Final Scoping Summary Report

Appendix C

Comments

APPENDIX C
COMMENTS

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LIST OF TABLES

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Commenters Listed by Document Number

Table C-1 includes all comment documents received by Western Area Power Administration (Western) during the scoping period, with each assigned document number.

Table C-1. Commenters Listed by Document Number

Document Number	Last Name	First Name	Agency or Organization Name or Individual Member of Public
1001	-	-	Northwest Council of Colorado Governments
1002	Warren	Michael	Colorado Division of Wildlife
1003	Public	Jean	Individual
1004	Morse	Travis	U.S. Army Corps of Engineers
1005	Smith	Cindy	EPG, Inc.
1006	Chapel	Steve	Western Slope ATV Association
1007	Smith	Rocky	Colorado Wild (and other signatories)
1008	Burns	Darlene	Uintah County (and other signatories)
1009	Riddle	Robert	Individual
1010	Glover	Breanne	Individual
1011	Sobal	Tom	Quiet Use Coalition
1012	-	-	Bureau of Reclamation
1013	Banks	Donald R.	Bureau of Land Management

Scoping Comments by Category

Table C-2 includes the comment document number and each comment made during scoping, reproduced as they were received, including all spelling and grammatical errors. Because of the unstructured nature of the comment process (i.e., commenters were not answering specific questions, but rather speaking to their concerns), Western and the Forest Service received comments that touched on multiple issue categories. In these cases, the comment was placed into the category where it seemed most appropriate. For example, a comment that talks about establishing vegetation cover after treatment and the types of species to use in revegetation efforts to control erosion is classified in the Vegetation category.

Table C-2. Scoping Comments by Category

Document Number	Comment
Access and Transportation	
1007	V. LIMIT ROADS USED FOR TREATMENT AND PROHIBIT PUBLIC USE OF THEM. Vegetation treatment will require roads along most segments of each power line. In most cases, such roads already exist. These roads and any new ones built should be maintained to the lowest standard needed to provide access to treat vegetation and accomplish any other maintenance and repair work, consistent with safety. However, the design and construction of roads must minimize erosion. (For work in perennially wet areas, see additional discussion in section VII below.)

