize these impacts versus a largely new routing across untouched land. If this project must go forward and lines would be located on power poles (instead of buried or submerged alternatives) <u>we are in favor of Alternative D as the appropriate route and strongly discourage your team to reconsider Alternatives C1 or C2.</u>

Sincerely,

Paul Klees
C Lazy U Ranch

Paul Klees
Project Manager /
Asst Operations Manager

C Lazy U Ranch

[redacted]

Jim Hartman
NEPA Document Manager
WAPA Corporate Services
12155 W. Alameda Pkwy
Lakewood CO 80228

1-10-1

Please add my voice to those in opposition to construction of tall towers in Grand County. Have you been there? It is an unique and beautiful area huse, unspoiled vistas of mountains and lakes. Please don't ruin this with your outdated technology!

Carla Lawn

[redacted]

From: [redacted]
Sent: Thursday, May 17, 2012 6:30 AM
To: [redacted]
Subject: Fwd: Granby Power Plant Towers

>>> "Lindgren, Renie" [redacted] 5/16/2012 4:23 PM >>>
To: Mr. Jim Hartman

1-11-1 I am a property owner in area where there is a proposal for towers to be built. My family has owned our property for greater than 50 years. There is no way I want those towers built on our easement. We use our property from April to October every year. It is sad enough to see the disappearance of our forest. The towers would be an insult and an assault to our senses. Thank you for considering my emphatic "NO".

Sincerely,

Irene Lindgren

[redacted]

[redacted]

From: Sally [redacted]
Sent: Sunday, April 22, 2012 11:46 AM
To: gppwgp@wapa.gov
Subject: Windy Gap Transmission Line Project

1-12-1

My husband and I live in the Scanloch area and we received an invitation to attend the public hearing for the transmission line on April 24. We will be out of town that week and will be sorry to miss the hearing. Due to the private property that the line currently runs along, we are in favor of moving the existing line to an alternative route. Upgrading the voltage and keeping it on existing location of line is of a great health concern to us and other neighbors. In addition to health issues, the line of sight impacts our property a great deal. We would prefer the other alternative routes that are proposed and at a minimum the preferred alternative is preferable to us.

Thank you for your consideration and the endless amount of work and study you have put forth n this project.

Sally and Robert Linton

Sent from my iPad

RESORT VENTURES WEST
STEAMBOAT SPRINGS, COLORADO

May 29, 2012

NEPA Document Manager, J0420
Western Area Power Administration
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228

Re: Granby Pumping Plant – Windy Gap Transmission Line Rebuild Project

To Whom It May Concern,

Please accept this letter on behalf of CLP Granby, LLC (CLP), the owner of approximately 1,553 acres shown in the enclosed map (Property), in response to the Draft Environmental Impact Statement (DEIS) issued by Western Area Power Administration (WAPA) regarding the aforementioned project (Project). The DEIS identifies Alternative D, Option 1 (D1) as WAPA's preferred re-alignment scenario. The DEIS also

1-13-1 identifies Alternative D, Option 2 (D2) as a viable re-alignment scenario. CLP has great concern with these alternatives and their negative impact to the residential development in this area of the Property and to the Property generally. Further, the uncertainty of the final outcome of the Project is presenting undue challenges for CLP regarding the marketing and potential sale of land within the D1 and D2 areas of the Property.

On March 27, 2012, the Town of Granby approved revised land use entitlements, including the zoning depicted in the enclosed map, for the Property. These revised entitlements are flexible in nature allowing for development densities to be shifted across the Property to meet market demand up to the approved zoning. The areas of the Property zoned Single Family Residential (R-1) shown in the enclosed map could be developed with up to 988 individual lots. It is anticipated that these lots will be some of the most valuable lots available on the Property.

1-13-2 D1 will require the acquisition of a new 100 foot wide easement through the Property. This new easement will directly impact approximately 16.5 acres of R-1 lands within the Property while also severely restricting the design layout of the R-1 lots and the necessary access roads, driveways and service utilities required to

1-13-3 serve the R-1 lots. Additionally, the D1 transmission line will create significant visual impacts to not only those lots within the D1 easement but also to the adjacent R-1 and Open Space lands within the Property.

1-13-4 D2 will require the acquisition of an additional 70 feet of easement to bring the existing 30 feet up to the required 100 feet. This additional easement will directly impact approximately 12 acres of R-1 land within the property. Similar to D1, this additional easement create significant visual impacts to the lots within D2 as well as surrounding lands within the Property. The cumulative effect of either the new D1 easement and transmission line or the expanded D2 easement will be the significantly diminished value of the Property.

1-13-5 It is also worth pointing out that the Town of Granby owns approximately 35 acres of land within the Property that intersect with D2. Easement acquisition negotiations, therefore, will need to include CLP and the Town of Granby for D2.

1-13-6 In addition to CLP's concerns of visual impact and diminished land values discussed above, CLP has great concern regarding potential damage to the extensive horizontal improvements already installed along the D1 and D2 lines. All of the roads depicted in the enclosed map are completed up to road base. Further, all major utilities are installed within the road rights of way along the D1 and D2 lines, including but not limited to, water and sewer mains and natural gas and electrical lines. The proposed alignments of D1 and D2 are adjacent to and/or intersect these improvements along their entire crossing of the Property resulting in substantial damage to these improvements.

It is for these reasons that CLP objects to WAPA's preferred alternatives, D1 or D2, for the Project. Instead,

1-13-7 CLP recommends that WAPA proceed with Alternative C1. It is in the best interest of WAPA and CLP to move the proposed line as far north as possible to avoid potential impacts to residential development and

RESORT VENTURES WEST
STEAMBOAT SPRINGS, COLORADO

1-13-7 existing infrastructure within the Property. The land north of the Property is not zoned for residential development and is free of existing infrastructure.

1-13-8 Should Alternative C1 (C1) not be selected as the final alignment, CLP requests that a modified version of C1, Alternative C1-CLP (C1-CLP), be considered instead. As depicted in the enclosed map, C1-CLP moves the new line and easement as far north on the Property as possible. This reduces the visual impact and diminished value concerns of the R-1 lots, decreases the planning restrictions associated with developing the R-1 lots, and increases the distance of the new line from any existing infrastructure on the Property.

We greatly appreciate your serious consideration of CLP's concerns regarding the current direction of the Project. Please do not hesitate to contact me directly for further discussion on any of these matters.

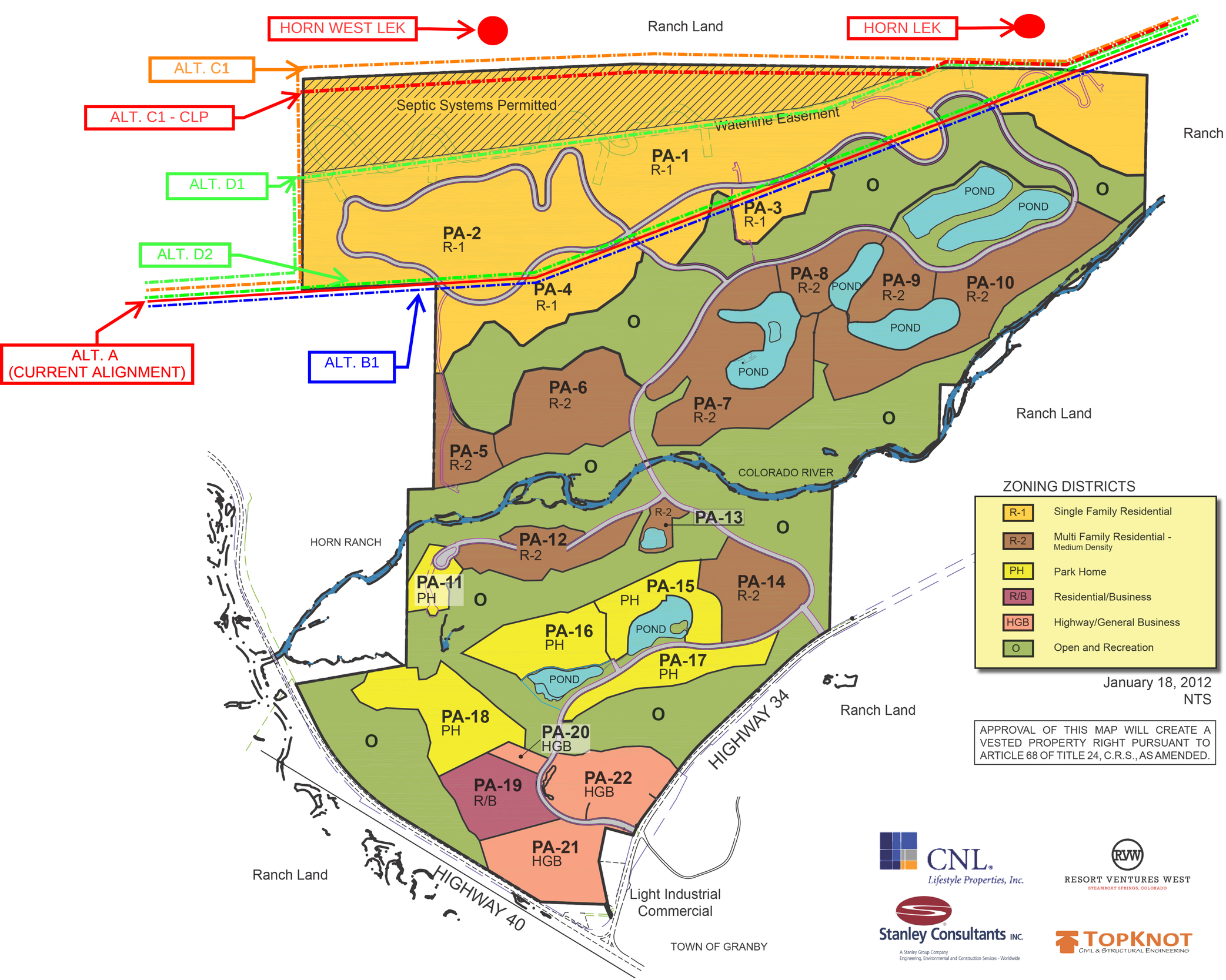
Respectfully,

Gavin Malia
Development Manager

Enclosure: Granby Development Land Zoning Map

Granby Development Land

Exhibit B Map of Revised Zoning



[redacted]

From: [redacted]
Sent: Wednesday, April 18, 2012 6:35 PM
To: gppwgp@wapa.gov
Subject: Granby Pumping Comment

Dear Mr. Jim Hartman,

This letter is about the Draft Environmental Impact Statement DOE/EIS-0400. There are some ideas regarding the switchyard and the the transmission line rebuild that I would like to express to you. Hopefully you are receptive to a voice that prefers to see very limited growth in this age.

