

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Land Use and Recreation	West	General	Agency-USFS	The Summary Tables and Tables in Chapter 2 state significant change to the 4 wheel drive (WD) opportunity but are silent on the change to dispersed recreation. The changes to dispersed recreation should be discussed.	Executive Summary and Chapter 2 comparison tables have been modified to detail the potential beneficial and adverse changes to dispersed recreation from greater recreational access from the improvement of West Pole Hill Road under Alternatives C and C1. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative (APA). Accordingly, under the APA there would be no effect to the 4WD opportunity or any change in dispersed recreation attributable to the proposed Project with the exception of during actual construction of the project.	Glenn Casamassa
Land Use and Recreation	West	C/C1	Agency-USFS	Alternatives C and C1: The effects of changing from a 4WD challenge road (level 2) to a 2WD passenger car are downplayed for recreation. This is not the case and this should be corrected.	The Alternative C and C1 recreation impact analysis has been augmented to further detail the potential beneficial and adverse impacts to dispersed recreation on USFS lands from the modification of West Pole Hill road from a 4WD road to a 2WD road. The impact assessments described for Land Use and Recreation, Section 4.11 in the Final EIS, have been modified to reflect this change. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to that section of road would be made as part of the APA. There would be no change to the road or its Forest Service classification under the APA, and subsequently no related long-term change to recreation attributable to the Project. Under the APA, short-term impacts would include temporary congestion or blockage of the road by construction vehicles during certain phases of construction. These impacts should be of very limited duration, primarily occurring when construction equipment is accessing or leaving structure locations, or during conductor stringing.	Glenn Casamassa
Land Use and Recreation	West	General	Agency-USFS	Chapter 3 has a separate section for the existing condition on National Forest System (NFS) lands; however, Chapter 4 does not separate NFS land from other lands in discussing the effects to NFS land. Chapter 4 lumps recreation effects for the entire line. We request that you separate the effects on NFS land.	Per an email from Karen Roth to Western, dated September 20, 2013, USFS management decided to not break out a Forest Service-only section, but to be able to identify and track USFS Key Issues and Effects in Chapter 4. Chapter 4 Key Issues and Effects are listed for USFS lands so those may be evaluated separately. Early in the EIS process, Forest Service management agreed that impacts would not be broken out for the small areas of affected Forest Service managed property. The exception was that the Forest Service requested a separate Transportation Plan prepared to their standards. The Transportation Plan was accordingly produced and accepted by the Forest Service. Since there is documented prior agreement between the agencies that only one impact analysis would be conducted, no changes to the Final EIS were made in response to this comment.	Glenn Casamassa
Land Use and Recreation	West	General	Agency-USFS	Throughout the DEIS you should review how you've stated the effects. For example, if you state there is an effect to recreation, that does not tell the reader whether it is an adverse or beneficial or to what degree the adverse or beneficial effect is. This should be corrected.	The impact analysis has been updated where applicable, and impacts indicated as adverse or beneficial. All impacts should be considered detrimental to environmental resources unless otherwise specified.	Glenn Casamassa
Land Use and Recreation	West	C/C1	Agency-USFS	Suggest providing a map for Alternatives C and C1 showing where the public could go once the Pole Hill Road has become a 2 wheel drive road.	In response to Forest Service concerns about improving the 4WD section of West Pole Hill Road, Western has determined that the Agency Preferred Alternative (APA) would not include improving this road, which would be used for construction and maintenance as is. Therefore, no map as suggested by the Forest Service is needed.	Glenn Casamassa
Land Use and Recreation	West	A/A1/A2, B, and C/C1	Agency-USFS	Table S-4 and Table 2.8-1 Measurement Indicators for Key and Other Issues, Issue: recreation uses & experiences: The effects should be as stated below: Alternative A/A1/A2: Slight beneficial effect due to decommissioning of one of the lines. Alternative B: Low (ROS class would change from roaded natural on the portion where the large poles will be located directly next to the road. The recreation visitors experience would be degraded with large poles directly next to the road.) Alternatives C/C1: Change wording to "significant adverse effects to OHV opportunities". Remove the word – Unquantifiable - in Table 2.8-1 also. This does not show up in Table S-4. Need another row to disclose short-term changes in recreation opportunities on NFS lands. See Section 4.11.3.2 Recreation first paragraph.	Text in Tables S-5 and 2.8-2 already state that the recreational experience would be enhanced where the current transmission line would be decommissioned. Per public comment letters, the beneficial effect of abandoning a ROW would be more than 'slight'. Additionally, verbiage in both tables under Alternative B currently include the expected impacts to the recreational setting on Pole Hill Road. Per the ROS Users Guide Page 22, powerline structures are included under both Roaded Natural and Rural. The change in powerlines from wood structures to higher steel poles would potentially necessitate a change in ROS from Roaded Natural to Rural. Text was augmented to include the potential for change in ROS class and the subsequent Forest Service Plan Amendment that would be necessary. The Agency Preferred Alternative (APA) would not require a Plan Amendment. Alternative C and C1 text in Tables S-5 and 2.8-2 has been modified to state the significant adverse effects to OHV users. Under the APA the 4WD section of West Pole Hill Road would not be improved, resulting in no adverse impacts to OHV users, except for short-term access restrictions during active construction activities. 'Unquantifiable' was removed from Table 2.8-1 . Short-term effects are adequately explained in Draft EIS Section 4.11.3.2 and are insignificant and short enough in duration that adding a new line to the Summary Table would not add to the analysis. Table S-4 is tied directly to Key Issues and the Management Indicators identified and agreed to jointly by Western and the Forest Service. Those issues underwent thorough evaluation during the EIS analysis.	Glenn Casamassa
Land Use and Recreation	West	All	Agency-USFS	Table S-5 Comparison of Alternative Effects pg. S-19 Recreation and Table 2.8-2 pg. 2-47: Alternative A: Need to state whether impact is beneficial or adverse. Alternative B: "Long-term impacts would include effects to the recreational setting on Pole Hill Road". Add the word "adverse" before effects. All Alternatives must state whether the impacts are beneficial, adverse, or both.	The impact analysis has been updated where applicable, and impacts indicated as adverse or beneficial. All impacts should be considered detrimental to environmental resources unless otherwise specified.	Glenn Casamassa

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Land Use and Recreation	West	General	Agency-USFS	Chapter 4 Section 4.11.3.2 Recreation: Need to state that the short-term effects are adverse.	The impact analysis has been updated where applicable, and impacts indicated as adverse or beneficial. All impacts should be considered detrimental to environmental resources unless otherwise specified.	Glenn Casamassa
Land Use and Recreation	West	General	Agency-USFS	Chapter 4 Section 4.11.5.2 Recreation pg. 4-96: First paragraph: Need to state that the recreation setting for Alternative B would have a low adverse effect. Fifth line down in first paragraph: "structures associated with Alternatives A and C would affect the recreation setting". Need to state that Alternative C would adversely affect and Alternative A could have both adverse (north line) and beneficial (removing south line) effects. Second paragraph: Disagree with this sentence because Alternative B poles are adjacent to West Pole Hill Road which would change "roaded natural" to "rural" class on this section. Fourth paragraph last sentence: "Whether beneficial or adverse, the effect would be readily apparent and measurable and, therefore, would be of moderate intensity". Delete this sentence because effects cannot be averaged.	The 'recreational setting' in this area is within an existing Forest Service-designated Utility Corridor. According to the Forest Plan direction for these areas, "Human development is obvious and may dominate the foreground views. Both motorized and nonmotorized use occurs in the area." Alternative B would improve the existing recreational setting by eliminating one of two existing ROWs. The 6th paragraph under Section 4.11.5.2 discusses the beneficial effects of abandoning a transmission line corridor, which would occur under both Alternative B and C. Per the ROS Users Guide Page 22, powerline structures are included under both Roaded Natural and Rural. The change in powerlines from wood structures to higher steel poles would potentially necessitate a change in ROS from Roaded Natural to Rural. Text was augmented in Sections 2.2.1.9 and 4.11.5.2 to include the potential for change in ROS class and the subsequent Forest Service Plan Amendment that would be necessary. The Agency Preferred Alternative would not require a Plan Amendment.	Glenn Casamassa
Socioeconomics	West	General	Agency-USFS	Chapter 3 Socioeconomics and Community Resources, starting pg. 3-109: Does not include any mention of the 4WD outfitter, Rocky Mountain Rush, permitted by the Forest Service to use Pole Hill Road. This needs to be added to the affected environment in this section because it needs to track with Chapter 4 Socioeconomic section where the effects are mentioned for this outfitter. See pg. 3-84 in the Recreation section last paragraph- this is where the outfitter guide is mentioned. Should be included as well in the Socioeconomic section in Chapter 3 and business name (Rocky Mountain Rush) should be included (see pg. 4-97 top paragraph for existing condition of this outfitter).	Western does not single out commercial entities or private individuals by name in its NEPA documents. Providing names can be construed as a government endorsement or infer special treatment for that individual or entity. OHV touring as well as clarification that there is one OHV authorized permit holder has been added to Section 3.13 .	Glenn Casamassa
Socioeconomics	West	C/C1	Agency-USFS	Table S-5 Comparison of Alternative Effects – Socioeconomics and Community Resources pg. S-20: Alternative C and C1: "Reconstruction of West Pole Hill Road would result in moderate long-term effects to a Forest Service permit holder that leads OHV tours in the Pole Hill area". This should state <u>significantly adverse</u> short- and long-term effects to the Forest Service authorized permit holder.	Table S-5 has been revised to reflect significant Alternative C and C1 adverse effects to the Forest Service authorized permit holder. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative. Under the APA there would be no change to the road or its Forest Service classification, and no impact to the OHV authorized permit holder, except for potentially negligible, temporary access delays during construction in this vicinity.	Glenn Casamassa
Socioeconomics	West	General	Agency-USFS	Chapter 4 Socioeconomic section pg. 4-132 second full paragraph: DEIS states "but would not completely displace the outfitter". This does not accurately display what would happen to the business since they would be losing their main attraction, the challenging 4WD section of West Pole Hill Road. The outfitter has stated this would most likely destroy his business. The DEIS states "the economic effects to this business are anticipated to be significant and long-term." Rather should state "the economic effects to this business are anticipated to be significantly adverse, short and long-term effects". We disagree with the last sentence of this paragraph because as written it downplays the significant adverse effects to this business.	Adverse, short and long-term effects' has been added to Final EIS Section 4.13 to describe the significant impact to the OHV authorized permit holder under Alternatives C and C1. Under the Agency Preferred Alternative, no improvements to this section of road would be made. Since there would be no change to the road or its Forest Service classification under the APA, there would be no impact to the OHV authorized permit holder except for potentially temporary delays in access during construction in this vicinity. Short-term impacts could be temporary congestion or blockage of the road by construction vehicles during certain phases of construction.	Glenn Casamassa
Visual	West	General	Agency-USFS	A couple of the variations that were developed after the KOPs were identified were the undergrounding of the line on the western end and the moving of the overhead section of the line from the slope up and to the south of the West Pole Hill Road to the shoulder of West Pole Hill Road. The Forest Service Landscape Architect had asked for a visual simulation of these developments from a point west of the Forest Boundary that would take in both the transition of the line from underground to overhead. That transition would necessitate a building and yard and two thickened towers. It would happen on private land next to the Forest boundary and the line would go from the double to single towers as it goes up the West Pole Hill Road.	The Agency Preferred Alternative does not include an underground construction component, so an additional simulation at that KOP was not completed. Western committed to doing additional simulations on the APA route. These additional simulations are presented in Appendix C of the Final EIS.	Glenn Casamassa
Visual	West	General	Agency-USFS	Appendix C at KOP 14 – the photograph supplied by the Forest Service Landscape Architect to Jeremy Call (with Logan Simpson) was taken from the opposite direction on Forest Service land but no visual simulation was prepared which needs to be done.	AECOM replaced the photo at this KOP in Appendix C of the Final EIS. Additional visual simulations are presented in Appendix C of the Final EIS for the agency preferred alternative.	Glenn Casamassa
Transportation	West	General	Agency-USFS	It is important to note for the transportation resource that maintenance levels and user classifications can differ between agencies and jurisdictions. While the maintenance level classifications of the Forest Service roads are based off a numerical value (1-5), it is more importantly noted that user classifications can differ within a maintenance level. To clarify, as it applies to Pole Hill road, it is currently a Level 2 road servicing high clearance 4x4 vehicles, or a specific (smaller) user class. An upgrade, even within its level status can create access for a larger user class, or low clearance 4x4 vehicles.	Text has been updated to clarify an upgrade to West Pole Hill Road would create access for a larger user class via lower clearance vehicles. See Section 4.16 of the Final EIS for modified text. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West	C/C1	Agency-USFS	The DEIS states that a less than significant impact would result from alternatives C and C1. Less than significant would not describe the effects of the transportation system 20 years from now with increases in maintenance, user defined routes and resource disturbance.	Text was augmented to better reflect significant effects associated with Alternative C and C1. The individual resource effects in Chapter 4 were tied directly to the Significance Criteria (found in each resource section in chapter 4) using the Impact Thresholds that are described in Chapter 4. The Significance Criteria, including the terminology used, underwent a thorough review and approval process with the Forest Service before being used in the EIS process.	Glenn Casamassa

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Transportation	West	C/C1	Agency-USFS	Currently the transportation system of Pole Hill is isolated and self-sustaining and serves a small user class (high clearance 4x4). With ANY increase in traffic proposed under alternatives C and C1 the transportation system of Pole Hill would be negatively impacted by allowing a larger user class access (low clearance 4x4).	In this scenario, the terms 'beneficial' and 'adverse' can be highly subjective, and what is beneficial to one aspect or user of the Transportation resource may be adverse to another. Text in Transportation Section 4.16 has been modified to detail adverse impacts associated with increased maintenance and resource disturbance, and beneficial impacts associated with opening access to a larger group of users. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West	General	Agency-USFS	Section 4.16 reads with short-term effects from construction based activities. These short-term effects are for the construction activities of the structures themselves. The long-term effects need to be stated if reconstruction of West Pole Hill Road occurs.	Section 4.16 text has been augmented to better clarify the long-term effects of West Pole Hill Road reconstruction. Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West	General	Agency-USFS	Dismissal of transportation comments were downplayed significantly without communication between resources. Talking through these issues would have helped us to arrive at an acceptable conclusion with the Forest Service position portrayed.	Comment noted.	Glenn Casamassa
Transportation	West	General	Agency-USFS	In Western's response to Forest Service comments, it was stated that "A determination that any increase in traffic would be significant may not be defensible and would establish an awkward precedent" is simply side casting professional judgment. Furthermore a "potential increase in traffic" from a recreational user (OHV/4x4) perspective directly correlates to the transportation system. Recreational users will come in larger quantities because a greater user class will have access.	Western must state that extreme OHV users are not the only constituency that desire access to the National Forest. From the perspective of the larger user class that would have access to the forest with an improved road, improved access would be a positive and beneficial impact. Text in Section 4.16 has been updated to detail the adverse and beneficial impacts of improving the 4WD section of West Pole Hill Road. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West	General	Agency-USFS	Maintenance Level (ML) classifications for Forest Service roads are numerical based 1-5, but they are dependent and defined on user comfort (passenger car). References to ML or classifications should note that while changes in classification are not anticipated, changes in user comfort are. With this increase in user comfort there is also a larger user class to the transportation system.	Text in Section 4.16 has been modified to note that although West Pole Hill Road maintenance level classification may not change, changes in user comfort would result in a larger user class gaining access to the transportation system. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West	General	Agency-USFS	Section 4.16 Transportation – Paragraph references the wrong sections for key issues and other issues selected for detailed analysis.	Section references have been corrected.	Glenn Casamassa
Transportation	West	C/C1	Agency-USFS	Section 4.16 Transportation – Second sentence – could include "increased traffic" construction based and post construction under alternatives C and C1.	Text in Section 4.16 has been modified per the comment to include the adverse short-term increase to traffic from construction activities as well as the long-term increases to traffic from reconstruction of Pole Hill Road under Alternatives C and C1.	Glenn Casamassa
Transportation	West	General	Agency-USFS	Section 4.16.1 Methodology – First sentence – states "existing daily traffic counts" curious what those are, where they were obtained and what roads they were taken from? Do these traffic counts reflect the roads on NFS land? Were attempts made to get traffic counts on NFS land?	Existing daily traffic counts were taken from Colorado Department of Transportation and Larimer County for large highways and secondary roads (Mall Road) within the project area and are presented in Table 3.16.1 . They do not reflect traffic on roads on NFS lands. Text in Section 4.16.1 has been modified to better describe the data source. If USFS Annual Average Daily Traffic (AADT) counts are available for affected USFS roads within the project area, they were not provided.	Glenn Casamassa
Transportation	West	General	Agency-USFS	Section 4.16.2 Significance Criteria – Another bullet could be added – Creation of road conditions that would increase user comfort and also user access within NFS land.	The Significance Criteria underwent thorough and exhaustive review and comment with the Forest Service to avoid subjective analysis. The individual resource effects in Chapter 4 were tied directly to the Significance Criteria (found in each resource section in Chapter 4) therefore, no bullet was added. Under the Agency Preferred Alternative, due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made.	Glenn Casamassa
Transportation	West	All	Agency-USFS	Section 4.16.3 Impacts Common to All Alternatives – Third sentence – "increased vehicle trips during and after construction activities." After needs to be included for future use of the road system by Western and public alike.	As two transmission line corridors are consolidated into one, it is anticipated that maintenance traffic levels would decrease when compared to existing maintenance traffic levels. Furthermore, Western would coordinate with the Forest Service to identify access spur roads that should be gated to discourage the creation of unauthorized user-created trails on National Forest System lands. The following revised text is provided in Section 4.16.3 Impacts Common to All Alternatives of the Final EIS: "Direct and indirect impacts to transportation resources could come from increases in traffic due to increased vehicle trips during construction. It is anticipated, given the maintenance of only one transmission corridor, that traffic maintenance levels would decrease during operations from existing maintenance levels."	Glenn Casamassa
Transportation	West	All	Agency-USFS	Section 4.16.3 Impacts Common to All Alternatives – Seventh sentence – MUTCD conformance is standard for all road signs.	Text has been modified for clarity. Revised text is provided in Section 4.16 of the Final EIS: "All road signs would conform to Manual on Uniform Traffic Control Devices (MUTCD) standards."	Glenn Casamassa
Transportation	West	All	Agency-USFS	Section 4.16.3 Impacts Common to All Alternatives – Final sentence – I have stated that there will be a negative impact to the transportation system (and all resources) of the Pole Hill area under alternatives C and C1. Final sentence does not reflect that.	The specific impact analysis for Alternatives C and C1 was not included under Draft EIS Section 4.16.3 , Impacts Common to All Alternatives, but was located in Draft EIS Section 4.16.5 , Impacts Unique to Specific Action Alternatives.	Glenn Casamassa
Transportation	West	All	Agency-USFS	Section 4.16.3 Impacts Common to All Alternatives – Second paragraph, sentence eight – and also access to a larger user class.	The specific impact analysis for Alternatives C and C1 was not included under Draft EIS Section 4.16.3 , Impacts Common to All Alternatives, but was located in Draft EIS Section 4.16.5 , Impacts Unique to Specific Action Alternatives. 'Access to a larger user class' is not an impact common to all alternatives.	Glenn Casamassa

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Transportation	West	No Action	Agency-USFS	Section 4.16.4 No Action Alternative – Last sentence – Long-term impacts would NOT be similar to “Impacts Common to All Alternatives” on NFS lands.	Maintenance and replacement activities for the existing transmission lines under the No Action Alternative would be similar to construction and operational activities as described in Draft EIS Section 4.16.3 Impacts Common to All Alternatives, and would result in similar short-term and long-term construction and operational impacts. Impacts Unique to Specific Action Alternatives were detailed in Draft EIS Section 4.16.5 . See Section 2.2.1.1 middle of first paragraph, "70-80% of structures will be replaced in the near future." Therefore, effects would be similar. Western would in all likelihood rebuild the entire lines over a period of years through their ongoing maintenance program in both ROW's in the near future in the absence of the proposed Project, resulting in access road maintenance and pole replacements along most of both ROWs.	Glenn Casamassa
Transportation	West		Agency-USFS	Section 4.16.5 Impacts Unique to Specific Action Alternatives – Paragraph seven, second sentence – Once again the reconstruction of 122 and 247.D will result in higher user comfort which will result in more users to the area.	Text in Section 4.16.5 has been modified per the comment. It is likely that the public currently excluded from access would view improved access as highly beneficial, as opposed to the Forest Service view. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West		Agency-USFS	Section 4.16.5 Impacts Unique to Specific Action Alternatives – Good paragraph but last sentence needs to read “likelihood” rather than possibility, this is professional judgment based on similar projects along the Front Range. This would be an irreversible change to the 4x4 challenge section of the West Pole Hill Road.	Text in Section 4.16.5 has been modified per the comment. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West		Agency-USFS	Section 4.16.7 Residual Impacts – First sentence – needs to read “likelihood” rather than possibility.	Text in Section 4.16.7 has been modified per the comment. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West	C/C1	Agency-USFS	Table 4.16-2 Access Requirements on National Forest System Land by Alternative – Statement under the table is believed false. Impacts to some degree will occur to the transportation system on NFS land under alternatives C and C1.	Text was augmented to better reflect significant effects associated with Alternative C and C1. The individual resource effects in Chapter 4 were tied directly to the Significance Criteria (found in each resource section in chapter 4) using the Impact Thresholds that are described in Chapter 4. The Significance Criteria, including the terminology used, underwent a thorough review and approval process with the Forest Service before being used in the EIS process.	Glenn Casamassa
Transportation	West	C/C1	Agency-USFS	Section 4.16.8 Irreversible and Irretrievable Commitment of Resources – Once again the lasting access that this project would create under alternatives C and C1 would have an impact to the transportation system.	Section 4.16.8 was augmented to better reflect effects associated with Alternative C and C1. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West		Agency-USFS	Section 4.16.9 Relationship Between Local Short-term Uses and Long-term Productivity – Disagree with the second sentence.	Section 4.16.9 was augmented to better reflect effects associated with Alternative C and C1. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative.	Glenn Casamassa
Transportation	West		Agency-USFS	Chapter 8.0 INDEX – page 8-2 – Transportation, general comment that pages 3-131 and 4-159 don't exist, page numbers have changed to 3-126 and 4-147.	References to page numbers have been checked for accuracy and corrected where necessary.	Glenn Casamassa
Transportation	West	C/C1	Agency-USFS	Section 1.6.4.2 Other Issues Selected for Detailed Analysis – A bullet can be added to address one of the Forest Service's main concerns relating to the likelihood of increased traffic and resource damage under alternatives C and C1.	Bullet was added: "• Effects of increased traffic and resource damage under Alternatives C and C1 due to West Pole Hill Road improvement."	Glenn Casamassa
Transportation	West	C/C1	Agency-USFS	Table S-5 Comparison of Alternative Effects – Page S-21 – Don't agree with the statements for Alternatives C and C1. Less than significant is not the view of the Forest Service for the future of the transportation system.	Text was augmented to better reflect significant effects associated with Alternative C and C1. The individual resource effects in Chapter 4 were tied directly to the Significance Criteria (found in each resource section in chapter 4) using the Impact Thresholds that are described in Chapter 4. The Significance Criteria, including the terminology used, underwent a thorough review and approval process with the Forest Service before being used in the EIS process.	Glenn Casamassa
Transportation	West	C/C1	Agency-USFS	Table 2.8-2 Comparison of Alternative Effects – Page 2-49 – Don't agree with the statements for Alternatives C and C1. Less than significant is not the view of the Forest Service for the future of the transportation system.	Text was augmented to better reflect significant effects associated with Alternative C and C1. The individual resource effects in Chapter 4 were tied directly to the Significance Criteria (found in each resource section in chapter 4) using the Impact Thresholds that are described in Chapter 4. The Significance Criteria, including the terminology used, underwent a thorough review and approval process with the Forest Service before being used in the EIS process.	Glenn Casamassa

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Transportation	West	General	Agency-USFS	<p>Transportation Conclusion</p> <p>It is apparent through the transportation comments that the Forest Service sees the reconstruction of West Pole Hill road as a negative impact to the transportation system of the Pole Hill area. This stance has never wavered and was never discussed on how it could be clearly portrayed. It has gotten better, but still lacks clarity to show that negative impacts are likely. It was downplayed and dismissed numerous times as indicated by the comment responses provided to the Forest Service by Western and the NEPA Contractor. Construction activities as stated in the DEIS are speaking to the construction of the structures and not the road. Under certain alternatives the reconstruction of Pole Hill Road is required for the power line installation. It is the reconstruction of the road that will produce long-term negative impacts to the Pole Hill transportation system and nearly every resource present within the Pole Hill area. Another area of concern and major point of confusion is that the transportation system on NFS land was not clearly defined. It seemed that more than once the transportation system was considered for the entire project and not separated between jurisdictions. Transportation analysis for NFS land needed its own section, period. When this project crosses NFS land, the transportation analysis changes drastically and they are not related to other public and private systems. This document needs to correctly reference page numbers or sections.</p>	<p>Section 4.16 has been updated, per USFS comments, to more clearly defined impacts associated with the improvement to West Pole Hill Road. Western agrees that improved access to the forest would attract more forest users, and would result in impacts associated with that increased use. However, it is undeniable that the public currently excluded from access would view improved access as highly beneficial from their perspective, as opposed to the Forest Service's perspective of negative impacts, and both positions have merit. A separate Transportation Plan was produced in response to the Forest Service's request to discuss transportation issues on Forest Service managed areas. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative. The Final EIS has been reviewed to correct page or section references where needed. Incorrect section references in the first paragraph of Section 4.16 were corrected.</p>	Glenn Casamassa
Proposed Project	East		Public	<p>Main issue was that the route up around the mountain on the east end of the line would run over/through properties up there. We need to make sure we move this route down the mountain to the north on our next set of maps, maybe to the edge of the burn area as suggested by the residents at the public meetings.</p>	<p>This route (Alternative A) was added to the Draft EIS in response to requests from members of the public who attended the routing workshops. Western is aware of several issues with this route, and it was not selected as part of the Agency Preferred Alternative.</p>	Linda Toppe
Alternative	East	C&D	Public	<p>We are the owners of the historic Pinewood Schoolhouse, located across from the eastern tip of Pinewood Reservoir, and directly in the path of Alternatives C and D for the Estes-to- Flatiron Transmission Lines Rebuild Project. We are also residents in the area who currently have WAPA transmission lines crossing our residential property at 239 Skinner Gulch Road. We would like to sign up to submit a formal oral comment at the October 29, 2014 Public Hearing at the Rialto Theater. Do we sign up that day, or by contacting you? Is there a time limit to the oral comments? Also, we plan to submit further comments in writing, which we understand can be emailed to this address as well, correct?</p>	<p>The section of the existing Western transmission line that passes through the Newell Lake subdivision was proposed for relocation from the beginning of the NEPA process due to encroachment and safety concerns. Information about commenting and the public hearings was provided to the commenter.</p>	Gib and Lisa Coalwell
Alternative		A	Public	<p>We know the very large poles that you'd like to use for this project would not only ruin our view, but seriously diminish the resale value of our home right when we need that money for our retirement. We know the only logical place for poles that big is on the backside of Green Mountain we all live on. I believe you refer to this route as "Alternative A – North Route".</p>	<p>Alternative A was analyzed in direct response to public comments received. A number of issues, including steep terrain, difficult access, and constructability were identified. In addition, Route A would not eliminate visual impacts to residents as there are homes on the back side of Green Mountain as well. This route was not selected to be part of the Agency Preferred Alternative. Section 2.8 of the Final EIS addresses the rationale for Western's selection of its Agency Preferred Alternative.</p>	Jeff Moore
Alternative	West		Agency-Mayors Office	<p>The Town of Estes Park would like to reiterate its previous position requesting that the Department of Energy consider under-grounding the transmission lines that currently parallel US 36 within the town of Estes Park. In addition, the Town of Estes Park is very concerned that the Town long haul fiber optical lines that are currently in place on WAPA infrastructure along this route will not be replaced on the new project lines. This is critical infrastructure to the Town of Estes Park and its residents and businesses, and in last year's floods it was the ONLY method of communication available during the emergency. Currently this is the only fiber optic link out of the Estes Valley, as the other private line was destroyed during the 2013 flooding. Although the private line is being replaced, it will again be located in a vulnerable location, following the Big Thompson River to the Front Range, leaving the town at considerable risk if another flood occurs. If the Town is prohibited from including our long haul fiber line on WAPA infrastructure, we may be forced to install another parallel line, including additional poles, and causing additional unnecessary environmental impact. This additional cost to the taxpayers of the Town and additional adverse environmental impact can easily be avoided by the continued co-use of publically owned WAPA infrastructure.</p>	<p>Please see Section 2.8 of the Final EIS for a discussion of the selection of the Agency Preferred Alternative. For the reasons discussed there, an underground construction option was not selected to be part of the Agency Preferred Alternative. The new transmission line would include a fiber optic ground wire with capacity at least equal to the existing fiber optic connection. However, the allocation and use of the fiber optics is beyond the scope of this EIS, as is the apportionment of the electrical capacity of the transmission line.</p>	Mayor Pinkham
Visual	West		Public	<p>Potential Effects of this Project on Property Values, Landscape Views, and Appearance of Massive Towers for Property Owners in Meadowdale Hills. I would like comments and reassurance regarding the above noted concerns as to what can be expected. A large part of the reasons for residing in or visiting Estes Park is the natural beauty of the area. It seems to me this area is paying a heavy price for the benefit of others far away who could care less about the effects on our community. How. Is this being financed? Will we expect higher regional or federal taxes, and electric bills</p>	<p>As detailed in Draft EIS Section 2.2.2, shorter average height structures would be considered in sensitive communities, however, shorter structures mean shorter span lengths, which in turn require more structures. Regarding property values, most studies find little or no effect to property values, especially over time. Additionally, in the case of this project, property values already take into account the presence of the existing transmission lines because they have been built near or against the existing easements. Further information on the potential effects to property values is detailed in Final EIS Section 4.13. Western is a Federal agency, but its operations are largely funded through the marketing of Federal hydropower and customer funding, not tax dollars.</p>	Edward Wheeler

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	B	Public	I live in the Saddle Notch division of the Pole Hill Community, past Pinewood Reservoir. The transmission lines go across and on my property at 16235 West County Road 18 E, the corner of Skinner Gulch Road and 18 E. I attended the Open House held at the Bison Center on Wednesday, September 24th. After looking at the different alternative routes suggested, I am in favor of Alternative B, the south route. It seems the most practical and least invasive of all the alternatives. I would like to see the transmission lines taken off my property permanently.	After consideration of many relevant factors, Western has selected Alternative B for this portion of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a discussion of the rationale for the selection of the Agency Preferred Alternative.	Belinda Biddle
General	West		Agency-Upper Thompson Sanitation District	Could you please send me a close-up of the exact location of where the alternatives come close to our property on 2200 Mall Rd. and BOR property 2196 Mall Rd. We are currently investigating the acquisition of some additional land from the Crocker ranch folks directly east of those parcels, south of the Big Thompson River and need to know exactly where your proposed transmission line is slated to come down before connecting to the Mall Rd section. The map books do not get to that magnification detail. We need to get this right the first time around.	The requested information was provided to the commenter.	Chris Bieker
Alternative	West	General	Agency-Visit Estes Park	I have a very general question to ask you, although please don't allow this to represent the main area of interest we have in this project. We understand how dynamic and expensive this entire project is and appreciate all of your efforts in providing info. and seeking public comment. We have had a few inquiries come in asking which option allows for the most underground. At first glance, it looks like Variant A2 and Variant C1 have the underground, but I'm not sure which has more. I've been navigating around your site, however if you could send me the direct link to the public comments that are posted, that would be appreciated.	All public comments and their responses were posted on the Project website when responses were finalized and were also included in the Final EIS. Variant C1 would have the longest underground length at 2.7 miles.	Elizabeth Fogarty
Alternative	East	A	Public	I am totally against Alt. Plan A. These lines would go through some rough territory and go over or border houses as it does in our neighborhood. The most reasonable place for them is the OPEN (no homes under the lines) area on the South side of County Road 18. We understand that Estes Park is asking for underground lines in there area. If they came have this so should we be eligible for underground lines if this is the objection from land owners on the Southern existing lines. The Southern route already has the easements in place, there are very few homes on the Southern lines (Plan B) the ugly poles would be a further distance as far as esthetics are concerned. I don't believe they should follow County Rd. 18 E as they again would be to close to homes especially from the last rise on 18E to the dam. I hope that this letter will be read and our wishes are considered. These are really ugly lines and certainly will bring down our property values if they are in our back yards. PLEASE consider using the Southern existing right of ways. I am also sure that this would be the cheapest way to go.	After consideration of many relevant factors, Western has selected Alternative B for this portion of the Agency Preferred Alternative. Alternative A was included for analysis based on comments received from members of the public who supported consideration of this route; due to several issues this alternative was not selected as part of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a discussion of the rationale used for the selection of the Agency Preferred Alternative.	Norma Dees
Transportation	East		Public	Pole Hill Road Association requests a written agreement with Western Area Power Association that documents WAPA's commitment to: 1) Repair any and all damages to Pole Hill Road Association, Quillan Park Road Association and Saddle North Ranch Road Association roads caused by this project. 2) Meet with the Pole Hill Road Association representative to establish agreement on the scope of repair work prior to bidding this project. Additionally, PHRA requests that potential damage to the road network be addressed in the revised EIS.	Western met with representatives of the Pole Hill Road Association on January 26, 2012 and provided a letter assuring its members that Western would require its contractor to repair any damage to the private portions of the Pole Hill Road as a result of their activity in relation to this project. Repairs would be based on a pre-construction survey of the road condition prior to the contractors use.	Pole Hill Road Assoc.
Special Status and Sensitive Plant Species	All	General	Agency-DOI	US Fish and Wildlife Service Comments: 1. The EIS states that the only T&E species that could occur in the project is the Ute ladies' tresses orchid. USFWS would disagree with this conclusion since the project area is within the range of the Preble's meadow jumping mouse (<i>Zapus hudsonius preblei</i>), which can occur up to 7600' and is known to occur in Larimer County.	Please refer to Table 3.10-1 and the Biological Report. It was determined that suitable habitat within the known elevation range for the Preble's jumping mouse does not exist within the project area. Further wetland delineations are planned on the Agency Preferred Alternative if potential wetlands could be large enough to be impacted if the transmission line cannot span across them.	Robert F. Stewart
Special Status and Sensitive Plant Species	All	General	Agency-DOI	2. Also, the project area is potentially within the range of the Colorado butterfly plant (<i>Gaura neomexicana</i> var. <i>coloradensis</i>), which can occur up to 6400' and is known to occur in Larimer County.	It was determined that suitable habitat for this species does not exist within the project area. The Biological Report is presented as an appendix to the Final EIS to document all potential species and their occurrences.	Robert F. Stewart
Vegetation		General	Agency-DOI	3. Project actions that result in ground disturbance and removal of vegetation have the potential to result in direct impacts to these species, and potentially in indirect impacts if sedimentation issues result from project actions.	It was determined that suitable habitat for these species does not exist within the project area. Western would conduct pre-construction surveys for the selected alternative after the EIS process is complete and prior to construction to minimize any effects to T&E or Sensitive Species.	Robert F. Stewart
Special Status and Sensitive Plant Species	East	General	Agency-DOI	4. Additionally, Mexican spotted owl (<i>Strix occidentalis lucida</i>) is known to occur in mixed conifer areas along the Front Range of Colorado. If a new route was selected that crossed areas of dense mixed conifer stands in narrow rocky canyons, there is the potential that these areas could be occupied by the Mexican spotted owl and therefore, could impact that species.	All routes analyzed for the project have been evaluated for impacts to all special status species with the potential to occur within or adjacent to the project area. Currently, no suitable habitat exists for the MSO within the project area and along the Agency Preferred Alternative.	Robert F. Stewart