Table C-2. Scoping Comments by Category

Document Number	Comment
1007	It is important that such roads be closed to public motorized use, unless they have been approved as system routes after a public process. The Forest Service already has a road system larger than it can manage. In some areas, use of motor vehicles on non-system (usually illegally created) routes is a major problem. Allowing, by design or default, public motorized use on roads intended only for power line maintenance would exacerbate this problem, as any such use would not necessarily be limited to the power line roads. Some motorized recreation enthusiasts frequently explore whatever areas they can, regardless of whether such use is legal or appropriate, often causing considerable impacts to as soils, water quality and wildlife habitat effectiveness. Where system roads cross power line roads, it may be necessary to block motor vehicle access to the power line roads from the other roads.
1007	All roads not intended to open to public motorized use should be gated and signed closed. Regular patrols by law enforcement officers should occur, especially during big game rifle hunting season, when many road use violations occur. It is important that gates be placed in areas where they are most likely to be effective, i. e., not in cleared or naturally open areas where they can easily be avoided. Rather, gates should be paced in other areas where mature trees or boulders, e. g., would prevent or discourage driving around gates.
1007	Roads in areas where vegetation treatment has been completed and will not likely need to be done again for many years should be obliterated. This would discourage illegal public access.
1009	Wasatch County encourages restrictions of corridor access roads to the general public to avoid future impacts to the watershed and to prevent user developed roads within the corridor.
1009	Future access needs must be planned and analyzed to determine the disposition of the road at the completion of its intended life. This is to ensure that needed access is maintained or that such access is removed and resulting disturbances reclaimed.
1009	Access to all water related facilities such as dams, reservoirs, delivery systems, monitoring facilities, communication sites, power line corridors etc., must be maintained. This access must be economically feasible with respect to the method and liming of such access.
1009	All necessary action will be taken to protect access. The county will identify and inventory roads and participate with federal and state land management agencies in decision-making regarding site-specific management.
1011	We understand a need to have administrative vehicle access routes to WAPA transmission lines for maintenance, inspection and other activities necessary for proper operation of the transmission line. The existence of these routes will have presence effects on the surrounding environment whether they are used or not. These routes generally receive rather infrequent and low volume use by administrative vehicles, so the actual use effects of these routes on the surrounding environment is minimal. Some routes may only receive administrative use once a month, once a year, or even less. This Is compared to the much greater use effects of a route open to unlimited public access like a Forest Service road. In general, WAPA transmission line access routes were approved under permit for WAPA administrative use only and not open to public use. These routes were generally not designed, constructed or maintained or approved for open public use. A growing population, advances in OHV technology, increased use of public lands and a lack of signage and education have resulted in what is, in effect, a problem of increased unauthorized use and trespass on WAPA transmission line access routes. Unauthorized public use of these routes results in increased maintenance costs, safety and liability concerns and potential vandalism concerns for WAPA. Unauthorized use of these routes also has numerous individual and cumulative negative effects on the surrounding environment. We strongly suggest that all transmission line maintenance and right of way (ROW) access routes be properly closed to public vehicle use to limit negative environmental effects. Properly closing transmission line ROW access and maintenance routes to open public vehicle use use will have numerous benefits, including but not limited to, reducing the spread of noxious weeds, improving public safety, minimizing resource impacts, minimizing erosion, siltation, sedimentation and impacts to watersheds, minimizing impacts to wildlife and habitat, reducing air and water quality impacts due to vehicle emissions and dust, reducing the chance of vandalism, reducing route maintenance costs and reducing the risk of human caused wildfire. (Photo: [p. 5] Steep route eroding due to lack of water and erosion control structures and open unauthorized public OHV use. Public OHV use of a route loosens the tread surface which may contribute to erosionand increased maintenance costs. [p. 6] Tracks of ATVs, motorcycles and jeeps on a transmission line

Table C-2. Scoping Comments by Category

Document Number	Comment
	administrative access route near Salida that is not properly closed to public use. [p. 8] Surface water ford under transmission line access route. Unauthorized public OHV use of this route where none should occur contributes to unnecessary oil and gas contamination of watersheds. [p. 9] This transmission line ROW and access road has presence effects on habitats, vegetation, water flow, etc. just by being there. Unauthorized public use of this route contributes to additional use effects above and beyond that required for administrative access including disruption of natural soundscapes, increased hunting pressure, increased maintenance, etc. [p. 14] Access road contributing to erosion)
1011	Unnecessary and unneeded routes in the transmission line right of way should also be revegetated and recontoured to prevent unauthorized use and limit resource impacts and unauthorized vehicle use.
1011	Routes in the transmission line right of way determined to be necessary for administrative maintenance purposes should be properly gated and signed as off limits to public vehicle use. These gates should be locked with only the permit holder and the managing agency having keys. (Photo: Spur route for transmission line access branching off designated Forest road 225.A. Side spur routes like this should be gated or at least signed as "Administrated route No public access" to prevent unauthorized use.)
1011	Permit holders and their authorized agents should use these designated routes and the gates so as not to create new routes.
1011	Necessary transmission line administrative routes need to be properly maintained to land management agency specifications reduce impacts to the surrounding environment.
1011	These necessary routes should be designed, constructed and maintained to only the minimum standards required to accommodate the most common modes and amounts of required access. In other words, a 2 lane paved route is not required for infrequent access when a narrow rough will suffice. (Photo: Steep route eroding due to lack of water and erosion control structures and open unauthorized public OHV use. Public OHV use of a route loosens the tread surface which may contribute to erosionand increased maintenance costs.)
1011	Existing routes within the transmission line right of way that are now open to public use should be evaluated to determine if this public use was determined to be needed and acceptable as the result of a previously documented NEPA decision. There are many instances where improper closure and lack of management on these routes have resulted in land management agencies and the public having the misperception that these routes were open to public use, when in fact they were originally designed and designated as limited access permit roads open only for administrative use. The North Fooses creek route on the USFS Salida District in Colorado is one such route. (Photo: Improperly signed as an open public road, this administrative access transmission line road on the Salida District invites unauthorized public use)
1011	(Photo: This inadequately closed side spur route off an administrative access road under transmission line is leading to additional unauthorized use by the public on OHVs.)
1011	Photo: [p. 12] Locked gate at bottom of transmission line admin/maintenance road is supposed to deny public access, but even the permittees never use it, as evidenced by trees growing in road bed. Permit holders also access the transmission line admin./maintenance road by bypassing gate and using route on the left in next photo. This is route 225.B on the Salida District. [p. 13] Road 225.B is an administrative permitted transmission line admin./maintenance road beyond this point on the Salida District. There is a locked gate to the right on this switchback which is supposed to deny public access to the power line road. The public bypasses this gate and cuts the switchback where the gate is to gain unauthorized access to 5 miles of road under the transmission line.)
Alternatives	
1007	The FR Notice (at 17914) states that WAPA's use of national forest land, authorized under 36 CFR 251.54, would need to be changed. The EIS should describe what the current authorization allows and requires, and how this would be different under the proposal and any alternatives to It.