As our population increases so does our demand for energy, and I understand that we should be well-prepared to meet those demands. We have, however, for many generations used more than we have put back. This usage style is known as drawdown that entails living off the principal rather than the interest. I know the Granby switchyard and Wind Gap line are not very large when compared to behemoth energy endeavors, but they are still part of the old school system that we must distance ourselves from.

In an effort to leave the old hydro, gas, nuclear, and coal power supply dogma behind we must integrate the means to convert the existing power lines into conduits for other energy sources such as solar, wind, geothermal. The grid is always a concern when discussions of how the energy infrastructure is going to make a transition to renewables, so it stands to reason that when any changes, whether they be maintenance or upgrade changes, should be made only when a solid plan for the future is incorporated. We must think about more than just answering the future call for power, but additionally ask ourselves how and with what we will do it.

Now that our technology has come such a long way we see many avenues of approach in delivering power, as you know by the alternatives offered in the draft EIS. My
I-14-1 recommendation is to abandon any that require more space for development processes such as Alternative B1, and rerouting such as Alternatives C1 and C2. Alternatives D1 and D2 in essence combine Alternatives B and C in their land use. When we must make changes to the land we always need to consider our ecological impacts. Alternatives C1, C2, D1, and D2 would create additional edge effects on top of the existing ones created by the existing line route and roads. If either of these alternatives were implemented they would further delineate natural ecological communities in the vicinity, which of course would have a negative impact.

I-14-2 As a solution to this dilemma I suggest that the new and improved power line be routed along the existing edge created by highways 34 and 40. The colocation of road and power increases efficient serviceability when needed, and decreases our environmental impact. The roads themselves are existing edges on natural communities that can be utilized for multiple purposes such as stacking power lines onto their footprints. In my mind there is no better solution.

When it is shown that the benefits of uniting human impact footprints (ecological improvement and money saved through better accessibility) outweigh the costs of dispersing our impacts for greater species to bear, an overhead power line adjacent to the roadways is relatively nothing. We save money and species doing it this way, and it is the right thing to do. If we want luxuries we should be willing to look at what it takes to have them.

Along major highways and in metropolitan areas we see advertisements aplenty. Without an image of something to consume the billboard is simply an undesirable purposeless

structure. As a culture we must witness our consumption. I firmly believe that power lines along the highways are the responsible solution. Furthermore I firmly suggest that before you move forward with your plan to improve the power supply and transport in Granby, you conduct an EA of routing the lines along highways 34 and 40. I-14-2

Respectfully,

Stanley Cordell Michael II

[redacted]

From: [redacted]
Sent: Wednesday, May 30, 2012 7:26 AM
To: [redacted]
Subject: Fwd: Granby Pumping plant - Windy Gap Substation Transmission Line Rebuild Project

>>> "John Nelson" [redacted] 5/29/2012 8:20 PM >>>
Jim Hartman

NEPA Document Manager

WAPA

Corporate Services Office

12155 W. Alameda Parkway

Lakewood, CO 80228

Subject: Granby Pumping plant - Windy Gap Substation Transmission Line Rebuild Project

Dear Mr. Hartman:

I-15-1 I am vehemently opposed to the proposed plan to place the transmission lines for the above referenced project above ground. It is clear that ALL of the important parameters have not been considered in the EIS.

I-15-2 First of all, the economy of Grand County relies very heavily on tourism, hunting and fishing. The "urbanization" of the area by placing the power lines above ground will destroy, never to come back, the pristine nature of our beautiful county. This will severely impact on the number of visitors to our county. Secondly, the EIS considered only the cost of construction in the cost - benefit analysis. However, the cost of lost economy must also be considered. Thirdly, what about just the consideration of the citizens of this fine county and their dislike of having to look at the cables and towers that will mar our fine landscape.

I think that it is unconscionable to even consider putting the lines above ground. The lines should be placed below ground and the cable in the Adams tunnel should be replaced.

Very truly yours,

John and Darlene Nelson

[redacted]

Email Note

May 17, 2012

Mr. Jim Hartman
Western Area Power Administration
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228

(Delivered via email: gppwgp@wapa.gov)

RE: EIS-0400: Granby Pumping Plant Switchyard-Windy Gap Substation Transmission Line Rebuild Project, Grand County, CO

Mr. Hartman:

I own, with partners, the 980 acre E Diamond H Ranch (in the EIS referred to as "C Lazy U Preserves") which is situated to the west of Table Mountain in Grand County, and is located in part (1/2 mile) within, and in its entirety directly adjacent or near to transmission line routing alternatives C1 and C2 described in EIS-0400.

I-16-1 **I agree with the EIS conclusion that Alternative D is the best routing of alternatives investigated.**

E Diamond H Ranch is unzoned agricultural land that has been in use primarily for hay production and cattle grazing for generations. Other than some old, small log homestead structures, the Ranch is undeveloped. The Ranch is surrounded to the east, south and west by public lands and/or private lands held for ranching or untouched entirely. Relocating the Windy Gap transmission lines according to the C1-C2 alignment, over and adjacent to or close to this land as a *de novo* project would in our opinion result in significant negative impact to the E Diamond H Ranch and thousands of acres of nearby private and public lands around it.

I-16-2

1. **The majority of E Diamond H Ranch acreage has been placed in a conservation easement with The Nature Conservancy (TNC), who has accepted this land only after determining that our land meets TNC's stringent tests for biodiversity. Moving ahead with Alternatives CI or C2 would adversely impact many of the scientific criteria evaluated and acknowledged by TNC as the motivation for establishing this conservation easement.**

I-16-3

2. **As the EIS concludes, the lands around the C1-C2 routes are home to a robust and diverse set of bird, big game, small animals and plant species. We are particularly concerned about the potential for significant adverse impacts to the Greater Sage Grouse and Golden Eagles —ranch owners and visitors have observed both of these species (and the specific grouse leks identified in the EIS) on or near the Ranch boundaries.**

I-16-4 **The E Diamond H Ranch and adjacent lands are for the most part untouched, and cutting a *de novo* 12-mile-long double circuit power transmission corridor to the west of Table Mountain will cause aesthetic and visual damage materially greater than following the Alternative D existing right-of-way corridor near existing power lines.**

Of the options not eliminated in the EIS-0400, Alternative D is the route that will cause the least environmental damage. Do not reconsider Alternatives C1 or C2.

Rick Pederson
E Diamond H Ranch

May 29, 2012

Jim Hartman
NEPA Document Manager
Western Area Power Administration
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228

RE: Granby Pumping Plant-to-Windy Gap Transmission Line Project
Draft Environmental Impact Statement

Dear Mr. Hartman:

I-17-1 Preferred Alternative D – Options 1 and 2 that Western Area Power Administration (WAPA), and Tri-State Generation and Transmission (Tri-State), are proposing has severe negative impacts to the residents of Grand County, the customers of Mountain Parks Electric, Inc. (MPEI), and millions of visitors to Grand County. Further it does not recognize or state the real purpose of the project.

Negative impacts to the residents of Grand County are the visual impacts to the views across Granby Reservoir, economic impacts, and potential health risks from electric and magnetic fields (EMF) to the property owners who live in houses in close proximity to the power lines.

I-17-2 Every year-round resident in Grand County is in some way dependent on an economy based on tourism and recreation. This project proposes to increase the height of the power poles that will severely impact the views from U.S. Highway 34, a Scenic Byway, across Granby Reservoir to the Indian Peaks and Never Summer Wilderness Areas, and within the Arapaho National Recreation Area (ANRA). Since millions of trees have been removed due to the Mountain Pine Beetle epidemic, the existing power line is quite visible. The pictures used at the public hearing on April 24, 2012 were at least 6-7 years old and did not accurately depict how the existing line looks, and artists' didn't accurately depict how the proposed power line would look. Anything that negatively impacts tourism and recreation will negatively impact our fragile economy in Grand County.

I-17-3 The potential health effects to humans from EMF living near high-voltage power lines have been debated at least since the 1970's. But, the fact that property values drop when the property is in close proximity to these lines is not debated. It has been repeatedly shown that there is a perceived health risk, in addition to the undesired view, that devalues property. This is another negative economic impact for people living in Grand County.

The DEIS states the main purpose of this project is "to provide a second feed in advance of the loss of the Adams Tunnel cable (AT cable), to accommodate load growth, and to bring the line to current codes". From the very beginning, the AT cable has been an intricate part of the whole Colorado-Big Thompson (C-BT) water diversion project now operated by Northern Colorado Water Conservancy District (NCWCD), in particular the Granby Pumping Plant (GPP). The original costs of the project (in the1930's) were estimated at $44 million with the water users paying $25 million (56.8%), and electric power sales were to pay off the balance of $19 million (43.2%). The electric power sales came from the hydroelectric power generated on the east side of the Continental Divide from the water pumped from GPP. The AT cable brought the power from the hydroelectric plant in Estes Park back to the GPP. This was very forward thinking for 1937 when legislation was finally signed by President Roosevelt to design a self-sustaining system for using clean energy (hydroelectric) to pump 310,000 acre-feet of water to eastern Colorado!

I-17-4 It is a clearly stated and known fact in the DEIS that the electrical cable through the tunnel would eventually wear out and need replacement. Why didn't WAPA, Tri-State, MPE, and NCWCD replace it when no water was being pumped through the tunnel during drought years, for example 2002-2004? The Alternative not given any further consideration is the one to replace the AT cable because it is "too dangerous, infeasible, and too costly". If it wasn't too dangerous and infeasible in the 1940's, why is it too dangerous and infeasible now? This is the Alternative that should have been completed decades ago.

I-17-5 A representative from WAPA stated at the public hearing that if this project is not completed, MPEI customers could be without power for weeks because there isn't enough capacity to bring power from the west. Why should we have to be without power? There's plenty of power if NCWCD stops using it and shuts down their pumps! Why shouldn't the real benefactors of this project, the water users east of the Continental Divide, have to bear the impacts of not replacing the AT cable? This is a clear example of WAPA and NCWCD bullying the western slope into accepting their project no matter what.