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Special Status and Sensitive Plant Species		General	Agency-DOI	5. We would expect the EIS to include a more thorough analysis of the potential for these species to occur in the project area, and to provide an analysis of the anticipated impacts.	The Final EIS includes the Biological Report as an appendix since it is referenced in both the Special Status Species plant and wildlife sections. Section 3.10.1 has been updated with the text: "The assessments contained within the BR are based upon information obtained from several sources: (1) published literature, (2) unpublished agency reports and data, (3) Colorado Natural Heritage Program (CNHP) database search, and (4) field surveys. The CNHP database search for threatened, endangered, and proposed species was requested for a 1-mile corridor on each side of all ROWs. Results of the CNHP database search request were received on November 18, 2011. A more detailed request was submitted for the National Forest parcels crossed. The specifics of the request for National Forest land and the results of this request are provided in the Biological Report submitted to the ARNF for the National Forest portions of the project area."	Robert F. Stewart
Alternative	All	C/C1	Agency-DOI	National Park Service Comments: 1. NPS favors Alternative C, Variant C1 for the reason that the western 2.7 miles of the transmission line would be constructed underground and therefore less visible.	Please see Section 2.8 of the Final EIS for a discussion of the rationale for the selection of the Agency Preferred Alternative. For the reasons given there, an underground option was not selected for the Agency Preferred Alternative. Because of the need to maintain a shrub-free 50-foot-wide zone over buried lines, an underground line may not be less visible than an overhead line from the Park; the cleared ROW has more visual influence than do the presence of structures at that distance. Please see Appendix C in the Final EIS for comparisons of visual simulations from the Park.	Robert F. Stewart
Visual	West		Agency-DOI	2. Section 4.12.1 states that, "... though individual transmission facilities can be seen by the unaided eye at miles from the project (outer extent of the middle ground distance zone) where not screened. Beyond 4 miles, individual facilities are generally difficult to discern. Landscape changes, such as ROW maintenance, may be discernible up to 12 miles away during optimal viewing conditions." We concur with this statement and it is relevant to the following comment.	Thank you for your comment.	Robert F. Stewart
Visual	West		Agency-DOI	3. Figure 3.12-1 depicts the Visual Resources Analysis Area and shows the middle ground extending up to 4 miles from the transmission line. Yet, the potential visibility within the project area is described in Section 3.12.2.2 as, "where potential structures averaging heights of 105 feet would be visible by a 6-foot tall viewer from highways, residences, and recreation areas within 1 mile of the project." We request that the "seen area" mapping for sensitive viewers include the entire middle ground specifically where it encompasses portions of Rocky Mountain National Park (i.e., extending up to 4 miles from the transmission line).	Thank you for your comment. We agree that the area of analysis should include the area within four miles, because structures and the ROW clearing would be apparent to sensitive viewers at that distance. Four miles is a standard distance for NEPA studies and USFS consistency analysis. This comment was addressed with additional "seen area" mapping. See Section 3.12.2 of the Final EIS.	Robert F. Stewart
Visual	All	General	Agency-DOI	4. In our opinion the viewshed analysis did not use the same criteria throughout so in essence the analysis is comparing apples to oranges. The transmission line visibility criteria for the existing transmission line viewshed, Alternative A, Variant A1, Alternative B, Alternative C, and Alternative D show "High" visibility as "up to 7 miles of transmission line visible." The visibility criteria for Variant A2 and Variant C1 show "High" visibility as "more than 2 miles of transmission line visible." Please use consistent criteria and the same analysis area boundaries for the visual resource analysis so we can compare apples to apples.	The visibility criteria have been adjusted for consistency. Section 4.12 in the Final EIS describes the visibility criteria.	Robert F. Stewart
Alternative	All	General	Agency-DOI	5. We support the adoption of Section 4.12.6 mitigation including VR-1, which states that "Rocks, brush, and woody debris will be salvaged and replaced to approximate pre-project visual conditions on graded structure pads, staging areas, and temporary access routes that are decommissioned post-construction, to re-establish the pre-disturbance surface character and aid in revegetation." "Implementation of VR-1, if adopted, would re-establish the pre-disturbance surface character following construction and accelerate long-term reclamation of graded pads, staging areas, and temporary access routes."	Thank you for your comment.	Robert F. Stewart
Visual	All	General	Agency-DOI	6. NPS supports the adoption of VR-2, which states that "Western will utilize non-specular conductors and non-reflective coatings on insulators." "Implementation of VR-2, if adopted, would reduce glare from transmission conductors and insulators."	Thank you for your comment. Western considered using self-weathering steel for its structures where appropriate. It was thought that in wooded areas, if used, this material would provide a protective barrier against the elements while also blending better aesthetically to the physical surroundings. However, the latest field experience information from the utility industry on self-weathering structures indicates that ongoing corrosion weakens these structures, therefore shortening their expected service life. For this reason, and the fact the Forest Service prefers dull galvanized steel, self-weathering steel structures would not be used for this project.	Robert F. Stewart
Visual	West	General	Agency-DOI	7. We support the adoption of VR-3, which states that "A rust-colored, weathered finish would be applied to transmission structures from Bald Mountain west to Estes Park." "Implementation of VR-3, if adopted, would reduce color contrasts and glare from transmission structures."	Western considered the use of both self-weathering and galvanized steel structures, depending on which would be more visually unobtrusive. However, the latest field experience information from the utility industry on self-weathering structures indicates that ongoing corrosion weakens these structures, therefore shortening their expected service life. For this reason, and the fact the Forest Service prefers dull galvanized steel, self-weathering steel structures would not be used for this project.	Robert F. Stewart

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual		General	Agency-DOI	8. During construction of the transmission lines and for vegetation management thereafter we request that to the maximum extent possible feathered tree lines be employed as opposed to straight tree lines. Transmission line clearings, and especially unnaturally straight clearings, can be highly visible on the landscape from many miles away. Feathered tree line clearings for the transmission line will help to reduce the adverse visual impact on Rocky Mountain National Park.	Western agrees that the feathering of ROW edges can result in a more natural appearance. However, feathering results in a wider cleared area, which may draw additional attention to the ROW. Western must point out that ROWs are cleared to NERC standards, and ROW width is partially determined by those standards. Therefore, feathering would have to occur outside of the ROW, and would result in more clearing on landowners' properties and a wider cleared area, since feathering cannot be accomplished by allowing more vegetation in the ROW. The ROW would already be managed to allow shrubs and low-growing trees to the extent compatible with fire management, maintenance access, and other considerations. Most landowners favor minimal impact on their properties, and Western has limited rights to clear vegetation (danger trees only) outside the ROW boundaries. These factors make feathering difficult to implement.	Robert F. Stewart
Proposed Project	All	General	Agency-DOI	Bureau of Reclamation Comments: All costs, direct or indirect, associated with the project that result from moving or replacing the SCADA fiber carried by the existing poles and which Reclamation jointly uses with WAPA and others should be considered a project cost of the ESTES TO FLATIRON TRANSMISSION LINES REBUILD PROJECT.	Bureau of Reclamation would not incur any costs as this is a Western Area Power Administration project.	Robert F. Stewart
General		General	Agency-Town of Estes	The Town of Estes Park strongly encourages and requests the Department of Energy consider alternatives to mitigate the following potential negative of the Estes-Flatiron Rebuild Project to the greater Estes Valley: 1) Impacts of transmission lines and towers and their effect on property owners near the right-of-way; and 2) Impacts of the transmission lines and towers on the rural character, majestic views, and the overall natural beauty of the area; and 3) Impacts to the local economy in the Estes Valley that emphasizes natural attractions for lodging, retail and recreational activities; and 4) Impacts of the transmission lines and towers to the Estes Valley view sheds, corridors and aesthetic values that support a successful Estes Valley economic tourism base; and 5) Impacts of not undergrounding transmission lines which may leave above ground transmission lines and towers vulnerable to terrorist threats; may result in tower failure and potential wildfire issues to an area already dealing with the impact of bark beetle infestation; and potential environmental damage from lightning and arcing of transmission lines; and Consider the negative impacts of the proposed project's encroachment into the greater Estes Valley Planning Area; and Consider the impacts of the proposed project to an Estes Valley landmark located on U.S. Highway 36 known as the "Estes Park" welcome sign where visitors routinely photograph their arrival to Estes Park; and Consider undergrounding transmission lines now and in the future, specifically transmission lines and towers along the U.S. Highway 36 causeway when such projects are presented.	The issues cited by the Town of Estes Park have all been addressed in both the Draft and Final EISs. Potential socioeconomic impacts of the transmission towers on property owners and the local economy are detailed in Sections 4.13.2.2 and 4.13.5. Further analysis regarding the visual impact of the proposed project on the viewshed and overall rural character is found in Section 4.12 with project simulations portrayed in Appendix C. Potential terrorist and fire impacts from the use of aboveground structures can be found in Section 4.17. Western must point out, however, that the two existing lines on maintained ROWs have been part of the landscape for 60+ years, and can hardly be considered a new 'encroachment'. Western's Agency Preferred Alternative would remove one existing line and abandon the existing ROW. This would allow the abandoned ROW to disappear from the visual landscape over time. This positive visual and property owner benefit needs to be recognized as an offset to the proposed taller structures. The new steel structures would be more impervious to wildfires than the existing wood poles, and because the new line would be more resistant to wind and other damage, any potential source of ignition would be minimized compared with the old lines. The Agency Preferred Alternative ensures that the new line would not be visible from the 'Welcome to Estes Park' sign, and would relocate the structures currently located adjacent to Highway 36.	Robert F. Stewart
Alternative	All	General	Public	As a biology student currently studying the issues of conservation biology I would like for the Western Area Power Administration (Western) to take path of reconstruction that has the lowest impact on the surrounding environment. I believe the no action alternative, is not feasible for the prolonged use of the power lines between Estes Park and the Flatirons and another alternative is called for.	Thank you for your comment. The fact that the No Action Alternative is not reasonable or feasible is the motivating force behind Western's proposed action to rebuild the existing transmission lines. Determining the environmental impacts of the alternatives to accomplish this goal is an important part of making an informed decision.	James M. Nichols
Alternative	All	B	Public	With consideration and concerns for the environment, while taking into account the overall cost of the proposed project in conjunction with the impact on local views and recreation. Planned Alternative B is the alternative with the best balance of all the issues kept in prospective. While the underground installation in alternative variants A1, A2 and C1 is appealing for the views they would save by going underground in the westernmost 2.7 miles, the cost is prohibitive. Alternative B is not the least expensive but has the smallest impact for the environment and involves the lowest right of way (ROW) acquisition. By following the ROW in use at present the maintenance and installation will leave less disturbance on the land and makes the best environmental sense.	On the eastern end of the project, Alternative B has been selected as part of the Agency Preferred Alternative.	James M. Nichols
Alternative	All	B	Public	To maintain a power line route for the sustainable future following an existing line in the ROW and building the new line with steel supports for prolonged reliability is a sound plan. With all alternatives having some impact on the wildlife, vegetation and recreational use of the area the 42 acres of new ROW is less than half of any other plan. As an avid outdoorsman I enjoy fishing and driving my jeep in and around this area of Larimer County and prefer the smallest amount of new land use provided by alternative B.	On the eastern end of the project, Alternative B has been selected as part of the Agency Preferred Alternative. Western also notes that consolidation of the two existing lines on one ROW allows the removal of the existing line and abandonment of the other ROW, allowing that ROW to revert to nature.	James M. Nichols

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	B	Public	If the original lines were able to withstand 60 to 75 years since being built a new transmission line built to new standards could last well into the future. Along with new construction methods and materials that can withstand the elements for longer use, the improvement of service roads will provide the means to sustain the transmission line for a very long time. With the ROW being widened in all alternatives the integrated vegetation management approach in the ROW is mandatory to maintain the electrical clearance for the life of the proposed project. This minor cost of ROW acquisition is acceptable in the alternative B plan and is an element of all alternatives. With the ROW expansion even included in the No Action Alternative this development of the land doesn't weigh heavily in my opinion.	Thank you for your comment.	James M. Nichols
Alternative	All	B	Public	I do appreciate the observation of animal and bird interference that construction will create and the effort to reduce this disturbance. Knowing that there is inevitable interaction with the local bird and wildlife I hope the seasonal restrictions and the proposed mitigation measures are not only implemented but also adhered to with out exception. With the habitat disturbances expected to be higher in the Alternative B to sensitive wildlife species than most other alternatives any change to improve this statistic would be met with approval.	Thank you for your comment.	James M. Nichols
Alternative	All	B	Public	As the improvement to the current transmission lines is a clearly needed project, I have submitted my analysis on the planned alternative that might have the lowest impact. This is not the only alternative and the other options have good aspects in their write-ups but I feel that Alternative B will have a strong following if the price does not make it undesirable.	Thank you for your comment. Alternative B has been selected as part of the Agency Preferred Alternative on the eastern end of the proposed Project.	James M. Nichols
Alternative	East	B	Public	<p>Many people in our community support Alternative B. The advantages are many:</p> <ul style="list-style-type: none"> - The south RoW was built in 1953. It is currently sufficiently wide for an open area. No additional easement will need to be acquired for the installation of modern transmission lines. This will avoid the high cost and long time frames of obtaining additional RoWs. -For more than 6 decades landowners have purchased and developed their properties around the south RoW. Land was purchased with the full knowledge and acceptance of the RoWs and structures. -Most existing structures are outside of the 300 foot buffer zone. -In the Pinewood Reservoir area the terrain is open and relatively flat. - Structures (houses, barns, storage buildings) are few and far apart. - Because much of it is ranch land, vegetation along the existing RoW consists of grasses and low shrubs. Where necessary it has already been cleared and is maintained. -There is easy access for installation and maintenance of the transmission lines and structures. There will be no need for additional access roads. Given the longer spans of the new structures, perhaps some of the access roads can be abandoned and returned to their original condition. The open terrain will require a minimum of roads, easing maintenance costs and limiting the damage caused by roads. - WAPA's assumed risk and liability from fire is minimized. Ignition sources from the lines themselves or from other causes will have minimal potential to cause fire compared to other Alternatives. In the unfortunate event of a fire, firefighters have easy year-round access to provide protection to homes and buildings as well as the lines themselves. Due to the general lack of trees, canopy fire dangers are minimized. <p>From Table 2.8-1 of the Estes to Flatiron Transmission Lines Rebuild Project Draft EIS, Alternative B has the following advantages. Please note that these numbers are based on the entirety of the alternative. We have no breakdown for the Pinewood Reservoir area. The No Action Alternative was not included: It requires only 42 acres of new RoW acquisition, compared to 110-177 acres for other alternatives. Only 19 landowners are affected by Row acquisition versus 36-48 with the other alternatives.</p>	Alternative B has been selected as part of the Agency Preferred Alternative on the eastern end of the proposed Project.	Craig Driear
Alternative	East	B1	Public	<p>We feel that Alternative B, as currently proposed, is the "least bad" alternative. However, there are two variants that would further improve Alternative B:</p> <p>Variant 1: Where required to ease the visual impact, wooden double circuit H-frames can be used instead of steel monopoles.</p> <p>We ask WAPA to reconsider the use of steel monopoles in favor of wooden double circuit H-frame design for the area around Pinewood Reservoir and Rattlesnake Park. The current visual impact should be improved as the H frames have longer spans resulting in fewer structures.</p>	Alternative B has been selected as part of the Agency Preferred Alternative on the eastern end of the proposed Project. In order to give the communities at either end of the proposed Project a better means of comparing impacts of alternatives at the local level, new impact summary tables are provided in Section 2.9 of the Final EIS that focus on those communities.	Craig Driear
Alternative	East	B1	Public	<p>Variant 2: Bury the lines in the vicinity of Rattlesnake Park and Pinewood Reservoir. In Estes Park the lines are being buried. There is no reason residents in the Pinewood Reservoir area should not have the same option. The land along the south route is open and the soil would allow the easy burial of transmission lines.</p>	Double circuit wood-H-frames compromise transmission line reliability and don't meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).	Craig Driear
Alternative	East	B2	Public	Variant 2: Bury the lines in the vicinity of Rattlesnake Park and Pinewood Reservoir. In Estes Park the lines are being buried. There is no reason residents in the Pinewood Reservoir area should not have the same option. The land along the south route is open and the soil would allow the easy burial of transmission lines.	The rationale for the selection of the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS. Underground options were not selected for the reasons provided there.	Craig Driear

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	A	Public	<p>In the vicinity of Green Mountain, this alternative has unique challenges when compared to B, C and D.</p> <ul style="list-style-type: none"> -The terrain is very rugged, the forest dense, with few improved roads. - Approximately 11h miles of new RoWs will need to be acquired, an expensive and time consuming process. There exists the potential for litigation from resistant landowners. A simpler solution is to use the existing Rows. -If acquired, the new RoWs will need to be cleared and all of the wood and slash removed. Over such extreme terrain this is a difficult, dangerous and expensive proposition. The steep, newly cleared land will be subject to erosion from snow melt & rain. - Access roads to each new structure will be cut, of sufficient width to accommodate the large vehicles required to install the structures. The steep roads, now devoid of vegetation, will be expensive to maintain and open to severe erosion throughout the year. -Wildlife -- one of the major attractions of the area --will be adversely affected. - With the existing significant loss of trees from Pine Beetles and wildfires, we find it difficult to understand how the destruction of even more forest can be justified - especially when cleared RoWs are already available. - During the winter much of the transmission lines would be inaccessible for repair and maintenance. Fires are more likely to occur in the alternative A area, and would more difficult to fight, than with the other alternatives (especially B). In this already fire-prone area, transmission lines could further increase the risk. - As viewed on a map, the transmission lines cross very close to, if not directly over several homes. WAPA's assumed liability from fire losses would be greater than with the other alternatives (especially B). 	<p>Although Alternative A was added to the NEPA analysis at the request of members of the public, for several of the reasons raised by the commenter, and others, Alternative A was not selected for inclusion in the Agency Preferred Alternative in this area; Alternative B was selected. Western evaluated this option and determined that the route had a number of issues, including access, steep terrain, and general constructability. As a result of public input on the Draft EIS, summary tables of impacts have been added to the Final EIS Section 2.9 that specifically assess impacts of the alternatives at each end of the line. This reorganizing of the data summary in Chapter 2 provides a better means of comparing and contrasting alternatives at the local level. Potential health effects are discussed in Section 4.14 of the Final EIS, and property valuation issues are covered in Section 4.13.5.</p>	Craig Driear
Alternative	East	A	Public	<ul style="list-style-type: none"> - Possible health effects from transmission lines have not been ruled out; the evidence is still inconclusive. We therefore feel that safety is best served by locating transmission as far as possible from people's homes, which can best be accomplished by Alternative B. - Along the Green Mountain deviation, properties would have a compromised viewshed and possible health factor, not foreseen when purchased. Plans to develop and improve the land overlooking or close to the proposed Alternative A route will be affected and may no longer be feasible. - Despite WAPA's conclusions (Estes-to-Flatiron Transmission Line Rebuild Project Draft EIS, section 4.13.3.2) "Most studies found no effect to [long term] property values ... " there will be a severe downward effect on the value of any property newly traversed by transmission lines. However, in section 4.13.5 they claim " ... estimates of the decrease in property values range from 2 to 9 percent." We are in the process of obtaining a statement of property devaluation. Preliminary estimates show a loss significantly more than their estimate, of at least 50 percent. -Table 2.8-1 of the Draft EIS show only 8 favorable outcomes to Alternative A, compared to a high of 19 for Alternative B. There is no breakdown of the effects by area - these are for the entire length of the Alternative A/A1/A2 plans. Negative outcomes include: <ul style="list-style-type: none"> -The most acres of New RoW acquisition (153/157/152 respectively) - The most landowners affected (46/48/42) - Except for the dual RoWs of Alternative D, the most RoW erodible acres (82/76/63) 	<p>Although Alternative A was added to the NEPA analysis at the request of members of the public, for several of the reasons raised by the commenter, and others, Alternative A was not selected for inclusion in the Agency Preferred Alternative in this area; Alternative B was selected. Western evaluated this option and determined that the route had a number of issues, including access, steep terrain, and general constructability. As a result of public input on the Draft EIS, summary tables of impacts have been added to the Final EIS Section 2.9 that specifically assess impacts of the alternatives at each end of the line. This reorganizing of the data summary in Chapter 2 provides a better means of comparing and contrasting alternatives at the local level. Potential health effects are discussed in Section 4.14 of the Final EIS, and property valuation issues are covered in Section 4.13.5.</p>	
Alternative	All	A	Public	<p>In today's Open House we were informed that Alternative A has been re-routed to follow Cottonwood Creek, passing through the area burned in the 2010 Reservoir Road Fire.</p> <p>The same argument applies to the Green Mountain area for any variant of Alternative A. For these reasons, and many of the same reasons stated in the previous presentation, we feel that Alternative B is still preferable.</p>	<p>Alternative A, requested for consideration by members of the public, was found to have a number of issues, and was not selected as part of the Agency Preferred Alternative. Alternative B was selected on the eastern end of the project for the Agency Preferred Alternative.</p>	Craig Driear
Socioeconomics	East	A	Public	<p>The proponents of Alternative A (hereafter referred to as "proponents") are those seeking the removal of the ROWs from their property. Proponents are also those seeking to remove the poles and lines from their scenic view across private and public lands.</p> <p>If the proponents are successful, a new and innocent group of landowners -- those along the proposed Alternative A route - would be burdened with new easements on their land. They would bear the cost in the form of new ROWs, and they would suffer from the diminished scenic value of their property.</p> <p>This amounts to an illegitimate transfer of property restrictions from one group of landowners to another.</p>	<p>As the commenter notes, Alternative A was identified by members of the public for analysis in the EIS. Western evaluated this option and determined that the route had a number of issues, including access, steep terrain, and general constructability. Alternative A was not included in the Agency Preferred Alternative.</p>	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Socioeconomics	East	A	Public	The key issue is that the north and south ROWs have existed for decades. And most, if not all, of the proponents in the Pinewood area purchased their properties willingly and with full knowledge that their land was subject to these ROWs. Conversely, those along the route -- and not in favor of Alternative A -- had no such knowledge. They purchased property that was not subject to these easements.	Thank you for your comment. Alternative A is not part of the Agency Preferred Alternative.	Jeff Barina
Socioeconomics	East	A	Public	In essence then, this is a case wherein one group of landowners would transfer property restrictions to another. That first group stands to gain with increased land values at the expense of the second group, whose property will be devalued.	Thank you for your comment. Potential effect to property values are discussed in Section 4.13 of the Final EIS, and are expected to be minor.	Jeff Barina
Alternative	East	B	Public	The solution is Alternative B: -- Alternative B uses the south ROW, a long-established easement familiar to and accepted by the landowners in the area. -- It successfully removes the north ROW from the property of most proponents and increases land values. -- It does not transfer property restrictions to a new, innocent set of landowners. The remaining issue of protecting scenic views is important, but it should not be paid for on the backs of other, innocent, private landowners - those landowners who are not even adjacent to the open space.	Alternative B has been selected as part of the Agency Preferred Alternative.	Jeff Barina
Visual	East	B	Public	Instead, the cost for protecting scenic views through public lands -which is a public benefit -- should be paid for by the public. One suggestion is to use the double-circuit wooden H-frame structures to minimize the visual impact to the scenic view. This is less expensive and much preferred to the steel monopoles. Another suggestion is using public funds, perhaps through park fees, Great Outdoors Colorado (GOCO) grants or other means, to help fund underground construction through the public open space areas.	The retention of wooden H-frame poles is detailed in Alternative D, which would rebuild both transmission lines 'in-kind'. The commenter's suggestion is not a viable option as a result of the short ruling span, fire risk, increased visual impact, and increased maintenance of the double-circuit 115-kV wood-pole H-frame structures. This alternative is also one of the more costly, as detailed in Section 2.4 , would require maintenance of two ROWs, and be more susceptible to wildfires due to the use of wooden structures. Visually, the removal of one existing line and abandonment of one ROW needs to be compared against construction of one taller double-circuit line on a single ROW. Partial public funding is complicated by regulations governing Western's acceptance of funds from the public; legislation would likely be required to do this. Lacking public or appropriated funding from Congress, electrical power rates (either Western's wholesale power rates or participating utilities retail consumer rates) would pay for the proposed Project.	Jeff Barina
Alternative	East	B	Public	There are two existing power transmission lines in service near the Flatiron substation and Pinewood Reservoir. One line runs roughly on the north side of County Road 18E, and is referred as the "north" line. The second line runs roughly on the south side of the same road and is referred as the "south" line. These two transmission lines run along rights-of-way (ROWs) that have been established and used in their present location for decades, since the 1930's and 1950's. They should be reused for the transmission line rebuild to the greatest extent. Utilization of existing ROWs is beneficial for a variety of reasons, among them: - It is more efficient and allows faster progress for the rebuild effort; - Cost is typically much less than acquiring new ROWs; - Potential litigation and other delays from newly affected landowners is minimized.	Western agrees with the commenter that existing ROWs should be reutilized whenever practicable. However, transmission line upgrades also provide the opportunity to relocate sections of line to avoid encroachments, avoid sensitive resources, relieve identified impacts (e.g., erosion areas), accommodate planned development, and otherwise respond to the situation as it presently exists.	Jeff Barina
Socioeconomics	East	A	Public	Arguments Against Alternative A: 2. Alternative A seeks to deviate from the existing, long-established ROWs. Property owners over the years have purchased land, planned, built homes/structures and otherwise developed their land based on these longtime established ROWs. Abandoning these ROWs and now imposing new easements causes severe, undue and unnecessary harm on a new set of landowners.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	East	A	Public	Acquiring new ROWs along Alternative A is more costly and timeconsuming than using the existing ROWs of the "north" and "south" lines, resulting in slower and more expensive progress. Per WAPA, PVREA customers will bear these costs as higher electric bills.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Jeff Barina
Transportation	East	A	Public	Alternative A would traverse extremely steep terrain. The steep terrain would make ROWs and access roads difficult to create, expensive to maintain, and subject to severe erosion. Snow cover on the steeper sections of these roads would make navigation of maintenance vehicles difficult or impossible. Transmission line maintenance would likely have to be excluded during winter months. More troubling is that essential or emergency repairs during winter months may be especially hampered by the steep, snow-covered access roads.	Alternative A was included in the Draft EIS at the request of members of the public. Western agrees that the concerns raised by the commenter are valid. Accordingly, Alternative A was not included in the Agency Preferred Alternative.	Jeff Barina
Accidents	East	A	Public	Alternative A would pass through thickly forested areas. Sources of ignition - from maintenance activities or the transmission lines themselves - could easily ignite a tinder-dry forested area.	Western would continue to utilize long-established safety practices during construction, operation, and maintenance of any alternative to ensure adequate protection against fire hazards. The new steel poles, coupled with new conductors and more modern design standards would also enhance fire safety. Information on fire management is located in Section 4.7.3.3 Fuels and Fire Management. In any case, Alternative A has not been selected for inclusion in the Agency Preferred Alternative.	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Accidents	East	A	Public	There are many residences within tens of feet of Alternative A's routing. Even more residences and structures are within a quarter-mile of the proposed routing. The resulting liability from fire losses could be very significant. This liability would be compounded by WAPA's decision to deliberately and knowingly favor Alternative A, while a less fire-prone, less steep, less inhabited and more accessible option exists, such as the "south" ROW.	The route mapped for Alternative A was conceptual in nature and did not represent a centerline or final route. Western would employ a 110-foot ROW that would maintain an adequate and safe set-back between the transmission line and residences on all alternatives. Western would continue to utilize long-established safety practices during construction, operation, and maintenance to ensure adequate protection against fire hazards. The new steel poles, coupled with new conductors and more modern design standards would also enhance fire safety. More information on fire management is located in Section 4.7.3.3 Fuels and Fire Management . Alternative A was not been selected for inclusion in the Agency Preferred Alternative.	Jeff Barina
Accidents	East	A	Public	Let me cite just one example: I'm sure you are aware that in 2011, there was a devastating fire in New Mexico. It was called the Las Conchas fire, one of the largest, most destructive fires in that state's history. The liability and those responsible for the damages are still being fought in court. The US Forest Service is billing the local electric cooperative (Jemez Mountains Electric Cooperative) for \$38 million dollars in firefighting costs and damages. Homeowners and insurance companies are also litigating. The coop is claiming the Forest Service is liable. It is a protracted mess. The fire was started by a downed power line from a falling tree during high winds. We have the exact same conditions here in Colorado: --Thick forests with tall trees -- Very high winds -- tinder-dry conditions Why would we perpetuate the same disastrous mistake here in Colorado? Alternative A would do exactly that -- by running a new power transmission line through tall trees, in steep terrain, in a wind-prone area, that is extremely dry. The only difference this time? The fire would be known as the "WAPA Alternative A fire". A less liable, much safer, and smarter alternative exists with Alternative B.	Western would employ a 110 foot ROW that would maintain an adequate and safe set-back between the transmission line and residences. Western would continue to utilize long-established safety practices during construction, operation, and maintenance to ensure adequate protection against fire hazards. The new steel poles, coupled with new conductors and more modern design standards would also enhance fire safety. More information on fire management is located in Section 4.7.3.3 Fuels and Fire Management . Western would also follow NESC vegetation management standards to ensure encroaching vegetation would not cause arcing and a potential ignition source. It should be pointed out that clearing to current NESC standards may increase visual impacts, just one of the unavoidable tradeoffs Western must consider. Alternative A was not included in the Agency Preferred Alternative.	Jeff Barina
Alternative	East	B	Public	Arguments For Alternative B (with two options): Alternative B is the preferred choice for the transmission line rebuild near the Flatiron - Pinewood Reservoir area. It re-uses the existing "south" ROW that has been in service for decades. Over the years, stakeholders have purchased land and developed their properties based on the location of this ROW.	Alternative B was selected as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	East	B	Public	Alternative B uses the "south" ROW near the Flatiron substation, which already has adequate width to meet current standards. Costs are minimized since the acquisition of additional ROWs is not necessary.	Alternative B was selected as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	East	B	Public	Table S4, "Measurement Indicators for Key and Other Issues", outlined in the draft Environmental Impact Statement (EIS), consistently shows Alternative B to have the smallest adverse impact on stakeholders. For example: Alternative B affects the fewest landowners (19 vs. 36-48); and fewest acres of new ROW acquisition (42 vs. 110-177). Alternative B also has the highest positive effect for the number of landowners with ROWs to be decommissioned (51 vs. 7-36). Totalling all line items in Table S4, Alternative B has 19 favorable outcomes. The nearest competitor is Alternative C1 at 11 favorable outcomes, while the undesirable Alternative A has only 8 favorable outcomes. Alternative B is clearly the best choice, according to Table S4.	Alternative B was selected as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	East	B	Public	Alternative B benefits the many landowners in the Newell Lake subdivision by decommissioning the transmission lines through the subdivision and along County Rd 18E.	Relocation of the existing transmission line through the Newell Lake subdivision was part of all action alternatives due to existing encroachments and safety concerns. Alternative B was selected as part of the Agency Preferred Alternative. However, one pole of each existing structure through the Newell Lake Subdivision would be left in place with the fiber optic ground wire in order to maintain a communications link with the Bureau of Reclamation operated dam.	Jeff Barina
Accidents	East	B	Public	WAPA's assumed risk and liability from fire hazard is minimized with the choice of Alternative B. The "south" ROW between the Flatiron substation and Pinewood reservoir is not in a forested area, has fewer at-risk structures and consists mostly of grasses and low-growing shrubs. Ignition sources are less likely to cause a wildfire outbreak, and tree canopy fires could not form. The proximity of County Road 18E provides easy access for firefighting ground equipment, and easy access to the transmission line. This choice compares very favorably to other alternatives that are routed through steep, inaccessible terrain with forested landscapes.	Alternative B was selected as part of the Agency Preferred Alternative.	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Proposed Project	East	B	Public	<p>An Option: Alternative B passes by the south end of Pinewood Reservoir, through an area some refer to as "Rattlesnake Park". The visual impact from Alternative B can be reduced with the use of wooden H-frame structures that can support a double circuit, contrary to what is stated in the draft EIS, page 2-41:</p> <p>2.7.2 Alternative Structure Types</p> <p>In addition to routing options, alternative project designs were considered and presented during the public workshops held in October 2012. Other structure types considered included a lattice structure and double-circuit H-frame. Neither the lattice nor double-circuit H-frame designs were supported by public comments, and were not carried forward for further analysis.</p> <p>The wooden double-circuit H-frame designs would be far less objectionable than the steel monopoles. We would like WAPA to reconsider in favor of the wooden double-circuit H-frame designs.</p>	<p>Double circuit wood-H-frames compromise transmission line reliability and don't meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).</p>	Jeff Barina
Proposed Project	East	B	Public	<p>A Second Option: Add a Variant to Alternative B that includes underground burial of the transmission line through Pinewood Reservoir County Park, also known as "Rattlesnake Park". This is analogous to the Variant C1, in which the westernmost 2.7 mile section near Lake Estes is constructed underground. Stakeholders on the eastern end should receive equivalent consideration for this option as are stakeholders on the western end.</p>	<p>A discussion of the rationale for not considering underground construction is found in Section 2.8 of the Final EIS.</p>	Jeff Barina
Land Use and Recreation	All	D,C	Public	<p>In talking with Western Power representatives, we have discovered that if the new structures described in the EIS under Alternative D, and possibly Alternative C, are put in place, we could lose most of the land on which the schoolhouse sits, due to the size of the right-of-way needed, especially if the structure is a turning pole, which requires an even larger footprint.</p>	<p>Alternative B was selected for inclusion in the Agency Preferred Alternative, rendering this concern moot.</p>	Gib Coalwell
Land Use and Recreation	East	General	Public	<p>As required, Western Power looked into the impact of its proposals on historical structures in the area, but we do not believe the agency did its due diligence. To begin with, the EIS contains inaccurate information. On page 1-5 of the EIS, Western Power states:</p> <p><i>It should be noted that both of the existing transmission line ROWs were in place prior to these neighborhood developments; the homes were built with the existing transmission lines in place.</i></p> <p>That information is incorrect. The schoolhouse was in place long before the right-of-way were procured, and the transmission lines were put into place.</p> <p>The current North line, which runs approximately 300 feet north of the schoolhouse, was constructed 28 years after the schoolhouse was built.</p>	<p>Text has been revised to state that most but not all of the existing development occurred after the transmission lines were constructed.</p>	Gib Coalwell
Cultural	East	General	Public	<p>Furthermore, the agency looked at the schoolhouse not once, but twice, but could not rule out its historical significance (see page 3- 124 for details). While labeling several sites as "determined not eligible" for the National Register of Historic Places, the EIS states the schoolhouse is "recommended" as not eligible, most likely due to the agency's finding that no National Register of Historic Places assessment has been found.</p> <p>We're now in the process of changing that. After seeing that Western Power could not definitively say the schoolhouse was not eligible for National Register of Historic Places status, we looked into the matter, and found that the building should easily qualify under the "Rural School Buildings in Colorado" designation, which is part of the "Multiple Property Listing" types, defined as a series of individual and/or district listings of thematically-related historic properties.</p> <p>...we are currently in the process of submitting the Pinewood Schoolhouse to be listed in the National Register of Historic Places, and the Colorado State Register of Historic Properties.</p>	<p>As detailed in the Addendum report, Western made the determination that the schoolhouse is not eligible and the Colorado State Historic Preservation Office (SHPO) concurred. This determination is based on modifications to the original structure over the years that has resulted in the schoolhouse no longer retaining sufficient historic integrity, as defined in 36 CFR 60, to be included in National Register of Historic Places. Since the Colorado SHPO has determined that the schoolhouse is not eligible, it is also not eligible for the Colorado State Register of Historic Properties. Western is aware of the owners' plans to restore the Pinewood Schoolhouse, and does not dispute that the property has historical interest. Alternative B was selected as part of the Agency Preferred Alternative in this area, so the Project would not affect the schoolhouse.</p>	Gib Coalwell
Cultural	East	General	Public	<p>We would like to point out that in the EIS, Western Power does refer to historical significance as a reason to avoid placing lines. On page S-12 of the EIS summary, you can read about how an alternative route that would have run along the Flatiron Penstocks was dropped, in part, because "the penstocks are iconic facilities that date to the 1940s and have historic significance."</p> <p>With all due respect to those silver pipes, we believe the 1910 schoolhouse has much more iconic appeal and historic significance.</p>	<p>The structural modifications to the Pinewood School have resulted in diminished integrity as defined in 36 CFR 60 National Register of Historic Places. The Colorado SHPO concurred that the property was not eligible for inclusion on either the Federal or State Register of Historic Places. Furthermore, while the historical significance of the penstocks was considered, additional rationale for not moving forward with additional analysis was the lack of opportunities for visual concealment provided by the surrounding terrain. Both of these rationale provided the justification for dismissing this alternative from further analysis. Alternative B has been made part of the Agency Preferred Alternative in this area.</p>	Gib Coalwell
Cultural	East	General	Public	<p>In addition, we have found no mention of the penstocks as being eligible for the National Register of Historic Places, so why did Western Power describe them as having "historic significance," and use that criteria as a means to drop a proposed alternative route, when it did not give that same consideration to the schoolhouse?</p>	<p>The fact that Alternatives C and D were fully analyzed does not mean that the Pinewood Schoolhouse was ignored. Indeed, it was one of the factors that lead to Alternative B being selected for inclusion in the Agency Preferred Alternative. The penstocks and associated facilities are not listed in the NRHP register (See Tables 3.15-1 and 3.15-2). There were other factors considered in dismissing the alternative near the Flatiron Penstocks from further analysis.</p>	Gib Coalwell