Table C-2. Scoping Comments by Category

Document Number	Comment
1007	The EIS should be as specific as possible about how treatment would be implemented under each alternative. Granted, the possible or likely treatments for every line segment could not easily be specified. However, the EIS' design criteria need to specify tree-removal widths for power line corridors, and particularly, state under what circumstances and in what areas would clearing distances of more than the tallest tree height plus about 10 percent be expected to be needed or desirable. It is not appropriate or acceptable to state that a large clearing width, applicable everywhere, would be allowed.
1007	III. SLASH TREATMENT MUST BE CAREFULLY DESIGNED. A major issue in the project will be how to dispose of slash, or logging waste. Cutting trees will produce a sizable volume of unmerchantable material, including tops, branches, and cull logs. In some cases, trees may be too small or too deteriorated to be sold for any product, in which case, entire trees would be "slash". Most of this material cannot be left on site, as it would result in too high of a fuel loading. Fires in such material could produce a flame high enough to threaten the power lines, especially if the slash was first piled. Even if such fires did not threaten lines, fires in a large slash bed could produce enough smoke to cause arcing, which would result in an interruption of electric transmission. But removing slash or disposing of it in place would be a challenge. Removing most of it would be quite expensive, requiring many truck trips. Or slash cold be skidded away from the power line corridors. But that could cause soil impacts, such as compaction, displacement, and erosion, from dragging logs and the use ofheavy equipment to do so. For transport of slash off-site for disposal, there would have to be designated and approved areas for dumping the slash, as it could not be placed anywhere, since doing so could just as easily create a fuel loading problem at the new location. Burning would cause the problems noted above, especially if the slash was first piled. Also, burning large slash piles or those containing material larger than about three inches in diameter is not a good practice because it creates a long, hot fire that sterilizes the soils beneath it and makes them water-repellent. Chipping or masticating could be done for a small percentage of the slash, but it would also be expensive. Also, a layer of chips or chunks on the ground would retard or prevent, for a long time, re-establishment of ground vegetation and trees. It might also use up most of the nitrogen in the soil, further retarding the establishment and growth of any vegetation. If chipping or masticating will be deployed, we recommend that no more than about 20 percent of the ground in scattered, small patches be covered with chips or chunks, and the depth should be no more than about two inches for chips and three inches for chunks. It is desirable to have ground vegetation in power line corridors. Thus some wood in all size classes should be retained on site to reduce soil erosion and gradually decompose into new soil. This would also provide a little shade and help retain moisture, which in turn would facilitate the establishment of ground vegetation. See further discussion in section VIII below. Retained wood should touch the ground so it will decay relatively rapidly and not pose a fuel problem that would threaten the lines. In some areas, it might be possible to reduce slash by offering free firewood to the public. But this would not likely remove enough of the material, and it would be limited to areas that were easily accessible via system roads. In sum, all slash disposal methods have problems of possible resources damage, cost, or possible undesirable effects on the power lines. WAPA and the Forest Service should develop combinations of disposal methods for use on various segments of power lines that would minimize impacts and threats to the lines while sufficiently reducing slash at reasonable cost. The EIS should discuss the benefits and detriments of various slash disposal/reduction methods and combinations of methods. The design criteria should state which methods will be used in which areas or situations, and in what proportions. Monitoring of areas where slash was treated should be done to assess impacts, including any weed introduction and spread (see section VIII below), and to modify future treatments as needed.