I-17-6 NCWCD should also have to bear the total cost of the GPP-Windy Gap project. Why should our electric costs go up just to benefit the NCWCD water users? NCWCD customers should have to pay the true cost of getting the water to them. The costs of the project can be divided amongst millions of people in eastern Colorado. According to the 2010 Census, there are only about 14,000 people in Grand County. Due to the economic conditions, many people have left the county so there are probably fewer people than that to divide the costs.

WAPA and all the other entities involved in this power line project need to do the following:

I-17-7	1. Provide a long-term plan to replace the AT cable so that the self-sustaining clean hydroelectric power can be restored to the C-BT water diversion project and GPP as originally designed.
I-17-8	2. If constructed as proposed, minimize the visual, economic, and potential health risks from the new lines by burying the new transmission lines from GPP along the west-side of Grand County Road 64 (through the Group Camping area in the ANRA), up to and across Highway 34. The U.S. Forest Service can move the group camping area if necessary.
I-17-9	3. NCWCD and its customers should pay the entire cost of providing electricity for GPP and Windy Gap. There should be no increase in the electrical costs to the electric customers west of the Continental Divide.

Sincerely,

Patricia Person

Patricia Person
Grand County Resident
Colorado native and life-long Colorado resident

RECEIVED 31 MAY 2012

May 29, 2012

Mr. Jim Hartman
NEPA Document Manager
WAPA
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228

Dear Mr. Hartman,

Please enter my comments into official public record.

I-18-1 I have enclosed a letter sent to you by Suzanne Gerhart. I agree wholeheartedly with what she has to say in her well researched letter sent to you earlier.

I-18-2 I do not want any new electrical towers built between Windy Gap & the Farr Pumping Plant. I want the Alva B Adams Tunnel fixed, making it the way it was originally intended to be used, so that it will again provide us with "green power" (in Grand County).

Thank you for your prompt attention to this matter.

Sincerely,

Kayleen S Reeve

KAYLEEN S REEVE

Granby Pumping Plant to Windy Gap Transmission Line Project DEIS—Comments on DEIS

From:
Larry and Michaela Rossi
[redacted]
29May2012

Submitted by telephone conversation with Jim Hartman and e-mail.

I-19-1 1) Had we known about the proposal we would not have purchased the property in January 2012. The impacts of these large structures are unacceptable and will interfere with our enjoyment of the property.

I-19-2 2) We are concerned that the database used for the mailing list (Grand County assessor records) was outdated. We were not on the mailing list and did not know of the proposed project until recently.

I-19-3 3) The issue of health effects from electro-magnetic fields associated with lines is not fully known. I have been working in the area of radiologic technology fields for many years and think that there are potential health risks, especially with younger children who have rapidly growing cells, and older individuals.

I-19-4 4) We are concerned that the larger transmission line structures will adversely affect our property values and there should be some compensation from the Project for this.

I-19-5 5) We have heard about a "Fall Zone" for the transmission line structures. We have heard that banks would be unlikely to provide a mortgage since insurance companies will not insure residences located within this "fall zone."

I-19-6 6) The Project should go underground for that section of transmission line from about Hwy 34 to the Farr Pumping Plant to address visual impacts to local residences, hazardous above ground high voltage lines, close proximity to houses and camp grounds, noise pollution, and unsightliness of the transmission lines.

I-19-7 7) We have been visiting the Granby Lake area for many years and we have not seen that the Cut Throat Bay Group Campground receives much use. In all of those years we recall that it was occupied on a half dozen or so occasions. These are temporary uses and we feel that the better route is through the campground, on the other side of the road. Local residents should not have to deal with the impacts of the transmission lines full time, when the impacts on the few users of the campground are temporary, very seasonal, and intermittent. There are many other areas to relocate the campgrounds but 20-40 residents cannot relocate their houses

I-19-8 8) While we understand that there might be a need to upgrade the electrical power in the area it is not fair that the local residents who own property near the lines should have to disproportionately put up with the impacts. This includes the visual impacts, any property value impacts, and physical and health hazards.

I-19-9 9) The 100 foot easement requirement is just barely being met by the proposed alignment of the transmission lines. This is a minimum requirement for the location of houses but residents and people walking along county road 64 , or working in their yards, will be in a potential danger zone much less than the 50 feet minimum from center line of the transmission line. It should be noted that county road 64 is a much utilized pathway for pedestrians in the area.

I-19-10 10) No homeowner would be agreeable to having a 5 ft diameter metal post and surrounding support area near their house since it will be major eyesore for their house.

I-19-11 11) We understand that part of this project is to provide more reliable power to Adams tunnel where there is an existing power cable which is near failure. The alternative to replace this cable has been abandoned because of safety, engineering, and cost considerations. We want this option back out on the table because it is the least

I-19-11 disruptive to the environment, people, and homes in this area. The difficulties in placing a new cable in the tunnel cannot be more difficult than the original installation. This option has been thrown out prematurely and should be reconsidered.

I-19-12 12) We have noted that the proposed alignment goes to great lengths not to disturb Forest Service properties but only minimally addresses homeowner concerns. Forest service properties should also share the burden of having power lines traverse across them instead of forcing lines close to residential property to preserve forest lands.

Sincerely,
Larry and Michaela Rossi

[redacted]

From: [redacted]
Sent: Monday, May 28, 2012 4:16 PM
To: gppwgp@wapa.gov
Subject: Windy Gap transmission line rebuild project

Mr. Hartman,

I-19-13
We oppose the Windy Gap Transmission Line Rebuild Project . The number of houses that will be in close proximity plus the unsightliness of the new powerlines in this pristine area make this project undesirable. This project will undermine property values and potentially negatively impact the health of residents of this area.

I-19-14
The routing of the new powerline near county road 64 is a significant concern since there is limited area for right away and the existing houses in this area are already to close to the present powerlines. We would like to all powerlines routed on National Park service lands where the occupancy is seasonal and intermittent.

We are homeowners (near highway 64) that will be in very close proximity to new powerlines being proposed. We are concerned whether we can get acceptable homeowners insurance with the hazard of these powerlines near our house.

I-19-15
Please let us know status of this Project and where we could access site plans of the final location of transmission line and poles.

Sincerely,

Larry and Michaela Rossi
[redacted]

Draft EIS Comment Form

Granby Pumping Plant Switchyard – Windy Gap Substation Transmission Line Project

Western AREA POWER ADMINISTRATION

Western Area Power Administration (WAPA) invites your comments on the Draft EIS for the Granby Pumping Plant Switchyard - Windy Gap Substation Transmission Line Project. Written comments may be mailed to Jim Hartman at WAPA Corporate Services Office, 12155 W. Alameda Parkway, Lakewood, CO 80228, or emailed to gppwgp@wapa.gov.

Contact Information (optional)

Please Print

[redacted]

Completing this form will automatically add you to the mailing list. If you prefer not to be on the mailing list, please check the box to the right. ☐ I do not wish to be on the project mailing list

Please print your comments below:

I-20-1 We would prefer that the line be put on the existing transmission that goes through Cutthroat Campground area and not along the ROW near residences.
This is in the Cutthroat Bay area in ANRA.
The Alturnative lines go directly over the top of our residence and property at 329 Mt View Drive. (6451)
This will devalue that property!
The camp ground offers no problems. Campers are there for one to two nights. They do not live there.
Along County Rd 64 Bury the line where there are residences.
The past summers there have been few campers in the area - There are no trees now.

COMMENTS MUST BE RECEIVED OR POSTMARKED BY MAY 29, 2012

[redacted]

From: [redacted]
[redacted] Sunday, May 20, 2012 9:41 AM
To: gppwgp@wapa.gov; gppwgp@wapa.gov
Cc: [redacted]
Subject: Comments on Windy Gap to Granby Pump Plant Project

As owners of a house that borders the proposed line, we have a couple of suggestions for your consideration:

I-21-1 1. At the Stillwater Tap, to minimize visual impact of tall deadend angle structures with switches, please consider the option to build a low profile switching station at this site.

I-21-2 2. With removal of the old lines from Stillwater Tap to Granby Pump Plant, the existing right-of-way documents reference the centerline of the existing structures and locating boundaries will become more difficult to establish in the field. Please consider having a surveyor place pins/monuments at the crossing of the existing easements (northern and southern edge) boundaries at each property line to assure accurate locations in the future when existing lines are removed.

Our property is at [redacted] and we will see the Stillwater Tap structures. The existing north boundary of the existing powerline easement is already confusing at our lot, but will be more so once existing lines are removed. Thank you for considering our suggestions.

Les Shankland and Clare Beth Rutila
[redacted]

[redacted]

From: Carol Sidofsky [redacted]
Sent: Monday, May 28, 2012 9:49 PM
To: gppwgp@wapa.gov
Cc: [redacted]

Subject: WAPA-EIS REPORT comments & requests (Mon., May 28, 2012):

Importance: High

Copy of the following letter/comments will go to Grand County Commissioners (James Newberry, Nancy Stewart & Gary Bumgarner), Colorado State Representative (Randy Baumgardner) and Colorado State Senator (Jeanne Nicholson), U.S. Representative (Jared Polis) and U.S. Senators (Michael Bennet and Mark Udall), and to Colorado Gov. John Hickenlooper.

Monday, May 28, 2012

FROM: Carol Sidofsky and Dave Hazelrigg
[redacted]

TO: Jim Hartman
NEPA Document Manager
WAPA
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228
Email: gppwgp@wapa.gov

Dear Mr. Hartman,

Please put Dave's and my comments into the official public record.

I-22-1
We, Dave Hazelrigg and I, Carol Sidofsky, agree 100% with what Suzanne Gerhart told you, in her well researched and well written comments and suggestions that you can see copied below.
We (Dave and I) want the Alva B. Adams tunnel fixed, making it the way it was originally intended to be used, so that it will again provide us in Grand County, with "green power".

I-22-2
We don't want any new electrical towers built between Windy Gap and the Farr Pumping Plant, period.

I-22-3
Grand County's income/economy comes mostly from tourism, skiing, outdoor activities, and ranching. We highly value our magnificent mountain and valley views, and so do the tourists who bring their tourist dollars into our county.

I-22-4
The East Slope takes way too much water from us already, and we don't want them to steal any more water from us, just to decrease their own water costs.

Let the East Slopers start to conserve their water instead. We don't want them to steal our economy either, by ruining our wonderful scenery.

Just say "no" to building new power towers.