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Cultural	All	C,D	Public	To further solidify the argument against Alternatives C and D, on page 4-146, the EIS states that both alternatives have a greater number of historic properties encountered than the other proposed options. Alternative C would affect nine historic sites, while Alternative D would affect 12 such sites. So, we respectfully ask that Western Power consider dropping both Alternatives C and D.	All potential alternatives have impacts, and only those that are clearly not reasonable or feasible, do not meet the purpose and need for action, or have unacceptable levels of impact even at the conceptual level are eliminated from full analysis. Others that do meet these criteria are fully analyzed in order to develop the pros and cons needed to make an informed decision; they are not 'dropped'. However, they may not be selected because of the cons, and in this case Western has selected Alternative B as part of its Agency Preferred Alternative in the vicinity of the Pinewood Schoolhouse.	Gib Coalwell
Alternative	East	A	Public	In closing, we wish to add that while we strongly oppose alternatives C and D, we believe that Alternative A on the east side of the project (Pinewood Reservoir area) is equally unfeasible, as backed by arguments you will hear from our neighbors in that area. Alternative B, where the power lines and 100-foot right-of-ways already exist, seems to be the most feasible and logical choice.	Western has selected Alternative B in this area as part of its Agency Preferred Alternative.	Gib Coalwell
Alternative	All	A	Public	Alternative A: This Alternative is the most destructive. This alternative was not presented at the last meeting for the development of the DOE/EIS Draft, therefore I was surprised, even blindsided to see it listed.	Alternative A was evaluated in direct response to public requests at the public routing workshop. It was not selected as part of the Agency Preferred Alternative.	Dennis Schump and Sharon Meyer
Alternative	East	A	Public	With Alternate "A" on the east side of the Newel subdivision, it would place a new pole row in a pristine, rugged area that was not involved in the Reservoir Road Fire. There are steep hills and a deep valley through the proposed route. The area is heavily forested with Douglas fir and Ponderosa pine; many of the trees are hundreds of year old. Two easements are currently being used: they have been used over 60 years; there is no need or an excuse for a new row.	Alternative A was evaluated in direct response to public requests at the public routing workshop. It was not selected as part of the Agency Preferred Alternative.	Dennis Schump and Sharon Meyer
Electrical	East	A	Public	If Alternative "A" were approved a corner pole would be placed on my property; a massive 8' round 110 foot pole near pole 14.1 would be easily seen from Loveland. The original power poles were arranged in an East - West direction; looking west of Loveland the poles are somewhat behind each other minimizing damage to the view. The section of Alternative "A" east of the Newel subdivision would run North - South, making it look like a row of radio Antenna's on top of Green Mountain. Radio frequency interference from the power lines would be located only 350-375' from our home. I am very concerned about possible interference from the power lines to my CRT-D heart pacemaker, also knowing that the power lines would be directly overhead if I walk in many areas of my property	Exact pole locations have not been determined at this time. Section 4.12 details visual impacts by alternative and visual impact mitigation measures. As detailed in Section 4.14.3.5 , the maximum induced electrical field of any of the proposed alternatives is estimated at 0.5 kV/m, well below the estimated interference threshold of 3.4-kV/M. Therefore, with operation at 115 kV, the proposed project would not pose a risk to pacemakers. In any case, Alternative A was not selected to be part of the Agency Preferred Alternative.	Dennis Schump and Sharon Meyer
Electrical	East	A	Public	We are concerned about power line interference with cell phones, cardiac heart monitoring and internet service: We currently have good but minimal 4G reception from Sprint. The RFI from the 115KV power lines may reduce the signal to noise ratio enough to prevent reliable reception. Skybeam internet reception may also be impaired since we have a straight shot to the Skybeam tower in Loveland; the new power lines would be directly in between the Skybeam transmitter and our home. Also I have radio operated heart monitor that could be impaired.	EMF from modern transmission lines is at a very low 60 hertz, far lower than the 800-2,500 megahertz ultra-high frequency ranges used by cell phones. EMF at 60 hertz do not cause cell phone or landline interference. In fact, cell phone transmitter/receiver equipment found on typical cell towers is routinely mounted to transmission line structures in developed areas where space is limited. For similar reasons the transmission line would not affect radio or TV frequencies. In isolated instances loose or damaged conductors or hardware can cause arcing, which can result in broadband interference at close distances. Once reported these issues are easily resolved.	Dennis Schump and Sharon Meyer
Socioeconomics	East	A	Public	The area is composed of 35 acre lots that were historically designated as view lots known as Pinewood Mountain Estates. Homes in this area have been built to enjoy the natural beauty and views of the area at significant expense, if Alternative "A" is chosen; I would expect significant depreciation of our property and nearby properties.	Potential effect to property values are discussed in Section 4.13 of the Final EIS, and are expected to be minor. In any case, Alternative A was not selected to be part of the Agency Preferred Alternative.	Dennis Schump and Sharon Meyer
Alternative	East	A	Public	If Alternative "A" must be used "worst case scenario", please look at this minor proposed easement change for Alternative "A"; rather than using pole 14.1, use pole 13.5. Run the line north from pole 13.5 and then draw a line east from pole 12.3 using an intersecting line. While this point would be a 90 degree turn, adding a couple poles would soften the transition that might make this idea more feasible. This change would minimize the environmental impact to the rugged far eastern side of Newell subdivision (Pinewood Mountain Estates), it also creates a fire break for the Newell community. This alternative runs through the reservoir fire on the north side. See attached PDF map file.	Alternative A was not selected to be part of the Agency Preferred Alternative.	Dennis Schump and Sharon Meyer

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	B	Public	<p>Alternative B: Of all alternatives, I find Alternative "B" the most sensible and least destructive approach to take. From the Flatiron substation past Pinewood Reservoir most of the poles are over grassy meadows with very few trees, under these circumstances the installation should be easier/safer for installation and maintenance. All of 115KW poles would be removed from the Pinewood lake subdivision. Shorter poles could be used over the grass area. A reduction of RFI and potential health concerns would be appreciated. Removal of large power poles from a subdivision should be seen as a positive improvement. The easements for Alternative "B" and poles have been in existence for almost 60 years. We are used to viewing the poles through this easement. I am very disappointed that an underground option for Alternative "B" was not considered through the Rattlesnake (Pinewood lake) area while the Estes Park Variant "A2" was available. Cost should be much less than the Estes Parks variant.</p>	<p>Alternative B was selected as part of the Agency Preferred Alternative. Removal of the portion of the existing line through the subdivision was proposed as part of all the action alternatives due to encroachments and safety concerns. However, one pole of each structure and the fiber optic ground wire would be left in place to maintain communications with the Bureau of Reclamation operated dam. EMF is discussed in Section 4.14.5.1 of the Final EIS. Please see Section 2.8 for a discussion of the rationale used in selecting the Agency Preferred Alternative.</p>	Dennis Schump and Sharon Meyer
Alternative, Visual	All	C	Public	<p>Alternative C: Alternative "C" should be discarded as there is no improvement to the neighborhood or views. The final results are many unsightly poles with lots of overhead wire. see no advantage to using Alternate "C". This problem could and should be addressed, (See Alternative "B").</p>	<p>Reasonable and feasible alternatives that meet the agency's purpose and need must be fully analyzed in the EIS. The pros and cons identified for each alternative allows the decision maker to make an informed decision. Alternative B has been selected to be part of the Agency Preferred Alternative.</p>	Dennis Schump and Sharon Meyer
Alternative, Visual	All	D	Public	<p>Alternative D: Alternative "D" should also be discarded as there is no improvement to the neighborhood or views. The final results are many unsightly poles with lots of overhead wire. see no advantage to using Alternate "D". This problem could and should be addressed, (see Alternative "B").</p>	<p>Reasonable and feasible alternatives that meet the agency's purpose and need must be fully analyzed in the EIS. The pros and cons identified for each alternative allows the decision maker to make an informed decision. Alternative B has been selected to be part of the Agency Preferred Alternative.</p>	Dennis Schump and Sharon Meyer
Alternative	All	A2	Public	<p>My choice would be A2 -burying the lines, at least where it impacts views, property and visitors. Future thinking and spreading cost over the lifetime of the projects, makes this the best choice. We are lucky to be surrounded by natural beauty, we are the caretakers for future generations, as well as, all the people who visit and enjoy the beauty and peace of this majestic place.</p>	<p>Underground options would require a 50-foot completely cleared (i.e., no shrubs) ROW which, at a distance, could be more visible than an overhead option. Please see Section 4.12.5 of the Final EIS for a comparison of visual impacts, and Section 2.8 for a discussion of the rationale used in selecting the Agency Preferred Alternative.</p>	Susan Johnston
Proposed Project	West	General	Public	<p>Project would cause major impact to Pole Hill Road during the construction phase Project would permanently alter the natural environment along this road (in the subdivision and in the park beyond) Property values would be significantly reduced This project would impact the beauty of this mountain community The proposed steel structures are significantly larger with additional cables than the current poles This is just the wrong project to be running through a subdivision</p>	<p>Impacts from Alternatives C and C1 improvement of West Pole Hill Road are detailed in Section 4.16. Due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the Agency Preferred Alternative. The proposed Project is to replace an existing line - it is not a new line going through undisturbed land. The Project would allow for the removal of one of the existing two lines and abandonment of the associated ROW, improving the visual setting from its current state. Alternatives that maximize the use of existing ROWs are considered to have the least economic effects. Any influence on property values should already be factored into the current existing valuation due to the presence of the existing transmission line, and the easement is already an encumbrance on the property. The replacement of an existing line with a new one should not have a substantial effect on a given property, and landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses. The economic effect of the proposed project is detailed in Section 4.13. In order to reduce visibility, special design measures would be locally considered, including the use of structures with a lower height and shorter span. Lower height structures, if selected, would be approximately 10 to 20 higher than the existing H-frame wooden poles. Commenter is correct that the new double-circuit steel poles would be taller, although any change in conductor diameter would likely be indiscernible. Rationale for the selection of the Agency Preferred Alternative is detailed in Section 2.8.</p>	Larry Olson
Alternative	All	No Action	Public	<p>No Action Alternative o Would not support. Steel towers are needed; Single Right-Of-Way is needed; Transmission system upgrades are needed.</p>	<p>Thank you for your comment.</p>	Larry Olson
Alternative	All	A/A1/A2	Public	<p>Alternative A (Variant A 1, A2) -Would support. This routes the project North of Meadowdale Hills subdivision and along the existing North transmission line Right-Of-Way. FIRST CHOICE.</p>	<p>Thank you for your comment.</p>	Larry Olson
Alternative	West	B	Public	<p>Alternative B -Would not support. This routes overhead lines through the Meadowdale subdivision.</p>	<p>Thank you for your comment.</p>	Larry Olson
Alternative	All	C/C1	Public	<p>Alternative C (Variant C1) -Would not support alternative C which routes overhead lines through the subdivision - Could support Variant C1 with underground lines through the subdivision. There would be construction impact. SECOND CHOICE.</p>	<p>Thank you for your comment.</p>	Larry Olson
Alternative	All	D	Public	<p>Alternative D - This is not a good solution. Would not support. This has wooden poles overhead through subdivision and a North & South Right-Of-Way.</p>	<p>Thank you for your comment.</p>	Larry Olson

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
General	West	General	Public	<p>My request is that several of the major decision makers take a tour through Meadowdale Hills subdivision before the decision is made regarding routing of this project.</p> <p>-Take a look. Drive to a house or two. Imagine yourself living there. Then, walk from the house to Pole Hill and continue down to US 36.</p> <p>-You will be able to imagine this visual impact of overhead lines. Residents will be impacted by this for the next 75 - 100 years. We can do better.</p>	<p>Members of the Project team have been to the Meadowdale Hills subdivision, and have examined the route alternatives from the air. The subdivision is crossed by an existing transmission line with adequate existing ROW in most places, so any assessment of impact has to take that fact into account. Most alternatives include the complete removal of one of the existing lines and abandonment of the ROW, a net gain in visual resources to the Estes Park area.</p>	Larry Olson
Alternative	All	A&B	Public	<p>At the meeting held on at the Rialto Theater in Loveland on October 29 all the residence from the Pinewood Reservoir area who spoke stated that Alternative B in that area was their preference and the only reasonable alternative and were against Alternative A except for one person who preferred Alternative A. (There were also folks who spoke against C and D.) All the representatives who were present from Estes Park (or more correctly were concerned about the Estes Park route) who spoke stated they wanted Alternative A in that area. The middle segment is nearly the same for both alternatives so there was no preference stated as I recall. Therefore, it appears the best approach for those present at the Rialto meeting was a combination of Alternatives A and B. As a resident of the Pinewood Reservoir area I do not want my preference (our preference) to come at the expense of the folks affected in the Estes Park area but want a solution that meets both our preferences.</p>	<p>As a result of public input on the Draft EIS, summary tables of impacts have been added to the Final EIS Section 2.9 that specifically assess impacts of the alternatives at each end of the line. This reorganizing of the data summary in Chapter 2 provides a better means of comparing and contrasting alternatives at the local level. Western respects the reasonableness of the commenter's views, and would make separate and independent decisions on routes on both ends of the proposed Project. As a result Western has used portions of several alternatives to arrive at an Agency Preferred Alternative. Alternative B has been selected on the eastern portion of the project area. Please see Section 2.8 of the Final EIS for a discussion of the rationale used in selecting the Agency Preferred Alternative.</p>	Phillip Hunger
Alternative	West	A2	Public	<p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods.</p> <p>It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative have also reduced existing impacts, especially visual. Underground vs. overhead lines result in several tradeoffs, as discussed in Sections 2.2.2, 2.2.4, and 2.8. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Charley L. Dickey IV
Alternative		A2	Public	<p>Form Letter with minor text changes (see Comment Letter 22)</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative have also reduced existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4 of the Final EIS. This section presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Jean McGuire

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
General	West	General	Public	My comments are specific to the west end of the project. The west end has very different factors than the east end; and it seems the two pieces of the project (and perhaps the center section as a 3rd piece) need to be evaluated on their own merits. Prior to moving forward in the decision-making process, WAPA needs to rewrite the evaluations of the alternatives based on the comparative impacts of each alternative to the west end and east end independently.	Western has adopted the approach suggested by this and other commenters. Impact summary tables have been developed for local impacts at either end of the proposed Projects, and are located in Section 2.9 of the Final EIS. The corresponding Agency Preferred Alternative figure shows the areas that the data in the tables represents. The data shown was used by Western in support of its determination of the Agency Preferred Alternative.	Keith Pearson
Alternative	West	A2	Public	The most important asset of the Estes Valley is the scenery. It is not a resource that we own... it is a national treasure, belonging to the millions of visitors from around the country. We do not own it, but we are entrusted with its stewardship. Tourism is the lifeblood of Estes Park. This is the reason that Governor Hickenlooper forced the re-opening of Rocky Mountain National Park during the government shutdown. And tourism is the reason the state and national agencies placed US-36 at the top of the priority list after the floods of 2013. These efforts were not only for the sake of Estes Park, but also for the benefit of the State of Colorado, recognizing that tourism in this area is a driving force in the state's economy. The scenery is the reason that tourism is such a big part of our economy. It isn't for the shopping or the dining. People come here for the views. And we must adamantly fight to preserve those views. Therefore, Variant A2, the buried option, is the preferred alternative. WAPA should explore all enabling technologies and funding sources, public and private, to make A2 possible.	Western is very much aware of the value placed on the visual aspects of their environment. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources. An underground option was not selected for the reasons discussed in that section. Partial public funding is complicated by regulations governing Western's acceptance of funds from the public; specific Federal-level legislation would likely be required to do this.	Keith Pearson
Alternative, Visual, Economics	West	A2	Public	Form Letter with following addition: I would like to add my support of the option Variant A2 as mentioned and supported by many businesses in the Estes Valley. As a small businessman who is reliant upon the vitality and success of other businesses I must agree that anything done in the Estes Park area must consider the image for our visitors. As I am certain you are aware, considering our visitor based economy, image is one of the primary things we have to offer. I hope you will seriously consider the position expressed in the attached letter.	Western is very much aware of the value placed on the visual aspects of their environment. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. Abandonment of one existing ROW would result in an overall improvement to visual resources.	Kent H. Smith
Alternative	East	A & B	Public	My comments pertain to the eastern end of the power transmission line near the Flatiron Substation and Pinewood Reservoir. The proposed route referred to as "Alternative A" and to which all alternatives are compared should not be on the table at all. It is perplexing as to how this proposed route came up for consideration in the first place and why alternatives are being compared to it instead of "Alternative B" which is the established current route with existing rights-of-way since 1930's. During public hearings, resident stakeholders present in Loveland and Estes Park support was overwhelming in support of "Alternative B" (East side) with only 1 resident in support of "Alternative A" (East side).	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternatives were compared and contrasted with each other, not just Alternative A. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Lucinda Van Inwagen
Alternative	East	A & B	Public	Two primary thoughts come to mind on how "Alternative A" was proposed in the first place. The first thought: Western Area Power Authorities eyeballed a map without considering the rugged, steep terrain, environmental impact such as deforesting of healthy trees and erosion created by construction, exceptional access challenges to maintenance of power lines and citizen safety created by power outages and the very real potential of fire causing loss of life and property for the people along the Alternative A route. The second thought: Behind the scenes, there have been lines of communication by individuals with possible influence or pressure in order to gain from shifting the existing route, "Alternative B", with historical existing easements to place burden on residents along "Alternative A". Simply stated, shifting from the existing practical route "Alternative B" with easements along the flat, grassy, easily accessible open space areas would directly benefit a small number of residents, primarily ranchers, through the removal of power lines on existing easements dating back to the 1930', thereby shifting the burden and negatives impacts including environmental, potential of fire, and loss of property equity, to innocent individual home owners.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternatives were compared and contrasted with each other, not just Alternative A. Alternative A was not selected to be a part of the Agency Preferred Alternative.	Lucinda Van Inwagen

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	A	Public	<p>The core truth of the matter, consideration of "Alternative A" is a bad idea, irresponsible and should be off the table due to:</p> <ul style="list-style-type: none"> • Significant and real fire hazards with the potential of devastation and loss of property and human life. Any fires along "Alternative A" would surely be hard and costly to defend, requiring firefighters and air support. Issues with construction or maintenance along this route could result in costly lawsuits and litigation involving homeowners, Poudre Valley Rural Area Electric, Western Area Power Authority or the US Forest Service. • Difficult access and cost to maintain lines during winter and heavy wet seasonal rains would be significantly increased, hampered by the steep, rugged terrain covered by trees in this area. This area historically receives snowfall up to twice as much as the lower flatlands – 8 inches is easily 16 inches of snowfall in this area. It's predictably guaranteed that there would be periods when power line crews would not be able to access this route during severe storms and power outages. Customers would be without power for extended periods of time, which raises health and safety concerns. • Negative environmental impact including deforestation and erosion to a currently beautiful natural scenic landscape that residents paid a premium to enjoy. Ponderosa Pines are the primary species of tree in the area yet there are a significant number of Douglas Firs in the proposed "Alternative A" area. Deforestation including the removal of the Douglas Firs would have negative ecological consequences and disrupt environmental balance. • Direct financial impact to innocent homeowners affected by "Alternative A". Despite what has been indicated on the environmental impact report, property owners along "Alternative A" (East) would lose the tranquility, views and at least 50% of their property values. Residents along "Alternative A" have higher end homes and paid high premiums their properties. Speaking for us, we have made significant additional investment to our homes including sweat equity improvements over the years. • Overall understatement and underestimate of the significant costs and impacts of shifting the existing rights of way along "Alternative B" to "Alternative A". 	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so and, as mentioned by the commenter, found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Lucinda Van Inwagen
Alternative	East	B		Western Area Power Authority has a great public/community relations opportunity here-- to listen and absorb public input, consider valid concerns and comments from the Pinewood Area residents and then make the best possible route choice for this project which is "Alternative B" (East side). It's very clear that "Alternative B" should be the only route under consideration for the project's east side.	Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Lucinda Van Inwagen
General	West	General	Public	<p>The truth is, based on today's EPA standards, this project would never have been undertaken in today's environmental milieu.</p> <p>To add to the offense, it is my understanding none of the power generated as a consequence of all this local visual torture actually benefits the citizens in the Estes valley, despite the fact we must tolerate the presence of these eyesores on a daily basis. Now, the time has inevitably arrived that the transmission lines in the Estes region are to be replaced and relocated; the time for decision is upon us.</p>	Western disagrees with the commenter's initial statement. Additionally, Estes Park does receive power generated in the area, in addition to contractual power-flow through Platte River Power Authority of which Estes Park is a part owner; therefore, when the local power plant is not running, Estes Park still receives power from the transmission lines. Transmission lines are a critical element of America's energy infrastructure. Since 1938 and 1953, these lines have both provided and delivered reliable power to Estes and other regions nearby.	Bert Bergland
Visual	All	General	Public	The report provided by WAPA for public consumption is concerning. What seems to be minimized in this report is the impact of a 300 foot swath of clear cut along the course of the project. What many readers of the environmental impact may fail to recognize is that 300' is the equivalent to the length of a football field! Hence, this project would result in an enormous physical and visual scar across the public and private forests east of Estes Park 100 yards wide and 14+ miles long. Additionally, this obnoxious visual scar would be continually "maintained", meaning this clear cut it will exist in perpetuity.	Commenter is misinformed. The ROW width would be 110 feet, as described in Section 2.2.2. The ROW would be maintained to NESC standards to ensure reliability. Shrubs and low- or slow-growing species would be allowed within the ROW in compliance with the NERC standards, which are not discretionary. Failure to maintain clearances can result in substantial fines, especially if a utility allows vegetation to encroach and an outage results.	Bert Bergland
Alternative, Visual	All	General	Public	<p>There is at least one more "alternative" that is not offered: closure of the entire system that currently exists, meaning complete removal of the exceptionally distasteful power plant, the hideous metal conduits that scar the north face of Prospect Mountain, the unsightly power grid at the power plant that has marred the Hwy 7- Hwy 36 intersection, ugly metal lattice power structures and lines that currently cross Lake Estes at the causeway, all transmission line structures between East Estes valley to Flatiron, all of which have marred the environment for well over a half century. That is, simply rid us of this entire distasteful invasion of ugliness.</p> <p>Use the money now planned to update the hideous to build a power plant elsewhere, and rid us of this once and for all.</p>	The alternative suggested by the commenter is neither reasonable nor feasible, and it does not respond to the purpose and need for the proposed Project. Therefore, it falls outside the scope of the NEPA analysis.	Bert Bergland

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative, Visual	West	A2	Public	At the very least, we in Estes Park not only expect, but request at a minimum, the burying of the existing power lines across the Lake Estes causeway which have marred the otherwise glorious vistas of Rocky Mountain National Park and the Continental Divide for over half a century. The truth is, Estes Park neither needs, wants nor benefits from this eyesore, and could easily do without its continued existence.	Western understands that Estes Park residents would like to see the lattice steel transmission line along the causeway into the town removed. That section of line is not part of the proposed Project and is therefore outside the scope of this EIS.	Bert Bergland
General	East	C & D	Public	<p>Duplicate of comment letter 17</p> <p>In talking with Western Power representatives, we have discovered that if the new structures described in the EIS under Alternative D, and possibly Alternative C, are put in place, we could lose most of the land on which the schoolhouse sits, due to the size of the right-of-way needed, especially if the structure is a turning pole, which requires an even larger footprint. As required, Western Power looked into the impact of its proposals on historical structures in the area, but we do not believe the agency did its due diligence. To begin with, the EIS contains inaccurate information. On page 1-5 of the EIS, Western Power states: It should be noted that both of the existing transmission line ROWs were in place prior to these neighborhood developments; the homes were built with the existing transmission lines in place. That information is incorrect. The schoolhouse was in place long before the right-of-way were procured, and the transmission lines were put into place. The current North line, which runs approximately 300 feet north of the schoolhouse, was constructed 28 years after the schoolhouse was built. Furthermore, the agency looked at the schoolhouse not once, but twice, but could not rule out its historical significance (see page 3- 124 for details). While labeling several sites as "determined not eligible" for the National Register of Historic Places, the EIS states the schoolhouse is "recommended" as not eligible, most likely due to the agency's finding that no National Register of Historic Places assessment has been found. We're now in the process of changing that. After seeing that Western Power could not definitively say the schoolhouse was not eligible for National Register of Historic Places status, we looked into the matter, and found that the building should easily qualify under the "Rural School Buildings in Colorado" designation, which is part of the "Multiple Property Listing" types, defined as a series of individual and/or district listings of thematically-related historic properties. ...we are currently in the process of submitting the Pinewood Schoolhouse to be listed in the National Register of Historic Places, and the Colorado State Register of Historic Properties. We would like to point out that in the EIS, Western Power does refer to historical significance as a reason to avoid placing lines. On page 5-12 of the EIS summary, you can read about how an alternative route that would have run along the Flatiron Penstocks was dropped, in part, because "the penstocks are iconic facilities that date to the 1940s and have historic significance."</p>	Alternative B on the east end was selected for inclusion in the Agency Preferred Alternative, rendering this concern moot. Text has been revised to state that most but not all of the existing development occurred after the transmission lines were constructed. As detailed in the Addendum report, Western has made the determination that the schoolhouse is not eligible and the Colorado State Historic Preservation Office (SHPO) has concurred. This is based on structural modifications to its original construction over the years that has resulted in the structure no longer retaining sufficient historic integrity as defined in 36 CFR 60 to be included in National Register of Historic Places. Since the Colorado SHPO has determined that the schoolhouse is not eligible, it is also not eligible for the Colorado State Register of Historic Properties. Western is aware of the owners' plans to restore the Pinewood Schoolhouse, and does not dispute that the property has historical interest. The fact that Alternatives C and D were fully analyzed does not mean that the Pinewood Schoolhouse was ignored. Indeed, it was one of the factors that lead to Alternative B being selected for inclusion in the Agency Preferred Alternative. The penstocks and associated facilities are not listed in the NRHP register (See Tables 3.15-1 and 3.15-2). There were other factors considered in dismissing the alternative near the Flatiron Penstocks from further analysis.	Gib and Lisa Coalwell
General	East	C & D	Public	<p>With all due respect to those silver pipes, we believe the 1910 schoolhouse has much more iconic appeal and historic significance.</p> <p>In addition, we have found no mention of the penstocks as being eligible for the National Register of Historic Places, so why did Western Power describe them as having "historic significance," and use that criteria as a means to drop a proposed alternative route, when it did not give that same consideration to the schoolhouse? To further solidify the argument against Alternatives C and D, on page 4-146, the EIS states that both alternatives have a greater number of historic properties encountered than the other proposed options. Alternative C would affect nine historic sites, while Alternative D would affect 12 such sites. So, we respectfully ask that Western Power consider dropping both Alternatives C and D. In closing, we wish to add that while we strongly oppose alternatives C and D, we believe that Alternative A on the east side of the project (Pinewood Reservoir area) is equally unfeasible, as backed by arguments you will hear from our neighbors in that area. Alternative B, where the power lines and 100-foot right-of-ways already exist, seems to be the most feasible and logical choice.</p>	Alternative B on the east end was selected for inclusion in the Agency Preferred Alternative, rendering this concern moot. Text has been revised to state that most but not all of the existing development occurred after the transmission lines were constructed. As detailed in the Addendum report, Western has made the determination that the schoolhouse is not eligible and the Colorado State Historic Preservation Office (SHPO) has concurred. This is based on structural modifications to its original construction over the years that has resulted in the structure no longer retaining sufficient historic integrity as defined in 36 CFR 60 to be included in National Register of Historic Places. Since the Colorado SHPO has determined that the schoolhouse is not eligible, it is also not eligible for the Colorado State Register of Historic Properties. Western is aware of the owners' plans to restore the Pinewood Schoolhouse, and does not dispute that the property has historical interest. The fact that Alternatives C and D were fully analyzed does not mean that the Pinewood Schoolhouse was ignored. Indeed, it was one of the factors that lead to Alternative B being selected for inclusion in the Agency Preferred Alternative. The penstocks and associated facilities are not listed in the NRHP register (See Tables 3.15-1 and 3.15-2). There were other factors considered in dismissing the alternative near the Flatiron Penstocks from further analysis.	

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Christian Collinet
Alternative		A2	Public	<p>Form Letter with minor text edits - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Janine Dawley

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Paul and Ingrid Drouin
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Rainer Schelp

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Scot A. Ritchie
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Paula Scheil