Table C-2. Scoping Comments by Category

Document Number	Comment
1007	II. KEEP THE CLEARED CORRIDORS TO MINIMUM WIDTHS, CONSISTENT WITH SAFETY AND RELIABILITY. Clearing trees, and in some cases, other vegetation also, from areas in power line corridors creates a beak in the forest canopy and a radical change in the habitat for some wildlife species. See further discussion in section IV below. Clearing the corridor and maintaining it causes other problems also, such as weed introduction and spread, which is discussed further in section VIII below.. The wider the clearing, the greater the impacts. Therefore, the width of vegetation treatment should be a narrow as possible, consistent with safety and reliability of each line segment. In most cases, the clearing need not be more than the height of the tallest tree plus about 10 percent. On some locations where lines cross steep slopes, the treatment distance might need to be greater than this to prevent trees upslope from the power lines from falling on the lines. (Concomitantly, the clearing distance should then be less on the downhill side of the lines.) Also, additional reduction of vegetation maybe needed where the distance between towers is long and the lines could sway a distance outward from the corridor during periods of high wind.
Climate Change	
1010	I believe as long as this project…reduces the effects of global warming this idea is brilliant and I am in support of it.
Floodplains, Wetlands, and Water Resources	
1004	The Corps of Engineers' jurisdiction within the study area is under the authority of Section 404 of the Clean Water Act for the discharge of dredged or fill material into waters of the United States. Waters of the United States include, but are not limited to, rivers, streams, lakes, ponds, wetlands, vernal pools, marshes, wet meadows, and seeps. Project features that) result in the discharge of dredged or fill material into waters of the United States will require Department of the Army authorization prior to starting work. To ascertain the extent of waters on the project site, the applicant should prepare a wetland delineation, in accordance with the "Minimum Standards for Acceptance of Preliminary Wetland Delineations", under "Jurisdiction" on our website at the address below, and submit it to this office for verification. A list of consultants that prepare wetland delineations and permit application documents is also available on our website at the same location. The range of alternatives considered for this project should include alternatives that avoid impacts to wetlands or other waters of the United States. Every effort should be made to avoid project features which require the discharge of dredged or fill material into waters of the United States. In the event it can be clearly demonstrated there are no practicable alternatives to filling waters of the United States, mitigation plans should be developed to compensate for the unavoidable losses resulting from project implementation. Please refer to identification number SPK-2818-08419 in any correspondence concerning this project. If you have any questions, please do not hesitate contacting me.
1007	VII. CAREFULLY DESIGN TREATMENT IN AREAS NEAR WATER BODIES. The Federal Register notice states that the project "may involve action in wetlands or floodplains". FR Notice at 17914. Any activity in wetlands must avoid long- and short-term impacts associated with the destruction or modifications of wetlands. 10 CFR 1022.3(c). See also 10 CFR I022.14(a). Alternatives that would avoid or mitigate damage to wetlands must be considered. 10 CFR 1022.3(d). The practicality of alternatives to wetland actions and of the mitigation measures must be evaluated with consideration of any public comment. 10 CFR 1022.15(b).
1007	The project may also involve action in riparian areas, those areas immediately adjacent to streams and lakes that show influence of a higher water table. Collectively, riparian, wetland, and floodplain areas are known as the water influence zone (WIZ). Actions in such areas must be designed to minimize damage to soils, water quality, and nontarget vegetation. Generally, heavy equipment, such as tractors, feller-bunchers, log forwarders, etc. commonly used in logging, should be kept out of such areas, as heavy machinery could cause a considerable amount of damage by compacting soils and causing sediment deposition into water bodies. Trees that need to be cut should hand felled (i. e. by people with chainsaws), then either treated in place or skidded out of the WIZ, if the latter can be done with minimal damage. The exception would be if the fisheries biologist believes that woody debris would create, maintain, or enhance fish habitat, in which case some tree bole sections could be retained in the WIZ or the stream itself. However, logs should not be placed near culverts or bridges, nor in such numbers or configuration that a debris jam could occur.
1007	The management measures, design criteria, and monitoring requirements in the Forest Service's Watershed Conservation Practices Handbook, FSH 2509.25, must be followed.