We would appreciate a reply from you at your earliest convenience, acknowledging your receipt of this email, and including your responses.

This e-mail to you, Mr. Hartman, will be followed by a "snail mail" letter, by us, sent via the U.S. Postal Service.

Sincerely,
Carol Sidofsky and Dave Hazelrigg

P.S. Our local newspaper (Sky Hi Daily News) incorrectly wrote that the deadline for comments was May 19, rather than the correct date, May 29, 2012. Because of this, we respectfully request that you extend the period of time for receiving public comments.

"Jim Hartman
NEPA Document Manager
WAPA
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228
Email: gppwgp@wapa.gov

RE: Granby Pumping Plant-Windy Gap Substation Transmission Line Rebuild Project

Dear Mr. Hartman:

The EIS (Environmental Impact Statement) indicates WAPA is planning to go forward with the proposed 138-kV, 105' tall, 5' wide towers with multiple rows of transmission lines running from the Granby (Farr) Pumping Plant on Lake Granby to Windy Gap. The proposed overhead towers represent obsolete technology that will mar our beautiful mountains and valleys for the next 80-90 years. Despite your massive report, you have not given adequate attention to the destruction of our gorgeous landscape and the

damage to the breathtaking views in our area.

Based on the severe visual pollution and consequent economic impact this proposed project places on Grand County residents, businesses and tourists, we request a thorough analysis of burying the lines as well as replacing the Adams Tunnel Cable, completed by reputable engineering firms who do not have an interest in construc-ting surface power lines. Your unsupported statement that such alternatives are “too expensive” is completely inadequate especially compared with the enormous cost you intend to impose on us in Grand County.

The primary purpose of the C-BT [Colorado Big Thompson] Project was to provide water to the East Slope, not to generate power for East Slope users. The Adams Tunnel Cable was installed to send this "green power" back to Grand County. It made the C-BT water project "sustainable." Excess power not sent back through the Adams Tunnel Cable was sold with the proceeds going to pay for the C-BT Project. When the Project was paid for, revenue received should have been earmarked for maintenance and replacement of the cable.

Instead, this power was sold for a profit or replacing the cable would not be an issue. Power needed at the Farr Pumping Plant needs to come from the Adams Tunnel Cable, not from tall unsightly towers and 13 miles of wires erected on Grand County landscape.

We strongly resent WAPA’s tactic of pitting residents against each other with respect to “alternatives.” It is an unconscionable divisive act by a Federal Govern¬ment Agency in a community that has traditionally been very cohesive. Somehow, WAPA has tried to sidetrack us into choosing divisive alternatives rather than focusing on acceptable alternatives of burying the lines or replacing the Adams Tunnel Cable. The C-BT Project was designed to provide power to the Farr Pumping Plant from the Adams Tunnel Cable, not from an unsightly defacement of our beautiful countryside.

Why do we need so much power and who benefits?

The need for significantly more power is not demonstrated in the 600+ page EIS report. The report does not contain any data showing the projected growth of the county. County population nearly doubled from 1980 to 2010, but most of that growth was in the 1990’s. Growth was under 20% in the last decade and the population actually declined from 2009 to 2010. The closure of Grand Lake Elementary reflects the trend in the area of the county to be “served” by the new power line.

With additional power the Farr Pumping Plant will have the capacity to pump more water out of Grand County. We are already witnessing what a lack of water does to our mountains. Shadow Mountain Lake and Grand Lake are already polluted with toxic algae; our rivers lack a sufficient flow of water to remain healthy. Regardless of the cause, global climate change predicts a dryer climate, leading to high fire danger. With lower water tables, will our wells go dry forcing us to vacate our homes and move?

Section 1.9 of the report states:
Front Range water use – The purpose of the project is to maintain and improve electrical

power reliability for this portion of Grand County. It would not affect nor be affected by existing or proposed water collection delivery projects that serve the Front Range.

This statement is simply disingenuous. The destination of the power lines TO THE FARR PUMPING PLANT says it all. The idea of taking more water out of the county and erecting unsightly towers to do so at our expense is unconscionable.

Interestingly, at a 2007 meeting held by concerned Grand County residents, Jim Liles, reported that he learned from an engineer at the Estes Power Plant that the switch to send power to Grand County had been locked for years. If we have not been receiving power through the Adams Tunnel Cable, then we have been adequately served by a 69-kV line. A diagram in the EIS report shows the proposed project at the Windy Gap Substation will provide both a 69-kV and an additional 138-kV, which represents a huge increase in power.

In addition, if power generated in Estes is not coming back to Grand County through the tunnel as initially intended, who is profiting?

What options are acceptable for Grand County and who pays?

Bury the lines:

The EIS report claims that burying the lines or replacing the Adams Tunnel Cable would cost a great deal more than the unsightly overhead lines, BUT the report fails to present any proposals or cost estimates by reputable engineering firms. Expert Harry Orton, Orton Consulting Engineers International Ltd., indicates underground lines are safer, preserve scenic beauty and cost nearly the same as overhead lines over the long term. Power lines are buried all over the United States. The technology exists and experts are available. The economic reason to dismiss this alternative is not satisfactorily explained.

WAPA estimates the cost to bury the lines to be $200 million. Even if such an outrageous estimate were true, it would cost East Slope residents and businesses (the true beneficiaries of this outrageous project) an additional $5 per person per year to maintain Grand County's scenic beauty. This calculation is based on a 40 year life expectancy of the lines serving the water supply needs of one million East Slope residents, businesses and agriculture.

Water/sewer bills for 2 people average $20 a month in Denver, $100 a month in Hot Sulphur Springs. Surely, East Slope recipients should be expected to bear the cost to replace the power cable in the Adams Tunnel that provides their water. It is not equitable for Grand County residents to be faced with undesirable power towers and shiny power lines in order for East Slope recipients to have very inexpensive water in comparison to local residents and the rest of the United States.

Local electric bills in Grand County are increasing. The May 2012 issue of Colorado Country Life indicates increases for the service energy portion and 4.8% for the energy charge. In comparison, Denver rates average $.04 per kilowatt hour in winter and $.08

in summer, while Grand County residents pay considerably more. Will Grand County residents and businesses be footing the bill for the power to send our water to the East Slope?

Replace the Adams Tunnel Cable:

In regard to burying the lines, WAPA ADMITS they do not have the expertise necessary for underground installation or maintenance. Then the logical and compelling solution is to replace the Adams Tunnel Cable:

- The tunnel is already in existence and is a proven source of power for 65 years.
- Power through the tunnel is not subject to rain, sleet, snow or wind.
- Trained personnel already exist.
- The tunnel provides a superior second source of power for Grand County – looped transmission between Estes Park and Windy Gap Substations.
- "Green Power" is generated from our water flowing through the tunnel.
- Environmental issues of tall towers and wires are eliminated.
- Aesthetic beauty in the Three Lakes Area is maintained as specified in the Colorado –Big Thompson Project design and agreement.
- EMF exposure, Noise, and Electronic Interference are eliminated.
- Tourism survives to provide a strong financial tax base.
- Property values remain stable.
- Pilots and birds are safer.

As noted above, by its original design, power for the C-BT Project in Grand County was self sustaining as the water flowing over the turbines in Estes Park produced electric power, which was sent back through the Adams Tunnel Cable and provided power to the Farr Pumping Station in Lake Granby. WAPA wants to change the original design and circumvent the legislated approvals for the project. Senate Document 80 granted Grand County aesthetic protection. Tall towers 100' tall and 5' in diameter with 13 miles of multiple layers of glistening wire are not aesthetic.

Federal legislation enabling the Colorado Big Thompson (CBT) Project clearly placed the burden for building and maintaining the facilities on the Project and its successors, namely, the Northern Colorado Water Conservancy. Under those circumstances, the Conservancy should bear the cost of replacing the Adams Tunnel line to assure our access to the "green power" produced with Grand County water.

Data gathered from "Colorado-Big Thompson Project," Robert Autobee, Bureau of Reclamation, 1996, indicates that under the Colorado Water Conservancy Law, land owners and those who benefit from project development, must contribute to the project's cost and operation in proportion to those benefits. The sunk cost of building the tunnel was paid with almost 50 percent amortized by hydroelectric generation, a percentage of the Department of Energy's revenue. A replacement cable represents a fraction of the total cost to maintain the system as it was intended and should not be changed now.

County Commissioner James Newberry at the Grand County meeting in 2007, pointed

out our need to have access to an increasing amount of “green power” which can be achieved by replacing the cable in the Adams Tunnel to transmit the power generated by the hydroelectric plant in Estes Park.

To erect 138-kV towers and wires in Grand County represents “takings” by the Government (WAPA) from individuals and the Grand County community at large. We should not be subject to such “takings,” as they were not part of the C-BT agreements.

The basic Pareto criterion for decision-making, which is related to both economic efficiency of transfers and to equity, states:

The only way to be sure that a new project is socially desirable
is to be sure that no one is made worse off by the project.
Thus, not only must aggregate benefits exceed aggregate costs,
but compensation in the amount of losses must actually be paid to
all losers.

(See, MacDonnell, et al., “Guidelines for Developing Area-Origin Compensation, Completion Report No. 139”)

Has WAPA applied this basic Pareto criterion for decision-making?

How will WAPA compensate Grand County, residents and businesses for every day we look at the tall towers and shiny lines draped across our sacred mountains so East Slope residents can have comparatively inexpensive water?

In conclusion, please let me emphasize that a careful analysis and public report on the costs of what WAPA is considering, as well as the alternatives of burying the lines and replacing the Adams Tunnel cable, is absolutely essential before this project goes another step forward.

Sincerely yours,

Suzanne Gerhart

P.S. This e-mail will be followed by a hard copy sent via U.S. mail."

[redacted]

From: [redacted]
Sent: Wednesday, March 21, 2012 3:46 PM
To: gppwgp@wapa.gov
Subject: Granby Pumping Plant to Windy Gap transmission line project

Mr. Hartman,

My wife and I own property that currently has the transmission line running accross it. I have read the EIS and just got the notice for the open house and hearing in the mail. I cannot determine from the maps that are given exactly where the line would be moved in
I-23-1 correspondance to my property. I would greatly appreciate a map that was zoomed in on my property so I can see exactly how it would impact me one way or the other. I currently have a building permit for a 30x40 shop/garage that is directly impacted by any increase in easment size. I plan on starting construction this summer. Our properties' adress is [redacted]. It is titled as Catherine A. Collins & Ronald Paul Strauss. Please contact me with any other info that is needed.