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	General	Public	<p>The Draft Environmental Impact Statement DOE/EIS-0483 is Incomplete.</p> <p>The draft EIS does not adequately compare the additional possible variants in which one alternative is preferred for the eastern segment and another alternative is preferred for the western segment.</p> <p>Such a hybrid alternative could be optimized for both the eastern and western ends. For example: Alternative B is the preferred option for the Pinewood area, while Alternative A could be the preferred option for the Lake Estes area.</p> <p>The draft EIS does not compare this hybrid variant, and it is not included in the Table S-4, "Measurement Indicators for Key and Other Issues".</p> <p>This has the potential to omit from consideration the best, most cost-effective routing possible for the power line rebuild.</p>	<p>Western has since the beginning of the proposed Project considered using segments of various alternatives to create an Agency Preferred Alternative, and we regret that this possibility was not made more clear. Western has in fact used portions of several alternatives - please see Section 2.8 for a description of the Agency Preferred Alternative and the rationale used to select it. Western has also prepared new summary impact tables for the Final EIS to both show the impacts at both ends of the proposed Project without the influence of data from the rest of the line, and to help determine the Agency Preferred Alternative.</p>	Jeff Barina
Electrical	All	B	Public	<p>The Effects on Human Health from Nearby Transmission Lines</p> <p>The effects of electro-magnetic fields (EMF) on human health are inconclusive, at present. Debate continues in the medical field over the causal relationship between EMF and diseases, such as leukemia.</p> <p>However, the draft EIS dismisses the possible health concerns as "negligible". Meanwhile, the medical community cautions that the possibility is not negligible, and that power lines should be located away from more populated areas.</p> <p>In the Pinewood area, Alternative B is the least populated route. The least populated route should also be chosen for the Estes Park area.</p>	<p>Commenter is correct that 40-odd years of research has not demonstrated a link between EMF exposure and human health effects. While some suggestions of a relationship have been reported, the degree of association has been weak, and study results have not been replicated, a critical factor in scientific proof. The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines, due to the cancellation effects from conductor arrangement on double-circuit lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within a 110-foot ROW. A more detailed description of EMF as they relate to potential health effects is found in Sections 3.14.1.3 and 4.14.5.1. Alternative B has been included as part of the Agency Preferred Alternative, but not because of EMF concerns.</p>	Jeff Barina
Electrical, Economics	East	B	Public	<p>The Negative Effects on Property Values from EMF Sources</p> <p>Regardless of a final determination of effects on health, EMF sources are perceived by the public as potentially or actually harmful to health. It matters not whether this is factual.</p> <p>Private property values will decline precipitously, not only from the visual blight of transmission lines, but also from the public perception that power transmission lines create EMFs that can harm health.</p> <p>Soothing words minimizing EMF effects as "negligible" will not allay these fears, nor will they convince a buyer to purchase property near a power line. This is especially pertinent to landowners on which new ROWs will be acquired, such as landowners along Alternative A near Pinewood. For that reason, Alternative B with its existing ROW is the preferred route near Pinewood.</p>	<p>Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and the studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the backgrounds, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted.</p>	Jeff Barina
Vegetation	East	A & B	Public	<p>Forest Diversity Negatively Affected by Removal of a Minority Species</p> <p>The forest between the Flatiron substation and Lake Estes is predominately Ponderosa pine trees, with a minority species of Douglas fir trees.</p> <p>Alternative A would route the transmission lines over Green Mountain and through a healthy stand of fir trees, which is a minority species in the Pinewood area. The destruction of this minority species will negatively impact the forest in various ways:</p> <ol style="list-style-type: none"> Reduced diversity of the forest Diminished regeneration of pine beetle-kill areas Increased forest susceptibility to mistletoe disease <p>These negative impacts are not in play with the choice of Alternative B in the Pinewood area.</p>	<p>The exact route that Alternative A would take around the back side of Green Mountain was never established, and siting could take into account the presence of Douglas fir trees and avoid them to the extent possible. However, Alternative A was not included in the Agency Preferred Alternative.</p>	Jeff Barina
Alternative	East	General	Public	<p>...these comments will apply only to the eastern segment of the rebuild project, the area around Pinewood reservoir and the Flatiron substation. There are two existing power transmission lines in service near the Flatiron substation and Pinewood Reservoir. One line runs roughly on the north side of County Road 18E, and is referred as the "north" line. The second line runs roughly on the south side of the same road and is referred as the "south" line. These two transmission lines run along rights-of-way (ROWs) that have been established and used in their present location for decades, since the 1930's and 1950's. They should be reused for the transmission line rebuild to the greatest extent. Utilization of existing ROWs is beneficial for a variety of reasons, among them:</p> <ul style="list-style-type: none"> - It is more efficient and allows faster progress for the rebuild effort; - Cost is typically much less than acquiring new ROWs; - Potential litigation and other delays from newly affected landowners are minimized. 	<p>Western agrees with the commenter that existing ROWs should be reutilized whenever practicable. However, transmission line upgrades also provide the opportunity to relocate sections of line to avoid encroachments, avoid sensitive resources, relieve identified impacts (e.g., erosion areas), accommodate planned development, and otherwise respond to the situation as it presently exists.</p>	Jeff Barina
Socioeconomics	All	A	Public	<p>Arguments Against Alternative A:</p> <p>Alternative A seeks to deviate from the existing, long-established ROWs. Property owners over the years have purchased land, planned, built homes/structures and otherwise developed their land based on these long-time established ROWs. Abandoning these ROWs and now imposing new easements causes severe, undue and unnecessary harm on a new set of landowners.</p>	<p>Alternative A was not selected as part of the Agency Preferred Alternative on the eastern end of the proposed Project.</p>	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	A	Public	Acquiring new ROWs along Alternative A is more costly and time-consuming than using the existing ROWs of the "north" and "south" lines, resulting in slower and more expensive progress. PVREA customers will bear these costs as higher electric bills.	Alternative A was not selected as part of the Agency Preferred Alternative.	Jeff Barina
Transportation	All	A	Public	Alternative A would traverse extremely steep terrain. The steep terrain would make ROWs and access roads difficult to create, expensive to maintain, and subject to severe erosion. Snow cover on the steeper sections of these roads would make navigation of maintenance vehicles difficult or impossible. Transmission line maintenance would likely have to be excluded during winter months. More troubling is that essential or emergency repairs during winter months may be especially hampered by the steep, snow-covered access roads.	Alternative A was included in the Draft EIS at the request of members of the public. Western agrees that the concerns raised by this commenter and others are valid. Alternative A was not included in the Agency Preferred Alternative.	Jeff Barina
Alternative	All	A	Public	Alternative A would pass through thickly forested areas. Sources of ignition – from maintenance activities or the transmission lines themselves – could easily ignite a tinder-dry forested area.	Western would continue to utilize long-established safety practices during construction, operation, and maintenance of any alternative to ensure adequate protection against fire hazards. The new steel poles, coupled with new conductors and more modern design standards would also enhance fire safety. More information on fire management is located in Section 4.7.3.3 Fuels and Fire Management . In any case, Alternative A has not been selected for inclusion in the Agency Preferred Alternative.	Jeff Barina
Alternative		A	Public	There are many residences within tens of feet of Alternative A's routing. Even more residences and structures are within a quarter-mile of the proposed route. The resulting liability from fire losses could be very significant. This liability would be compounded by WAPA's decision to deliberately and knowingly favor Alternative A, while a less fire-prone, less steep, less inhabited and more accessible option exists, such as the "south" ROW.	Western would employ a 110-foot-wide ROW that would maintain an adequate and safe set-back between the transmission line and residences on all alternatives. Western would continue to utilize long-established safety practices during construction, operation, and maintenance to ensure adequate protection against fire hazards. The new steel poles, coupled with new conductors and more modern design standards would also enhance fire safety. More information on fire management is located in Section 4.7.3.3 Fuels and Fire Management . In any case, Alternative A has not been selected for inclusion in the Agency Preferred Alternative.	Jeff Barina
Alternative	All	A	Public	Let me cite just one example: I'm sure you are aware that in 2011, there was a devastating fire in New Mexico. It was called the "Las Conchas fire", one of the largest, most destructive fires in that state's history. The liability and those responsible for the damages are still being fought in court. The US Forest Service is billing the local electric cooperative (Jemez Mountains Electric Cooperative) for \$38 million dollars in firefighting costs and damages. Homeowners and insurance companies are also litigating. On the other hand, the coop is claiming the Forest Service is liable. It is a protracted mess. The fire was started by a downed power line from a falling tree during high winds. We have the exact same conditions here in Colorado: --Thick forests with tall trees -- Very high winds -- tinder-dry conditions Why would we perpetuate the same disastrous mistake here in Colorado? Alternative A would do exactly that -- by running a new power transmission line through tall trees, in steep terrain, in a wind-prone area, that is extremely dry. The only difference this time? The fire would be known as the "WAPA Alternative A fire". A less liable, much safer, and smarter alternative exists with Alternative B.	Western would employ a 110-foot-wide ROW (Table 2.2-1) that would maintain an adequate and safe set-back between the transmission line and residences. Western would continue to utilize long-established safety practices during construction, operation, and maintenance to ensure adequate protection against fire hazards. The new steel poles, coupled with new conductors and more modern design standards would also enhance fire safety. More information on fire management is located in Section 4.7.3.3 Fuels and Fire Management . Western would also follow NESC vegetation management standards to ensure encroaching vegetation would not cause arcing and a potential ignition source. It should be pointed out that clearing to current (National Electric Safety Code) NESC standards may increase visual impacts, just one of the unavoidable tradeoffs Western must consider. Alternative A was not included in the Agency Preferred Alternative.	Jeff Barina
Alternative	East	B	Public	Arguments For Alternative B (with two options): Alternative B is the preferred choice for the transmission line rebuild near the Flatiron – Pinewood Reservoir area. It re-uses the existing "south" ROW that has been in service for decades. Over the years, stakeholders have purchased land and developed their properties based on the location of this ROW.	Thank you for your comment. Alternative B has been selected as part of the Agency Preferred Alternative on the eastern end of the proposed Project.	Jeff Barina
Alternative	East	B	Public	Alternative B uses the "south" ROW near the Flatiron substation, which already has adequate width to meet current standards. Costs are minimized since the acquisition of additional ROWs is not necessary.	Alternative B was selected as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	All	B	Public	Table S4, "Measurement Indicators for Key and Other Issues", outlined in the draft Environmental Impact Statement (EIS), consistently shows Alternative B to have the smallest adverse impact on stakeholders. For example: Alternative B affects the fewest landowners (19 vs. 36-48); and fewest acres of new ROW acquisition (42 vs. 110-177). Alternative B also has the highest positive effect for the number of landowners with ROWs to be decommissioned (51 vs. 7-36). Totalling all line items in Table S4, Alternative B has 19 favorable outcomes. The nearest competitor is Alternative C1 at 11 favorable outcomes, while the undesirable Alternative A has only 8 favorable outcomes. Alternative B is clearly the best choice, according to Table S4.	Alternative B was selected as part of the Agency Preferred Alternative. The rationale for the Agency Preferred Alternative is detailed in Section 2.8 .	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	B	Public	Alternative B benefits the many landowners in the Newell Lake subdivision by decommissioning the transmission lines through the subdivision and along County Rd 18E.	Alternative B was selected as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	East	B	Public	WAPA's assumed risk and liability from fire hazard is minimized with the choice of Alternative B. The "south" ROW between the Flatiron substation and Pinewood reservoir is not in a forested area, has fewer at-risk structures and consists mostly of grasses and low-growing shrubs. Ignition sources are less likely to cause a wildfire outbreak, and tree canopy fires could not form. The proximity of County Road 18E provides easy access for firefighting ground equipment, and easy access to the transmission line. Alternative B compares very favorably to other alternatives that are routed through steep, inaccessible terrain with forested landscapes.	Alternative B was selected as part of the Agency Preferred Alternative.	Jeff Barina
Visual	East	B	Public	An Option: Alternative B passes by the south end of Pinewood Reservoir, through an area some refer to as "Rattlesnake Park". The visual impact from Alternative B can be reduced with the use of wooden H-frame structures that can support a double circuit, contrary to what is stated in the draft EIS, page 2-41: 2.7.2 Alternative Structure Types In addition to routing options, alternative project designs were considered and presented during the public workshops held in October 2012. Other structure types considered included a lattice structure and double-circuit H-frame. Neither the lattice nor double-circuit H-frame designs were supported by public comments, and were not carried forward for further analysis. The wooden double-circuit H-frame designs would be far less objectionable than the steel monopoles. We would like WAPA to reconsider in favor of the wooden double-circuit H-frame designs.	Double circuit wood-H-frames compromise transmission line reliability and don't meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood-H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).	Jeff Barina
Alternative	East	B	Public	A Second Option: Add a Variant to Alternative B that includes underground burial of the transmission line through Pinewood Reservoir County Park, also known as "Rattlesnake Park". This is analogous to the Variant C1, in which the westernmost 2.7 mile section near Lake Estes is constructed underground. Stakeholders on the eastern end should receive equivalent consideration for this option as are stakeholders on the western end.	A discussion of the rationale for not considering underground construction is found in Section 2.8 of the Final EIS.	Jeff Barina
Socioeconomics	All	A	Public	Comments: Rebuttal to Arguments for Alternative A The proponents of Alternative A (hereafter referred to as "proponents") are those seeking the removal of the rights-of-way (ROWs) from their property. Proponents are also those seeking to remove the poles and lines from their scenic view across private and public lands. If the proponents are successful, a new and innocent group of landowners - - those along the proposed Alternative A route - would be burdened with new easements on their land. They would bear the cost in the form of new ROWs, and they would suffer from the diminished value of their property. This amounts to an illegitimate transfer of property encumbrances and restrictions from one group of landowners to another.	As the commenter notes, Alternative A was identified by members of the public for analysis in the EIS. Western evaluated this option and determined that the route had a number of issues, including access, steep terrain, and general constructability. Alternative A was not included as part of the Agency Preferred Alternative.	Jeff Barina
Socioeconomics	East	A	Public	The key issue is that the north and south ROWs have existed for decades. And most, if not all, of the proponents in the Pinewood area purchased their properties willingly and with full knowledge that their land was subject to these ROWs. Conversely, those along the proposed route -- and not in favor of Alternative A -- had no such knowledge. They purchased property that was specifically not subject to these easements.	Thank you for your comment. Alternative A is not part of the Agency Preferred Alternative.	Jeff Barina
Socioeconomics	All	A	Public	In essence then, this is a case wherein one group of landowners would transfer property restrictions to another. That first group stands to gain with increased land values at the expense of the second group, whose property will be newly encumbered and newly devalued. WAPA, in choosing Alternative A, would be the facilitating agency for this illegitimate transfer of property restrictions.	Alternative B has been selected as part of the Agency Preferred Alternative on the eastern end of the proposed Project. Section 4.13.5 of the Final EIS discusses the potential impacts on land valuation.	Jeff Barina
Alternative	All	B	Public	The solution is Alternative B: -- Alternative B uses the south ROW, a long-established easement familiar to and accepted by the landowners in the area. -- It successfully removes the north ROW from the property of most proponents and increases land values. -- It does not transfer property restrictions to a new, innocent set of landowners.	Alternative B has been selected as part of the Agency Preferred Alternative. The rationale for the Agency Preferred Alternative is detailed in Section 2.8 .	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Socioeconomics	All	General	Public	The remaining issue of protecting scenic views across public open space is important, but it should not be paid for on the backs of other, innocent, private landowners – those landowners who are not even adjacent to the open space.	Thank you for your comment.	Jeff Barina
Socioeconomics	All	General	Public	Instead, the cost for protecting scenic views through public lands – which is a public benefit -- should be paid for by the public. One suggestion is to use the double-circuit wooden H-frame structures to minimize the visual impact to the scenic view. This is less expensive and much preferred to the steel monopoles. Another suggestion is using higher electric rates to pay the added cost of underground construction. Yet a third method would use public funds - perhaps through park fees, Great Outdoors Colorado (GOCO) grants or other means - to help fund underground construction through the public open space areas.	A discussion of the rationale for not considering underground construction is found in Section 2.8 of the Final EIS. Double circuit wood-H-frames compromise transmission line reliability and don't meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood-H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1). Partial public funding is complicated by regulations governing Western's acceptance of funds from the public; legislation would likely be required to do this. Lacking public or appropriated funding from Congress, electrical power rates (either Western's wholesale power rates or participating utilities retail consumer rates) would pay for the proposed Project in any event.	Jeff Barina
Alternative	West	A2	Public	My family supports burying power lines in the Estes Valley and Variant A2. Burying lines in the valley and routing new lines in a manner that doesn't impact view corridors for Colorado's premier national park, Rocky Mountain National Park is what must be done. This is not a short term item (rerouting power lines) and the greatest care must be taken to do it right. Form Letter - See comment letter 22	Visual impacts are complicated, and underground construction may not reduce visual impacts as much as supposed. A 50-foot completely cleared ROW would be required to be maintained over an underground line. Section 3.12.2.1 shows visual simulations looking back from near the Park, and it is the ROW that is apparent and not the structures. An above-ground line would allow for shrubs and low- or slow-growing woody species in the ROW which would add darker greens to the more tan grass areas. Section 2.8 provides a discussion of the rationale supporting the selection of the Agency Preferred Alternative.	Ron & Ann Wilcocks
Alternative		A2	Agency-ARD Directors	Form Letter with minor text edits - See comment letter 22 Furthermore, the desires of full time citizens of Estes Park are often ignored. ARD has tried to represent the interests of citizens by making responsible development our major theme.	Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction are fully discussed in Sections 2.2.2 through 2.2.4 of the Final EIS. Section 2.8 of the Final EIS presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.	Thomas Gootz, Rebecca Urquhart, Chris Reveley
Visual	All	General	Public	The proposed and significantly taller steel poles will greatly impact the existing natural landscape. The proposed steel poles will be 40% higher and will provide an industrial look to the natural forest lands. Because the route follows the ridge lines, the impact of the taller steel poles will be even more pronounced. It is my understanding that it will take more steel poles spaced closer together to accomplish the same support the current wooded "H" structures now provide. Lower height wooden structures, while not attractive; blend with the natural forest environment better than reflective galvanized steel towers the height of a ten story building.	Commenter understands that the steel poles would be taller and closer together, which is generally incorrect. Table 2.2-1 shows that the ruling spans would be longer for the steel pole line, therefore visual impact may be reduced based on the longer span length for steel monopoles compared to wood-H-frames, roughly 25 percent fewer structures per mile. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Reduced structure height would reduce the span length between structures at the visual expense of more structures per mile. Opinions vary as to whether fewer taller structures or more shorter structures is visually less impacting, and the effects vary with viewer location. It is not possible to use the height of the existing structures with a double-circuit line due to the necessity of maintaining proper clearances from the ground and between conductors. The effects of structure types are taken into consideration by Western as discussed in Section 2.2.2 of the Final EIS.	Steven A. Goodroad
Alternative	All	General	Public	WAPA should use its existing rights of way and not increase the easement width. Increasing the clear-cut easement width combined with the steel poles will exacerbate the "industrial" look and impacts to the natural forest lands.	The ROW width is dictated by the double-circuit 115-kV line and NERC clearance standards. Compliance is required; failure to maintain specified clearance from vegetation can result in outages, potential fire ignition, and substantial fines to utilities including Western. Sufficient NERC specified clearances for the existing line or any proposed alternative, including D, would need to be implemented.	Steven A. Goodroad
Wildlife	All	General	Public	I believe WAPA's EIS falls short addressing the impacts steel towers will have on our raptor population. Because the steel towers are used as a part of the grounding system for the power line, they are known to increase accidental electrocution of raptors. Non-conductive wood poles in combination with phase protection at the poles would help mitigate accidental raptor electrocutions.	Electrocution of raptors is not an issue with transmission lines of this voltage, because the clearances between grounded components such as structures and davits to the energized conductor needed to prevent flashover are too great for the largest raptor to contact ground and conductor at the same moment to be electrocuted. Raptor electrocution is, as the commenter notes, an issue with lower voltage sub-transmission and distribution lines where clearances are reduced. Wood poles are not as conductive as steel of course, but they are a ground and do not offer protection against electrocution.	Steven A. Goodroad
Electrical	All	General	Public	WAPA's proposed power line is in an area of very dry air subject to very high winds. The effects of positive static electricity generated by the lines on taller steel poles and how this energy may impact people and animals living near the new line was minimally considered, stating induced current and the electromagnetic field would be less than the existing transmission line. A supporting study for WAPA's assertions would be helpful in putting this concern to rest.	Western operates and maintains nearly 18,000 miles of transmission lines in all or parts of 15 western states, so the climatic conditions in this area are nothing unusual. Both wood and steel structures are properly grounded to carry lightning strikes or static charges safely to ground. Induced currents are unrelated to wind and weather, and are a function of the magnetic field of the operating line. Fences and other metal objects close to the line or in the ROW would be grounded appropriately to prevent induced currents. Section 4.14 details the affects of EMF and other electrical effects. As previously noted, the new transmission line would produce less EMF at the edge of the ROW than the current transmission line. Additional supporting information and analysis is available in Appendix D .	Steven A. Goodroad
Proposed Project	All	General	Public	It is important to have a reliable power line and since WAPA is not increasing the power capacity of the transmission line, the existing design seems logical with the least impacts. Using the existing wood pole design also seem like it would be the most cost effective option.	The commenter's suggestion is not a viable option as a result of the short ruling span, fire risk, increased visual impact, and increased maintenance of the double-circuit 115-kV wood-pole H-frame structures. This option would be more expensive and more visually impacting than a single steel pole double-circuit alternative because both existing lines would have to be rebuilt, and no ROW would be abandoned. An underground option was not selected for the Agency Preferred Alternative - please see Section 2.8 of the Final EIS for the rationale for selecting the Agency Preferred Alternative. Alternative D also has more visual and environmental impacts than the Agency Preferred Alternative.	Steven A. Goodroad

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction are fully discussed in Sections 2.2.2 and 2.2.4 of the Final EIS. Section 2.8 of the Final EIS presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Leanne Lauren
Alternative		General	Public	Duplicate of comment letter 20	<p>Members of the Project team have been to the Meadowdale Hills subdivision, and have examined the route alternatives from the air. The subdivision is crossed by an existing transmission line, so any assessment of impact has to take that fact into account. Most alternatives include the complete removal of one of the existing lines and abandonment of the ROW, a net gain in visual resources to the Estes Park area.</p>	Larry Olson
Alternative	West	General	Public	<p>Is there any discussion of burying the lines.... From the Estes Park Power Plant east bound following US 36 across the lake to the Estes Park town city limit at (Mall Road) ? If so just that alone would be a huge improvement!!!! I would go steel from there...</p>	<p>While Western is aware of the desire to remove the steel lattice structures along the causeway, these structures are not included as part of the agency's present project scope. At some point in the future, when these structures are in need of replacement, undergrounding this section would very likely be considered.</p>	Dave Ranglos

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customer that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 of the Final EIS presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Lori Smith
Alternative	East	B	Public	<p>Concerning the proposed power lines near Pinewood Reservoir, my husband and I would like to offer our preference for Alternative B. We are landowners in this area and feel that Alternative B is the best option both for us and for the majority of stakeholders living near Pinewood, as it doesn't cross smaller residential lots and maintains the current lines and easements that have been in place for decades. Alternatives C and D in particular may threaten our ability to build a home on our property, depending on the specific placement of towers. Alternative A is displeasing to many of our neighbors, who likewise would prefer not to have monopoles and structures on their land. In closing, we would like to state again our preference for Alternative B.</p>	<p>In this area, Alternative B has been selected as part of the Agency Preferred Alternative.</p>	Alicia and Dillon Sprague
General	All		Public	<p>First of all I would encourage Western Power to consider the Estes Flatiron project as the first step in an ongoing and larger engineering project, and plan not only for the current consolidation of the existing transmission system, but consider the impact of what we do today on future infrastructure projects.</p>	<p>Every transmission project is part of the larger interconnected power system, and each region has a 10-year construction plan, so Western does consider future infrastructure needs as it makes decisions on current construction projects. The rationale for selecting the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS.</p>	Chip Sproul
Alternative	West	A	Public	<p>Alternative A routes the project North of the Meadowdale Hills subdivision and along the existing North transmission line Right-Of-Way. The installation of a new six line system consisting of one hundred foot towers does not belong in a residential neighborhood negatively impacting over one hundred home owners. I am sure the money spent today to place power lines underground along the North route (Alternative A) will be appreciated not only in the short run by improving the views as you approach Estes Park and Rocky Mountain National Park, but also by succeeding generations of engineers planning the infrastructure for the second half of the twenty first century.</p> <p>In short, let's extend our Planning Horizon beyond today by undergrounding as much as possible and look forward to undergrounding the current structures along Lake Estes.</p>	<p>Western points out that the proposed Project is not a new project, but would replace two existing lines with one transmission line and abandon one entire existing ROW under most alternatives. As described in Section 2.8 of the Final EIS, undergrounding transmission lines has its own set of issues and impacts that are very different than burying a distribution line. The rationale supporting the selection of the Agency Preferred Alternative is presented in Section 2.8.</p>	Chip Sproul
Visual	West	General	Agency-Estes Valley Land Trust	<p>EVL very much supports the variant alternatives that reflect the burying of the transmission lines. In section 4.12.6 Mitigation, the DEIS states "The most effective mitigating strategy for scenic resources is proper siting and structure design." EVLT disagrees: rather the most effective long-term mitigation strategy for protection of the scenic resources of the Estes Valley is burial of the lines. EVLT recognizes the additional cost involved, but believes that over the long term, this is the most effective strategy and requests that the final EIS language reflect this comment. EVLT has long-term responsibilities to protect its easements, and indeed under federal and state law, those responsibilities are in perpetuity. We would like to see WAPA also take a long term perspective and bury the transmission line as shown in variants C1 or A2.</p>	<p>An underground transmission line also requires a cleared ROW of, in this scenario, at least 50 feet. While an aboveground line requires structures and conductors, its ROW can contain shrubs and low-growing trees. Where spans cross draws and ravines there may be no clearing of vegetation at all save access to the structures themselves. An underground transmission line would require total clearance of woody vegetation across the entire ROW, for its entire length. The effects of the structures and conductors diminish in front-lit, side-lit, and back-lit lighting conditions; in background terrain situations; and with a relatively short distance. The ROW clearings typically cause visual impacts throughout each day that are greater than the effects of the structures. An underground line cleared ROW in forested landscapes could be more visible than an overhead line ROW, as the latter would have darker shrubs and low trees to blend with the surrounding vegetation. Individuals will have varying opinions about which ROW is less obtrusive to them, but Western believes that the completely cleared ROW needed for underground construction would result in negligible benefits in many areas, and would be worse in some.</p>	Mary Banken

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Land Use and Recreation	West	B,D	Agency-Estes Valley Land Trust	Our second comment is that it is our understanding that the Right of Way owned by WAPA through the existing EVLT CE properties are 11 O' and that is the width required for alternatives B and D. In other words, EVLT understands that expansion of the RO W's through EVLT owned CE's for these alternatives would not occur, beyond that which existed at the time the easements were acquired. We requested a GIS data layer of the WAPA ROW at the open house on September 23rd to assist in the verification of the location of the ROW relative to EVLT's CE's (we have followed up this verbal request with emails to WAPA but have had no response). Our comments assume that the ROW's through EVLT's CE's would not be increased. EVLT would be opposed to any expansion from the existing ROW though its easements regardless of their current width if it is determined by WAPA that it is necessary to increase the width of these easements. Further, if any ground disturbance in EVLT CE's occurs with resulting soil disturbance, as indicated in the DEIS, EVLT would expect that the original topography and condition be reestablished and the disturbed areas restored.	Western has provided the requested GIS data layer. Where Western has existing ROW of 110 feet (the 'South Route'), no additional ROW would be required. Reclamation of construction disturbance is discussed in Sections 4.4 and 4.7 of the Final EIS.	Mary Banken
General	West		Public	Quite simply, you have before you the once-in-a-lifetime opportunity to make a significant positive impact on the beauty, economy, health and legacy of Estes Valley and its residents and visitors. This is not a responsibility to be taken lightly or based on a single consideration.	Western has a large number of considerations it needs to factor into a decision on the proposed Project. The rationale used to determine the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS.	Rich and Joy Harvey
Alternative		General	Public	We strongly encourage WAPA and the Estes Park and Estes Valley leaders to seriously consider the underground options for new transmission lines.	Underground construction was considered in two options near the west end of the proposed project. The issues and impacts associated with underground construction are presented in Section 2.2.4 of the Final EIS, and the rationale used to determine the Agency Preferred Alternative is presented in Section 2.8 .	Rich and Joy Harvey
Visual	West	General	Public	WAPA's proposed above ground alternatives for the Estes to Flatiron Transmission Lines rebuild project while decreasing the number of poles would increase the number of lines carried by each pole, the power carried by each line, as well as significantly increasing the height of the poles and lines. For some this may raise the lines above their line of sight but for many others this would extend the lines and poles directly into their now beautiful view. The existing power lines and poles currently in place on the Lake Estes causeway are a constant reminder of the negative impact a good project can have if the implementation is less than wise. This is our chance to correct that negative impact.	While most alternatives considered would indeed include double-circuit, taller steel structures, those alternatives would also include the removal of the other existing line and abandonment of that ROW, which would have substantial beneficial visual effects as compared to the existing conditions. Western is well aware that the removal of the lattice steel structures along the causeway would greatly improve the visual situation coming into Estes Park, but that segment is not included in the proposed Project and is beyond the scope of the EIS.	Rich and Joy Harvey
Land Use and Recreation		General	Public	Our expectation and that of many Estes Valley residents is that this project would be consistent with the Vision, Mission and Goals of Estes Park, i.e., the 2014 Strategic Plan for Estes Park. The town Vision: "The Town of Estes Park will enhance our position as a premier mountain community." When arriving in Estes Park via Highway 36 the immediate view of massive transmission poles and lines does not bring to mind "a premier mountain community." On the contrary, it causes one to think, "How did this happen?" "The Mission of the Town of Estes Park is to provide high-quality, reliable services for the benefit of our citizens, guests, and employees while being good stewards of public resources and our natural setting." How is the placement of new above ground transmission lines consistent with "...being good stewards of public resources and our natural setting."? The Key Outcomes, Goals and Board Objectives of this 2014 Strategic Plan are not consistent with the projected impacts of new above-ground transmission lines. New construction projects and extensive remodels within Estes Valley are required to place utility lines underground. How is it that WAPA and the Estes to Flatiron project is exempted from this requirement???	The proposed Project is not a 'new transmission line'. It is a rebuild and consolidation of two existing lines that have been part of the local landscape for over 60 years. Further, the Agency Preferred Alternative results in the consolidation of both lines into one, allowing the removal of one line and abandonment of the ROW so that 16 miles of existing ROW can be allowed to revert to nature. The trade-off is taller structures on the remaining existing ROW.	Rich and Joy Harvey
Socioeconomics	West	General	Public	There is no argument that the proposed power lines/poles would negatively impact our land values. WAPA has estimated a decrease in value to individual properties of between 10% and 30%. (Of course, it is in their best interest to minimize the estimate of negative impacts.) How can the community leaders condone this loss or any loss to property values? A very experienced realtor with an investment in the welfare of the local community has predicted a much higher loss to our land values. Would it not be in the best interest of the entire Estes Valley community to mitigate this negative impact??	Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and most studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the backgrounds, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted. please see Section 4.13 for a more detailed discussion. As detailed in Section 2.2.2 , shorter average height structures with a shorter span length could be considered in sensitive communities; however, the tradeoff for somewhat shorter structures is shorter spans and more structures. As visual impacts are subjective and vary by viewer, some would prefer taller, fewer structures, and others shorter but more numerous structures.	Rich and Joy Harvey
General	West		Public	The WAPA representatives at the most recent open house held here in Estes Park on October 30, 2014 referenced a "not in my backyard" attitude expressed by those residents who would be directly impacted by the proposed alternative routes for the transmission lines. What we heard from those concerned citizens who took the time and effort to speak publicly was a much broader more global concern for the future of Estes Valley's health and welfare. Is not the Estes Valley all our backyards? And yes, we all have an obligation to protect our 'backyard' and those of our neighbors.	There are many considerations Western must take into account for a project of this type, including those raised by local residents, those imposed by law and regulations, those associated with the agency's mission, and the realities of the physical and human environment. Western must seek to balance many competing, conflicting, and sometimes mutually exclusive factors in order to arrive at a decision.	Rich and Joy Harvey

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative, Visual, Electrical	West	General	Public	<p>You are aware of the many benefits of underground transmission line installation as it relates to protection from wildfire, protection of the views and decreased exposure to electromagnetic fields. These positive effects should not be underestimated. A most insightful paper, Underground Electric Transmission Lines, submitted by the Public Service Commission of Wisconsin is available on the WAPA web site @ ww2.wapa.gov. We highly encourage you to read it. The Underground Electric Transmission Lines paper submitted by the Public Service Commission of Wisconsin provides valuable information regarding the impact of underground lines both pro and con. However, what may be a negative for one community may not be the same for Estes Park and Estes Valley.</p> <p>The impact of an underground line on the environment is less than the lifetime scar of a 300 foot clear-cut right of way for an above ground transmission line. The significant impact of placing transmission lines underground is the economic cost. The residents of Estes Valley understand that. What is somewhat more difficult to measure is the value of the benefits such as: improvement in visual impact, the improved health benefits by reducing the effect of the electromagnetic field, the reduced loss in land values, the increased appeal of the Town of Estes and the Estes Valley to the many visitors who support our economy, and the legacy that will be left behind for future generations to experience and emulate.</p> <p>How do you weigh these benefits against the economic cost of the underground alternative? The answer must come from those who will carry that responsibility, the residents of the Estes Valley and those who will benefit from improved electric power.</p>	<p>Underground transmission lines typically have shielded electric fields, but higher magnetic fields than overhead lines because the conductors are closer to the ground surface. Western is familiar with the Wisconsin publication, which as the commenter notes is available on our web site. Commenter is incorrect that the cleared ROW would be 300 feet; Western would use a 110-foot-wide ROW, which the present 'South Route' already has. It should also be noted that shrubs and small trees would be allowed to grow across an above-ground line ROW, while an underground line would require a completely cleared 50-foot strip directly above the buried lines. This comment illustrates some of the many factors and effects, some measurable and some very subjective, that must be considered in order to make an informed decision. The rationale used to support the identification of the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS.</p>	Rich and Joy Harvey
General	West		Public	<p>If you are to listen and really hear those giving input there is a tremendous amount of support by neighbors and customers of power carried by these lines to share that economic responsibility. Spread over the many consumers and the years of service the responsibility in the opinion of many is worth sharing and more than worth the cost. Many individual landowners who will be directly affected have voiced their willingness to support an impact to their land that will support such an overall beneficial outcome for the Estes community.</p> <p>Is not the support of the community in the form of positive public opinion and a willingness to support this project both morally and economically worth its weight in gold?</p> <p>In the words of a long time resident and very wise woman, "Let's do it right this time." This outcome is indeed truly priceless.</p>	<p>Western appreciates the comments and concerns voiced by the public; a fundamental goal of the NEPA process is to elicit public participation and input, and to use the results of that participation to make informed agency decisions. The discussion of the rationale used to support the selection of an Agency Preferred Alternative clearly reflects this input, although inevitably not everyone will be satisfied. The elimination of one of the existing lines and abandonment of the ROW to be reclaimed by nature would provide a substantial benefit to the area, a fact that has been largely overlooked.</p>	Rich and Joy Harvey
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods.</p> <p>It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 of the Final EIS presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Robert (Butch) and Leah Lundstedt

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	West	General	Public	Although the Rebuild Project will make our electric power more reliable and fire resistant, placing the Towers above ground along Highway 36 and through the Meadowdale Hills neighborhood will significantly diminish the pristine and scenic nature of the entire Estes Valley. Highway 36 is the gateway to the town of Estes and Hermit Park and provides a first impression to the thousands of visitors who travel there to escape the undesirable characteristics of urban living.	Western took the visual aspect of the proposed Project into account, as evidenced by the selection of the Agency Preferred Alternative and its supporting rationale, and the proposed removal of the structures presently adjacent to Highway 36.	Bill & Sue Oakes
Alternative	West	General	Public	The best way to contribute to the natural beauty of the Estes Valley and to the economic impact that tourism provides, is to underground the transmission lines and allocate the additional cost among all of the affected regional electric customers. If placing the lines underground simply cannot be done, then the other best alternative is to run them through the mostly uninhabited Crocker Ranch. With all due respect for the work that has been done to enhance the power system in the Estes Park area, we urge WAPA to either underground the transmission lines or place the towers through Crocker Ranch, out of sight of those who visit Estes Park and contribute to the economic success of the entire Estes Valley.	The selection of the Agency Preferred Alternative took into account many factors, and necessitated several resource trade-offs. The rationale for the selection of the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS. All alternatives cross the Crocker Ranch, as they have been since being identified. This is not a new project, and involves rebuilding lines that have been present in the area for many decades. Additionally, all alternatives except D and No Action would remove one entire existing line and the ROW would be abandoned. This would improve the present visual impacts.	Bill & Sue Oakes
Socioeconomics	West	General	Public	I realize from all that has been written about this project that there is much to gain in "creature comforts" by this Estes-Flatirons Rebuild. With the knowledge that we now have, the technology available, and the backing of the residents of the Estes Valley, it seems like the perfect opportunity to make a change that will be valued now and for generations to come. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.	The rationale discussed in Section 2.8 of the Final EIS provides a review of the many factors Western must consider when making a decision on the proposed Project. Visual concerns are just one of those factors, and Western must again point out that this is not a new transmission line, but a replacement project for two existing lines that have been in place for over 60 years. The Agency Preferred Alternative would result in the removal of one line and abandonment of its ROW, which would revert back to its natural state within a few years and represent a substantial visual improvement over the present condition. As a responsible Federal agency, Western must also consider cost in its decisions, both construction and operations and maintenance costs.	Paulette Robles
Land Use and Recreation	East	General	Public	Table 3.113 has incorrect information in it. I believe the information for Pinewood Reservoir County Park should be updated based on the changes the County is making that are scheduled to be completed next spring. They are in the process of adding additional campsites and have completed an additional mile of trail along CR18E. The trail mileage would be closer to 5 miles rather than the 4 stated in the table. I am not sure what the final newly enlarged campground count will be, but it will be greater than what is also stated in the table.	Table 3.11-3 has been updated with the latest possible information regarding Pinewood Reservoir County Park.	Barbara Sax
Land Use and Recreation	East	General	Public	Table 3.111 has incorrect information in it. It does not appear you included the lower portion of Green Mountain Drive or all of the homes on Newell Dr in the Newell Lake View Subdivision numbers based on the map on page 383. I believe they should have been included somewhere as current lines run by some of the houses and everyone walks and drives the same roads. I included homes on Green Mountain Dr, Greenwood Dr, Sylvia Ct, Newell Dr, and CR 18E (between Green Mountain Dr & Greenwood on the East side of the lake. ● I believe the Estimated Undeveloped Lots is less than the 7 indicated in the table ● Developed Lots is closer to 63 ● Total Residential is closer to 62. The location is directly East of Pinewood Reservoir not the North. (Please look at your maps as the community runs directly east of the entire length on the lake.)	The Larimer County Assessor has been consulted again to ensure that the most current and up to date Newell Lake View Subdivision information has been incorporated into Section 3.11 . Portions of the roads and adjacent residences mentioned in the comment are outside the boundaries of the Newell Lake View Subdivision and are not included within the subdivision tally. Text has been added in the section acknowledging these properties.	Barbara Sax
Visual	East	General	Public	I have two main goals that I have listed in the order of importance 1. keep Transmission Lines from running across any of the Newell Lake View Area properties. 2. protect the viewshed of Pinewood Lake My main issue with the Draft is that it does not adequately address the goal of protecting the viewshed of Pinewood Lake. The draft recognizes that there is a sensitivity to the viewshed of Pinewood Lake and Alternative A was added to address those, but several inaccurate statements have been made. I question the accuracy of this statement in regards to Alternative C.	Visual impacts are just one of the many potential environmental impacts and other factors Western must consider, and we acknowledge it as being an important one. Removal of the portion of the existing transmission line across the Newell Lake View Subdivision is and has been a component of every alternative, including No Action, since the beginning of the process due to encroachment and safety concerns.	Barbara Sax

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	East	A, C, D	Public	<p>Page S13& 241 "Several alternatives, specifically Alternatives A and C, avoid the viewshed south of Pinewood Lake, providing an alternative that eliminates these impacts at a much lower cost." Alternative C does not avoid the viewshed issue. As shown in figure 3.126 & 3.127 of the Draft, Alternative C clearly falls into both the Recreational and Residential Viewsheds. It runs by a number of houses along CR 18 E obstructing the view of the Newell Lakeview Subdivision and close to the new trail segment on the other side of CR 18E. Alternative D also has the same issue. This statement has been used throughout the Draft as a reason not to pursue a number of other alternatives, such as other Northern paths, like Cottonwood Creek. The fact is we do not have several alternatives as stated in the draft, that address the Pinewood Lake viewshed issue. We only have one Alternative A.</p>	<p>Commenter is correct, Alternative C is within the viewshed of Pinewood Reservoir (lake), and the text in the Executive Summary and Section 2.9 have been adjusted to reflect this. Alternative B has been selected as part of the Agency Preferred Alternative in this area.</p>	Barbara Sax
Visual	East	A & C	Public	<p>Also when I read the draft I got the impression that our original comments made at the community brainstorming session at the Bison Center, and the statements sent to you following the last review period have been understated or largely ignored in the draft, as a number of residents commented that they were concerned with the larger transmission lines impacting their view of the Pinewood Lake area. Since the major subdivision that looks at the lake is named the Newell Lake View Subdivision, the view of the area around the lake is obviously of great concern. I agree that Alternative A protects the viewshed, but the draft's statement that Alternative C eliminates the viewshed concern is not correct and I feel it may have adversely affected the methodology in coming up with Pinewood Lake viewshed alternatives.</p>	<p>The text in the Executive Summary and Section 2.9 have been corrected based on the viewshed of Alternative C. Alternative B has been selected as part of the Agency Preferred Alternative in this area.</p>	Barbara Sax
Proposed Project, economic, visual	East	A	Public	<p>Extra costs associated with protecting the Pinewood Lake viewshed for generations of users to come are justified to maintain the rustic nature of the area. The additional costs depreciated over the life of the next transmission lines greatly reduces any financial impact.</p>	<p>Both costs and visual impacts have been considered in the selection of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a discussion of the rationale for selecting this alternative.</p>	Barbara Sax
Alternative	East	A	Public	<p>Although I like the concept of choosing a path north of the dam on Pinewood Lake I have to question the methodology used in selecting the route chosen in Alternative A. The route goes very close to many of the homes on the Northern Boundary of the Newell Lakeview Area. Faced with a choice between protecting a viewshed they value or having lines run through their property close to their homes, homeowners will willingly give up pursuit of protecting the viewshed. By routing alternative A close to homes in the Newell Lakeview Area you have divided the community. The homeowners affected have aggressively recruited neighbors to support their cause to choose Alternative B to prevent this from happening, skewing comments you will receive away from protecting the lakeview to protecting their neighbors.</p>	<p>Alternative A was identified during public routing workshops, and Western was asked to evaluate it. The route shown on the maps was conceptual only, and not intended to represent a final centerline. We have heard from residents supporting Alternative A, and others who oppose it. In the end, weighing all of the factors Western must consider led to the selection of Alternative B as part of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a more detailed discussion.</p>	Barbara Sax
Alternative	East	A	Public	<p>I question how homeowners would have responded if Alternative A had just been placed just a 1/4 of a mile north of the existing route so that it ran more through the burned area and not through the Newell Lakeview Area properties. I believe there needs to be a revision to the existing Alternative A. This should be expected when a new proposal is placed into the draft. The newly revised Alternative A should run north of the Newell Lakeview Area community, which consists of approximately 216 acres in size and is the highest populated area on the east side of the project, and instead be focused to minimize the impact on homeowners. There are many acres of burned land and vacant properties that would make a much more viable alternative to homeowners. Perhaps there are even property owners who would welcome the compensation they would receive with new ROWs.</p>	<p>Alternative A was identified during public routing workshops, and Western was asked to evaluate it. The route shown on the maps was conceptual only, and not intended to represent a final centerline. Several serious issues were identified with any route in this area, including access, steep slopes, and constructability, among others. We have heard from residents supporting Alternative A, and others who oppose it. In the end, weighing all of the factors Western must consider led to the selection of Alternative B as part of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a more detailed discussion.</p>	Barbara Sax
Wildlife	East	B	Public	<p>In addition to the major concern on the viewshed for the Pinewood Lake area by the Newell Lakeview Area residents, the ranch residents and the visitors to Pinewood Lake area, I am concerned about the impact on elk migration, nesting ospreys, and the broadcasting of internet and phone services to the Newell Lakeview area residents.</p>	<p>Impacts to elk and other big game species were analyzed in Sections 4.9.5.1 and 4.9.5.2 of the Draft EIS. Based on the project-specific design criteria for avian wildlife (Section 2.5.1), breeding raptors would not be impacted by these alternatives. Concerns about communication services are addressed in Section 4.14.</p>	Barbara Sax
General	East	General	Public	<p>I believe it would have been quite easy to have drafted a "Protect the Viewshed on Pinewood Lake document" based on what I have previously stated to collect hundreds of signatures from individuals who recreate in the Pinewood Lake area, by visiting campgrounds, fishing areas, and libraries, to oppose placing transmission lines as outlined in Options B, C or D. I have refrained from doing that based on the comments provided on The Dropin Learning Session Fact Sheet which states "NEPA isn't a voting exercise don't simply provide an expression of preference for one alternative versus another." I agree with your statement for many reasons. Please do not give credit to others who have collected signatures.</p>	<p>Thank you for your comment. Western included the quoted statement deliberately in an effort to obtain feedback on why members of the public liked or did not like certain aspects of the proposed Project, and elicit thoughts about how issues could be mitigated or resolved, allowing Western to respond more meaningfully.</p>	Barbara Sax