Table C-2. Scoping Comments by Category

Document Number	Comment
1009	Wasatch County encourages restriction of corridor access roads to the general public to avoid future impacts to the watershed and to prevent user developed road within the corridor.
1009	The management of the watershed should allow for continued multiple use. It should preserve the quality and quantity of water as well as environmental values and allow the watershed to support existing and future uses.
Health and Safety	
1003	Western energy needs to be balanced by the toxic assault from their use of toxic herbicide which is also inflicting cancer on people in the area.
Land Use	
1007	To avoid a stark contrast between the surrounding forest and the treated transmission corridors, i.e., a straight line cut, the edges of areas where trees are cleared should be "feathered", i. e., the cutting intensity should gradually transition from full clearing (where needed) to untreated area. Some forest plans have requirements to minimize visual impacts. Note the following from the management plan for the White River National Forest: Standard: Vegetation management plans, for new or reissued permits, are designed to minimize and rehabilitate visual impacts. Guideline: The boundaries of the cut areas bordering utility corridors are blended into the surrounding vegetations in locations visible from key viewpoints. White River Plan at 3-89, in management area 8.32, Designated Utility Corridors - Existing and Potential. Similarly, the plan for the Grand Mesa-Uncompahgre-Gunnison (GMUG) National Forest has direction that utility lines must "harmonize with the landscape". GMUG Plan at III-97. The Arapaho-Roosevelt (A-R) Plan has a guideline with similar language. A-R Plan at 386. Both the White River and GMUG plans direct that, to the extent possible, management in transmission corridors be consistent with that in adjacent management areas. White River id., and GMUG Plan, id. These and other requirements of all national forest management plans must be followed.
Process and Public Involvement	
1003	the "suits" will be at these hearings, which are usually held when the working people are at work and therefore have no voice at all with ..... washington dc agencies.
1007	The EIS should describe the relationship of this project, if any, to the Emergency Powerline Clearing Project on the Arapaho-Roosevelt, White River, and Routt National Forests, for which the Forest Service issued a scoping notice on August 19, 2009. We assume there is some overlap between the two projects, as The analysis area for th[e Emergency Clearing] project includes all distribution and transmission lines on National Forest System lands, approximately 500 miles, across the Routt, Arapaho and Roosevelt, and White River National Forests.
Recreation	
1006	In the past WAPA has left a mess behind when cutting trees under the power line in the Hightower Area of Grand Mesa. Hundreds of trees have been left blocking ATV Trails under the power line which resulted in users going off trail, making their own route because the existing trail was not navigable.
1006	When trees are cut in the winter, WAPA needs to send someone up as soon as the snow melts to clear the trail.
1009	Off-highway vehicles should be used responsibly, and the management of off-highway vehicles should be uniform across jurisdictional boundaries. Laws related to the use of off-highway vehicles should be uniformly applied across all jurisdictions.