Sincerely,

Paul Strauss
[redacted]

[redacted]

From: Steven Sugg [redacted]
Sent: Monday, May 28, 2012 2:33 PM
To: gppwgp@wapa.gov
Subject: Power Lines

I-24-1
We are frequent visitors to Grand County, including Granby and Grand Lake. The recent issue regarding power lines is disturbing. For what it's worth, we feel that putting in additional above-ground power lines is unnecessary and will be unsightly, decreasing the aesthetics of the area.

Sincerely,

Steven & Elizabeth Sugg

[redacted]

From: June and Jim Timmermann [redacted]
Sent: Monday, May 28, 2012 10:14 AM
To: gppwgp@wapa.gov
Subject: Granby Pumping Plant-Windy Gap Substation Transmission Line Rebuild Project

Jim Hartman
NEPA Document Manager
WAPA
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228
Email: gppwgp@wapa.gov

RE: Granby Pumping Plant-Windy Gap Substation Transmission Line Rebuild Project

Dear Mr. Hartman:

I-25-1
As home owners in Grand County Colorado, we strongly support our County Commissioners' call, as well as that of numerous Grand County friends and neighbors, for further study of what have been rejected alternatives to the currently planned Windy Gap Substation Transmission Line Rebuild Project.

As we understand it, the primary rejected alternatives have been:

1. Burying the cable (either under land as well as under Lake Granby)
2. Replacement of the aging cable traveling through the Adams Tunnel

While other reasons for rejection of these two alternatives were given, the common rejection rationale for both was higher cost.

So it's clear that Western has selected the cheapest alternative which benefits the Eastern Slope, even though it continually profits from Grand County-based resources for its hydroelectric power.

I-25-2
However, we feel Western's current plan to go forward with the proposed 105' tall, 5' wide towers with multiple rows of transmission lines running from the Granby (Farr) Pumping Plant on Lake Granby to Windy Gap will result in unacceptable visual impacts to the area, given the vicinity to the Arapaho National Recreation Area, the Three Lakes Design Review area that has been county-regulated for 40 years, and the Colorado River Headwaters Scenic Byway.

I-25-3
Therefore we strongly support our Grand County Commissioners' call for the draft environmental impact statement to include cumulative effects to aquatic and scenic resources in Grand County.

June and Jim Timmermann
[redacted]

[redacted]

From: Sue Tomasek [redacted]
Sent: Friday, April 27, 2012 4:15 PM
To: gppwgp@wapa.gov
Subject: Comments on Granby Pumpling Plant to Windy Gap Transmission Line Project

I-26-1 Hi Jim, We would like the residents, like us, to be considered when making the decision on where the location of these lines will be. We live here year round on the pumping plant road (county road 64) for the last 19 years. We live at [redacted] which is across from the group camp ground. The present lines run directly above our front yard. We hope that when the time comes to move these lines the choice will be on the forest service property across the street. The people who camp there are only there a few days while they visit. Also, the camp ground is only open several months out of the year.

I-26-2 We were unable to make the meeting on April 24th. However, we understand that a certain amount of energy is released from these lines and feel that this may be a health hazard after long term exposure. We also feel that it may decrease the value of our home. For these reasons along with

I-26-3 the visual of one of these huge poles, possibly in our front yard, is a great concern. Please consider us, the permanent, full time residences in your decision. Thank you for the opportunity to express our concern! Sincerely, Bill and Sue Tomasek

[redacted]

From: JD Ward[redacted]
Sent: Wednesday, May 30, 2012 9:09 AM
To: gppwgp@wapa.gov

I-27-1
I vote for the cable to be replaced in the existing tunnel. Jim Ward, Alpine Wings, LLC; [redacted], Grand County, Colorado.

[redacted]

[redacted]

Sent: Friday, April 06, 2012 9:17 AM
To: gppwgp@wapa.gov
Subject: Grandby Pumping plant transmission line

Jim Hartman,

I-28-1 Your web site given in our mailing is almost impossible to type in without error - and it appears that there is at least one error in the address - infrastruct???

I-28-2 In any event we don't need details to know that these power lines should be underground. (period)

The technology is there and it is about time any projects in the mountains used it. You may not have the where with all to do underground power but you need to acquire it.

Since we the taxpayers will end up paying for this project one way or another, we would more readily pay for getting the lines out of sight!

Thanks for listening.
Frank and Jane Watts
BSME, CCDM
ec3corp
[redacted]

[redacted]

[redacted]

Sent: Wednesday, May 30, 2012 7:24 AM
To: [redacted]
Subject: Fwd: WAPA proposed power lines--Comments from Mr. Wunder; Granby Pumping Plant-Windy Gap DEIS
Attachments: polis and udall.docx

>>> Tom Wunder [redacted] 5/29/2012 9:55 PM >>>
Mr. Hartman,

Today is the deadline for submitting comments on the proposed WAPA power lines.

Please see the attached correspondence with Senator Udall and Representative Polis regarding my concerns and objections to WAPA's proposal.

I-29-1
I do not believe a viable outcome regarding the transmission lines has been identified. The case for the power line is also questionable. The fact is I am left wondering if the residents of Grand County are not being manipulated.

I-29-2
For instance, I understand underground transmission lines are expensive, a tunnel already connects Estes and Grand Lake. As far as I know, a cable runs through it. Even if the tunnel cable is reaching or exceeded its' life expectancy‹am I to understand that running a new cable through a preexisting tunnel is more expensive than putting up 100' power lines over 13 miles?

I-29-3
AS Grand County is already blighted by the pine beetle, now WAPA wants to further spoil the beauty of our area‹that has an economic impact.

And why does your proposal end at the pumping station? As you will see in my letter, WAPA hasn't earned my trust nor is the approach I sense WAPA has used on this project one that will build trust in Grand County.

Please consider my observations.

Thank you.

Tom

Email: gppwgp@wapa.gov

Tom Wunder
[redacted]

May 29th, 2012

Honorable Senator Mark Udall
Denver Metro Region
999 18th Street
Suite 1525, North Tower
Denver, CO 80202

Honorable Representative Jared Polis
4770 Baseline Road, #220
Boulder, CO 80303

Dear Senator Udall and Representative Polis,

I-30-1 I am writing to express deep reservations about a federal project being considered for Grand County, Colorado—our back yard. Truth be known, however, it is more than *our* back yard, my wife and I have a home there. We chose to build in Grand County based on our perception that it reflects all that we love about Colorado: mountains, lakes, trees, low density, primitive environment, the origins of the Colorado River and wild life.

With deep dismay, I learned some time ago that a WAPA project was being considered in which an existing power line would be replaced in Grand County. This I-30-2 power line would replace existing lines that are about 40' tall with 105' towers—just the kind of thing to disrupt peoples' view corridors.

In following the news on WAPA's proposed project the ordinary citizen—people like me--get confused, dismayed, and disheartened. The EIS is 600+ pages long and I suspect those studies, if they made it to your desk, would be read by a staffer and interpreted. I get lost trying to comprehend all that is being put forth—what is that old saying "the devil is in the details"?

Which is why I am writing. In my work I have seen how people and organizations influence things. One strategy—a form of subterfuge—is to get people focused on one thing in order to keep them focused off the more critical issues. The presenting issue is to get more power to Grand County.

So, to get more power to Grand County WAPA is positioning that we need 105' I-30-3 power lines installed through 13 miles of our county. Grand County is already blighted with the tree beetle and **now we are to have 100' power lines**? And, why do we not retrofit the power line running *in the tunnel* between Estes Park and Grand Lake?

[redacted]

The WAPA proposal, as I understand it, has the lines terminating at the pumping station on Granby Lake…certainly convenient if more water is to be pumped out of our county to the western states.

I-30-4 I'm left wondering who has oversight of these federal and state agencies? Who ensures that the citizens of Grand County and our environment are protected? I believe that a 600+ page report is a tool that could confuse average voters banking on peoples' indifference or intimidation by the "government bureaucracy".

As I struggled to figure who to contact or write to regarding my concerns and dismay, one agency that came up on the internet was the Bureau of Reclamation—
I-30-5 they have oversight of WAPA and Grand County. But, I then I began to wonder, does the Bureau of Reclamation want to keep water in Grand County? Could the Bureau be anxious to see water leave Grand County? And if the Bureau is our natural resource guardian for Grand County has the Bureau's mission been compromised?

I-30-6 My understanding is that in the planning years ago for the Big Thompson Project (of which I believe this issue falls under) clearly intended that Grand County was not to have its' natural beauty jeopardized. It seems to me this value has been lost.

And this is why I am contacting you. I am against the 100' power lines as I am against the continued depletion of our water resources in Grand County. I don't want to see the tree blight experienced in Grand County furthered by putting in 13 miles of giant power lines further adding to the degradation of our view corridors.

There has to be a better way. I am asking you to scrutinize what is going on in Grand County and help ensure the least onerous solution is implemented. I look forward to a thoughtful approach.

A concerned Colorado Citizen,

Tom Wunder

[redacted]

Suzanne M. Gerhart

[redacted]

May 26, 2012

Jim Hartman
NEPA Document Manager
WAPA
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228
Email: gppwgp@wapa.gov

RE: Granby Pumping Plant-Windy Gap Substation Transmission Line Rebuild Project

Dear Mr. Hartman:

The EIS (Environmental Impact Statement) indicates WAPA is planning to go forward with the proposed 138-kV, 105' tall, 5' wide towers with multiple rows of transmission lines running from the Granby (Farr) Pumping Plant on Lake Granby to

I-31-1 Windy Gap. The proposed overhead towers represent obsolete technology that will mar our beautiful mountains and valleys for the next 80-90 years. Despite your massive report, you have not given adequate attention to the destruction of our gorgeous landscape and the damage to the breathtaking views in our area.

I-31-2 Based on the severe visual pollution and consequent economic impact this proposed project places on Grand County residents, businesses and tourists, we request a thorough analysis of burying the lines as well as replacing the Adams Tunnel Cable, completed by reputable engineering firms who do not have an interest in constructing surface power lines. Your unsupported statement that such alternatives are "too expensive" is completely inadequate especially compared with the enormous cost you intend to impose on us in Grand County.