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	All	General	Public	The anodized Silver poles look better against the sky, rock, grass and the lake and should be the color of choice.	Western considered both galvanized steel 'silver' monopoles and self-weathering steel 'brown' monopoles (see comparison in Section 4.12). The USFS Landscape Architect concurs with the commenter's assessment; a mix of both steel types may be used depending on setting. There are supporters of both types, further proof that visual impacts are very subjective and highly variable (see comparison in Section 4.12). However, the latest field experience information from the utility industry on self-weathering structures indicates that ongoing corrosion weakens these structures, therefore shortening their expected service life. For this reason, and the fact the Forest Service prefers dull galvanized steel, self-weathering steel structures would not be used for this project.	Barbara Sax
Alternative	East	C & D	Public	Alternative C or D should not be selected as the lots are smaller and they impact many homeowners along CR 18E next to Pinewood Lake as well as the viewshed of the Newell Lakeview Area residents higher on the mountain and the recreational areas of the Lake. In addition they threaten the historic school house on the SE side of the lake.	Alternative B was selected for the Agency Preferred Alternative in this area.	Barbara Sax
Alternative	East	B	Public	Alternative B should not be selected as it has a major impact on the viewshed of the Pinewood Lake Recreation area and the residential areas of the Newell Lake Subdivision and the ranches on the West side of the lake.	Thank you for your comment. Please see Section 2.8 for a discussion of the rationale used to arrive at a decision on the Agency Preferred Alternative. Alternative B was selected to be a part of the Agency Preferred Alternative in this area.	Barbara Sax
Alternative, Visual	East	A	Public	The draft does not adequately address the Pinewood Lake viewshed concerns brought up in previous sessions. Alternative A should be modified by taking a more northerly route that does not go through the heavily populated Newell Lakeview Area and strives to minimize impact on homeowners by routing through burned and unoccupied land. Other options to minimize the Pinewood Lake viewshed concerns should also be presented, as the one alternative (which is not even supported by the community it is meant to help) is not enough.	Thank you for your comment. Please see Section 2.8 for a discussion of the rationale used to arrive at a decision on the Agency Preferred Alternative. Alternative A was identified during public routing workshops, and Western was asked to evaluate it. The route shown on the maps was conceptual only, and not intended to represent a final centerline. Weighing all of the factors Western must consider led to the selection of Alternative B as part of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a more detailed discussion.	Barbara Sax
Alternative	East	A	Public	The Newell Lakeview Area has the largest population (approx 116) on the East side of the project. The only solution that we could all totally embrace is one where no Transmission Lines run through the community and the Pinewood Lake viewshed is protected. This aligns with the the opinions of those recreating on Pinewood Lake who would not want to see transmission lines run by the trails, lake, or campground as presented in option B,C or D. So far, the only solution presented needs to be revised by considering a more carefully thought out rerouting of Alternative A.	Thank you for your comment. Please see Section 2.8 for a discussion of the rationale used to arrive at a decision on the Agency Preferred Alternative. Alternative A was identified during public routing workshops, and Western was asked to evaluate it. The route shown on the maps was conceptual only, and not intended to represent a final centerline. Weighing all of the factors Western must consider led to the selection of Alternative B as part of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a more detailed discussion.	Barbara Sax
Alternative		General	Public	<p>Duplicate to comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods.</p> <p>It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed Project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Mike Sax

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	West	A	Public	<p>We are supporting Alternative A for the following reasons: Our current property, located in Ravenscrest Estates, has a land easement that provides for a 55 feet on either side of the current transmission centerline. Alternative A would remove this proposed transmission line from our property, and the proposed 105 feet steel monopoles that would wheel 230 kilovolts of electricity close to our home. We are very concerned about this health risk. We have not seen nor been provided with any new information from Western Area Power Administration ("WAPA") that 230 kilovolts of electricity close to a residential home does not cause or create any health concerns from these additional Electromagnetic Fields ("EMFs"). Even the NIH booklet dated April 4, 1999 provided by WAPA, states that EMF exposure can't be recognized as entirely safe. Since the data on EMF's have not been conclusive, it would be prudent for WAPA to avoid this health risk. Alternative A would solve this issue for us and our neighbors. WAPA would also save millions of dollars in litigation costs due to significant health effects. By removing this line from our property and others, the proposed transmission line would be consolidated with the existing North Transmission Line ROW on the Western side, where no residential homes nor farms are located.</p>	<p>Section 4.14 of the Final EIS discusses EMF and potential health risk issues. Additionally, Tables 4.14-1 and 4.14-2 portray the estimated differences in EMF from the proposed new structures and the current H-frame structures. The new line, like the old ones, would be operated at 115-kV, and would have lower EMF than the existing line due to higher conductor clearances and the cancellation effects of a double-circuit line. Voltages are not additive as the commenter suggests. The rationale supporting the selection of the Agency Preferred Alternative is provided in Section 2.8 of the Final EIS.</p>	Reggie and Mary Elizabeth Smith
Alternative	West	A	Public	<p>Alternative A would also eliminate all the current transmission lines along Route 36, which would significantly improve the visual impact for visitors coming to Estes Park. A vista clear of power lines would have tremendous economic benefit for Estes Park and Larimer County tourism.</p>	<p>Western notes that consolidation of the two existing lines on one ROW allows the removal of the existing line and abandonment of the other ROW, allowing that ROW to revert to natural conditions and lessening the visual impact. The rationale supporting the selection of the Agency Preferred Alternative is provided in Section 2.8 of the Final EIS.</p>	Reggie and Mary Elizabeth Smith
Alternative	West	A	Public	<p>Property values for the homeowners close to the transmission line would also be negatively impacted if Alternative A is not implemented on the Western side. These large monopoles will decrease property values by more than 30%. Lower property values will also mean lower tax revenues for Larimer County and a reduction in new home construction as fewer people would be willing to move to this area. People do not want to live near steel monopoles as described in the EIS.</p>	<p>Please refer to the discussion of property valuation in Section 4.13 of the Final EIS. Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and most studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the backgrounds, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted; please see Section 4.13 for a more detailed discussion. As detailed in Section 2.2.2, shorter average height structures with a shorter span length could be considered in sensitive communities; however, the tradeoff for somewhat shorter structures is shorter spans and more structures. As visual impacts are subjective and vary by viewer, some would prefer taller, fewer structures, and others shorter but more numerous structures.</p>	Reggie and Mary Elizabeth Smith
Alternative	All	A	Public	<p>From a cost point of view, Alternative A has the second lowest life cycle cost of \$22.6 million, a difference of only \$500,000 over the lowest cost alternative. The difference of \$500,000 is marginal when amortized over 80 years. That difference amounts to only \$6,250 per year.</p>	<p>Thank you for your comment. Cost, while important, is just one of many factors considered when making a decision on a project such as this.</p>	Reggie and Mary Elizabeth Smith
Alternative	All	A2	Public	<p>We would also support Alternative A Variant A-2 as the power lines would be underground and the electric fields at the ROW would be at zero kilovolts.</p>	<p>Electric fields are measured in Volts per meter, and as the commenter notes would be zero at the ground surface. These fields from overhead lines are also easily shielded by vegetation and buildings. No potential associations between electric fields and suspected human health issues have been identified. Magnetic fields are measured in milligauss, and buried transmission lines would likely result in higher exposure at ground level than from overhead lines, because magnetic fields are not shielded by burial. Exposure is solely a function of distance from the energized conductor.</p>	Reggie and Mary Elizabeth Smith

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	David Batey
Alternative		A2	Public	<p>Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction are fully discussed in Sections 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	JoAnn Batey

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customer that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction are fully discussed in Section 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Catherine Lawson
General	All	General	Public	<p>The Board of County Commissioners believes the WAPA's analysis of environmental and other factors to be considered in the evaluation, addresses the concerns we noted in our original comments on the scoping of the EIS.</p>	<p>Thank you for your comment.</p>	Tom Donnelly
Alternative	All	A & B	Public	<p>With respect to the DEIS and the alternatives proposed, it is clear from the public comment received that there is generally a strong support of a "blended hybrid" approach to the routing, rather than relying upon strictly following one of the enumerated routes.</p> <p>Specifically there is strong support for a route, which stays south of Pinewood Reservoir, the B alternative, along the eastern reach of the route as well a similar support for the northern or A alternative alignment at the western end of the route.</p>	<p>Segments from several alternatives were in fact included in the Agency Preferred Alternative.</p>	Tom Donnelly
Alternative	West	A2	Public	<p>There is also a strong sentiment from commenter's, therefore the Board of County Commissioners would urge WAPA to closely examine the potential for underground facilities especially at the western end of the project. We believe at least some portion of the alignment that approaches the area of Mall Road and the "causeway" bears serious consideration to be constructed below ground.</p>	<p>Due to public and agency input, underground options were identified for the west end of the proposed Project. An underground option was not selected for the Agency Preferred Alternative. Please see Section 2.2.4 of the Final EIS for a discussion of undergrounding, and Section 2.8 for the rationale used in selecting the Agency Preferred Alternative</p>	Tom Donnelly
Proposed Project	East	General	Public	<p>We did also receive comments from individuals in the Pinewood Reservoir area who suggested that underground or the double circuit H-poles should be considered. We realize that this was not a part of any of the alternatives in the analysis of the DEIS, but would suggest that consideration of this issue is warranted.</p>	<p>The commenter's suggestion is not a viable option as a result of the short ruling span, fire risk, increased visual impact, and increased maintenance of the double-circuit 115-kV wood-pole H-frame structures. The undergrounding option was considered, and a discussion of the viability of this option can be found in Section 2.2.4 of the Final EIS.</p>	Tom Donnelly
Alternative, Visual	East	A, B, C	Public	<p>We find that the eastern segments of Alternative A create unnecessary visual and physical impacts and cannot be supported. The western end of Alternatives B and C would create an undesirable visual impact to the neighborhoods directly affected.</p>	<p>While efforts would be made to reduce visual impacts, the proposed Project would remain visible to a greater or lesser degree depending on location. Western points out that most alternatives would result in the removal of one of the existing lines and abandonment of one entire ROW. Consolidation of the two lines would have a positive visual effect.</p>	Tom Donnelly
Proposed Project	Central	General	Public	<p>For the majority of the central section of the alignments, we would support the use of the higher brown metal towers to minimize the number of towers necessary.</p>	<p>Self-weathering and galvanized steel monopoles were considered, either for the entire project or for the parts of it where the dark poles would be most compatible. Opinions vary, as with all visual issues, as to whether galvanized steel or self-weathering is visually preferable (see comparison in Section 4.12). However, the latest field experience information from the utility industry on self-weathering structures indicates that ongoing corrosion weakens these structures, therefore shortening their expected service life. For this reason, and the fact the Forest Service prefers dull galvanized steel, self-weathering steel structures would not be used for this project.</p>	Tom Donnelly

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Land Use and Recreation	All	General	Public	Larimer County Natural Resources would like to work closely with WAPA during the development of construction plans, in order to minimize impacts to our parks and open spaces. Larimer County and Northern Water will develop a future public access road, off County Road I SE, into Chimney Hollow Open Space. Depending on the status of our road plans, we would like to make sure the poles do not create a conflict with access.	Western welcomes the opportunity to coordinate project design plans with Larimer County Natural Resources as requested.	Tom Donnelly
General	All	General	Public	It has come to the Board of County Commissioners attention that there is currently a fiber optic communication line that is installed on the existing facilities, and this may not be continued with the rebuild. The line(s) apparently serve both the Platte River Power Authority as well as the Town of Estes Park for a variety of functions. We would strongly support the continuation of this public service for the future. It seems unreasonable to discontinue this service with the rebuilding of the power lines.	All action alternatives would include a fiber optic ground wire that would equal or exceed the capacity of the current fiber optic cable. However, the use of the fiber optic connections is beyond the scope of this EIS, just as power capacity allocations on the transmission line are not addressed.	Tom Donnelly
General	All	General	Public	The Board of County Commissioners heard from many well informed citizens who indicated that they did speak at one of the hearings held in Loveland or Estes Park they presented many issues which we cannot cover in our comments but believe careful consideration of their comments is warranted.	All comments received have been considered.	Tom Donnelly
Alternative	East	B	Public	The present north line is very close to our home and homes at the south end of Pinewood reservoir. We would prefer to have it removed. We both support "Option B" for building a single new power line to replace the aged and inadequate line on the existing south right of way. We believe it is sensible and efficient to remove the existing north line and towers so that only one line, capable of transmitting all present and anticipated power load need to be constructed and maintained. Using the existing wide and non-disruptive south right of way makes good common sense. ...we find "Option B" least damaging and disruptive to wildlife, the lives, property, homes, health and well being of residents.	The portion of the existing 'north line' that passes through Newell Lake View Subdivision would be relocated under all alternatives, including No Action, due to encroachments and safety concerns. However, one pole of each structure and a fiber optic ground wire would be left in place to maintain communications with the Bureau of Reclamation operated dam. Alternative B has been included as the Agency Preferred Alternative in this area.	Jim Wiegand, Janet Collins
Land Use and Recreation		B,D	Agency-Estes Valley Land Trust	Duplicate of comment letter 48 EVLTL very much supports the variant alternatives that reflect the burying of the transmission lines. In section 4.12.6 Mitigation, the DEIS states "The most effective mitigating strategy for scenic resources is proper siting and structure design." EVLT disagrees: rather the most effective long-term mitigation strategy for protection of the scenic resources of the Estes Valley is burial of the lines. EVLT recognizes the additional cost involved, but believes that over the long term, this is the most effective strategy and requests that the final EIS language reflect this comment. EVLT has long-term responsibilities to protect its easements, and indeed under federal and state law, those responsibilities are in perpetuity. We would like to see WAPA also take a long term perspective and bury the transmission line as shown in variants C1 or A2. Our second comment is that it is our understanding that the Right of Way owned by WAPA through the existing EVLT CE properties are 11 O' and that is the width required for alternatives B and D. In other words, EVLT understands that expansion of the RO W's through EVLT owned CE's for these alternatives would not occur, beyond that which existed at the time the easements were acquired. We requested a GIS data layer of the WAPA ROW at the open house on September 23rd to assist in the verification of the location of the ROW relative to EVLT's CE's (we have followed up this verbal request with emails to WAPA but have had no response). Our comments assume that the ROW's through EVLT's CE's would not be increased. EVLT would be opposed to any expansion from the existing ROW though its easements regardless of their current width if it is determined by WAPA that it is necessary to increase the width of these easements. Further, if any ground disturbance in EVLT CE's occurs with resulting soil disturbance, as indicated in the DEIS, EVLT would expect that the original topography and condition be reestablished and the disturbed areas restored.	An underground transmission line also requires a cleared ROW of, in this scenario, at least 50 feet. While an aboveground line requires structures and conductors, its ROW can contain shrubs and low-growing trees, and where spans cross draws and ravines there may be no clearing of vegetation at all save access to the structures themselves. An underground transmission line would require total clearance of woody vegetation across the entire ROW, and for its entire length. The effects of the structures and conductors diminish in front-lit, side-lit, and back-lit lighting conditions, in background terrain situations, and with a relatively short distance. The ROW clearings typically cause visual impacts throughout each day that are greater than the effects of the structures. An underground line cleared ROW in forested landscapes could be more visible than an overhead line ROW, as the latter would have darker shrubs and low trees to blend with the surrounding vegetation. Individuals will have varying opinions about which ROW is less obtrusive to them, but Western believes that the completely cleared ROW needed for underground construction would result in negligible benefits in many areas, and would be worse in some. Western has provided the requested GIS data layer. Where Western has existing ROW of 110 feet (the 'South Route'), on additional ROW would be required. Reclamation of construction disturbance is discussed in Sections 4.4 and 4.7 of the Final EIS.	Mary Banken
Alternative	All	A	Public	The Impacted Landowners object to the inclusion of the New Right of Way in the Project.	Comment noted.	Daniel K. Brown
Alternative	All	A	Public	These collective comments principally concern the process failures in the development of the DEIS that resulted from the inclusion of the New Right of Way in the Project in the first place. By including the New Right of Way in Alternative A, this route alternative becomes not only unfair, but a product of a procedural failure resulting from WAPA's failure to properly scope Alternative A with the New Right of Way included. For this reason, we request that any alternative, or blend of alternatives, that includes the New Right of Way, or a variation of the New Right of Way, be rejected in the Final EIS. To be clear, the Impacted Landowners are not commenting on, and do not wish to be involved in, other aspects of the Project, and encourage WAPA to select a route through each area and community that is best for that location. The same should be true of the Pinewood Reservoir area. In the end, a "blended route" that best mixes different aspects of existing alternatives may be the best solution, but in no event should any alternative include the New Right of Way.	Alternative A was identified during public routing workshops, and Western was asked to evaluate it. The route shown on the maps was conceptual only, and not intended to represent a final centerline. Weighing all of the factors Western must consider led to the selection of Alternative B as part of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a more detailed discussion. Western has always intended to use portions of all the alternatives carried forward for full analysis in the EIS if it made sense to do so. The Agency Preferred Alternative is in fact such a combination.	Daniel K. Brown

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	A	Public	The New Right of Way was hastily developed, ill-conceived and not properly vetted during the scoping process. The New Right of Way would be an entirely new route that appeared for the first time in September 2014 when the DEIS was published. The route deviates, without sufficient basis and explanation, from the existing rights of way and, therefore, requires new easements through private property - property that is rugged, relatively undisturbed and contains environmentally important areas that will be damaged if the NEw Right of Way is selected. Our understanding is that the New Right of Way was offered as a variation of the "Northern Route" after the scoping process had concluded, largely, it appears, for the purpose of placating a few landowners where the two current rights of way exit. No notice of this new route was provided to the Impacted Landowners and no opportunity was offered for comment. Indeed, it is not even clear where the New Right of Way will be located (the initial effort apparently being drawn right over the tops of certain landowners' homes).	The NEPA process requires that alternatives suggested by the public be evaluated in EISs. The commenter is correct that Alternative A was a later addition. It was identified and proposed by residents during public routing workshops, which were held to gather residents' thoughts on additional alternatives. The Alternative route shown on the maps was conceptual only, and not intended to represent a final centerline should that route prove viable. Due to steep terrain, access, and constructability issues, among others, Alternative A was not selected to be part of the Agency Preferred Alternative. Alternative B has been selected as part of the Agency Preferred Alternative. Please see Section 2.8 of the Final EIS for a more detailed discussion.	Daniel K. Brown
Alternative	All	A	Public	This is not how alternatives are developed under the National Environmental Policy Act ("NEPA"), NEPA mandates that an agency must <u>rigorously explore and objectively evaluate all reasonable alternatives</u> . NEPA alternatives are not developed hastily behind closed doors based upon the complaints of a vocal few. Rather, NEPA analysis rests upon feasibility, cost-effectiveness, sound information and reason - all after sufficient notice and opportunity for public comment has taken place. The New Right of Way appears to be based upon none of these, but rather seemingly WAPA's effort to find the path of least public resistance to the route selected. The New Right of Way amounts to nothing other than shifting the burden of the Project from one group of peoperty owners (that bought property with the full knowledge of the existing easements) to the Impacted Landowners who had no reason to suspect (until the DEIS came out) that their properties would ever be potentially subjected to such intrusion and damage. Accordinly, the inclusion of the New Right of Way in Alternative A in the DEIS is improper on procedural grounds, and should be rejected.	The commenter mischaracterizes the development of Alternative A. The alternative was suggested by members of the public, residents of the area, in a public routing workshop held expressly to develop additional alternatives and address concerns that not enough alternatives had been considered. Western was requested to evaluate this alternative, and alternatives suggested by the public must be considered. Ultimately, upon consideration of all relevant factors, Alternative B was selected as the Agency Preferred Alternative in this area.	Daniel K. Brown
Alternative	All	A	Public	If WAPA persists with this ill-conceived idea to create an entirely new easement through the Impacted Landowners' properties, we request that WAPA engage in additional scoping and alternative review as it relates to the New Right of Way and other route alternatives in the Pinewood Reservoir area. After this is done, WAPA should prepare an amended or supplemental Environmental Impact Statement properly addressing the issues, concerns, alternatives and mitigation measures associated with any such route alternative(s). To do otherwise is not only unfair to the Impacted Landowners, but also would subject WAPA to potential litigation for failing to follow mandated NEPA procedural requirements.	Alternative A was not selected to be part of the Agency Preferred Alternative.	Daniel K. Brown
Alternative	East	A	Public	...The inclusion of the New Right of Way as part of Alternative A was a substantial change in the proposed action because it represents a significant deviation from the existing rights of way. This is all the more important because the Project is described as a transmission line " <u>rebuild project</u> ." Just as a house is not "rebuilt" on a different piece of property, WAPA is not "rebuilding" a transmission line when it is on an entirely new route. Thus, the Impacted Landowners would rightfully not be expecting to see alternatives developed that would deviate from the existing rights of way, and certainly were entitled to notice and input before alternatives involving the New Right of Way were developed. WAPA was obligated to engage in additional scoping, at least in regard to the Project impacts in the Pinewood Reservoir area.	Re-routes of portions of an existing alignment made to avoid identified resource or human conflicts are accepted in transmission line rebuild projects. In any case, Western found serious issues with the public-suggested Alternative A, and it was not made part of the Agency Preferred Alternative.	Daniel K. Brown
Alternative	All	A	Public	NEPA law is clear that an agency cannot break a larger project into a series of smaller proejects in order to avoid reviewing the cumulative environmental impacts. See the Yaak Committee v. Block, 840 F.2d 714 (1988). Similarly, an agency cannot use the scope of a larger project to obscure localized, site-specific environmetnal impacts within the more generalized impacts of the overall project. This is precisely what the DEIS does with its treatment of the New Right of Way. Meaningful analysis of the New Right of Way and comparison of alternatives, options and mitigation measures, is not possible because the impacts and the potential options are obscured by the much coarser analysis of Alternative A and the overall Project Alternatives.	A more detailed analysis of Alternative A was not necessary as just a high level analysis revealed issues serious enough to keep the alternative from being considered as part of an Agency Preferred Alternative.	Daniel K. Brown

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	A	Public	The DEIS fails to meet these NEPA requirements in the development and presentation of Alternative A, at least as it relates to the New Right of Way. The route through the Pinewood Reservoir area is a critical and controversial part of the Project. Common sense and NEPA requirements required that it receive "rigorous" analysis, which in this case must be equal, or at least similar, to the treatment given the route alternatives through populated areas in Estes Park. Unfortunately, this is not the case. The DEIS does not "sharply define," "rigorously explore" nor "devote substantial treatment" to this critical aspect of Alternative A. Unlike in the Estes area, where there are two separately defined, described and evaluated route variants, the New Right of Way was merely lumped into Alternative A. This is improper because: (1) the New Right of Way was not properly scoped; (2) is not adequately described or evaluated; (3) is not treated in a consistent manner as other route variants, such as Variant A 1, A2 and C1 .	A more detailed analysis of Alternative A was not necessary as just a high level analysis revealed issues serious enough to keep the alternative from being considered as part of an Agency Preferred Alternative.	Daniel K. Brown
Alternative	East	A	Public	Furthermore, it is clear from the DEIS that WAPA internally considered other "Northern Route" alternatives through the Pinewood Area, but dismissed them without much apparent evaluation, and certainly no public debate or input. For instance, a "reroute along Cottonwood Creek" option is briefly raised but summarily discarded because it would require "several miles of construction through steep terrain with poor access." DEIS, p. 5-12. Lengthy construction through steep terrain with poor access would also be required for the construction in the New Right of Way. However, WAPA is promoting the New Right of Way while at the same time dismissing out-of-hand the Cottonwood Creek option. The only rationale given is that the New Right of Way is preferred because it "accomplishes the avoidance of the Pinewood Lake viewshed and the adjacent subdivision in a more direct and effective manner." Id. (emphasis supplied).	The difference between the 'Cottonwood Creek option' and Alternative A is that the former was identified by Western early on and briefly considered until obvious issues caused it to be eliminated from full analysis. Alternative A was raised later during public routing workshops by area residents who wanted Western to analyze a potential route in this area. NEPA anticipates that additional alternatives may be suggested by the public, as late as during comments on the Draft EIS. Alternative A is feasible, but it clearly has serious issues that kept it from being selected as part of the Agency Preferred Alternative. Commenter indicates Alternative A should have been placed in Section 2.7 , Alternatives Considered but Dismissed, in the Draft EIS. However, as the alternative was requested to be analyzed by area residents, it was retained as a full alternative.	Daniel K. Brown
General	East	General	Public	In a report the size of the DEIS, it is remarkable how telling one statement can be, but this underlined provision above speaks volumes. First, this statement underscores that 'WAPA has implicitly elevated "avoidance [of impacts] to the Pinewood Lake viewshed and adjacent subdivision" above other environmental issues and the concerns of the Impacted Landowners, and WAPA 's own stated preference that the Project remain within the existing rights of way. NEPA alternatives are not selected based upon hidden value judgments or agency biases. Power lines constructed in the New Right of Way will certainly affect the Impacted Landowners' viewsheds, as well as cause other environmental damage (construction, deforestation, erosion, access road creation and maintenance, to name just few) and an unwarranted fire hazard.	Rebuilding the proposed Project on an existing ROW is a reasonable and feasible alternative that would be expected to compare favorably to other identified alternatives in terms of overall impact. Western also views rebuild projects as an opportunity to reduce identified local conflicts or impacts, such as the section of line through the Newell Lake View Subdivision. Development of the area has caused encroachments on the line and safety issues that require the line to be relocated in this area. Several of the potential impacts noted by the commenter would occur on other alternatives as well, and are all part of the resource impact tradeoffs the agency must consider when making its decisions.	Daniel K. Brown
General	All	General	Public	Second, the DEIS is not internally consistent because it does not treat all alternatives in the same way-a NEPA requirement. This is evident from the detailed treatment given Variants A1 , A2 and C1 and the summary discarding of the "Cottonwood Creek" option. The New Right of Way does not receive the necessary detailed treatment, nor is it summarily discarded. Rather, it is incorporated into Alternative A, without description or justification. Such disparate treatment is arbitrary and unfair, and agency law is clear that arbitrary and capricious decisions constitute an abuse of agency discretion and violate NEPA.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. A more detailed analysis of Alternative A was not necessary because a preliminary high level analysis revealed issues serious enough to refrain from additional analysis.	Daniel K. Brown
Alternative	All	B	Public	Even were it not the case that Alternative A with the New Right of Way was improperly included in the DEIS, it is evident, even from a cursory review of the DEIS, that Alternative B should be preferred to Alternative A. This conclusion can be fairly easily drawn from WAPA's own matrix of "Measurement Indicators for Key and Other Issues" contained in the DEIS, pages S-14 through S-27. Perhaps the most compelling reason, though the least emphasized in the DEIS, is that Alternative B does not deviate from the existing rights of way. This is a stated goal of WAPA. It also should be preferred as a matter of common sense and basic fairness. The south right of way has been in existence for over a half-century. Landowners in the area have purchased their properties with the full knowledge of the transmission line and associated easements. WAPA should not upset these settled expectations absent a compelling reason to do so. The DEIS offers no such reasons.	Western disagrees with the commenter's assertion that Alternative A was improperly included in the Draft EIS: area residents requested it be included. It was not selected as part of the Agency Preferred Alternative, while Alternative B in this area was selected. Western views rebuild projects as an opportunity to reduce identified local conflicts or impacts. Departing from an existing ROW when identified conflicts would be reduced by so doing, conforms to the goals of NEPA.	Daniel K. Brown
Alternative	East	General	Public	The Impacted Landowners, and others, will elaborate in more detail on the substance of the proposed alternatives, but I would like to highlight just a few that would suggest Alternative B should be preferred to Alternative A, at least as the route through the Pinewood Reservoir Area:	Thank you for your comment. Alternative B was in fact included in the Agency Preferred Alternative.	Daniel K. Brown
Alternative	All	A	Public	The New Right of Way, and Alternative A generally, require the acquisition of new easements and expanded easements. Alternative B does not require new easement acquisition (except in the Pole Hill substation area) and generally much less need for expanded easements.	Commenter is correct. Alternative B was included in the Agency Preferred Alternative in this area.	Daniel K. Brown

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	A	Public	Alternative A, through the New Right of Way, is through very steep and rough terrain where there is presently no access. Not only would structures need to be built but access roads created, with all the attending environmental damage, scarring and erosion that would occur. Grades in the area are from 25% to 70%, making road construction difficult, access difficult (particularly in the winter), maintenance more frequent and difficult, and erosion more severe. Alternative B is through relatively flat and accessible land.	Commenter articulates several of the reasons Alternative A was not selected to form part of the Agency Preferred Alternative.	Daniel K. Brown
Alternative	East	A	Public	Alternative A in the New Right of Way is through dense timber that would have to be cut, including old and significant Douglas Fir stands. This would create another visual scar. Vegetation in the Alternative B route in the Pinewood Area consists largely of grasses and low shrubs. As it runs through an existing right of way, there has been historical maintenance of these easements. It is hard to understand how WAPA could justify the removal of even more timber after the devastating fires of recent years, particularly when relatively clear rights of way already exist. Further, the remaining timber in the New Right of Way area would make it more likely that the lines could be impacted by wildfire or cause a wildfire.	Alternative A was not selected as part of the Agency Preferred Alternative; Alternative B was selected in this area.	Daniel K. Brown
Alternative	All	A	Public	The cutting of timber in the New Right of Way would result in habitat loss, in particular loss of habitat from the felling of old-growth trees. Additionally, there are caves that serve as habitat for wildlife along the proposed route in the New Right of Way. This habitat would be disrupted by construction and regular access for repair and maintenance.	Alternative A was not selected as part of the Agency Preferred Alternative; Alternative B was selected in this area.	Daniel K. Brown
Alternative	All	A	Public	Common sense dictates that the decision to site the existing power lines, when constructed, was based upon at least some level of analysis that would suggest that Alternative B is a more sensible, cost-effective route. There was no doubt a good reason that these existing lines attempted to avoid rocky, steep, rough, forested terrain.	Alternative B was selected in this area.	Daniel K. Brown
Alternative	East	B	Public	After attending all the scoping meetings over the past two years, including the workshops to present opportunities, identify constraints, to develop alternatives, and comment on the potential transmission line routes in the vicinity of the Pinewood Lake-Newell Lake View Subdivision areas, it has become apparent to me, that of the four alternatives "A", "B", "C", "D" and their respective variants, Alternative "B" will be identified and selected simply because of its much lower cost savings to "Western" and the least path of public resistance of the number of landowners affected.	Strong public support for Alternative B was one of many relevant factors Western considered in determining its Agency Preferred Alternative. See Section 2.8 of the Final EIS for the rationale used to select the Agency Preferred Alternative.	Russell Atwood
Alternative	East	General	Public	During the public workshop scoping meetings, as well as, viewing the various existing "Western" rights of way easements and of hearing the potential "adverse effects" (which later were identified as "KEY ISSUES") voiced by my neighbors, myself, and of the various stakeholders present, I proposed an reasonable alternative which might solve most of, if not all of the negative effects of the proposed overhead transmission line- monopole project in and around the immediate Pinewood Lake area. <ul style="list-style-type: none"> Simply bury the power line underground using a concrete vault on the existing right of way (Alternative B) 110 foot easement, which seems parallel to the existing 8" Natural Gas Line; from between the access road to Bald Mountain Radio facility and the intersection of Pole Hill Road West, across private and a corner of federal lands (approximately 1 mile) to the East boundary of the State Trust Land (see map). This option eliminates the construction of 9 of the 105 foot monopoles and transmission lines form the scenic VIEWSHED of all involved, and positively addresses most all of the resulting "KEY ISSUES." <ul style="list-style-type: none"> Although "Western" cites higher costs prohibitive for 1 mile of potential underground construction for the Pinewood Reservoir recreation, conservation, and Newell Lake View Subdivision areas, "Western" has already determined that 2.7 miles of the transmission line in Estes Park will be constructed underground, (Summary S-7). 	Many issues must be weighed for these types of projects, and resource trade-offs often have to be made. Contrary to the commenter's assertion, there has been no decision made to construct the proposed Project underground in the Estes Park area; final decisions on any aspect of the proposed Project will not be made until the Record of Decision is signed. Western has, however, disclosed its preferred course of action in the Final EIS with the identification of the Agency Preferred Alternative	Russell Atwood
Alternative	East	B & No Action	Public	1. Larimer County Commissioners and the City of Loveland, DEMAND that the 1 mile of the proposed Estes to Flatiron Transmission Line (alternative route "B" alignment which passes through the Pinewood Lake-Newell Lake View Subdivision be constructed UNDERGROUND with NO overhead pole construction OR: 2. Adopt the NO ACTION ALTERNATIVE for the Estes-Flatiron Transmission Project.	Western identified the proposed Project to replace existing wood-pole transmission lines that are well past their service life. As discussed in Section 2.8 of the Final EIS, the No Action Alternative is not a viable option given the purpose and need for the proposed Action. Underground construction is discussed in Section 2.2.4.	Russell Atwood
Alternative	East	A	Public	An argument opposing the Alternative A WAPA power line relocation. Alternative A, as proposed, would run poles and lines parallel and adjacent to our northern property line. The 110' easement and the forest clearing for the lines as well as the road access for each power pole would unnecessarily add another scar to the landscape of the Pinewood area. Alternative A would be over some of the steepest and roughest terrain of anywhere along the Front Range foothills.	Alternative A, suggested by some area residents, was analyzed at their request. It was not selected to be part of the Agency Preferred Alternative.	Gary & Cindy Bragden