Table C-2. Scoping Comments by Category

Document Number	Comment
Roadless Areas	
1007	VI. PROTECT ROADLESS AREAS. It is likely that some of the approximately 270 miles of WAPA power lines on Colorado's national forests pass through some roadless areas. While power line corridors in these areas may still need to be treated, any treatment should be done in such a way as to conserve, to the maximum extent possible, roadless area characteristics. These are: Roadless area characteristics. Resources or features that are often present in and characterize inventoried roadless areas, including: (I) High quality or undisturbed soil, water, and air; (2) Sources of public drinking water; (3) Diversity of plant and animal communities; (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land. (5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation; (6) Reference landscapes; (7) Natural appearing landscapes with high scenic quality; (8) Traditional cultural properties and sacred sites; and (9) Other locally identified unique characteristics. From the Roadless Area Conservation Rule, 36 CFR 294.11 (2001). This Rule is in effect on Colorado's national forests. Any treatment within roadless areas should be designed to minimize impacts. New road construction must be minimized. Before any roads are constructed, non-road construction alternatives should be considered. Any roads must be low standard and, if possible, be obliterated after treatment. Road closures must be made effective. There should be no piling of slash in roadless areas. Weeds must be eradicated.
Social and Economic Values	
1009	Wasatch County encourages utilization of merchantable timber wherever possible and opposes the policy of cutting, loping and scattering timber resources that could be developed into a product. Forest management plans shall be written and effective management techniques adopted to promote a stable forest economy and enhanced forest health, in accordance with the National Healthy Forest Initiative. (Act of 2003, P.L. 108-148) Efficient and effective use of National Environmental Policy Act Documentation for limited timber harvest will be encouraged. Use of Interim Directive (ID) 1909.15-2003-2 will be encouraged for timber harvest projects that do not require further analysis and may be categorically excluded as outlined in categories 12, 13 & 14 of said ID. Opportunities for harvesting forest products shall he promoted.
Soils	
1009	Apply scientifically effective practices to maintain and improve the quality and quantity of desirable plant cover to protect watersheds, timber, and rangelands from soil erosion.
1009	Recognize the Natural Resource Conservation Service (NRCS) soil survey as the authority in matters of soil conservation.
1011	Erosion control structures and culverts must be installed and maintained. (Photo: [p. 5] Steep route eroding due to lack of water and erosion control structures and open unauthorized public OHV use. Public OHV use of a route loosens the tread surface which may contribute to erosionand increased maintenance costs. [p. 16] Unauthorized public use and insufficient maintenance and water diversion structures contributing to erosion on access road.)
1011	In some high altitude environments areas cleared of vegetation may not naturally revegetate on their own with grasses and such, or it may take years for this to occur. Without adequate vegetation, these areas are susceptible to soil instability and erosion, especially on sloping land. Extra care should be taken to stabilize these slopes, using a combination of water diversion structures and planting of grasses and other plants. (Photo: ROW, cleared area without vegetation and the road are all contributing to soil instability on this slope. This is leading to erosion. Extra care should be taken here at this high altitude location to ensure that vegetation and water diversion structures are installed to adequately stabilize the soil.)