The primary purpose of the C-BT Project was to provide water to the East Slope, not to generate power for East Slope users. The Adams Tunnel Cable was installed to send this "green power" back to Grand County. It made the C-BT water project "sustainable." Excess power not sent back through the Adams Tunnel Cable was sold with the proceeds going to pay for the C-BT Project. When the Project was paid for, revenue received should have been earmarked for maintenance and replacement of the cable.

I-31-3 Instead, this power was sold for a profit or replacing the cable would not be an issue. Power needed at the Farr Pumping Plant needs to come from the Adams Tunnel

I-31-3 Cable, not from tall unsightly towers and 13 miles of wires erected on Grand County landscape.

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Why do we need so much power and who benefits?

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This statement is simply disingenuous. The destination of the power lines TO THE FARR PUMPING PLANT says it all. The idea of taking more water out of the county and erecting unsightly towers to do so at our expense is unconscionable.

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In addition, if power generated in Estes is not coming back to Grand County through the tunnel as initially intended, who is profiting?

What options are acceptable for Grand County and who pays?

I-31-8 ***Bury the lines:***

The EIS report claims that burying the lines or replacing the Adams Tunnel Cable would cost a great deal more than the unsightly overhead lines, BUT the report fails to present any proposals or cost estimates by reputable engineering firms. Expert Harry Orton, Orton Consulting Engineers International Ltd., indicates underground lines are safer, preserve scenic beauty and cost nearly the same as overhead lines over the long term. Power lines are buried all over the United States. The technology exists and experts are available. The economic reason to dismiss this alternative is not satisfactorily explained.

WAPA estimates the cost to bury the lines to be $200 million. Even if such an outrageous estimate were true, it would cost East Slope residents and businesses (the true beneficiaries of this outrageous project) an additional $5 per person per year to maintain Grand County's scenic beauty. This calculation is based on a 40 year life expectancy of the lines serving the water supply needs of one million East Slope residents, businesses and agriculture.

Water/sewer bills for 2 people average $20 a month in Denver, $100 a month in Hot Sulphur Springs. Surely, East Slope recipients should be expected to bear the cost to replace the power cable in the Adams Tunnel that provides their water. It is not equitable for Grand County residents to be faced with undesirable power towers and shiny power lines in order for East Slope recipients to have very inexpensive water in comparison to local residents and the rest of the United States.

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I-31-9

- EMF exposure, Noise, and Electronic Interference are eliminated.
- Tourism survives to provide a strong financial tax base.
- Property values remain stable.
- Pilots and birds are safer.

I-31-10 As noted above, by its original design, power for the C-BT Project in Grand County was self sustaining as the water flowing over the turbines in Estes Park produced electric power, which was sent back through the Adams Tunnel Cable and provided power to the Farr Pumping Station in Lake Granby. WAPA wants to change the original design and circumvent the legislated approvals for the project. **Senate Document 80 granted Grand County aesthetic protection.** Tall towers 100' tall and 5' in diameter with 13 miles of multiple layers of glistening wire are **not** aesthetic.

I-31-11 Federal legislation enabling the Colorado Big Thompson (CBT) Project clearly placed the burden for building and maintaining the facilities on the Project and its successors, namely, the Northern Colorado Water Conservancy. Under those circumstances, the Conservancy should bear the cost of replacing the Adams Tunnel line to assure our access to the "green power" produced with Grand County water.

Data gathered from "Colorado-Big Thompson Project," Robert Autobee, Bureau of Reclamation, 1996, indicates that under the Colorado Water Conservancy Law, land owners and those who benefit from project development, must contribute to the project's cost and operation in proportion to those benefits. The sunk cost of building the tunnel was paid with almost 50 percent amortized by hydroelectric generation, a percentage of the Department of Energy's revenue. A replacement cable represents a fraction of the total cost to maintain the system as it was intended and should not be changed now.

County Commissioner James Newberry at the Grand County meeting in 2007, pointed out our need to have access to an increasing amount of "green power" which can be achieved by replacing the cable in the Adams Tunnel to transmit the power generated by the hydroelectric plant in Estes Park.

I-31-12 To erect 138-kV towers and wires in Grand County represents "takings" by the Government (WAPA) from individuals and the Grand County community at large. We should not be subject to such "takings," as they were not part of the C-BT agreements.

I-31-13 The basic Pareto criterion for decision-making, which is related to both economic efficiency of transfers and to equity, states:

> The only way to be sure that a new project is socially desirable is to be sure that no one is made worse off by the project. Thus, not only must aggregate benefits exceed aggregate costs, but compensation in the amount of losses must actually be paid to all losers.

(See, MacDonnell, et al., "Guidelines for Developing Area-Origin Compensation, Completion Report No. 139")

I-31-13 Has WAPA applied this basic Pareto criterion for decision-making?

I-31-14 How will WAPA compensate Grand County, residents and businesses for every day we look at the tall towers and shiny lines draped across our sacred mountains so East Slope residents can have comparatively inexpensive water?

In conclusion, please let me emphasize that a careful analysis and public report on the costs of what WAPA is considering, as well as the alternatives of burying the lines and replacing the Adams Tunnel cable, is absolutely essential before this project goes another step forward.

Sincerely yours,

Suzanne Gerhart

P.S. This e-mail will be followed by a hard copy sent via U.S. mail.

Patricia D. and John F. Raney
[redacted]
May 28, 2012

Jim Hartman
NEPA Document Manager
WAPA
Corporate Services Office
12155 W. Alameda Parkway
Lakewood, CO 80228
Email: gppwgp@wapa.gov

RE: Granby Pumping Plant-Windy Gap Substation Transmission Line Rebuild Project

Dear Mr. Hartman:

The EIS (Environmental Impact Statement) indicates WAPA is planning to go forward with the proposed 138-kV, 105' tall, 5' wide towers with multiple rows of transmission lines running from the Granby (Farr) Pumping Plant on Lake Granby to
I-31-1 Windy Gap. The proposed overhead towers represent obsolete technology that will mar our beautiful mountains and valleys for years.

The primary purpose of the C-BT Project was to provide water to the East Slope, not to generate power for East Slope users.
I-31-3 Instead, this power was sold for a profit or replacing the cable would not be an issue. Power needed at the Farr Pumping Plant needs to come from the Adams Tunnel Cable, not from tall unsightly towers and 13 miles of wires erected on Grand County landscape.

I-31-6 **With additional power the Farr Pumping Plant will have the capacity to pump more water out of Grand County. We are already witnessing what a lack of water does to our mountains. Shadow Mountain Lake and Grand Lake are already polluted with toxic algae; our rivers lack a sufficient flow of water to remain healthy**

Section 1.9 of the report states:

> Front Range water use – The purpose of the project is to maintain and improve electrical power reliability for this portion of Grand County. It would not affect nor be affected by existing or proposed water collection delivery projects that serve the Front Range.

This statement is simply disingenuous. The destination of the power lines TO THE FARR PUMPING PLANT says it all. The idea of **taking** more water out of the county and erecting unsightly towers to do so at our expense is unconscionable.

What options are acceptable for Grand County and who pays?

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WAPA estimates the cost to bury the lines to be $200 million. Even if such an outrageous estimate were true, it would cost East Slope residents and businesses (the true beneficiaries of this outrageous project) an additional $5 per person per year to maintain Grand County's scenic beauty. This calculation is based on a 40 year life expectancy of the lines serving the water supply needs of one million East Slope residents, businesses and agriculture.

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I-31-14

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I-31-1 Granby to Windy Gap. The proposed overhead towers represent obsolete technology that will mar our beautiful mountains and valleys for the next 80-90 years. Despite your massive report, you have not given adequate attention to the destruction of our gorgeous landscape and the damage to the breathtaking views in our area.

I-31-2 Based on the severe visual pollution and consequent economic impact this proposed project places on Grand County residents, businesses and tourists, we request a thorough analysis of burying the lines as well as replacing the Adams Tunnel Cable, completed by reputable engineering firms who do not have an interest in constructing surface power lines. Your unsupported statement that such alternatives are "too expensive" is completely inadequate, especially compared with the enormous cost you intend to impose on us in Grand County.

The primary purpose of the C-BT Project was to provide water to the East Slope, not to generate power for East Slope users. The Adams Tunnel Cable was installed to send this "green power" back to Grand County. It made the C-BT water project "sustainable." Excess power not sent back through the Adams Tunnel Cable was sold with the proceeds going to pay for the C-BT Project. When the Project was paid for, revenue received should have been earmarked for maintenance and replacement of the cable.

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Sincerely yours,

Suzanne Gerhart

P.S. This e-mail will be followed by a hard copy sent via U.S. mail.

This carefully researched, thoughtful letter, composed by Suzanne Gerhart, is totally supported and seconded by:
Paul L. Shetler M. D., and Judy C. Shetler Ph. D.
[redacted]

Telephone Communications Summary:

Call Initiated By: Mr. Robert Alesandra **Date and Time:** 28 March 2012, 9:44 pm

Party Called: Jim Hartman **Phone Number:**

Reason for Call/Subject: GPP-WGP

Other Parties on the Call: none

I-32-1

Mr. Alesandra: His property is at the intersection of . The transmission line goes through his property. He plans to build on the property. He bought the property for his retirement place. He is angry that this project will affect his retirement home and plans.

Mr Alesandra expressed concerns:

- **The higher voltage worries him. He has concerns about the potential health effects from the electrical lines.**
- **He would like the line to go around his neighborhood, not through lots.**

1:30 pm; 29 May 2012

Telephone conversation with
Mr. Joe Burbach

Mr. Burbach purchased his residence in 2008. He stated that he did not receive notice of the project. He found out about it from an article in the SkyHi News. His name and correct address are on our mailing list for the Project.

I-33-1 Mr. Burbach purchased his residence because of the "sweeping views" of the Valley and part of Lake Granby. He is very concerned about the impact of the transmission lines on his views.

I-33-2 He expressed concern for the electromagnetic field effects.

I-33-3 He is concerned that the project will result in increased electrical rates. They have already had a recent increase in their rates.

I-33-4 He did not think that the project was justified, he has not experienced flickering lights or brown outs when the Farr Pumps started.

He did not think that the justification for the two lines-especially to one that is much higher voltage was justified.

He did not understand why the FARR Pumping Plant needed additional electricity or another circuit, if no addition water was going to be pumped. He did not feel that the load growth in the area (residences and commercial load) justified the much high voltage of the transmission line.