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Soils	All	A	Public	Road access to install and maintain the power poles and lines for Alternative A would create uncontrollable erosion issues due to the 25% to 70% grade of the west side of the mountain. There are caves on the west side of the mountain that native animals habitat that would surely be disrupted with the construction and maintenance of the power lines and poles.	Alternative A, suggested by some area residents, was analyzed at their request. It was not selected to be part of the Agency Preferred Alternative. Section 4.9 analyzes these impacts to wildlife from the proposed project alternatives.	Gary & Cindy Bragden
Alternative	All	A	Public	We understand the need to upgrade the power transmission lines but we do not understand why, with all of the existing easements and power lines in place now, that we need to add a new scar to our landscape. The environmental, economic and logistical feasibility of Alternative A with all of the existing alternatives makes no sense to us.	Alternative A, suggested by some area residents, was analyzed at their request. It was not selected to be part of the Agency Preferred Alternative. Section 4.9 analyzes these impacts to wildlife from the proposed project alternatives.	Gary & Cindy Bragden
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. Underground and overhead line construction is fully discussed in Section 2.2.2 and 2.2.4. Section 2.8 presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Terence & Jacqueline Chiplin
Visual	West	General	Public	<p>A. WAPA Should Honor its Policy of Protecting and Enhancing the Environment</p> <p>The Crocker Ranch urges WAPA to recognize its commitment to environmental excellence and select the alternative that best minimizes adverse visual impacts to the environment and the historic nature of the valley.</p>	<p>Western recognizes the visual sensitivity of the proposed Project. The proposal to consolidate two separate lines into one and remove the other line and abandon its ROW is responsive to visual concerns. The abandoned ROW would eventually revegetate and become indistinguishable from the surrounding area. The rationale presented in Section 2.8 documenting the selection of the Agency Preferred Alternative clearly reflects consideration of visual impacts. However, Western must consider many natural resource impacts, human conflicts, power system needs, and costs, among other issues, in making its decisions.</p>	Zeke Williams, Teresa Abel
Purpose and Need	All	General	Public	<p>B. WAPA's Purpose and Need Statement Should Aim to Minimize and Avoid Visual Impacts</p> <p>WAPA's purpose and need statement should be expanded to specifically include minimizing and avoiding the visual impacts of the transmission lines and rights of way.</p>	<p>It is not appropriate to include desired resource outcomes in the purpose and need statement. That statement is meant to specify the purpose and need to which the agency is responding in proposing the alternatives including the proposed action. The purpose and need to which Western is responding is stated in Section 1.4.1, with supporting information in the rest of Section 1.4. Western's purpose and need is to upgrade and rebuild aging transmission lines; visual impacts are just one of many natural resource impacts Western must consider when deciding how to replace the existing lines.</p>	Zeke Williams, Teresa Abel
Purpose and Need	All	C1	Public	<p>C. WAPA Should Select the Alternative that Best Accomplishes the Purpose and Need Objectives while Minimizing and Avoiding Adverse Visual Impacts</p> <p>WAPA should select the alternative that best satisfies its purpose and need objectives and minimizes and avoids visual impacts. The information disclosed in the Draft EIS supports selection of Variant C1.</p>	<p>The purpose and need to which Western is responding is stated in Section 1.4.1, with supporting information in the rest of Section 1.4. Western's purpose and need is to upgrade and rebuild aging transmission lines; visual impacts are just one of many natural resource impacts Western must consider when deciding how to replace the existing lines. Western's Agency Preferred Alternative is presented in Section 2.8 of the Final EIS along with supporting rationale. Western believes this alternative best accomplishes Western's purpose and need while considering all public and agency comments, resource impacts including visual, and other relevant factors.</p>	Zeke Williams, Teresa Abel

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	All	C1	Public	D. Variant C1 Best Accomplishes WAPA's Purpose and Need and Minimizes Visual Impacts. WAPA should reject Alternatives A, B, D and Variants A1 and A2 because they do not satisfy WAPA's purpose and need and they do not minimize visual impacts. Instead, WAPA should select Variant C1 or, alternatively, Alternative C.	The purpose and need to which Western is responding is stated in Section 1.4.1 , with supporting information in the rest of Section 1.4 . Western's purpose and need is to upgrade and rebuild aging transmission lines; visual impacts are just one of many natural resource impacts Western must consider when deciding how to replace the existing lines. Western's Agency Preferred Alternative is presented in Section 2.8 of the Final EIS along with supporting rationale. Western believes this alternative best accomplishes Western's purpose and need while considering all public and agency comments, resource impacts including visual, and other relevant factors.	Zeke Williams, Teresa Abel
Cultural	West	General	Public	E. The Draft EIS Overlooks the Effect of Alternatives on the Crocker Ranch's Historic Sites and Structures The Crocker Ranch should be protected as an area of significant cultural and historic value. WAPA should fully assess the historic quality of the Crocker Ranch and structures on the ranch. WAPA should evaluate the alternatives in light of their adverse effects. Alternative A and Variants A1 and A2 are particularly disruptive to the ranch's historic qualities. WAPA should recognize that the Crocker Ranch and the structures on the ranch have significant historic and cultural value that is protected under the NHPA. It should not construct transmission lines or underground lines that adversely impact the historic sites and structures on the ranch.	The concerns expressed by the Crocker Ranch have been considered along with all the other comments received from the public and agencies. Alternative A and Variants A1 and A2 were not selected as the Agency Preferred Alternative, which would lessen the likelihood of potential impacts to the historic qualities of Crocker Ranch. A more detailed discussion in the rationale for the selection of Alternative C on the western portion of the project area as the Agency Preferred Alternative is detailed in Section 2.8 .	Zeke Williams, Teresa Abel
Alternative	West	C1	Public	F. The Selected Alternative Should Distribute Impacts Fairly WAPA should select Variant C1 because it would distribute the impacts of the Project fairly. Although the transmission lines would cross the Crocker Ranch, they would be placed where they have the least amount of visual and environmental impact for everyone. The valley's iconic character and environmental health is important to the entire town of Estes Park and to the millions of visitors who travel to the Estes Valley to experience the scenic character of the land. Variant C1 protects these values and also meets all of WAPA's needs.	The concerns expressed by the Crocker Ranch have been considered along with all the other comments received from the public and agencies. The underground alternatives (A2 and C1) were analyzed for cost and other purpose and need factors. See Section 2.2.4 for analysis. Additionally, the replacement of an existing line with a new one should not have a substantial effect on a given property, and landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses. Furthermore, all alternatives, with the exception of Alternative D and the No Action Alternative, would result in the consolidation of two ROWs to one. A more detailed discussion in the rationale for the selection of Alternative C on the western portion of the project area as the Agency Preferred Alternative is detailed in Section 2.8 .	Zeke Williams, Teresa Abel
Land Use and Recreation	West	General	Public	G. WAPA Should Depict the Crocker Ranch on its Maps in the Final EIS and ROD WAPA should include maps in the Final EIS and ROD that depict the Crocker Ranch and show where each alternative would cross the ranch.	Crocker Ranch was added to Figure 3.11-1 as suggested.	Zeke Williams, Teresa Abel
Visual	All	General	Public	H. WAPA's Visual Modeling is Incomplete WAPA's visual modeling has not captured key viewsheds along Highway 36. WAPA should include in the Final EIS visual modeling for at least two additional observation points – one looking southeast, and one looking northwest along Highway 36.	Additional visual simulations were developed for the Agency Preferred Alternative and are shown in Appendix C of the Final EIS.	Zeke Williams, Teresa Abel
Land Use and Recreation	West	General	Public	I. WAPA Should Correct Inaccuracies on Its Maps WAPA should edit the maps in the Final EIS to ensure that they depict Meadowdale Ranch in its correct location.	Text and figures have been modified as suggested in the Final EIS.	Zeke Williams, Teresa Abel
Proposed Project	All	General	Public	J. WAPA Should Fully Assess Underground Construction Costs and Options The Crocker Ranch urges WAPA to thoroughly assess the options and costs of underground construction in the Final EIS.	Undergrounding was discussed in the Draft EIS, and is covered in Section 2.2.4 of the Final EIS. The underground alternatives (A2 and C1) were analyzed for cost and other purpose and need factors. Further discussion of the rationale supporting the selection of the Agency Preferred Alternative is presented in Section 2.8 .	Zeke Williams, Teresa Abel
General	All	General	Public	K. WAPA Should Cooperate with Landowners in Selecting Specific Site Locations at the Design and Construction Phases. WAPA should state in the Final EIS that it will cooperate with landowners on a site-specific basis as to the exact location of the ROWs, transmission structures, and other on-the-ground impacts at the design, implementation, and construction stages so as to minimize and avoid adverse impacts.	Every affected landowner would have an opportunity to discuss the placement of the transmission line on their property during the right-of-way acquisition process. However, note that making accommodations for landowners may be limited because the situation on adjacent lands has to also be taken into consideration. This coordination would be accomplished during the discussions between Western Lands personnel and each landowner during negotiations for a ROW easement.	Zeke Williams, Teresa Abel
General	All	General	Public	L. WAPA Should Seek to Acquire ROW Voluntarily and Avoid Condemnation Where Possible The Final EIS should provide that WAPA prefers to acquire land for the transmission line facilities, ROW, and access routes through voluntary transactions with landowners rather than through condemnation.	Western makes every effort to work with affected landowners and avoid condemnation actions. Section 2.3.1 of the Final EIS discusses eminent domain.	Zeke Williams, Teresa Abel

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Socioeconomics	West	General	Public	We will be negatively affected in many personal ways if the power lines are bigger than they are now. It will decrease the value of our property. People move to Estes Park for many reasons. The view from a person's home is important and adds to the home's value. A view certainly is one of the intangible values of a home in Estes Park, more so than other areas. People live on Pole Hill because the view of the mountains is fantastic here. The power lines are currently just in the edge of our view. We are concerned about how the power lines, if bigger, will change the view from our home.	Please refer to the discussion of property valuation in Section 4.13 of the Final EIS. Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and most studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the backgrounds, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted. Western's Agency Preferred Alternative would remove one existing line and abandon the existing ROW. This would allow the abandoned ROW to disappear from the visual landscape over time. This positive visual and property owner benefit needs to be recognized as an offset to the proposed taller structures. As detailed in Section 2.2.2 , shorter average height structures with a shorter span length could be considered in sensitive communities; however, the tradeoff for somewhat shorter structures is shorter spans and more structures.	Kevan Davidson
Electrical	All	General	Public	Also, having a small child, one on the way in January 2015, and hopefully more after that, my wife and I are seriously concerned about the health affects of having larger and more high voltage power lines close to our home. We are very concerned about the impact it will have on us, and not only us, but people who come to visit us. We have relatives with Pacemakers who have been told by their doctors to stay away from high-voltage power lines. This is very concerning to us.	The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. The new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot-wide ROW due to cancellation of fields by the two circuits. A more detailed description of EMF as they relate to potential health effects and the proposed project is found in Sections 3.14.1.3 and 4.14.5.1 . As detailed in Section 4.14.3.5 , the maximum induced electrical field of any of the proposed alternatives is estimated at 0.5 kV/m, well below the estimated interference threshold of 3.4-kV/M. Therefore, with operation at 115 kV, the proposed project would not pose a risk to pacemaker wearers	Kevan Davidson
General	All	General	Public	Furthermore, my wife and I have concerns about our neighbors and our community, and the negative affect this change will have on them. We respectfully ask that you bury the power lines or move them away from our homes. Please do not build an eye-sore in front of our front window.	Alternatives that maximize the use of existing ROWs are considered to have the least economic effects. The replacement of an existing line with a new one should not have a substantial effect on a given property, and landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses. The economic effect of the proposed project is detailed in Section 4.13 . In order to reduce visibility, special design measures would be locally considered, including the use of structures with a lower height and shorter span. Lower height structures, if selected, would be approximately 10 to 20 higher than the existing H-frame wooden poles. Visual simulations of the structures are depicted in Appendix C . Rationale for the selection of the Agency Preferred Alternative is detailed in Section 2.8 .	Kevan Davidson
Electrical	All	General	Public	I realize that the Western Area Power Association has an easement and the right to modify the lines, but I respectfully ask you to consider either an alternate route or burying the lines. I am concerned about the effect of the higher voltage on my health and that of my family. I am also concerned about how it could affect visitors, as both my grandfather and father have pacemakers and have been instructed to stay away from high voltage lines. Furthermore, enlarging the towers will cause a decline in our property value as it will intrude on our view of the Front Range. I know there are several other residents who share these concerns. Please consider alternatives that would prevent visual pollution and protect the health of residents who live along this utility corridor.	There have been several alternative routes studied in the EIS. All involve some sort of resource trade-offs, and most, including the Agency Preferred Alternative, include the removal of one of the two existing lines, and abandonment of the ROW. This would result in an improvement to the existing visual setting. In the end, the rebuilt transmission line has to go somewhere, and Western's rationale for the selection of the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS. As detailed in Section 4.13 , most studies found no effect to property values when adjacent to electrical transmission lines, which was attributed to the addition of open space contributed by the transmission line easement. Additionally, in the case of this project, many of the residences have property values that have taken into account the presence of the transmission lines because they have been built near or against the easements of the existing transmission lines. A detailed discussion regarding the visual assessment is located in Section 4.12 . The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot-wide ROW. A more detailed description of EMF as they relate to potential health effects and the proposed project is found in Sections 3.14.1.3 and 4.14.5.1 . As detailed in Section 4.14.3.5 , the maximum induced electrical field of any of the proposed alternatives is estimated at 0.5 kV/m, well below the estimated interference threshold of 3.4-kV/m. Therefore, with operation at 115 kV, the proposed project would not pose a risk to pacemaker wearers.	Roberta Davidson

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	West	General	Public	<p>We hope that the power lines will be buried so that the Estes Park Valley will be as stunning as it can be without the eyesore.</p> <p>In addition, we have concerns about the possible health hazards of the power lines, especially to our children and to others starting families and already having small children.</p> <p>We most strongly support the option of burying the power lines. We support the opinions of Joy and Rich Harvey included in their letter to WAPA. We appeal to the conscience of those representing us on the WAPA board. We support the option of burying the power lines for the following reasons:</p> <p>1) Burying the power lines will enhance the beauty of the area and be more attractive to the approximately 10 million visitors from around the world who come annually to the Estes Park Valley and to Rocky Mountain National Park, as well as those who live here, drawn by the natural beauty of our national treasure;</p> <p>2) There are serious on-going concerns about the health effects from exposure to power-line frequency electric and magnetic fields (EMF), particularly to pregnant women and young children;</p> <p>3) It is unfair to the homeowners who would be negatively impacted by the new power-lines above ground.</p> <p>We strongly are in support of burying all power lines, both in Estes Park, and from Estes Park to Loveland.</p>	<p>Several alternative routes have been studied in the EIS, all involve some sort of resource trade-offs, and most, including the Agency Preferred Alternative, include the removal of one of the two existing lines and abandonment of the ROW. This would result in an improvement to the existing visual setting.</p> <p>Western's rationale for the selection of the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS. The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot ROW. A more detailed description of EMF as they relate to potential health effects and the proposed project is found in Sections 3.14.1.3 and 4.14.5.1. Section 3.14.1.3 and 4.14.5.1 of the Final EIS discusses the EMF/potential health risk issue. As detailed in Section 4.14.3.5, the maximum induced electrical field of any of the proposed alternatives is estimated at 0.5 kV/m, well below the estimated interference threshold of 3.4-kV/m. Therefore, with operation at 115 kV, the proposed project would not pose a risk to pacemaker wearers</p>	Carol Dreselly and Steve Thomas
Transportation	East	General	Public	<p>The paragraph numbers refer to WAPA Rebuild Project-Group Statement.pdf</p> <p>8. Most existing structures are outside of the 300 foot buffer zone. In the Pinewood Reservoir area the terrain is open and relatively flat. Structures (houses, barns, storage buildings) are few and far apart.</p> <p>There is easy access for installation and maintenance of the transmission lines and structures. There will be no need for additional access roads. The open terrain will require a minimum of roads, easing maintenance costs and limiting the damage caused by roads.</p>	<p>Western is unsure what the commenter means by a 300-foot buffer zone. Several other commenters have referenced a 300-foot-wide ROW, but the ROW would in fact be 110 feet wide, with no additional 'buffer zone'. Comment implies support for Alternative B in the Pinewood vicinity, and Alternative B has been made part of the Agency Preferred Alternative in this area.</p>	Craig & Jean Driear
Alternative	East	B	Public	<p>9. ROW acquisition costs are only \$0.4 million versus up to \$1.8 million.</p> <p>Only 3 National Register of Historic Place-eligible historical sites are potentially impacted versus as many as 8 for other alternatives. Alternative B avoids the historically significant 1910 school house located near Pinewood Reservoir.</p> <p>Only 6 wetlands will be crossed versus a maximum of 15 for other alternatives.</p>	<p>Alternative B has been selected as part of the Agency Preferred Alternative in this area.</p>	Craig & Jean Driear
Alternative	East	A	Public	<p>Additional Arguments Against Alternative A</p> <p>2. In Table 2.7-1, one of the stated reasons for dismissing reroutes along U.S. Highways 34 & 36 is "These proposals were not carried forward because they do not address the issues raised during scoping, but simply displace impacts to new landowners and may require constructing an additional length of transmission line." A reason for dismissing the proposed route near Pinewood Reservoir Stewardship Trust and Blue Mountain Bison Ranch is repeated "...and displaced impacts to new landowners." The same argument applies to the Green Mountain properties for any variant of Alternative A.</p>	<p>The alternatives not carried forward were identified by Western early on and briefly considered until obvious issues caused them to be eliminated from full analysis. Alternative A was raised later during public routing workshops by area residents who wanted Western to analyze a potential route in this area. NEPA anticipates that additional alternatives may be suggested by the public, as late as during comments on the Draft EIS. Alternative A could be constructed, but it has serious issues that kept it from being selected as part of the Agency Preferred Alternative. However, as the alternative was requested to be analyzed by area residents, it was retained as a full alternative.</p>	Craig & Jean Driear
Alternative	East	A	Public	<p>3. More than 1 ¼ miles of new ROWs will need to be acquired, an expensive and time consuming process. There exists the potential for litigation from resistant landowners. Cost increases for Alternative A have been quoted to us as up to a 25% increase in construction costs (from Gregory Johnson, 10/29/14 "higher due to the access roads identified in paragraph 2.3.2, additional turning structures, and difficult terrain" and "\$500,000 additional may be required for land and easement costs for this portion of alternate A.") These will increase the cost of Alternative A to \$29.6 million, the highest of any alternative without buried cables. In the Pinewood Reservoir area, a simpler and less expensive solution is to use the existing ROWs, such as Alternative B.</p>	<p>Alternative B has been selected as part of the Agency Preferred Alternative in this area.</p>	Craig & Jean Driear

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	A	Public	<p>4. If acquired, the new ROWs will need to be cleared to a width of 110' and all of the wood and slash removed. Over such extreme terrain this is a difficult, dangerous and expensive proposition. The steep, newly cleared land will be subject to erosion from snow melt & rain. In addition, access roads to each new structure will be created, of sufficient width to accommodate the large vehicles required to install the structures. Even with switchbacks, which will affect even more acreage, the extreme roads, now devoid of vegetation, will be expensive to maintain and open to severe erosion throughout the year.</p> <p>In Table 2.7-1, one of the reasons for dismissing the Cottonwood Creek route states "This alternative would require several miles of construction through steep terrain with poor access." As the terrain along Cottonwood Creek is not as difficult as Green Mountain we feel the same reason applies to Green Mountain for its dismissal.</p>	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Craig & Jean Driear
Alternative	East	A	Public	<p>6. The proposed re-route of Alternative A, nudged to the north on Green Mountain has removed several houses from being within 10's of feet of the lines. However, they are still close to the lines and threatened by fire losses.</p>	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Craig & Jean Driear
Wildlife	East	General	Public	<p>Additional comments not addressed by the Group Statement, but merit your attention: -Wildlife, one of the major attractions for moving to the area, will be negatively affected. The statement that elk, mule deer and moose will be affected falls far short of the wildlife in this area. While living on Green Mountain we have seen: Dusky Grouse Bald Eagles Golden Eagles Mountain Lions Bobcats Foxes Turkeys Bears Albert Squirrels Owls Bats Colorado Bluebirds -In the area are caves used by a variety of wildlife. These animals will be displaced by the construction and maintenance of the transmission lines and may never return.</p>	Section 3.9 identifies the wide variety of wildlife within the project region and Section 4.9.3 does address the impact of wildlife displacement as a result of project construction. While construction could cause some species to avoid the area temporarily, this would be a minimal impact of short duration.	Craig & Jean Driear
Vegetation	All	General	Public	<p>There are also groves of Douglas Fir trees, unusual for this area, that are in path of the proposed transmission line. Clearing of ROWs and creating roads could destroy these trees and lessen the diversity of the forest, making it more vulnerable to disease and pestilence.</p>	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Craig & Jean Driear
Vegetation	All	B	Public	<p>In recent years we have experienced a significant loss of trees to Pine/IPS/Twig Beetles and wildfires. We find it difficult to understand how the destruction of even more forest to ROWs, access roads and staging areas can be justified. Cleared ROWs are already available along Alternative B, minimizing the additional clearing of trees.</p>	Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Craig & Jean Driear
Socioeconomics	East	B	Public	<p>Many purchase their property for retirement, the last home they plan to buy. If Alternative A is selected, properties on Green Mountain would have a compromised view-shed and possible health factor, not foreseen when purchased. Plans to develop and improve the land overlooking or close to the new ROW will be affected and would no longer be feasible.</p> <p>Despite WAPA's conclusions in the Draft EIS, section 4.13.3.2 which claims "Most studies found no effect to [long term] property values...", there will be a severe downward effect on the value of any property newly traversed by transmission lines. However, in section 4.13.5 it is stated "...estimates of the decrease in property values range from 2 to 9 percent." We are in the process of obtaining a statement of property devaluation with a comparable. Preliminary estimates show a loss significantly more than their estimate, of at least 50 percent.</p>	Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative. Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and the studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the background, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted.	Craig & Jean Driear
Electrical	East	B	Public	<p>Possible health effects from transmission lines have not been ruled out, please refer to the individual comments on health effects submitted by Pamela Mausner, MD. We feel that safety is best served by locating transmission as far as possible from as many homes as possible, which can best be accomplished by Alternative B in the Pinewood Reservoir area.</p>	The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot-wide ROW. A more detailed description of EMF as they relate to potential health effects and the proposed project is found in Sections 3.14.1.3 and 4.14.5.1 . In any case, Alternative B was selected in this area for inclusion in the Agency Preferred Alternative.	Craig & Jean Driear

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Electrical	East	General	Public	Verizon customer service has claimed that a high tension line installed on the north side of Green Mountain would decrease our cell phone signal by up to 50%. Our current cell phone reception is poor - our other telephone service is VOIP with Skybeam. When our internet is down or the service is slow, our telephone is unreliable. Our property has a 360 degree view of the area allowing us to watch for wildfires. If any are seen we can report them to 911. In other emergencies cell phones maybe our only way to contact help.	EMF from modern transmission lines is at a very low 60 hertz, far lower than the 800-2,500 megahertz ultra-high frequency ranges used by cell phones. EMF at 60 hertz do not cause cell phone or landline interference. In fact, cell phone transmitter/receiver equipment found on typical cell towers is routinely mounted to transmission line structures in developed areas where space is limited. For similar reasons the transmission line would not affect radio or TV frequencies. In isolated instances loose or damaged conductors or hardware can cause arcing, which can result in broadband interference at close distances. Once reported these issues are easily resolved.	Craig & Jean Driear
General		General	Agency-EPA Region 8	General Considerations The EPA supports Western's decision to prepare a Draft EIS for this proposed project. The decision to prepare an EIS rather than an Environmental Assessment was based on concerns about the significance of the environmental impacts raised during public meetings and comments in 2011 and through scoping in 2012. The EPA also supports Western's stated purpose and need as including the need to increase the resiliency of the transmission infrastructure which has not been updated since its original construction in the 1930s and 1950s.	Thank you for your comment.	Phillip S. Strobel
Water		General	Agency-EPA Region 8	Aquatic Resources The Draft EIS does not disclose which waters in the project area have been impacted by the recent flood event of 2013 (e.g. Colorado 1-highway 34 and associated road/stream/restoration repair work done). It is EPA's understanding that water resources, specifically water quality, aquatic life habitat, stream bank integrity and road systems have been dramatically affected by the events of the 2013 flood. The EPA recommends that Western contact the Colorado Department of Transportation, the Colorado Parks and Wildlife and the Colorado Department of Public Health and Environment, or the Governor's Disaster Recovery Office to identify current information related to water resources, and road systems affected by the recent flood and restoration work. The EPA recommends Western include this information in the Final EIS. We also recommend the Final EIS assess how current conditions influence the affected environment and the project's environmental impacts.	The potential effects of the proposed Project on water resources is covered in Section 4.5.5 of the Final EIS. The Agency Preferred Alternative would not result in significant impacts to water resources. Only short-term and temporary impacts were found for surface and groundwater resulting from the proposed Project. EPA is correct that the 2013 flood affected roads and water resources in the Estes Park area, but those affected areas are largely in the Big Thompson River corridor. The existing transmission lines were not affected by the flood. They are located on higher ground and either span or entirely avoid the areas affected by the flood or restoration efforts. As such, the required analysis of the effects of the proposed Project did not need to address effects of the 2013 flood. Analysis of flood impacts is outside of the scope of the EIS.	Phillip S. Strobel
Wetlands	All	General	Agency-EPA Region 8	Wetland impacts are common with transmission line projects and can be significant to the geographic scope of these linear projects. Clearing vegetation in and around wetlands can alter the functional type of the wetlands and can affect wetland hydrology. Additionally, some transmission projects have included direct fill of wetlands for service roads and tower bases.	Western's vegetation management plan provided in Appendix B describes the vegetation management techniques. Clearing vegetation in or near wetland areas is not part of the plan. Avoiding or spanning wetlands (rather than filling them) is planned.	Phillip S. Strobel
Wetlands	All	General	Agency-EPA Region 8	EPA appreciates the use of the Southwest Regional Gap Analysis Project (SWReGAP) data in the Draft EIS to present approximate identifications of wetlands in the project vicinity and that were not part of the 2011 110 foot ROW inventory along the existing transmission lines and access roads.	Thank you for your comment.	Phillip S. Strobel
Wetlands		General	Agency-EPA Region 8	The Draft EIS indicates that site specific wetland inventories in proposed new ROW acquisitions, re-routes and/or alternative variants will not be completed until after a Record of Decision (ROD) is selected. The EPA notes that for (non-federal land) areas, like the re-route along the Newell Lake View subdivision, wetland surveys and delineations have not been completed. Finally, the Draft EIS states wetland and waters of the U.S. field surveys have not been completed along the proposed alternative variants A2 and CI routes, and that if wetlands are located along these routes that impacts could be significant, resulting in the removal of the wetlands and associated vegetation. Without a wetland inventory for ROWs for the Newell Lake Viewsubdivision, and for the A2 and CI variants it is not possible to determine which alternative will have the least impact to wetlands. Therefore, based on the lack of information in the Draft EIS on wetlands surveys and potential impacts in some alternatives, it is not possible to determine a complete magnitude of impact for the alternatives. It is also not possible to determine whether specific measures to mitigate impacts to wetlands or other surface waters in new ROW alternatives, re-routes and variants are adequate. The EPA recommends that the Final EIS identify specific wetland and other surface water resources in all alternatives to enable a comparison of potential impacts and informed decisions on how those impacts can be mitigated.	Western has selected Alternative B in the eastern portion as its Agency Preferred Alternative. Section 4.6 of the Final EIS details potential impacts to wetlands as well as wetland mitigation measures. Avoiding or spanning wetlands is planned.	Phillip S. Strobel
Wetlands	All	General	Agency-EPA Region 8	The Draft EIS states that the preferred alternative, once selected, will avoid impacts to wetlands from roads, structures and re-routing as necessary after delineation results are compiled. Please clarify in the Final EIS what is meant by the phrase "as necessary." We recommend that the Final EIS clarify that in addition to the protections required by the Clean Water Act, Executive Order 11990 directs federal agencies to avoid impacts to all wetlands regardless of jurisdiction, and commit to providing protection of all wetlands and mitigation for all impacts. See: http://water.epa.gov/lawsregs/guidance/wetlands/eo11990.cfm .	The Final EIS Sections 2.8 and 4.6 clarifies that Western plans to avoid impacts to all wetlands regardless of jurisdiction, and commits to providing protection of all wetlands.	EPA Region 8

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Air Quality		General	Agency-EPA Region 8	Greenhouse Gases Sulfur hexafluoride (SF6) has often been used in electrical transmission equipment, including transformers and circuit breakers. The global warming potential of SF6 is 23,900 times that of CO2 when compared over a 100-year period, making it the most potent greenhouse gas that the Intergovernmental Panel on Climate Change has evaluated (source: http://epa.gov/climatechange/ghg/ghgen11s/gases/fgases.html). According to EPA research on power systems using SF6 systems, 15% of those systems experience leaks and of that 15%, 10% can be repaired. While this is a small subset of an entire system's equipment that may be releasing greenhouse gasses, due to the potency of SF6, the EPA recommends that the Final EIS identify what steps Western has taken and will take to either substitute SF6 emitting equipment or mitigate the greenhouse gas emissions from leaking electrical transmission equipment. Much has been done in this area and EPA recommends Western include its contributions and reporting history with the SF6 Partnership initiative and The EPA Green House Gas Emissions Inventory in the Final EIS (see: http://www.epa.gov/lectricpower-sf6/documents/SF6_Annual_Report_2013.pdf).	The proposed Project is a transmission line upgrade. No SF6 equipment would be involved.	Phillip S. Strobel
General		General	Agency-EPA Region 8	The EPA 's Rating Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information present, the EPA is rating the Draft EIS Alternatives A through D, including all Alternative Variants and excluding the No Action Alternative, EC-2 (Environmental Concerns - Insufficient Information). The "EC" rating means that the EPA's review has identified potential impacts that should be avoided in order to fully protect the environment. The "2" rating means that the Draft EIS does not contain sufficient information for EPA to fully assess environmental impacts. A description of the EPA's rating system can be found at http://www.epa.gov/compliance/nepa/comments/ratings.html .	Comment noted. The EPA's comments have been addressed in this comment/response table and in the Final EIS.	Phillip S. Strobel
Alternative	All	A	Public	We request that WAPA use Alternative A in the impending Rebuild project. The multiple reasons for this request are: 1) cosmetic/ property financial devaluation, 2) perceived health risks & 3) stated alternatives in the EIS.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	James & Patrica Gildart
Socioeconomics	All	General	Public	The 1st reason is based on our own rejection of a home for sale on Stanley Circle this last fall. In our search for homes in the area' we drove up to a cute 2 story home with Transmission Lines in the back yard. We didn't even get out of our car. Our property on Pole Hill is residential and we didn't really see the Lines until after we started exploring the Hill and the forest access. Of course, the structures supporting the lines now are 76 & 61 years old, respectively and somewhat blend with their surroundings. It's a little hard to envision a series of 110 ft poles that will blend with their surroundings. In our travels, we've seen the large octagonal steel transmission poles that run between the electric generation windmill farms and would hate to see them in our sub-division with possible resultant property value loss. Reviewing a study by Jackson & Pitts in 2010 entitled, "The Effects of Electric Transmission Lines on Property Values: A Literature Review", reveals that in 1967 people didn't much mind the presence of the Lines in their neighborhoods, but that by 1992, people were very aware and found their presence in their sub-division objectionable and they resulted in lower property values. See Exhibit 1, page 5 & 6. See also, Price Effects of HVTLs on Abutting Homes, by Delaney and Timmons in The Appraisal Journal, Winter 2013, Pgs. 46 & 52, wherein they quote studies of homes served by the Bonneville Power Authority that resided on an acre or more losing some avg of 10% value to to close proximity.	Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and the studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the backgrounds, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted. In the case of this project, many of the residences have property values that have already taken into account the existing transmission lines and easements. A more detailed discussion regarding property values can be found in Section 4.13 .	James & Patrica Gildart
Electrical	All	General	Public	The 2nd reason is the question of power-line EMFs and health effects. After searching for information in the possible health ill-effects, we find that too much controversy abounds in this area to wish to replace the old lines with towering poles through our sub-division, especially when Alternatives exist. See http://www.safespaceprotection.com/electrostressfrom-power-lines.aspx for one conglomeration of information available on this subject.	The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot-wide ROW. A more detailed description of EMF as they relate to potential health effects and the proposed project is found in Sections 3.14.1.3 and 4.14.5.1 .	James & Patrica Gildart
Alternative	West	General	Public	Finally, the 3rd reason is the availability of the Alternatives in the EIS. We moved to Estes Park from the limestone environment of the Texas Hill Country north of San Antonio, Texas where we lived in the middle of ranch-land acreage. In building our family home, we were on well water but had both telephone and electrical brought in underground, which required a track-type rock saw. The EIS alternatives don't go so far as to propose complete burial, but taking the possibly more direct route through ranch-land, USFS, etc. sounds like a more modern approach to viably rebuild the Estes-Flatiron Transmission Line Project.	Thank you for your comment.	James & Patrica Gildart

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	A	Public	<p>ALTERNATIVE A</p> <p>As outlined in the Pinewood community group statement (titled "WAPA Rebuild Project--Group Statement.pdf"), Alternative A would require the acquisition of new rights-of-way (RoWs) and the development of access roads through steep, heavily forested terrain on the north side of Green Mountain. The resulting loss of trees would not only irreparably destroy the visual beauty of the area, but would also likely lead to severe erosion. Wildlife would be displaced – not only mammals, but also (according to my next-door neighbors, who are dedicated birdwatchers) more than 50 species of birds.</p> <p>Like many of my neighbors, I bought a home in the Pinewood community because I wanted to enjoy the peace and beauty of the mountain and its wild creatures. Although my house is on the south side, I walk almost every day (both for pleasure and for health reasons) to the top of Green Mountain and along the north side. If Alternative A is chosen, the peace and beauty would be gone forever. Walking would become a distressing chore rather than a pleasure, and this would surely have an adverse effect on my health.</p>	Alternative A was not selected to be a part of the Agency Preferred Alternative in this area.	Pamela Mausner, MD
Electrical	East	A	Public	<p>Another issue outlined in the Group Statement is the fire hazard that would be created by Alternative A due to the possibility of arcs, downed power lines, and fires accidentally started by workers or vehicles. In the 10 years that I have lived here, fire has been an increasing concern – especially since the Reservoir Road fire several years ago, when we had to evacuate. I know how fast a wind-driven fire can move, and that it can easily jump across a road – or a RoW. I am the sole caregiver for my 94-year-old disabled mother, who lives with me. If we had only minutes to evacuate, we would be hard-pressed to get out with our lives – much less save any important belongings. Therefore, any avoidable increase in fire risk is unacceptable.</p>	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Pamela Mausner, MD
Electrical	East	A	Public	<p>A third issue is that of cell phone reception. Currently, we have little reception in our area, but as one goes up Green Mountain Drive toward the top, there are some spots where it is possible to get a signal. I have been advised by a Verizon customer service representative that a high-voltage transmission line on the north side of Green Mountain would reduce what little cell reception we have by approximately 50%. This situation would be more than inconvenient; it could be dangerous. Some of my neighbors have no land line; they have Skybeam phone service, which utilizes the internet. If their internet service goes down (as it sometimes does), their only way of communicating with the outside world (short of leaving home) is by cell phone. During times of severe fire danger, I have often carried my cell phone with me on my walks, so that I can call 911 if I see smoke. It appears that Alternative A would not only increase our fire risk, it could also decrease our ability to respond rapidly in the event of a fire.</p>	EMF from modern transmission lines is at a very low 60 hertz, far lower than the 800-2,500 megahertz ultra-high frequency ranges used by cell phones. EMF at 60 hertz do not cause cell phone or landline interference. In fact, cell phone transmitter/receiver equipment found on typical cell towers is routinely mounted to transmission line structures in developed areas where space is limited. For similar reasons the transmission line would not affect radio or TV frequencies. In isolated instances loose or damaged conductors or hardware can cause arcing, which can result in broadband interference at close distances. Once reported these issues are easily resolved.	Pamela Mausner, MD
Cultural	East	C & D	Public	<p>ALTERNATIVES C/D</p> <p>Currently, the north transmission line goes almost directly over my next-door neighbor's house. Although it is very close to my house, it is not visually obtrusive for me, because it is downslope from my property. Alternatives C or D would move it further away, but might also mar my view, depending on the exact location of the poles. Even so, my major concern about C and D is not so much the view, but the fate of the old schoolhouse on County Road 18E. The schoolhouse was built in 1910 – so it belongs to an era that was even before my mother's time. The current owners bought it in order to restore it as a historical site. Several years ago, they gave an open house for the community. My mother and I went to the open house, and saw the inside of the building, as well as photographs showing what it looked like when it was still in use as a schoolhouse. Alternatives C or D would likely put an end to the restoration plans. This would harm not only the owners, but all – including myself – who care about remembering the past. How sad it would be to lose this unique historical and cultural resource.</p>	Removal of the section of existing line through the subdivision is part of all alternatives. However, one pole of each structure and a fiber optic ground wire would be left in place to maintain communications with the Bureau of Reclamation operated dam. Alternatives C and D were designed to accomplish the removal of the line in the neighborhood with minimal relocation and maximum use of existing ROW. After consideration of all of the factors Western must take into account, including public input, Alternative B was selected as part of the Agency Preferred Alternative in this area. This alternative would avoid the Pinewood Schoolhouse.	Pamela Mausner, MD