Table C-2. Scoping Comments by Category

Document Number	Comment
Special Status and Sensitive Species	
1007	PROTECT RARE WILDLIFE AND PLANTS. Removal of mature trees and some other vegetation adversely alters habitat for a wide variety of wildlife, and can destroy plant populations. Most affected are likely to be species that depend on, or at least prefer, a continuous forest canopy. these species include, but are not limited to: lynx, marten, goshawk, boreal owl, golden-crowned kinglet, olive-sided flycatcher, and red crossbill.
1007	Lynx are known to avoid large openings; in general they "avoid open areas where security cover is lacking". Aubry et al, 1999 at 381; citation omitted. Specifically, these authors cite previous work showing that lynx only cross openings that were less than 100 meters wide. Id. It is very important to maintain landscape linkages to ensure connectivity oflynx habitat. Identified and potential linkage areas must be identified and protected. See Ruediger et al, 2000, at 88-90. Corridors where vegetation is cleared to protect power lines in the proposed project area should not ever need to be 100 meters wide.
1007	WAPA needs to work with the Forest Service wildlife biologists to minimize the adverse impact to lynx habitat for all proposed treatment, especially for any wide clearing areas. Consultation with the Fish and Wildlife Service under section 7 of the Endangered Species Act (ESA) will also be necessary if there is a "likely to adversely affect" determination, which there will probably be for some line segments.
1007	All proposed treatment areas should be surveyed by a qualified botanist prior to treatment. Areas with plants that are endangered, threatened, proposed for ESA listing, or Forest Service sensitive or otherwise known to be rare (such as those identified by the Colorado Natural Heritage Program) must be treated carefully to avoid destroying any plant populations. Rare plant populations must be clearly marked to make it easy for contractors to avoid them. Treatment must also be limited in adjacent areas to allow rare plants to occupy new ground.
1011	Lynx is one such species that avoids open non-forested areas. Where possible, appropriate lower growing species (such as willows, other bushes and shrubs, and perhaps aspen) should be left to provide migration corridors across the transmission line right of way to facilitate species movement. Especially in the higher elevations (9000' and up) that lynx prefer, the growth of trees is very slow. It may take 50 or more years for a seedling to grow to a height where it would interfere with a transmission line. Ground dwelling species like lynx may benefit from 50 meter wide sections of younger trees left to grow periodically under a the transmission line right of way. We know that maintenance crews may have a tendency to just clear all trees and brush in the right of way. A few corridors where this does not occur developed and clearly delineated with the help of Forest Service biologists would go a long way towards preserving and facilitating species migration.
1007	For Forest Service sensitive species, both plant and animal, procedures at FSM 2672.42 and 2672.43 must be followed.
Vegetation	
1003	stop all the overuse of prescribed burning and toxic herbicide.
1007	We agree with the proposed change in focus from "danger trees", i. e., cutting trees that are already at risk of falling on power lines, to active management, under which vegetation is treated, to the extent practicable, before it becomes a threat to power line safety and reliability. However, there are likely numerous areas with possible danger trees that would need to be treated before a more integrated treatment strategy could be implemented. The EIS should identify areas that are most in need of treatment, and what kind of treatments might be done in these areas, as well as what might be done in the future in lower priority areas to prevent threats to power lines from developing.
1007	A design criterion should require establishment of native vegetation a soon as possible after treatment. It is most important to do so in areas where power lines cross steep slopes, as such locations would have the highest potential for water erosion of soils. While native plant species should be used, sterile, annual, non-native plants can be used while native species are getting established on sites that are difficult to revegetate. All sites where revegetation is necessary need to be regularly monitored to assess the progress of reestablishment of vegetation.
1007	Prior to any treatment in a given power line corridor, there must first be a thorough survey for noxious weds. Any such plants found should be eradicated, to the extent practical. After treatment, survey and eradication should be done for at least two full growing seasons. There must also be requirements for vehicles used in treatment operations to be washed before they come on to the national forest each day.

Table C-2. Scoping Comments by Category

Document Number	Comment
1010	I believe as long as this project doesn't affect...ground plant growth...this idea is brilliant and I am in support of it.
Visual Resources	
1007	To avoid a stark contrast between the surrounding forest and the treated transmission corridors, i.e., a straight line cut, the edges of areas where trees are cleared should be "feathered", i. e., the cutting intensity should gradually transition from full clearing (where needed) to untreated area. Some forest plans have requirements to minimize visual impacts. Note the following from the management plan for the White River National Forest: Standard: Vegetation management plans, for new or reissued permits, are designed to minimize and rehabilitate visual impacts. Guideline: The boundaries of the cut areas bordering utility corridors are blended into the surrounding vegetations in locations visible from key viewpoints. White River Plan at 3-89, in management area 8.32, Designated Utility Corridors - Existing and Potential. Similarly, the plan for the Grand Mesa-Uncompahgre-Gunnison (GMUG) National Forest has direction that utility lines must "harmonize with the landscape". GMUG Plan at III-97. The Arapaho-Roosevelt (A-R) Plan has a guideline with similar language. A-R Plan at 386. Both the White River and GMUG plans direct that, to the extent possible, management in transmission corridors be consistent with that in adjacent management areas. White River id., and GMUG Plan, id.
Wildlife and Wildlife Habitat	
1003	Western energy needs to be balanced by the toxic assault on birds, butterflies, insects and animals from their use of toxic herbicide
1010	I believe as long as this project doesn't affect wildlife habitat...this idea is brillaint and I am in support of it.
1011	We realize the concern with trees possibly interfering with transmission lines because of their height. The removal of all vegetation in a transmission line right of way should be avoided. Some forest dwelling species are very reluctant to cross open areas and thus a long linear transmission line right of way devoid of cover vegetation acts as a migration barrier to these species.

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