I-33-5 He wanted to know what would happen to the generation from the Mary's Lake area if it was not going to be provided to the Granby area via the Adams Tunnel Cable. Would that result in use of more coal generation being used in the Granby Area from the Craig Power Plant?

Telephone Communications Summary:

Call Initiated By: Mr. Daniel Mcgrail **Date and Time:** 14 May 2012, 1:00 pm

Party Called: Jim Hartman **Phone Number:**

Reason for Call/Subject: GPP-WGP

Other Parties on the Call: none

I-34-1 **Notes (Resolution, follow-up or action items, etc.): Mr. Mcgrail requested information on the project. Wanted to know the proposal for the line that is now in the Scanloch Subdivision. He requested a map of the Project. Requested information on the earliest that construction would start. Stated that it was good that the project was moving forward.**

Hartman sent 3 maps, the website address, and requested his comments by 29 May 2012.

Telephone Communications Summary:

Call Initiated By: Mr. Tom O'Connor **Date and Time:** 21 March 2012, 2:15 pm

Party Called: Jim Hartman **Phone Number:**

Reason for Call/Subject: GPP-WGP

Other Parties on the Call: none

Left Hartman a Voice Message at 2:15 pm.

I-35-1 **Notes (Resolution, follow-up or action items, etc.): Mr. O'Connor lives by Willow Creek Reservoir at Granby, CO. The existing transmission line goes through his property and he would like to know how the project would impact the 4 or 5 houses in that area.**

Hartman returned call at 2:50 pm.

The Preferred route shown in the Draft EIS is a proposal to move the existing line closer to the waterline. If the preferred is selected it may move the line about ¼ mile further from its present location. No decision on whether to construct on the existing alignment or to move it near the water pipeline has been made.

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VERBATIM TRANSCRIPT OF
PUBLIC COMMENT HEARING FOR:
GRANBY PUMPING PLANT-WINDY GAP TRANSMISSION LINE PROJECT
HELD TUESDAY, APRIL 24, 2012
AT MOUNTAIN PARKS ELECTRIC
321 WEST AGATE AVENUE
GRANBY, CO 80446

A P P E A R A N C E S

Public Comment by:
Richard Schoenebeck

Also Present:
Claire Douthit, Esq.

♀

2

1 PUBLIC HEARING:

MS. DOUTHIT: It's 6 o'clock and the formal public hearing is to begin. We haven't had anyone indicate they want -- sign the speaker sheet as of yet. So does anyone want to speak at the public hearing?

MR. SCHOENEBECK: Yeah, I'll speak.

MS. DOUTHIT: Okay. Please sign the sheet recognizing that you want to speak. And if anyone else does you do need to sign the sheet to speak.

So with that in mind we'll start the public hearing. Good evening, I'm Claire Douthit, and thank you for coming out tonight. I'm going to -- yeah, if you all could sit down that would be helpful.

I'll start over. Good evening, everyone. Thank you for coming out. I'm Claire Douthit. I'm an attorney with Western Area Power Administration's Rocky Mountain region. I will be the hearing officer for this hearing. The purpose of the hearing, as we have mentioned, is to receive comments on the Draft Environmental Impact Statement for the proposed Granby Pumping Plant Windy Gap Substation Transmission Line project.

Western's Rocky Mountain region proposes to rebuild and upgrade the Granby Pumping Plant Windy Gap 69-kV transmission line between the Windy Gap substation

and the Granby pumping plant, a distance of approximately 13 miles. The transmission line which was constructed on the wood pole A-frame structures is located in Grand County, Colorado here, near the towns

of Granby and Grand Lake. Other participants in the project include Tri-State Generation and Transmission and the Northern Colorado Water Conservancy District.

The US forest Service, the Bureau of Land Management and Grand County are cooperating agencies on the EIS.

Western's Granby pumping plant, Windy Gap, 69-kV transmission line has been in operation for approximately 70 years. It supplies electrical power to the Colorado Big Tompson project facilities and electrical substations operated by Mountain Parks Electric, a member of Tri-State.

The area transmission system has also been served by the Bureau of Reclamation Adams Tunnel, 69-kV cable for the past 61 years, and the cable is at the end of its planned service life. The Adams Tunnel 69-kV cable provides Tri-State with a second power source for Mountain Park's load, western and Reclamation study costs engineering requirements and electrical system constraints for replacing the Adams Tunnel cable in anticipation of its eventually failure. Western and

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Reclamation decided not to replace the cable if it fails. In 2006 an additional study on the replacement of the Adams Tunnel cable was completed in response to public and agency scoping comments. The study supported the decision not to replace the cable.

For electric service reliability, Tri-State must maintain a second source of power for Mountain

Park's load. The results of system studies by both Western and Tri-State demonstrated an electrical system reliability improvement when a new 138-kV transmission line was added between the Windy Gap and Granby substations. The Northern Colorado Water Conservancy District expressed interest in extending the 138-kV transmission line directly to the Colorado Big Thompson project facilities at Granby Pumping Plant to allow voltage support for motor starting at Granby pumping plant.

The right-of-way for the existing transmission line between Windy Gap substation and Stillwater tap is generally 30 feet wide, which is inadequate for new transmission line construction, operation and maintenance. Some segments of the proposed rebuild and upgraded transmission line are proposed to be constructed on the new rights-of-way on alternative alignments. Remaining segments of the

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transmission line would be constructed on existing rights-of-way that would be widened to accommodate construction, operation and maintenance.

The proposed substation site for the new 138 69-kV Granby Pumping Plant Substation would be approximately 200 feet by 100 feet in the area and located on reclamation property.

Prior to the start of hearing an open house was held to provide information on the proposed project and the environmental-effects analysis and the Draft

Environmental Impact Statement. And I believe most of you have participated in that.

The public hearing is not a question-and-answer forum, this part -- this is a public hearing. It is an opportunity to provide your formal comments orally.

I will be calling the registered speakers, those individuals who have signed the sheets, so, please, if you want to speak, you need to sign the sheet. Right now I believe we only have one individual. So -- and after I call your name, please come to microphone. And you're -- the court reporter is going to be recording what is said, and so please state your name and spell your name for the record.

I will be -- well, I will be limiting oral

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comments to three minutes out of respect to the others here. But if you have written comments, again, I think we have told you all, you may submit them, and they will be entered into the hearing record. If you run out of time during your oral presentation, you should provide your written comments to the court reporter.

You all have until May 29th, 2012 to submit written comments. All comments will be a part of the administrative record for the projects. Written comments can be sent to the address on the comment forms, which I think you all have, and in the notice that's provided on the posters back there. And, as I mentioned, the court reporter is recording your

comments. And if you want to -- earlier others submitted comments on the transcript as well, and you may contact Jim Hartman if you want to receive a copy of the hearing transcript. When available, Western will post a copy of the transcript on our web site, and our court reporter is Rosie Stahl with Eagle-Summit Reporting.

All substantive comments received this evening and throughout the public comment period will be addressed in the final environmental impact statement. Public comments assist the decision makers by identifying concerns and values of interested parties.

When the public comment period ends the final EIS will be prepared. The final EIS is scheduled to be issued in the fall of 2012. After the United States Environmental Protection Agency publishes the notice of availability for the final EIS, there will be a 30-day waiting period before Western makes a final decision on the project.

The Forest Service and the Bureau of Land Management also will issue their decisions and complete their own decision processes after the EPA notification is published. These decisions will be issued as separate records of decision.

I now call upon our first speaker.

UNIDENTIFIED SPEAKER: Is there anyone else who wanted to sign up to speak?

AUDIENCE MEMBER: Could I ask why isn't it question and answer since you've got -- I mean, look at

this, you've got to out number us. You've got all the experts we could want.

MS. DOUTHIT: Yeah, this is a public hearing and it's an opportunity to provide your comments to the public in a public forum on the record.

So, with that, I'll call Richard Schoenebeck.

MR. SCHOENEBECK: All right. My name is Richard Schoenebeck, S-c-h-o-e-n-e-b-e-c-k.

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I'm a summer resident on County Road 64, which is my property is right across from Cutthroat Bay campground. I have made some -- I have talked to

T-1-1 various people here tonight, and there is some, I believe, alternatives other than following the existing power line that presently exists on County Road 64. I believe at that -- in that area of the Cutthroat Bay campground why don't you consider running it across through the federal land which is across the road from 64, following the parallel path that already exists which does go across the lake. And I heard aesthetically-wise it's going -- it might not be the best for Granby. Well, that part of the lake we cross might represent maybe less than one percent of the lake, and I don't think it's going to be bothered.

As for the campground, since they destroyed it but cutting all the trees down, I'm pretty sure not very many people use that campground, and it is a private campground for group camping. So -- and when

T-1-1

I'm up there very few people during the summer use that campground. So put the power line through the campground. Take it off the residents. Thank you.

MS. DOUTHIT: Thank you for your comment. The next speaker is Spike Potts.

MR. POTTS: I don't have anything to say. I

got my answers, thank you.

MS. DOUTHIT: And is there anyone else who would like to register to speak? So anyone? All right.

Hearing none, thank you again for coming out tonight, and do submit your comments by May 29th, 2012.

MR. SCHOENEBECK: Can I make another comment since nobody else is making comments?

T-1-2

Another alternative rather than run the cable through the air for that section of residence, which from where the -- from the Granby pump to 34, bury the cable. You can then bring it out of the ground and send it where you want. But at least you could dig the hole, bury it along the line. You're only talking about less than maybe, what is that length, about 100 feet?

AUDIENCE MEMBERS: It's about a mile.

T-1-2

MR. SCHOENEBECK: And about a mile, and that's all you have to do. Because that's the only place probably on this whole line that you have residents, and that's the only place you haven't considered were the residents within that area. All the other area I'm pretty sure is open land. That's my only other comment.

MS. DOUTHIT: Anyone else? All right. Well again --

MR. SCHOENEBECK: Thanks.

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MS. DOUTHIT: -- thank you for coming out. And, again, everyone will be around afterward to answer questions.

(A break in the record was taken from 6:14 p.m. to 6:38 p.m.)

REPORTER'S CERTIFICATE

The above and foregoing is a true and accurate transcription of my stenotype notes in my capacity as a Registered Professional Reporter.

Dated at Breckenridge, Colorado, this 10th day of May, 2012.