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	B	Public	<p>ALTERNATIVE B</p> <p>In the Pinewood area, this alternative corresponds to the current south transmission line, running through the ranchlands on the south side of Pinewood Reservoir. As outlined in the group statement, the already-existing RoW is adequate; it is also easy to access because the terrain is relatively flat and open, with few trees. With this alternative, the transmission lines would be a good distance away from our subdivision. Even with the taller steel monopoles, I believe the view from the subdivision and from County Road 18E would be minimally impacted. Understandably, the ranchers do not want Alternative B. However, it is my understanding that the RoWs and transmission lines were already present when they purchased those properties. It's like buying a house near an airport, and then complaining about the noise. Furthermore, to offload the transmission lines onto a new group of landowners (as in Alternative A), who bought their homes with no expectation that this could ever happen, would be extremely unfair. This deeply violates my sense of justice. What's more, some of my friends are among the people who would be most severely impacted by Alternative A – and if they are harmed, then so am I.</p>	After consideration of all of the factors Western must take into account, including public input, Alternative B was selected as part of the Agency Preferred Alternative in this area.	Pamela Mausner, MD
Proposed Project	East	B	Public	<p>For these reasons (as well as those discussed below in my statement about possible health effects), I feel strongly that, for the Pinewood Reservoir area, Alternative B is the only acceptable alternative. The ideal solution would be to bury the lines through the ranchland and open space areas. I understand that the Estes Park end of the project will have buried lines, but this is considered not to be cost effective on the Pinewood end. In that case, I strongly recommend the use of wooden H-frames, rather than steel monopoles, in the ranchland and open space areas. Although taller than the current structures, the H-frames would blend in much better than steel monopoles so that, visually, they would not be much worse than what we have now -- and might even be better, because there would be fewer of them. This would ameliorate the impact on the ranchers, as well as on subdivision residents who may be concerned about having the monopoles in their viewshed.</p>	For a discussion of the rationale used for selecting the Agency Preferred Alternative, please see Section 2.8 of the Final EIS. An underground alternative for the western end of the Project was not selected. After consideration of all of the factors Western must take into account, including public input, Alternative B was selected as part of the Agency Preferred Alternative in this area. Wood H-frames compromise transmission line reliability and do not meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).	Pamela Mausner, MD
Electrical	All	General	Public	<p>POSSIBLE HEALTH EFFECTS OF HIGH-VOLTAGE TRANSMISSION LINES</p> <p>The presence of transmission lines in populated areas raises the issue of possible health effects. When I first learned of the Estes-to-Flatiron Transmission Lines Rebuild Project 2 years ago, I scanned the medical literature and submitted comments to WAPA summarizing what I found. Recently, I updated my previous literature search. Although time limitations do not permit a comprehensive review, I believe I have a good overall impression of where these issues currently stand. In the following comments, I will focus on two persistent concerns: childhood leukemia and interference with cardiac pacemakers.</p>	In addition to text in Sections 3.14 and 4.14 , EMF is further discussed in Appendix D .	Pamela Mausner, MD
Electrical	East	General	Public	<p>Childhood leukemia</p> <p>To summarize: In 2014, it is still unclear whether exposure to high-voltage transmission lines causes childhood leukemia – and, if it does, how far away from the lines the risk extends. Further research is needed to resolve these uncertainties. Meanwhile, the safest course of action is to locate high-voltage transmission lines as far away as feasible from more populated areas. For the Pinewood Reservoir area, this would best be accomplished by choosing Alternative B.</p>	Commenter is correct that 40-odd years of research has not demonstrated a link between EMF exposure and human health effects. While some suggestions of a relationship have been reported, the degree of association has been weak, and study results have not been replicated, a critical factor in scientific proof. The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines, due to the cancellation effects from conductor arrangement on double-circuit lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within a 110-foot-wide ROW. A more detailed description of EMF as they relate to potential health effects is found in Sections 3.14.1.3 and 4.14.5.1 . Alternative B has been included as part of the Agency Preferred Alternative, but not because of EMF concerns. In addition to text in Sections 3.14 and 4.14 , EMF is further expounded upon in Appendix D .	Pamela Mausner, MD
Electrical	All	General	Public	<p>Cardiac pacemakers and defibrillators</p> <p>It is well known that EMFs at power line frequencies (50-60 Hz) can interfere with pacemakers and defibrillators. Whether or not electromagnetic interference (EMI) occurs depends on numerous variables, including: [THOSE LISTED IN COMMENT]</p> <p>Multiple experts have concluded that, with appropriate pacemaker settings, symptomatic or dangerous EMI due to transmission lines is unlikely to occur in everyday life – but that the possibility cannot be completely ruled out, especially with unipolar pacemakers</p>	As detailed in Section 4.14.3.5 , the maximum induced electrical field of any of the proposed alternatives is estimated at 0.5 kV/m, well below the estimated interference threshold of 3.4-kV/m. Therefore, with operation at 115 kV, the proposed project would not pose a risk to pacemaker wearers.	Pamela Mausner, MD

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customer that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project is thus a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. The pros and cons of underground vs. overhead lines result in several tradeoffs, as fully discussed in Section 2.8. This section presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Kathy Moran
General	East	General	Public	<p>Background and Premise:</p> <p>1. There are two existing power transmission lines in service near the Flatiron substation and Pinewood Reservoir. One line runs roughly on the north side of County Road 18E, and is referred as the "north" line. The second line runs roughly on the south side of the same road and is referred as the "south" line. These two transmission lines run along rights-of-way (ROWs) that have been established and used in their present location for decades, since the 1930's and 1950's. They should be reused for the transmission line rebuild to the greatest extent.</p> <p>Utilization of existing ROWs is beneficial for a variety of reasons, among them:</p> <ul style="list-style-type: none"> - It is more efficient and allows faster progress for the rebuild effort; - Cost is typically much less than acquiring new ROWs; - Potential litigation and other delays from newly affected landowners is minimized. 	<p>Western's proposed alternatives maximize the use of existing ROWs. Other alternatives are the result of specific resource conflicts or public input. The Agency Preferred Alternative does make use of the existing ROWs, but also recognizes conditions have changed since the lines were constructed.</p>	Pinewood Community
Socioeconomics	All	A	Public	<p>Arguments Against Alternative A:</p> <p>2. Alternative A seeks to deviate from the existing, long-established ROWs. Property owners over the years have purchased land, planned, built homes/structures and otherwise developed their land based on these longtime established ROWs. Abandoning these ROWs and now imposing new easements causes severe, undue and unnecessary harm on a new set of landowners.</p>	<p>Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.</p>	Pinewood Community
Socioeconomics	All	A	Public	<p>3. Acquiring new ROWs along Alternative A is more costly and timeconsuming than using the existing ROWs of the "north" and "south" lines, resulting in slower and more expensive progress. Per WAPA, PVREA customers will bear these costs as higher electric bills.</p>	<p>Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.</p>	Pinewood Community
Transportation	All	A	Public	<p>4. Alternative A would traverse extremely steep terrain. The steep terrain would make ROWs and access roads difficult to create, expensive to maintain, and subject to severe erosion. Snow cover on the steeper sections of these roads would make navigation of maintenance vehicles difficult or impossible. Transmission line maintenance would likely have to be excluded during winter months. More troubling is that essential or emergency repairs during winter months may be especially hampered by the steep, snow-covered access roads.</p>	<p>Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.</p>	Pinewood Community

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Accidents	All	A	Public	5. Alternative A would pass through thickly forested areas. Sources of ignition – from maintenance activities or the transmission lines themselves – could easily ignite a tinder-dry forested area.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Western would continue to utilize long-established safety practices during construction, operation, and maintenance of any alternative to ensure adequate protection against fire hazards. The new steel poles, coupled with new conductors and more modern design standards would also enhance fire safety. More information on fire management is located in Section 4.7.3.3 Fuels and Fire Management . Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Pinewood Community
Accidents	All	A	Public	6. There are many residences within tens of feet of Alternative A's routing. Even more residences and structures are within a quarter-mile of the proposed routing. The resulting liability from fire losses could be very significant. This liability would be compounded by WAPA's decision to deliberately and knowingly favor Alternative A, while a less fire-prone, less steep, less inhabited and more accessible option exists, such as the "south" ROW.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Pinewood Community
Alternative	East	B	Public	Arguments For Alternative B (with two options): 7. Alternative B is the preferred choice for the transmission line rebuild near the Flatiron – Pinewood Reservoir area. It re-uses the existing "south" ROW that has been in service for decades. Over the years, stakeholders have purchased land and developed their properties based on the location of this ROW.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Pinewood Community
Alternative	East	B	Public	8. Alternative B uses the "south" ROW near the Flatiron substation, which already has adequate width to meet current standards. Costs are minimized since the acquisition of additional ROWs is not necessary.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Pinewood Community
Alternative	All	B	Public	9. Table S4, "Measurement Indicators for Key and Other Issues", outlined in the draft Environmental Impact Statement (EIS), consistently shows Alternative B to have the smallest adverse impact on stakeholders. For example: Alternative B affects the fewest landowners (19 vs. 36-48); and fewest acres of new ROW acquisition (42 vs. 110-177). Alternative B also has the highest positive effect for the number of landowners with ROWs to be decommissioned (51 vs. 7-36). Totalling all line items in Table S4, Alternative B has 19 favorable outcomes. The nearest competitor is Alternative C1 at 11 favorable outcomes, while the undesirable Alternative A has only 8 favorable outcomes. Alternative B is clearly the best choice, according to Table S4.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Pinewood Community
Alternative	East	B	Public	10. Alternative B benefits the many landowners in the Newell Lake subdivision by decommissioning the transmission lines through the subdivision and along County Rd 18E.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Pinewood Community
Accidents	East	B	Public	11. WAPA's assumed risk and liability from fire hazard is minimized with the choice of Alternative B. The "south" ROW between the Flatiron substation and Pinewood reservoir is not in a forested area, has fewer at-risk structures and consists mostly of grasses and low-growing shrubs. Ignition sources are less likely to cause a wildfire outbreak, and tree canopy fires could not form. The proximity of County Road 18E provides easy access for firefighting ground equipment, and easy access to the transmission line. This choice compares very favorably to other alternatives that are routed through steep, inaccessible terrain with forested landscapes.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Pinewood Community
Visual	East	B	Public	12. An Option: Alternative B passes by the south end of Pinewood Reservoir, through an area some refer to as "Rattlesnake Park". The visual impact from Alternative B can be reduced with the use of wooden H-frame structures that can support a double circuit, contrary to what is stated in the draft EIS, page 2-41: 2.7.2 Alternative Structure Types In addition to routing options, alternative project designs were considered and presented during the public workshops held in October 2012. Other structure types considered included a lattice structure and double-circuit H-frame. Neither the lattice nor double-circuit H-frame designs were supported by public comments, and were not carried forward for further analysis. The wooden double-circuit H-frame designs would be far less objectionable than the steel monopoles.	Double circuit wood H-frames compromise transmission line reliability and do not meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).	Pinewood Community

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	West	B	Public	13. A Second Option: Add a Variant to Alternative B that includes underground burial of the transmission line through "Rattlesnake Park". This is analogous to the Variant C1, in which the westernmost 2.7 mile section near Lake Estes is constructed underground. Stakeholders on the eastern end should receive equivalent consideration for this option as are stakeholders on the western end.	For the reasons given in Section 2.8 of the Final EIS, underground options were not selected as part of the Agency Preferred Alternative at either end of the proposed Project.	Pinewood Community
Land Use and Recreation	West	A-2 & C-1	Agency-Upper Thompson Sanitation District	The District strongly supports the A-2/C-1 Variant identifying a proposed WAPA transmission line below ground just south of the Bureau of Reclamation (BOR) Siphon. As you are aware, the District's wastewater treatment plant is located on Bureau of Reclamation land west of Mall Road, with WAPA utility easements along the northwest portion of the parcel. The transmission line also travels across the lower portion of District property east of Mall Road. The District's Master Plan identifies expansion of the treatment facility, installation of additional piping and concrete structures or basins (covered or uncovered). As shown on the enclosed Figure 1 – District Facility Map, future District expansion would be severely encumbered by existing overhead transmission lines shown as proposed above ground ALT A and existing above ground ALT D. The proposed re-route of the transmission line would, therefore, allow the District to utilize available vacant areas of both BOR parcels and District owned property, and thereby eliminate any potential encroachment of the easement.	The underground alternatives (A2 and C1) were analyzed for cost and other purpose and need factors. See Section 2.2.4 for analysis. Additionally, Western anticipates that potential conflicts with the Upper Thompson Sanitation District would be minimal and could be accommodated through careful micro-siting in this area. With the selection of Alternative C as part of the Agency Preferred Alternative, the existing line would be removed and there would be no conflict with the Upper Thompson Sanitation District's expansion plans.	Upper Thompson Sanitation District
General	West	A-2 & C-2	Agency-Upper Thompson Sanitation District	It is the desire of the District to partner with WAPA in support of the Estes-Flatiron Rebuild Project, identifying strategies and solutions which provide mutual benefit. Through careful examination of current and projected needs, equitable solutions may be identified, benefiting the entire Estes Valley and enhancing environmental protection efforts.	Comment noted. Western has been discussing the proposed Project with the Upper Thompson Sanitation District during the course of the EIS process and the effects of the alternatives on the facility were analyzed in the Final EIS.	Upper Thompson Sanitation District
Alternative		A-2 & C-3	Agency-Upper Thompson Sanitation District	Upper Thompson Sanitation District fully endorses the proposed re-route of WAPA transmission lines and considers it critical in nature to providing future sanitation service for the greater Estes Valley. The District therefore respectfully requests WAPA consider the A-2/C-1 variant as described in the Draft EIS. We look forward to continued cooperation of our respective entities and collaborative efforts in delivering exceptional service to customers of the Estes Valley, both now and in the future.	The underground alternatives (A2 and C1) were analyzed for cost and other purpose and need factors. See Section 2.2.4 for analysis. Additionally, Western anticipates that potential conflicts with the Upper Thompson Sanitation District would be minimal and could be accommodated through careful micro-siting in this area. With the selection of Alternative C as part of the Agency Preferred Alternative, the existing line would be removed and there would be no conflict with the Upper Thompson Sanitation District's expansion plans.	Upper Thompson Sanitation District
Alternative		A-2 & C-3	Agency-Upper Thompson Sanitation District	Duplicate, see comment letter 78 The District strongly supports the A-2/C-1 Variant identifying a proposed WAPA transmission line below ground just south of the Bureau of Reclamation (BOR) Siphon. As you are aware, the District's wastewater treatment plant is located on Bureau of Reclamation land west of Mall Road, with WAPA utility easements along the northwest portion of the parcel. The transmission line also travels across the lower portion of District property east of Mall Road. The District's Master Plan identifies expansion of the treatment facility, installation of additional piping and concrete structures or basins (covered or uncovered). As shown on the enclosed Figure 1 – District Facility Map, future District expansion would be severely encumbered by existing overhead transmission lines shown as proposed above ground ALT A and existing above ground ALT D. The proposed re-route of the transmission line would, therefore, allow the District to utilize available vacant areas of both BOR parcels and District owned property, and thereby eliminate any potential encroachment of the easement. It is the desire of the District to partner with WAPA in support of the Estes-Flatiron Rebuild Project, identifying strategies and solutions which provide mutual benefit. Through careful examination of current and projected needs, equitable solutions may be identified, benefiting the entire Estes Valley and enhancing environmental protection efforts. Upper Thompson Sanitation District fully endorses the proposed re-route of WAPA transmission lines and considers it critical in nature to providing future sanitation service for the greater Estes Valley. The District therefore respectfully requests WAPA consider the A-2/C-1 variant as described in the Draft EIS. We look forward to continued cooperation of our respective entities and collaborative efforts in delivering exceptional service to customers of the Estes Valley, both now and in the future.	The underground alternatives (A2 and C1) were analyzed for cost and other purpose and need factors. See Section 2.2.4 for analysis. Additionally, Western anticipates that potential conflicts with the Upper Thompson Sanitation District would be minimal and could be accommodated through careful micro-siting in this area. With the selection of Alternative C as part of the Agency Preferred Alternative, the existing line would be removed and there would be no conflict with the Upper Thompson Sanitation District's expansion plans.	Upper Thompson Sanitation District

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative		A2	Public	<p>Form Letter - See comment letter 22</p> <p>The Estes-Flatirons Rebuild will clearly advance our man-made amenities by making our electric power more reliable and fire resistant. The gains in this area, however, may or may not result in a loss of natural amenities. Through WAPA's current plans to consolidate the power lines, fewer intrusions on the natural beauty will occur. By burying the remaining power lines in the Estes Valley, no power lines or power poles will be visible. By following the path they have labeled Variant A2, the clear cutting associated with any of the methods can be moved farther from our transportation routes, residential communities, and recreational areas. Variant A2 gives us clear gains in man-made amenities and enhancements of our natural amenities as well.</p> <p>By taking this opportunity to add value to our community through both better man-made amenities and better display of our natural amenities, WAPA can add value to the Estes Valley in yet another way. The Estes Valley survives economically by hosting millions of guests who are visiting Rocky Mountain National Park. While these guests enjoy the beauty of our natural environment, our shop owners try to make their visits enjoyable, memorable, and restful. By contributing positively to the natural beauty of the Estes Valley, WAPA will contribute to our guests' experiences and to the economic health of the Estes Valley. This can best be accomplished by modernizing our electric transmission using Variant A2, as that minimizes the barriers to the natural beauty and the disruption of our neighborhoods. It seems fair that we citizens of the Estes Valley share with WAPA's other electric service recipients in the costs of having high quality electric service. It also seems fair that all of WAPA's customers share as equally as possible in minimizing the environmental costs of providing their service. By undergrounding the Estes-Flatirons transmission lines using Variant A2 and sharing that extra cost with all affected regional electric customers, WAPA can improve the nature experience of millions of Americans and treat the citizens of the Estes Valley equitably at a monthly cost per customers that is very low.</p> <p>In summary, I ask that you encourage WAPA to enhance the natural beauty of the Estes Valley, add to the economic health of the Estes Valley, and treat its regional customers fairly through embracing Variant A2. If Variant A2 is simply not possible, the next best method for accomplishing these goals is best through Alternative A.</p>	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project would be a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. The pros and cons of underground vs. overhead lines result in several tradeoffs, as fully discussed in Section 2.8. This section presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically retail rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Tom Vogelsang
Alternative		A2	Public	Form Letter - See comment letter 23	<p>Commenter correctly states that the proposed project would improve reliability and reduce risk of wildfire-relayed outages, but at the cost of some impact to environmental resources. Removal of one line and abandonment of the existing ROW would allow that line route to revert back to natural vegetation and eventually merge with the rest of the area, and that aspect of the proposed Project would be a tangible improvement to the Estes Park vicinity. Other adjustments to the line route as included in the Agency Preferred Alternative would also reduce existing impacts, especially visual. The pros and cons of underground vs. overhead lines result in several tradeoffs, as fully discussed in Section 2.8. This section presents the rationale that led to the selection of the Agency Preferred Alternative. Western must carefully consider the costs of its projects, as all costs are recovered in the wholesale power rates it charges its utility customers, and not through tax dollars. In joint participation projects where Western partners with other utilities, the partners must recover their investment through their rates, typically electrical power rates to end users such as the residents of Estes Park. The costs of this Project would be similarly recovered and would be, therefore, similarly spread to ratepayers directly or indirectly.</p>	Carol Barsch Bontrager
Alternative	All	A	Public	My comments are directed to an alternative to remove the eight miles of the wood pole and wires that comprise A -- excuse me B, C, and D from consideration and select A as the form on the north side, everything on the north side of County Road 18E from Flatiron Reservoir to Pole Hill Road to the substation.	Thank you for your comment.	Russell Atwood
All	All	B,C,D	Public	By removing Alternatives B, C, and D, it would resolve most of the key issues that have been raised in this pamphlet and the issues that most of you have.	Thank you for your comment. Unless an alternative can be dismissed due to reasons such as feasibility or technical issues, it must be evaluated in the EIS.	Russell Atwood
Socioeconomics	East		Public	If the proponents are successful, a new and innocent group of landowners, those along the proposed Alternative A route, would be burdened with new easements on their land. They would bear the cost in the form of new rights of way, and they would suffer from the diminished scenic value of their property. This amounts to an illegitimate transfer of property restrictions from one group of landowners to another group of landowners.	Alternative A was not selected as part of the Agency Preferred Alternative in this area.	Jeff Barina
All	East	B	Public	The solution is Alternative B. Alternative B uses the south right of way, a long-established easement familiar to and accepted by the landowners in the area. It successfully removes the north right of way from the property of most proponents and increases their land values. It does not transfer property restrictions to a new innocent set of landowners.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Socioeconomics	East		Public	The remaining issue of protecting scenic views is important but should not be paid for on the backs of other innocent, private landowners. Those landowners are not even adjacent to this open space. Instead, the cost of protecting scenic views for the public lands, which is a benefit, should be paid for by the public. One suggestion is to use double-circuit wooden H-frame structures to minimize visual impacts to the scenic view. This is less expensive and much preferred to the steel monopoles.	Double circuit wood H-frames compromise transmission line reliability and don't meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).	Jeff Barina
Socioeconomics	East		Public	Another suggestion is using public funds, perhaps through park fees, Great Outdoors Colorado grants, or other means to help fund underground construction through the public open space areas.	Partial public funding is complicated by regulations governing Western's acceptance of funds from the public; legislation would likely be required to do this. Lacking public or appropriated funding from Congress, electrical power rates (either Western's wholesale power rates or participating utilities retail consumer rates) would pay for the proposed Project.	Jeff Barina
Alternative	East	A & B	Public	So for background and premise, there are two existing power transmission lines in service near the Flatiron substation in Pinewood Reservoir. One line runs roughly on the north side -- excuse me -- north side of County Road 18E and is referred to as the north line. The second line runs roughly on the south side of the same road and is referred to as the south line. 2 These two transmission lines run along rights of way that have been established and used in their present locations since the 1930s and 1950s. They should be reused for the transmission line rebuild to the greatest extent. Utilization of existing rights of way is beneficial for a variety of reasons. Among them, it's more efficient and allows faster progress for the rebuild effort. Cost is typically much less than acquiring new rights of way. Potential litigation and other delays from newly affected landowners is minimized.	Western's proposed alternatives maximize the use of existing ROWs. Other alternatives are the result of specific resource conflicts or public input.	Jeff Barina
Alternative	East	A	Public	The following arguments are for -- are against Alternative A. Alternative A seeks to deviate from the existing, long-established rights of way. Property owners over the years have purchased land, planned, built homes and structures, or otherwise developed their land based on these long-time established rights of way. Abandoning these rights of way and now imposing new easements causes severe, undue, and unnecessary harm on a new set of landowners.	Western analyzed Alternative A and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	East	A	Public	Acquiring new rights of way along Alternative A is more costly and time consuming than using the existing rights of way, the north and south lines, resulting in slower and more expensive progress. Per Western Power, the PBERA customers would bear the cost of these higher electric -- in the form of higher electric bills.	Alternative A was not selected as part of the Agency Preferred Alternative in this area.	Jeff Barina
Transportation	East	A	Public	Alternative A would traverse extremely steep terrain. The steep terrain would make rights of way and access roads difficult to create, expensive to maintain, and subject to severe erosion. Snow cover on the steeper sections of these roads will make navigation and maintenance vehicles difficult or impossible. Transmission line maintenance -- excuse me. Transmission line maintenance would likely have to be excluded during winter months. More troubling is that essential or emergency repairs during winter months may be especially hampered by the steep snow-covered access roads.	Western analyzed Alternative A and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Jeff Barina
Accidents	East	A	Public	Alternative A would pass through thickly forested areas, sources of ignition from maintenance activities. Transmission lines themselves could easily ignite a tinder dry-forested area. There are many residences within tens of feet of Alternative A's routing. Even more residences or construction are within a quarter-mile of the proposed route. The resulting liability from losses could be very significant.	Western analyzed Alternative A and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Jeff Barina
Alternative	East	B	Public	A less liable, much safer and smarter alternative exists with Alternative B. The following are arguments for Alternative B. Alternative B is the preferred choice for the transmission line rebuild near the Flatiron Pinewood Reservoir area. It reuses the existing south right of way that has been in service for decades. Over the years, stakeholders have purchased land and developed their properties based on the location of this right of way. Alternative B uses the south right of way near the Flatiron substation which already has adequate width to meet current standards. Costs are minimized since the acquisition of additional rights of way are not necessary.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Jeff Barina

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	B	Public	If you look at the table and you total all the line items in Table S-4, Alternative B has 19 favorable outcomes. The nearest competitor is Alternative C-1 and only 11 favorable outcomes, while the undesirable Alternative A has only 8 favorable outcomes. Alternative B is clearly the best choice according to Table S-4. Alternative B benefits the many landowners in the Newell Lake subdivision by decommissioning the transmission lines through the subdivision along County Road 18E. WAPA's assumed risk and liability from fire hazard is minimized with the choice of Alternative B. The south right of way between Flatiron substation and Pinewood Reservoir is not in the forested area, has fewer at-risk structures, and consists mostly of grass and low-growing shrubs. Ignition sources are less likely to cause a wildfire outbreak, and tree canopy fires could not form. The proximity of County Road 18E provides easy access for firefighting ground equipment and easy access to the transmission lines. This choice compares very favorably to other alternatives that are routed through steep, inaccessible terrain with forested landscapes.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Jeff Barina
Visual	East	B	Public	An option: Alternative B passes by the south end of Pinewood Reservoir through an area some refer to as Rattlesnake Park. The visual impact from Alternative B can be reduced with the use of wooden H-frame structures that can support a double circuit, contrary to what is stated in the Draft EIS on Page 421.	Double circuit wood H-frames compromise transmission line reliability and don't meet WAPA's Purpose and Need. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).	Jeff Barina
Alternative	East	B	Public	A second option: A variant to Alternative B that includes underground burial of the transmission lines through Pinewood Reservoir County Park, which is also known as Rattlesnake Park. This is analogous to the Variant C-1 in which the westernmost 2.7-mile section near Lake Estes is constructed underground. Stakeholders on the eastern end should receive equivalent consideration for this option as stakeholders on the western end.	Section 2.8 of the Final EIS describes the methods and considerations for choosing the Preferred Alternative. For the reasons discussed there, no underground options were included in the Agency Preferred Alternative.	Jeff Barina
Land Use and Recreation	West	General	Public	I just want the trails -- I don't want it to change or anything. I just want the normal trail on Pole Hill. That's it.	West Pole Hill Road would be improved under Alternatives C and C1 resulting in beneficial and adverse impacts as detailed in Section 4.16 . As part of the APA there would be no change to the road, and subsequently no related long-term change to recreation attributable to the proposed Project. Under the APA, short-term impacts would include temporary congestion or blockage of the road by construction vehicles during certain phases of construction. These impacts should be of limited duration, primarily occurring when construction equipment is accessing or leaving structure locations, or during conductor stringing. --	Kaylee Beach
Cultural	All	C, D	Public	In talking with Western Power representatives, we have discovered that if the new -- if the new structures described in the EIS under Alternative D and possibly Alternative C are put into place, we could lose most of the land on which the schoolhouse sits due to the size of the right of way needed, especially if the structure is a turret pole which requires even a larger footprint. The Western Power representatives explained that if this happens, we would be given a severance payment for the amount of land rendered unusable. But how do you put a price on history?	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Gib Coalwell
Cultural	East	C, D	Public	As required, Western Power looked into the impact of its proposal on historical structures in the area, but we do not believe the agency did its due diligence. To begin with, the EIS contains inaccurate information. On Page 1-5 of the EIS Western Power states: It should be noted that both the existing transmission line right of ways were in place prior to these neighborhood developments. The homes were built with the existing transmission lines in place. That information is incorrect. The schoolhouse was in place long before the right of ways were procured and the transmission lines were put into place. The current north line which runs approximately 300 feet north of the schoolhouse was constructed 28 years later after the schoolhouse was built.	Text has been revised to state that most but not all of the existing development occurred after the transmission lines were constructed.	Gib Coalwell
Cultural	East	C, D	Public	Furthermore, the agency looked at the schoolhouse not once but twice but could not -- excuse me -- could not rule out the historical significance. See Page 3-124 for details. While labeling several sites as "determined not eligible" for the National Register of Historic Places, the EIS states the schoolhouse is recommended as not eligible, most likely due to the agency's finding that no National Register of Historic Places assessment had been found. We're now in the process of changing that. After seeing Western Power could not -- after seeing that Western Power could not definitively say the schoolhouse was not eligible for the National Register of Historic Places status, we looked into the matter, and we found that the building could easily qualify under the rural school buildings of Colorado designation, which is part of a multi-property listing type defined as a series of individual and/or districts listings of thematically related historic properties. ...we are currently in the process of submitting the Pinewood schoolhouse to be listed in the National Register of Historic Places and the Colorado State Register of Historic Properties.	As detailed in the Addendum report, Western has made the determination that the Pinewood Schoolhouse is not eligible, and the Colorado State Historic Preservation Office (SHPO) has concurred. This determination is based on modifications to its original construction over the years that have resulted in the structure no longer retaining sufficient integrity, as defined in 36 CFR 60, to be included in National Register of Historic Places. Since the Colorado SHPO has determined that the schoolhouse is not eligible, it is also not eligible for the Colorado State Register of Historic Properties. Western is aware of the owners' plans to restore the Pinewood Schoolhouse, and does not dispute that the property has historical interest.	Gib Coalwell

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Cultural	East	C, D	Public	We would like to point out that the EIS Western -- that in the EIS, Western Power does refer to historical significance as a reason to avoid placing the lines. On Page S-12 of the EIS summary, you can read about how an alternative route that would have run along the Flatiron's penstocks was dropped in part because, quote, the penstocks are iconic facilities that date to the 1940s and have significant -- and has historic significance, end quote.	The structural modifications that have occurred to the Pinewood School have resulted in diminished integrity as defined in 36 CFR 60 National Register of Historic Places. Therefore, the Colorado SHPO concurred that the property was not eligible for inclusion on either the Federal or State Register of Historic Places. Furthermore, while the historical significance of the penstocks was considered, additional rationale for not moving forward with additional analysis was the lack of opportunities for visual concealment provided by the surrounding terrain. Both of these rationale provided the justification for dismissing this alternative from further analysis.	Gib Coalwell
Cultural	East	C, D	Public	With all due respect to the silver pipes, we believe the 1910 schoolhouse has much more iconic appeal and historic significance. In addition, we have found no mention of the penstocks as being eligible for the National Register of Historic Places. So why did Western Power describe them as having historic significance and use that criteria as a means to drop that proposed alternative route when it did not give the same consideration to the schoolhouse?	The fact that Alternatives C and D were fully analyzed does not mean that the Pinewood Schoolhouse was ignored. Indeed, it was one of the factors that led to Alternative B being selected for inclusion in the Agency Preferred Alternative. The penstocks and associated facilities are not listed in the NRHP register (See Tables 3.15-1 and 3.15-2). There were other factors considered in dismissing the alternative near the Flatiron Penstocks from further analysis.	Gib Coalwell
Cultural	All	C, D	Public	To further solidify their argument against Alternative C and D, on Page 4-146 of the EIS, the EIS states that both alternatives have a greater number of historical properties encountered than the other proposals. Option C would affect nine historic sites while Alternative D would affect 12 such sites. So we respectfully ask that Western Power consider dropping both Alternative C and D.	All potential alternatives have impacts, and only those that are clearly not reasonable or feasible, do not meet the purpose and need for action, or have unacceptable levels of impact even at the conceptual level are eliminated from full analysis. Others that do meet these criteria are fully analyzed for their effects in order to make an informed decision. However, they may not be selected because of the effects analysis and agency purpose and need, and in this case Western has selected Alternative B as part of its Agency Preferred Alternative in the vicinity of the schoolhouse.	Gib Coalwell
Alternative	All	C, D	Public	In closing, we wish to add that while we strongly oppose C and D, we believe that Alternative A is equally unfeasible as backed by arguments that you will hear from our neighbors in that area. Alternative B where the power lines and the 100-foot right of way already exists seems to be the most feasible and logical choice.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Gib Coalwell
Land Use and Recreation	All	General	Public	One issue we've seen mainly with off-road trails and OHV areas is whenever work is done, they go in and grade them smooth. There's a significant increase in accidents, people getting injured, additional resource damage from increased traffic.	West Pole Hill Road would be improved under Alternatives C and C1 resulting in both beneficial and adverse impacts as detailed in Section 4.16 . However, under the Agency Preferred Alternative, Western's decision not to upgrade the 4WD section of Pole Hill Road would leave access and forest recreation use unchanged. Leaving the 4WD section of Pole Hill Road unimproved would leave that barrier to public access unchanged, so no increase in public access and related recreational use attributable to the proposed Project would occur.	James Dixon
Land Use and Recreation	All	General	Public	Leaving the four-wheel drive trails the way that they are currently reduces the speed, reduces the environmental impact from use. Close them down and it increases traffic on other trails, creates more resource damage there. We would just like to see our trails left the way they are and not damaged to where it creates more headaches later for everyone and then more trails getting closed because of accidents, injuries, and even in some cases fatalities.	West Pole Hill Road would be improved under Alternatives C and C1 resulting in both beneficial and adverse impacts as detailed in Section 4.16 . However, under the Agency Preferred Alternative Western has determined that it would not upgrade the 4WD section of Pole Hill Road. Other roads may be improved to allow access for construction.	James Dixon
Alternative	East	B	Public	Many people in our community support Alternative B. The advantages are many. The south right of way was built in 1953. It is currently sufficiently wide for transmission lines in an open area. In the area, no more additional easement will need to be acquired for the installation of these modern transmission lines. It's already 100-foot wide. That's plenty wide. For more than half a century, landowners have purchased and developed their property around the south right of way. Land was purchased with the full knowledge and acceptance of the right of ways and structures. Most of the existing structures are outside of the 300-foot buffer zone. In Pinewood Reservoir area, the terrain is open and relatively flat. Because so much of it is ranchland, vegetation along the right of way consists of grasses and low shrubs. When necessary, it has already been cleared and maintained. There is easy access for installation and maintenance of the transmission lines and structures. There is no need for additional access roads. Given the longer spans of the new structure, perhaps some of the access roads can be abandoned and returned to their original condition. The open terrain will require minimum of roads, easy maintenance costs, and limiting the danger -- the damage caused by roads.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Craig Driear
Accidents	All	B	Public	WAPA's assumed risk and liability from fire is minimized with Alternative B in the area. Ignition sources from lines themselves or from other causes will have minimal potential to cause fire compared to the other alternatives. In the unfortunate event of a fire, firefighters will have easy year-round access to provide protection to homes and buildings as well as the lines themselves. Due to the general lack of trees, canopy fire dangers are minimized.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Craig Driear
Alternative	All	B	Public	...for the sake of you folks listening, we can summarize by saying there are 19 advantages to Alternative B listed in Table 2.8-1, more than any of the other alternatives. We feel that Alternative B as currently proposed is the least bad alternative. However, there are two variants that would further improve Alternative B. Variant 1. Where required to ease the visual impact, wooden double-circuit H-frames can be used instead of the steel monopoles.	Double-circuit wood-pole H-frames structures are not a viable option as a result of the short ruling span, fire risk, increased visual impact, and increased maintenance. Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Craig Driear