_____

Rosie Stahl, Court Reporter
Eagle-Summit Reporting & Video
PO Box 464
Kremmling, CO 80459
970-468-9415

VERBATIM TRANSCRIPT OF
PUBLIC MEETING FOR:
GRANBY PUMPING PLANT-WINDY GAP TRANSMISSION LINE PROJECT
HELD TUESDAY, APRIL 24, 2012
AT MOUNTAIN PARKS ELECTRIC
321 WEST AGATE AVENUE
GRANBY, CO 80446

A P P E A R A N C E S

Public Comment by:
Nancy Stuart
Kristen Manguso
Sandra Schoenebeck
Pat Verlo
Steve Miller
Pat Potts

Also Present:
Carey Ashton

♀

1 APRIL 24, 2012, 4:00 P.M.

2 P R O C E E D I N G S

STATEMENTS BY NANCY STUART AND KRISTEN MANGUSO:

MS. STUART: It's Nancy Stuart, and I'm Garfield County Commissioner for District Two. S-t-u-a-r-t.

T-2-1 And I guess our concerns is the visual impact up 34. And then we also have some concerns about the electricity that's already in the Adams Tunnel that was put in there and is referred in Senate Document 80 about making the loops. So if it made the loop, if that was the thing that connected everything, we sure don't need the visual impacts if we can avoid that. And it's a US national scenic byway that we're talking about here that comes down the 34 corridor and on down 40.

MS. MANGUSO: Kristen Manguso, K-r-i-s-t-e-n M-a-n-g-u-s-o. I'm Planning Director for Grand County,

T-2-2 and I'm here to reiterate Nancy Stuart's comment.

Yes, Commissioner Stuart is correct. We are very concerned about the visual impacts on the Highway 34 corridor.

We also realize that WAPA Power is traded on the futures market, and they have made significant financial gains off of this. And we believe that part of their responsibility is to mitigate the visual

impacts and also the Grand Lake clarity issues. We believe that's part of this as well, the Adams Tunnel and everything that's happened in Grand County.

It's a pretty big deal for the County. I should have brought my notes.

(A brief break was taken while Ms. Manguso retrieved her notes.)

T-2-2

MS. MANGUSO: Grand County also had a visual impact map prepared, and we have requested GIS data be provided. We can't seem to get that GIS data to help us make sure that the visual impact map is accurate. So until we can get data from you guys to help us make informed decisions on the visual impacts of these towers, we have to use something that's inaccurate and probably encompasses a lot more area than it really should.

T-2-3

Another one is the fiscal responsibility of these huge visual impacts can effect tourism in Grand County. You know, the Highway 34 corridor with the three lakes, and we instituted a design review area in 1981. These types of things really effect that. And with THE economic conditions today, it doesn't really make sense to impact our view corridors that could impact tourism in this area.

MS. STUART: And it's the gateway to Rocky

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Mountain National Park, the west end of it, and the Indian Peaks Wilderness, so we have concerns about it meeting.

Also, there is a three lakes design review area, and does it fit into -- the purpose of that was put in place and the impacts that it would cause.

We also -- Lake Granby is part of the Arapahoe National Recreation Area, and it's 36,000 acres within the upper Colorado -- reaches of the Colorado River Valley. And all of this causes us great concern of the impacts, the visual impacts, that -- well,

T-2-3

12 especially where it's going to cross 34 and go to the
13 pumping plant. That's very, very visual on 34. I mean,
14 I was at meetings before where they were going to run it
15 up behind starting on where the -- more or less
16 following the route of the tunnel that pumps it up to
17 Lake Granby. But then when it gets up near the top of
18 Coffey Divide, it's going to cut across, and it's -- I
19 mean, it's right in, right along, the highway and
20 crosses the highway, and then across to the pumping
21 plant.

T-2-4

22 And, like I say, one of our big concerns is
23 the electricity in the tunnel, and that was part of the
24 reason why the Bureau of Rec the purpose of their
25 project was for electricity to be made and tunneled by

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1 the water passing through. And now they want to stop
2 using that because they say that it would be such a
3 greater cost to them to do that, but, yet, they were
4 selling the electricity. And I think now there is
5 $14,000,000 a year made of the electricity that goes
6 through there and that the project has brought. And it
7 was to pay for the project. The project has been paid
8 for. So our thoughts are why couldn't part of that
9 money go to pay for some of what Senate Document 80 was
10 set forth by Congress to protect, which is the greening
11 of Grand Lake. Because you can very well see the
12 impacts of when they start pumping and the water goes
13 from Shadow Mountain over into there. So with this it's
14 all electricity. And, like I say, when $14,000,000 is
15 being made off of this, and the impacts are what they
16 are, and the Senate Document 80 when this all went in

said that it wouldn't cause any of impacts like the water quality and the quantity and fishery and the aesthetics and everything else that went along with it. It's a 400-page document, and now all of a sudden that's what we're finding is that these impacts are very real, and they are very much there. So it's a lot of our very much concerns in Grand County and the Grand County government.

Do you have anything else to ad?

MS. MANGUSO: I think that's going to be it, you know.

MS. STUART: I'm sort of reiterating it over and over, but, like I say, there is -- we have been impacted to death, and we were promised in a Senate document that was created when the Bureau of Rec project went in that this wouldn't happen. And, you know, come visit us, come look at some pictures we got, and we can sure it tell you that there has been impacts, so we don't want any more.

MS. MANGUSO: Thank you.

MS. STUART: I guess that's it. Thank you.

(A break in the record was taken from 4:08 p.m. to 4:11 p.m.)

STATEMENT BY STEVE MILLER:

T-2-5 MR. MILLER: My name is Steve Miller, S-t-e-v-e M-i-l-l-e-r.

And we live in Scanlock subdivision, and we were just advised of where the preferred line will be placed in Scanlock, and we just want to voice our

support for that option. Okay.

MS. ASHTON: Here is a better map.

MR. MILLER: Oh, that's wonderful.

MS. MILLER: So does it give you which option that is?

T-2-5

MR. MILLER: Well, here it says "preferred alternative." So it was just blue line, right? So yeah this blue line, and we're at the

in the Scanlock subdivision. And so the preferred alternative would be moved up the hill from there. And we view that as the most positive step.

MS. MILLER: And our second one would be, second option --

(Reporter interruption.)

MR. MILLER: So our second preferred option would be to move it completely to the other side of Table Mountain.

MS. MILLER: Where it tells you the different option one and option two.

MS. ASHTON: Can I help you, Steve?

MR. MILLER: She won't stop talking. So what I told her was that we just wanted to voice our support for the preferred alternative group. And I guess that's option two; is that what we call option two?

MS. ASHTON: Yeah, that would be called option two, and it's alternative D.

MR. MILLER: Okay. Alternative D is the one that we support.

MS. ASHTON: Yes.

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MR. MILLER: And then our second option after that would be --

MS. ASHTON: Alternative C.

MR. MILLER: Alternative C would be our second option that we would most support.

MS. ASHTON: It is confusing, because this is this is option one for Alternative C over here.

MR. MILLER: Oh.

MS. ASHTON: Or this is option one for Alternative D, I'm sorry. There is option two which goes along the existing, and option one is along the pipeline, the water pipe line, which doesn't effect you.

MR. MILLER: Right.

MS. ASHTON: So over here you are looking at Alternative D, which is the blue.

MR. MILLER: Right.

MS. ASHTON: Option one, option two over here. And then alternative A is existing. You don't want A. A is existing.

MR. MILLER: So we're opposed, or vehemently opposed option -- Alternative A, because that's in our backyard. Okay.

MS. ASHTON: This is so confusing. You need glasses to read that.

MS. MILLER: I know, it's so tiny.

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MS. ASHTON: A is the existing, D is the preferred or proposed, and C is the one that goes on the

west side of Table Mountain.

MR. MILLER: That's all I would like to say.

(A break in the record was taken from 4:15 p.m. to 5:11 p.m.)

STATEMENT BY SANDRA SCHOENEBECK:

T-2-6 MS. SCHOENEBECK: Sandra, the last name is Schoenebeck, S-c-h-o-e-n-e-b-e-c-k.

And I just wanted to add the comment to my previous one of saying they should just condemn all the property along that if they can't move it, because of the emissions of those lines they are not healthy for the people that have to live under it. Okay. That ought to do it. I'm trying to think of a nice way of saying it. But they ought to just condemn all of that property.

(A break in the record was taken from 5:12 p.m. to 5:58 p.m.)

STATEMENT OF PAT VERLO:

T-2-7 MS. VERLO: Pat Verlo, P-a-t V-e-r-l-o.

And I am a resident with property value on County Road 64. And the line will go directly across my property which looks ugly, which brings down the value of my property. And even though they say the magnetic

field is not detrimental to your health, I still question that. It will reduce any buyers I would ever want for that place.

T-2-8 And my other thing the Forestry Department -- we have huge empty campground right across the street, but the Forestry Service doesn't want it on that because it doesn't look good, but it should be on

T-2-8

our personal property. So there is, like, three-quarters to a mile along 64 that has numerous homes that would just destroy our property value, make it look like crap, and it's right next to the lake, so it ruins our scenery.

And so we are requesting that we have under-line, for just that mile anyway, on the way to the pump house, that we that put underground for aesthetic reasons. That's my point.

(A break in the record was taken at 5:59 p.m. to 6:02 p.m.)

(A break in the record was taken from 6:14 p.m. to 6:38 p.m.)

STATEMENT BY PAT POTTS:

MS. POTTS: Hi, I'm Pat Potts, and we're on [redacted]. P-o-t-t-s.

T-2-9

And we were hoping against hope that you would go underground up here. This is a resort area. It's absolutely gorgeous, and then we have power lines. So that that's all. We just would like to keep the beauty.

(A break in the record was taken from 6:39 p.m. to 7:03 p.m.)

STATEMENT BY NANCY STUART:

MS. STUART: This is Nancy Stuart.

T-2-10

Okay. And I just overheard, and I don't know the lady's name, but she works for WAPA, I do believe, over there in the black suit. And she was saying that the $14,000,000 that has been generated actually goes back into the lines and keeping the electricity going on this project. So I would like to know how much of that $14,000,000 has stayed on the Eastern Slope and how much of the $14,000,000 comes back to Grand County?

(A break in the record was taken from 7:04 p.m. to 8:00 p.m.)

(The hearing was adjourned at 8:00 p.m.)

REPORTER'S CERTIFICATE

The above and foregoing is a true and accurate transcription of my stenotype notes in my capacity as a Registered Professional Reporter.

Dated at Breckenridge, Colorado, this 10th day of May, 2012.

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