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	East	B	Public	We would ask that WAPA reconsider the use of the steel monopoles in favor of the wooden double-circuit H-frame design in the area around the Pinewood Reservoir and Rattlesnake Park. The current visual impacts would be improved as the H-frames have longer spans and would result in fewer structures.	Double circuit wood H-frames do not have longer spans, but rather shorter spans. Steel monopoles combine long term transmission line reliability with the lowest life cycle cost compared to wood structures. Additionally, visual impact may be reduced based on the longer span length for steel monopoles compared to wood H-frames, roughly 25 percent fewer structures per mile (see Table 2.2-1).	Craig Driear
Alternative	East	B	Public	Variant 2 is to vary the lines in the vicinity of Rattlesnake Park and Pinewood Reservoir. In Estes Park, these lines are being buried. There is no reason residents in Pinewood Reservoir area should not have the same option. The land along the southern route is open, and the soil would allow for easy burial of these transmission lines.	There has been no decision made to construct the proposed Project underground in the Estes Park area; final decisions on any aspect of the proposed Project will not be made until the Record of Decision is signed. Western has, however, disclosed its preferred course of action in the Final EIS with the identification of the Agency Preferred Alternative, which does not include an underground option. The Alternatives developed for in depth analysis are described in Section 2.2 of the Final EIS. Only alternatives that were economically or technically infeasible were not assessed.	Craig Driear
Alternative	East	A	Public	In the vicinity of Green Mountain, this alternative has unique challenges when compared to B, C, and D. The terrain is very rugged, the forest dense with few improved roads. Approximately 1½ miles of new right of way will have to be required, an expensive and time-consuming process. There exists the potential for litigation from resistant landowners. A simple solution is to use the existing right of ways. If acquired, the new right of ways will need to be cleared and all of the wood and slash removed. Over such extreme terrain, this is difficult, dangerous, and an expensive proposition. The steep, newly cleared land will be subject to erosion from snowmelt and rain.	Western analyzed Alternative A and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Craig Driear
Wildlife	All	A	Public	Wildlife, one of the major attractions of the area, will be adversely affected. We all love our wildlife. With the existing significant loss of trees from pine beetles and wildfires, we find it difficult to understand how the destruction of even more forest can be justified, especially when cleared right of ways are already available.	Western analyzed Alternative A and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Craig Driear
Socioeconomics	All	General	Public	Despite WAPA's conclusions in the Draft EIS Section 4.13.3.2 that most studies have seen -- found no effect on the long-term property values, there will be a severe downward effect on the value of any property newly traversed by transmission lines.	Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative. Commenter may well be correct that proximity to a transmission line may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and the studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the backgrounds, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted.	Craig Driear
Socioeconomics	All	General	Public	We are in a process of obtaining a statement of property devaluation. Preliminary estimates show a loss significantly more than their estimates, of at least 50 percent.	Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, property valuations are based on actual property transactions, and the studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected. Furthermore, the longer a line is in place, the less of an impact it makes because its visual impact diminishes as it becomes part of the background. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted.	Craig Driear
Alternative	All	A	Public	Some of the advantages of Alternative A, A-1 and A-2, I just lumped them together. The most acres of new right-of-way acquisition for Alternative A: 153, 157, and 152. Most landowners affected: 46, 48, 42. And, except for the dual right of ways of Alternative D, the most right-of-way erodible acres.	Thank you, your comment has been considered.	Craig Driear
Alternative	East	A	Public	In Table 2.7-1, stated as one of the reasons for dismissing reroutes along U.S. Highway 34 and 36 are that these proposals were not carried forward because they do not address the issues raised during scoping but simply displaced impacts to new landowners, the same argument we feel applies to the Green Mountain area for any variant of Alternative A. For these reasons and the reasons stated above, we feel that Alternative B is preferable.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Craig Driear

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	East	General	Public	We can see the wooden H-structures on the ridge line. As we go to a taller pole, if we go to the steel monopoles, it's going to look like a picket fence coming down the hill, and that's, I think -- I would like to see WAPA stay with the wooden structures. I think they're more environmentally friendly, as friendly as a power line can be. The visual impact would be less. Obviously you can't put the whole thing underground, but I do concur that through the open space and all that along Pinewood, that underground is a good alternative.	On the eastern end of the project, Alternative B has been selected as part of the Agency Preferred Alternative. Western also notes that consolidation of the two existing lines on one ROW would result in the removal of the existing line and abandonment of the other ROW, allowing that ROW to revert to natural conditions and lessening the visual impact.	Steve Goodroad
Alternative	All	General	Public	I do believe that using existing right of ways where people do know they bought their property and these power lines were there is the best alternative, although I hope you get rid of the power line on your property, Gary.	Thank you for your comment.	Steve Goodroad
Transportation	All	General	Public	Our concern is that with the construction traffic -- it sounds like there's a lot of heavy trucks and traffic, pulling the poles up and down that hill -- that WAPA address a maintenance agreement similar to the one that we had with the Bureau of Reclamation when they work on the canal project a couple of years ago. That worked very nicely. If we don't get that type of agreement, we ask that it be addressed somehow in the EIS draft.	Western provided a letter dated February 6th, 2012 to the Pole Hill Road Association assuring that its contractor would be required to repair any damage to the private portions as a result of their activity in relation to this project.	Gary Havener
Alternative		General	Public	Secondarily, as a private resident, I do have a pole, and a line does cross in front of our property on the north route. Obviously, I would like to see that decommissioned and am more in favor of the south route. Although we will still be able to see the poles, it will not be on my particular piece of property.	Thank you for your comment.	Gary Havener
Land Use and Recreation	West	General	Public	My only concern is the Pole Hill four-wheel drive route on the northern end. We're losing more and more roads for our recreational use every day. I can see going in and improving the road, but I would like to see it restored back to the original condition that it's in now. That's my only concern on the project.	Western has determined that the 4WD section of West Pole Hill Road would not be improved under the Agency Preferred Alternative. It would be left in its current condition. Alternatives C and C1 propose upgrading the West Pole Hill Road, and the Final EIS Section 4.11 describes the significant recreational impact as a result.	Eddie Householder
Alternative	All	General	Public	One of my concerns from the very first public meetings is, is there really two big pieces to this, the piece up in Estes and the piece at Pinewood? The way -- and we've asked for a breakdown of, you know, what -- like, for example, comparing A but then coming over and using B here, or using A over here and then B over here. You're kind of mixing two pieces together. It's -- people at Estes have their concerns, and we at Pinewood have our concerns. The way this has been laid out makes it very difficult to -- it just makes it difficult to understand the impacts, et cetera. We have people with different preferences. To somehow mix it all together makes it much more confusing.	The Final EIS includes tables in Section 2.9 that portray the two ends of the ROW as individual alternative options so that impacts to Key Issues on each end can be separately assessed.	Phillip Hunger
Alternative	All	B	Public	My preference is, for the Pinewood area, B; and I want the Estes people to have what they want.	Thank you for your comment.	Phillip Hunger
Visual	East	General	Public	I just would like to emphasize the scenic beauty of the Pinewood area and also the sensitivity of the viewshed. I would support an alternative that takes that into consideration, especially from the north viewshed. In the Draft EIS, I noticed the sensitivity of the southern view towards the lake, but I would like to speak for the community about the viewshed from the north. I think the proposal by Craig Driear is a good one as far as taking that into account, taking those lines that exist out of the neighborhood and try and find a reasonable alternative that works for everybody in the area. I think that idea was a good one, and I would support that as well. I just wanted to emphasize that that's unique in that area as far as the beauty and the view and the experience going up there from the urban corridor. I think we ought to protect that and take that into consideration.	Thank you for your comment.	Craig Canal
Transportation	All	General	Public	We do want to make sure that it's on record that the road -- that will be affected. No matter which route is chosen, that it is considered in the environmental impact and that -- not only for the time that it is being used but for the future so that there can be a planned relook at the road in the future to make sure that that road has, in fact, held up based on what their initial environmental studies indicated.	Short-term and long-term impacts, both beneficial and adverse, from improving West Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative, Western has committed to leaving West Pole Hill Road unimproved. There could be some improvements made to other access roads, and there could be damage to other roads as a result of heavy truck traffic during construction; any damage would be repaired. Western provided a letter dated Feb. 6th, 2012 to the Pole Hill Road Association assuring that its contractor would be required to repair any damage to the private portions as a result of their activity in relation to this project. Text has been updated to reflect that Western's contractor would be required to repair any damages to the private portions of Pole Hill Road.	Neil OMaley
Transportation	West	General	Public	The only -- the other area I want to talk about today is how we are affected. I want to make sure that it is noted that we are only -- in terms of the roads that I'm talking about here, they're only the areas that are the four-wheel drive roads that are found on the Estes Park side. So anytime I mention Alternative A, it is only for purposes of talking about the western side connected to Estes Park.	Comment is noted.	Neil OMaley

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Transportation	West	General	Public	So from the standpoint of our business, we have sustained numerous hits and losses due to fires and floods -- or the flood. This is just one more thing that could really impact us severely if the road that is -- let's see here. I believe it is-- 122 -- if 122 is graded down to dirt. One of the things is, even if it was able to be graded down to dirt, there's really no way to bring it back to its original condition. The road itself is made up of granite that is part of the entire mountain. It's not something you can just bring more rocks in later.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative, Western has determined that no improvements to West Pole Hill Road would be made. Accordingly, there would be no impact on the 4WD section, and no impact to the permittee except possibly some temporary access during actual construction in that vicinity.	Neil OMaley
Land Use and Recreation	West	General	Public	...the more trails that we have reduced, the more pressure that we get on other off-road recreational areas. Case in point: Bunce School Road. When we had Storm Mountain and Pole Hill that were temporarily closed due to the floods, the kinds of pressure that Bunce School Road received turned into just a lot of problems for a lot of people. We had a lot of accidents on that road in Bunce School. There 4 was road degradation. There were -- the overuse of that one particular trail is exactly the same kind of thing that will happen if this road gets turned into just a dirt road because the four-wheel drive experience will no longer be available.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative, Western has determined that the 4WD section of West Pole Hill Road would not be improved. It would be left in its current condition.	Neil OMaley
Land Use and Recreation	West	General	Public	So I do believe that this is an historic road. This road was established in late 1800s. That was the original road from Loveland up to Estes Park. One of the things we talk about is the whole historic experience that folks had when they came up on covered wagons and the kind of roads that they experienced when they came up here. It is a real eye-opener to so many people.	Thank you for your comment.	Neil OMaley
Alternative	All	B	Public	It's basically right there. That transmission line currently runs right about this far in front of my face looking out a window. I mean, it looks like you can reach out and touch it. I would vote for anything to get it out of my face, but I don't want to get it out of my face at the expense of people who don't have it there now. So I believe that we should be giving consideration to burying across here. That gets it out of my face, which makes me happy. Or if it goes to the H-frames, it's still in a distance and it's not out my front window. A lot of the people that live along that 18E are looking at these lines now. Some of them even have it coming right over the top of them, which I understand it will not happen and, you know, that will go away. But it still could go between 18E and the lake or between Pinewood residences and the lake. So to me, the solution that affects the least amount of people the least extremely is B.	Thank you for your comment.	Larry Pearson
Visual		A	Public	What they end up doing is basically putting a rather large pole on my property that's 8-foot wide, 110-foot tall. And I have a large valley that runs over to where the next pole would be. They would basically be hanging the wires about 300, maybe 350 feet in front of my house, and that would be directly in my view. I bought the property as a view property and built the house thinking it would be a view property. And they're looking at putting a new ROW, not existing but a brand new ROW, and cutting trees and the whole thing through the property. That is, like I say, the front of my house.	Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative. The existing north line ROW would be abandoned and allowed to return to natural conditions, therefore lessening visual impacts.	Dennis Schump
Electrical		A	Public	I'm also kind of concerned about the EMFs and the fact that the wires run through there. I have several conditions. I have heart monitors that are on the phones. I have cell phone service.	The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot ROW. A more detailed description of EMF as they relate to potential health effects and the proposed project is found in Sections 3.14.1.3 and 4.14.5.1 .	Dennis Schump
Alternative	All	A	Public	When we were -- when we had the last meeting, I think in 2012, where we put together the Draft EIS, Alternative A was not presented. I was rather shocked to see it at the last meeting. As a matter of fact, I was more than surprised. I was absolutely blind-sided, I think, by that particular alternative since it hadn't been brought up before.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Dennis Schump
Alternative	All	B	Public	I think it's really time to look at what we really have and what we can do for running power lines. To me, it makes no sense of putting power lines where all those people are down there. I mean, yes, the power lines were there first. Now there's people in homes all over. But we have the opportunity to take out those gigantic poles and stuff and move them away and probably over to Alternative B.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Dennis Schump
Alternative	East	A	Public	I was also a bit disappointed that they didn't consider looking at the Pinewood underground alternative. They were willing to look at the Estes Park underground alternative. Actually, the one over in the Pinewood run is probably about a mile shorter to open up that meadow that they have in there, and it may be a lot cheaper to really put that in underground. But I was disappointed that that wasn't, you know, offered on this side. You know, maybe the political clout was a little greater in Estes than what we have, but I think it would have been fairer to open up that alternative.	The A alternatives developed for in depth analysis are described in Section 2.2 of the Final EIS. If alternatives were not economically or technically feasible, they were not assessed. Construction of an underground transmission line is quite different from burying a residential distribution line, as described in Section 2.2.4 of the Final EIS. Large transition structures are also needed when transitioning from above ground to underground and back again.	Dennis Schump

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Alternative	East	C & D	Public	I really don't think that Alternative C or D is really a viable alternative because it does go through the Newell subdivision. I say clear the poles off of Green Mountain entirely. Get rid of them. I mean, get them away from the people. We have a chance to do that because we're putting new poles in.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Dennis Schump
Alternative	All	B	Public	So I'm kind of in favor for Alternative B, and I think the worst one out there as far as actually creating damage is putting in a brand-spanking new ROW and trying to -- and destroying the property that's there.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Dennis Schump
Alternative	East	A	Public	I suppose that's -- another thing, too, is maybe shorter poles could be put over that grassy area that goes through the rattlesnake valley through there. It's kind of described as that because there's no trees. It's just grass. It's perfect for safety and maintenance of those poles. Why would you want to go through a canyon and up steep hillsides? And it's very rugged and rocky. It just does not make sense.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative. While shorter structures are advantageous in certain circumstances, in open areas taller structures are usually less intrusive because fewer structures per mile are needed.	Dennis Schump
All	All	General	Public	I do have an alternative. I'm not sure how to tell you about it. I have a picture of it. I'm saying go to a different pole, and I've indicated what pole it is, basically across from this other pole. I mentioned north and south and east and west.	Different structure types are evaluated in Section 2.2.2 of the Final EIS. Landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses.	Dennis Schump
Visual	East	A	Public	My property, they want to go north for a while and around. What it would end up looking like is gigantic antenna across going every -- you know, 800 feet across the top of Green Mountain. That would be this whole area. And you can see this all from Loveland. You would see all those poles. Aesthetically, it's very unattractive to see something like that. All those poles up there in that Alternative A you would see from the lake and would be way at the top of the hill. It would look very bad.	Western selected Alternative B as part of the Agency Preferred Alternative in this area. See Section 2.8 of the Final EIS for the rationale for the Agency Preferred Alternative.	Dennis Schump
Transportation		General	Public	We're sure that a large part of that breakdown, ["significant breakdown of the road"] which is increasing our cost on the road, to maintain the road, is because of the heavy truck traffic that damaged the substructure underneath the paving that we've done. We're concerned that the WAPA project will have a similar impact. The heavy steel structures and the large truck traffic that's going to come up and down that road in order to do this, regardless of which alternative is chosen, will continue to deteriorate our roads. I went through the impact study, the environmental draft, section by section looking for consideration of the damage to the road, and it was not there. So we would like to see that that was considered in the environmental impact. It is a clear impact to the environment.	Western would reconstruct or recondition roads only to the extent that it is necessary to provide access for construction equipment. Western would also consider overland access where topography, soil, and vegetation conditions support overland travel with minimum disturbance and compaction. As stated in Section 2.3.4 , damaged roads would be restored to their original condition.	Neil Snyder
Transportation	All	General	Public	As far as Big Thompson 4-Wheelers, I share a similar concern to Eddie Householder on the road on Option C at the eastern -- or western end of the project. The environmental statement says that they plan on grading that four-wheel drive road out so it is suitable for semi-trailer truck traffic carrying steel poles. It also says in the environmental impact statement that that is one of the few remaining quality four-wheel drive roads in the area of Estes Park.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative, Western has determined that it would not upgrade the 4WD section of Pole Hill Road under any alternative, leaving the road in its current condition.	Neil Snyder
Land Use and Recreation		General	Public	The proposed C-1 in the environmental statement is to grade that road out, suitable for semi-trailer truck traffic, and not restore it to its original condition afterwards, which would totally ruin that road for any kind of four-wheel drive. In addition, it also addressed an impact in increased public use to the area afterwards because of increased public access for people with passenger cars. We would like to see that option not taken and keep that one of the few remaining four-wheel drive roads accessible.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative, due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to the 4WD section of road would be made. Since there would be no change to the road or its Forest Service classification, there would be no indirect change in access to the forest or recreation resulting from the APA.	Neil Snyder
Alternative	East	General	Public	So anyway, what I'm thinking is that it should be buried underground across 18E. That way, as it's indicated, Newell Lake View subdivision is exactly what it is: Newell Lake view. And it wouldn't be in anybody's view or, as Larry was saying, out his window. So that's what I would like to say.	The rationale for the selection of the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS. Underground options were not selected for the reasons provided there.	Patricia Storm
Alternative		A	Public	I just want to put in front of you -- so I'm just really perplexed as to how they came up with that front end of Alternative A. I'm just really perplexed because I would love to take some WAPA engineers and walk that. It is very rugged. It's super difficult to get around. I can't think for the life of me why they would think that that would be actually a viable option to construct and maintain when they have something that they have already in existence, the existing easement.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Lucinda Van Inwagen
Alternative		A	Public	I would welcome to give them a tour and walk that line because it is extremely rugged. And, you know, I actually hear what you're saying about the trails and things like that. I think those things should be considered: our heritage, our legacies, our history.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Lucinda Van Inwagen

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Land Use and Recreation	West	A	Public	My concern with this is if they do come -- instead of using Alternate A up at Pole Hill on the western part there, if they come up through the main area like Neil was talking about, called 122, the four-wheel drive road, if they end up plowing that, the negative thing on that is -- like, some of the people at 22 the club have been talking. It's going to cause a lot more damage and overcrowding on other trails around, not to mention it will make a massive impact on the business, a reputable business, that's been up in Estes Park for several decades now, a company that employs several different guides and drivers. We do emphasize a lot on the environment and the historical aspects of the Pole Hill Trailhead. So I guess I would just -- I would be opposed to that.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative, Western has determined that the 4WD section of West Pole Hill Road would not be improved. It would be left in its current condition.	Craig Welker
Land Use and Recreation	West	A	Public	I would be more in favor of Alternate A on that western side right there. I don't know how hard it would be or if anybody would think about it, but right here where that little loop comes up, I don't know if there's some way of joining that right there and then coming over and then leaving this whole section right here alone; and then right in that little area right there that kind of goes out, that's the area called the Notch which has a beautiful overlook of the whole Estes Valley. We take a lot of our customers and stuff over there quite a bit. By doing that, if they used Alternate A up in that area, it will make minimal impact on that first section of the trail.	Western is very much aware of the value residents place on the visual aspects of their environment. Alternative C, the Agency Preferred Alternative, has been selected for the western portion of the project area. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources that would more than offset the incremental impact of taller structures on the other ROW. The replacement of an existing line with a new one should not have a substantial effect on a given property, and landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses.	Craig Welker
Alternative		A	Public	So I guess my choice would be to completely avoid that first section of that trail and stick on the western part there with Alternate A.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Craig Welker
General	West	General	Public	So there's a significant amount of infrastructure that we've had for decades supporting the infrastructure around Estes Park and the related communities.	Comment noted.	Bill Curren
General		General	Public	My second comment that I wanted to touch on were the routes that were outlined in detail and many of the variations around it. I think what's important, as I've already alluded to, is we have lots of infrastructure today, and we're going to have lots of infrastructure going forward on our property. We're a willing participant in that infrastructure that's, unfortunately, a necessary evil for all of us. None of 19 us wants it in our backyard, but we recognize the need for it. I think what's important, though, and leading into my last point, you know, is we are certainly encouraging WAPA to consider the route that meets all of their goals which are highlighted in the back, but certainly one that's fair.	Thank you for your comment.	Bill Curren
Alternative	All	General	Public	You've highlighted the safety, accessibility, cost. I think the fourth one was around fire resistance. All of those are critically important parts of it, but all of those goals, we believe, need to be met with mutually shared burden amongst all of us as members of this community, and I encourage that to be one of the driving considerations. Variant A-1, for example, does not meet that goal and really shifts the entire burden of these two power lines, along with all the other infrastructure that we have, onto one property owner. That would be one of the ones that we're not in support of.	Thank you for your comment.	Bill Curren
Visual	West	General	Public	My key remark that I would like to make has to do with the view, as the previous gentleman said. I like to use the word what we have here is a national treasure, and we ought to treat it as a treasure, as you would anything in your possession, a family heirloom or any other thing that you can think of that's a treasure. It's a national treasure. In fact, it's an international treasure. We have visitors from throughout the world who come here.	Thank you for your comment.	Cullen Darnell
Visual		General	Public	Now as a people, I think what we're faced with is, where are we going to go as far as visual? How important is it to us? ...Well, if you look at the particular area that concerns me most is that the operational issues are the primary concerns of WAPA. That's what their mission statement is. That's what they're rated on. So they're doing the job that they should. But the visual impact is the thing that we're going to leave as a legacy for our future generations. And the people during the 1930s didn't have that opportunity because transmission line limitation in terms of doing buried lines so that you protect the vision, the visual effects. They didn't have that available to them. It's only in the '50s and '60s that that particular technology started evolving rapidly.	Western is very much aware of the value residents place on the visual aspects of their environment. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources that would more than offset the incremental impact of taller structures on the other ROW. An underground option was not selected for the reasons discussed in that section.	Cullen Darnell
Visual		General	Public	So as you look at this, one of the limitations that I'm concerned about is that it's going to be costly to do buried lines that would protect the visual. ...Well, is there some way that we can try to move ourselves into a progressive stage where we can actually try to find the money to go ahead and preserve what is a national treasure?	While cost is an important consideration when considering underground construction, it is not the only one. Please see Section 2.2.4 for further information on the other issues associated with underground construction, and Section 2.8 for the rationale for selecting the Agency Preferred Alternative.	Cullen Darnell

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Proposed Project, Visual	West	General	Public	You know, I don't believe that the quantification of that particular category, the visual resources, that I would agree with some of the adjectives used here, like minor to moderate and so forth. This is going to be the start of something in a new decade that the '30s and the '50s had initiated. Is there some way that we can go beyond that and try to get the funds some way that we can protect the national treasure?	Impacts to visual resources are highly subjective and vary widely depending on the individual. Several methods have been developed to assess visual change or impacts that attempt to standardize impact ratings and terminology, and minimize bias in impact assessments. Tables in Section 2.9 of the Final EIS portray a quantitative presentation of visual impacts. Partial public funding is complicated by regulations governing Western's acceptance of funds from the public; legislation would likely be required to do this. Lacking public or appropriated funding from Congress, electrical power rates (either Western's wholesale power rates or participating utilities retail consumer rates) would pay for the proposed Project in any event.	Cullen Darnell
Socioeconomics		A,B	Public	The other part that I think I would review and see if there's some way of making more accurate judgment in one of these cells, is that would be the socioeconomics part, and it's specific under Alternate A and B, which is essentially the same. I feel the same about A and B. I have a personal interest in B. I'm only two lots away from the line in B. But Alternates A and B, it affects people living there in both places, and I would like to see, is there some way that those people can be -- their concerns addressed. But here's the thing -- a minor decrease in property values as a result of taller structures and, conversely, minor increases in property values where the structures would be removed, I personally don't agree with that. I think that it's pretty significant decreases and increases in value. Very significant.	As detailed in Section 4.13 , most peer-reviewed studies in the literature found no effect to property values when adjacent to electrical transmission lines, which was attributed to the addition of open space contributed by the transmission line easement. Additionally, in the case of this project, many of the residences have property values that have taken into account the presence of the transmission lines because they have been built near or against the easements of the existing transmission lines. Furthermore, as detailed in Section 2.2.2 , shorter average height structures with a shorter span length would be considered in sensitive communities. Shorter structures do have a trade-off, however. With shorter structures the spans have to be reduced to maintain center-span clearances, and with shorter spans more structures are needed over a given length of line.	Cullen Darnell
Electrical		General	Public	One of the issues is the fact of looking at, is there any health issues on this. Obviously, it's -- there's been all sorts of studies done. There hasn't ever been any definite linkages to that, but the one that's kind of a weak cause and effect that's been established is some different types of cancer with children that are close to the facilities. ...There's been a lot of progress made, but we have never -- as a society, as a human race, we have not been able to demonstrate that there is no connection. We haven't been able to prove there is a connection. ...There's a lot of work, but there's no substantial data that's proven definitely that there's no linkage, nor is there any definite linkage other than the child cancer thing.	The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot ROW. A more detailed description of EMF found in Sections 3.14.1.3 and 4.14.5.1 .	Cullen Darnell
Socioeconomics		General	Public	Whenever you couple that with the other concern I had about the socioeconomic issue, I think what you see is that people that are adjacent to the right of ways are going to be the ones that are probably going to be impacted most by this economically.	As detailed in Section 4.13 , most peer-reviewed studies in the literature found no effect to property values when adjacent to electrical transmission lines, which was attributed to the addition of open space contributed by the transmission line easement. Additionally, in the case of this project, many of the residences have property values that have taken into account the presence of the transmission lines because they have been built near or against the easements of the existing transmission lines.	Cullen Darnell
General		General	Public	And the only real suggestion I had as far as the study -- thought it was excellent, too -- but it perhaps did not give enough weight to people. That kind of seems like that's a tree falling in the forest. Does it make noise? It doesn't really matter if there's no people around.	Thank you for your comment.	Gordon Pedersen
Alternative	West	General	Public	There are half a dozen homes right up here at the top where it goes over the top of Pole Hill. We're concerned with that.	Western is aware of the location of these homes, and they are one of several considerations Western needed to balance to determine its Agency Preferred Alternative.	Gordon Pedersen
Alternative	All	A1,C2	Public	The other thing is, I think we're mainly in favor of the -- well, we like Variant A-2 and C-1, underground, obviously.	Please see Section 2.8 of the Final EIS for a discussion of the rationale for the selection of the Agency Preferred Alternative. For the reasons given there, an underground option was not selected for the Agency Preferred Alternative. Because of the need to maintain a shrub-free 50-foot-wide zone over buried lines, an underground line may not be less visible than an overhead line, and the cleared ROW would likely have more visual influence than would the presence of structures at a distance. Please see Appendix C in the Final EIS for comparisons of visual simulations.	Gordon Pedersen
General	West	General	Public	The other thing I would say right now, and a big concern of the town as well, is the power lines that run across Lake Estes. We recognize that's not part of this study, but we think there's going to be a strong urging to underground those power lines from the town and the 6,000 people that are affected, as well as a couple million tourists.	The lattice steel line across the lake is not within the scope of this Project. The purpose and need for the proposed Project is the aging existing wood pole lines. Western is aware of the desire to underground the existing section of lattice steel line that crosses the lake, and believes that undergrounding of this segment would be seriously considered when the time comes to rebuild that section of line.	Gordon Pedersen
Visual	West	General	Public	The first of those point is economic impact. All but two of the routes would include clearcuts that go along U.S. 36. ...Everybody that lives here moved here for the views. Everybody that has a business here makes their money off of the views. The views are very important to us. U.S. 36 is the gateway to those views. If you do 300-foot clearcuts along U.S. 36, that will have an impact on us. It will have an impact on our lives in the sense we don't really appreciate it as much.	Western is very much aware of the value residents place on the visual aspects of their environment. Alternative C, the Agency Preferred Alternative, has been selected for the western portion of the project area. New ROW would be required near U.S. Highway 36, which is intended to reduce visibility from the highway. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources that would more than offset the incremental impact of taller structures on the other ROW.	Larry Lawson

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Socioeconomics	West	General	Public	Point Two is community standard. Estes Park imposes on itself a standard of burying its power lines because that improves the view. Somebody said, "Well, should people have to pay for that?" ...Everybody that builds a house here pays to have their power lines buried. Okay. So paying to -- people having to pay to have their power lines buried is not new. It's this thing that's new. ...Somebody said, "Well, gee, should taxpayers have to pay for that?" But it's my understanding that WAPA is not a tax -- primarily a taxpayer-supported entity. Maybe someone can clear me up on that. It's an enterprise entity of the federal government, not a taxpayer-supported entity. So when we say people shouldn't have to pay, you're saying the customers shouldn't have to pay the full price of their product. I don't think that we hold to that standard in other places, and I don't think we should be held to that standard here. ...Anyway, I think that paying for burying power lines is not new, and that's going to be paid for by the customers, by the users of that power.	There are major differences between burying a power distribution line to residences and constructing an underground high-voltage transmission line. Simple trenching and direct burial of residential service distribution lines is routine, easily accomplished, and inexpensive so long as no rock is encountered. See Section 2.2.4 of the Final EIS for a description of how an underground transmission line would need to be constructed. Western is not taxpayer supported, but funds itself through its power rates and customer financing. If an underground option would have been selected, the additional cost would have to be recovered through an increase in wholesale power rates Western charges its customers, and they would in turn pass the cost on to retail power consumers.	Larry Lawson
Socioeconomics	West	General	Public	Okay. The next thing then is economic justice. Should the people of Estes Park pay more by having power towers in their yards as well as having to pay for the electricity, or should the cost of that electricity be spread over all of the customers? There's some debate over how much it costs to bury power lines. It costs a lot, okay? But then if you say if you spread that over 20 or 30 years and you spread that over -- well, WAPA covers from the Canadian border to Mexico, but undoubtedly these power lines don't help all those people. Probably they help Weld County and probably they help Larimer County and probably they help Boulder County. If you spread the cost over those people and over a number of years, it might be 50 cents a month, or it might be a dollar a month, but it's not an overwhelming burden. It's not -- the argument of economic justice says we should all bear that cost. We should pay more for our electricity, and other people should too, but we should not pay more. We should not pay by paying for the electricity and paying for it by having a pole in our front yard.	Western has a number of different power rates that are defined largely by power project; power projects are the generation components of the Federal hydroelectric dams and water storage/delivery projects authorized by Congress. Power rates are determined by calculating the repayment costs, operations and maintenance costs, replacement costs, interest payments, and all other costs of the specific project, according to the authorizing legislation. So, while the cost of the Estes-Flatiron Project would be included in the power rate Western charges its customers, the rate increase would only affect Loveland Area Projects customers. As for the location of the line, Western has endeavored to remain on existing ROW to the extent possible to minimize property impacts, departing from existing ROW only where other resource concerns prevail.	Larry Lawson
Alternative	All	General	Public	One of the points that was made yesterday that I thought was really good was that this really needs to be broken down into two separate conversations between what happens on the east and what happens in the west and how it is defined with the A's and A-1's or the Bs. It needs to be -- it needs to be more clear. The people that are affected most on one side or another should kind of have a little more weight on what is said on that particular part of it.	The Final EIS includes tables in Section 2.9 that portray the two ends of the ROW as individual alternative options so that impacts to Key Issues on each end can be separately assessed.	Neil OMaley
Transportation	West	General	Public	We provide a service in bringing people up there, which is a four-wheel drive experience. One of the options is to grade Pole Hill, the four-wheel drive road, down to dirt so tractor trailers can go up there. There are no provisions in there to bring it back to its original state, not that I believe it could be after it was done. But it will take away the entire -- it will take away our business, not only our business, but we provide many jobs here in the Estes area, both seasonal and full time, to support this. So one of the things -- so not only will this -- if this direction is taken, that the road will be brought down to dirt, but there will be numerous homes along that corridor -- Ravenscrest and all those folks up on Pole Hill that currently don't see the power lines or they see them in a very minimal aspect, they will be greatly affected by this.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative, Western has determined that no improvements to West Pole Hill Road would be made. Accordingly, there would be no impact on the 4WD section, and no impact to the permittee except possibly some temporary access during actual construction in that vicinity.	Neil OMaley
Alternative		General	Public	The thing that I find fascinating is that a lot of this work that we're told is being done is -- we don't have to change exactly what we have. We can replace a lot of the power lines and continue on with the normal path that we have. Nobody is -- I don't know if many people are actually talking about that. For some areas, I think that might be the best option, because they are fairly low impacts in terms of visual.	Alternative D was considered as an option; that alternative would replace both lines in kind. For the reasons discussed in Section 2.8 of the Final EIS, that option was not selected. Although somewhat taller structures would be used in the double-circuit alternatives, one of the two existing ROWs would have the existing transmission line removed. That ROW would be abandoned and allowed to revert to natural vegetation, a substantial improvement over current visual conditions.	Neil OMaley
Visual	West	General	Public	You know, we -- numerous people have said the views, the views, the views. You're absolutely right. One of my good friends, who I would like to quote, he said, "Do you know the reason why people come to Estes Park?" He said, "It's because people live in ugly places." And that is so true. So we have three or four million people a year come up to just -- and these are just the numbers that recorded by the national park. So there's probably even more people that are coming into, you know, Estes that are not even going into the park. Everything that we can do to preserve this national treasure -- like has been mentioned before, it's not just the national park. It's all of this land that we're in. Anything we can do to bury lines, to protect the views, and look at a very long range is extremely important. I don't know how to overemphasize this. Wherever there's a visual impact that we can reduce it and make values of people's properties better, we need to strive mightily to do so. Because unlike those other people that come from ugly places, a power line in their backyard or that's in the distant view or in a view that they can see may not be that bad. That might be the only thing they get to see besides a bunch of homes. But that's not the way it is for us up here.	Western is very much aware of the value residents place on the visual aspects of their environment. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources that would more than offset the incremental impact of taller structures on the other ROW. Section 2.8 of the Final EIS addresses the rationale for Western's selection of its Agency Preferred Alternative. An underground option was not selected for the reasons discussed in that section.	Neil OMaley

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Transportation	West	General	Public	We do not want this road to be turned to dust. And something that's very interesting, too, is that the United States Forest Service does not want that to happen either. They have very specific and exact, precise language that states they do not want the rugged nature of Pole Hill Road to be changed at all for a very big piece of it.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, due to Forest Service concerns about improvements to the 4WD section of West Pole Hill Road, Western has determined that no improvements to this section of road would be made as part of the APA.	Neil O'Maley
Transportation	All	General	Public	So I just want to sum up that we work with the United States Forest Service. We work with Big Thompson 4-Wheelers, and we in agreement with the national forest service and the recommendation to leave the natural trail just the way it is. It is an historic route that was established from Loveland to Estes Park. It was first used by Native Americans, and then it was used by the settlers. We have actual historical indicators that wagons, Conestoga-style wagons, have been down there and used that trail extensively; hence the name -- the reason for the name, why it's called Pole Hill, is because of what they had to do in order to get their wagons safely down that road.	Short-term and long-term impacts, both beneficial and adverse, from improving Pole Hill Road under Alternatives C and C1 are described in Section 4.16.5 in the Final EIS. However, under the Agency Preferred Alternative (APA), Western has determined that it would not upgrade the 4WD section of Pole Hill Road.	Neil O'Maley
General	West	General	Public	I would say that two themes are very, very familiar from all of those conversations that I've had: Not in my backyard, and; We have to protect the views. We understand that the not-in-my-backyard argument is not going to hold water with WAPA, okay? And that's understandable. That's certainly something that, if I were in their shoes, I'd have to discount that as well. It's not a vote. It's not a popular vote. It's what's best for the Estes Valley and what's best for the customers of WAPA.	The commenter identifies two of the wide range of issues and concerns Western must consider a in order to arrive at a decision for the proposed Project. The NEPA process is designed to solicit input on any and all factors important to the public. In addition, Western must consider natural resources, economics, laws, regulations, access, operations and maintenance, and a host of other factors in its decision making. The rationale for the selection of the agency Preferred Alternative is provided in Section 2.8 of the Final EIS.	Larry Pearson
Visual	West	General	Public	So we come to the views ...You came up one of the most scenic, beautiful drives anywhere in the world. ...But that view then becomes scarred by power lines that were built 60, 80 years ago. But we have a great opportunity to reclaim that scenic beauty of the Estes Valley. I think we know that the Town of Estes Park has a guideline that any new power line should be buried. That's because they're working to reclaim the scenic view and the scenic beauty of the Estes Valley. ...if money is the issue, we need to look for opportunities for public-private partnerships to try to bury the lines. So Variant A-2, we believe, is the best option to reclaim the lines -- or reclaim that scenic beauty -- correction on that -- reclaim that scenic beauty and also affect the least number of property owners. We understand that it has higher costs, but we need to figure out a way to do it.	Western is very much aware of the value residents place on the visual aspects of their environment. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources that would more than offset the incremental impact of taller structures on the other ROW. Undergrounding a high-voltage transmission line is far different than the direct burial of a residential distribution line. A description of constructing a buried transmission line is provided in Section 2.2.4 of the Final EIS. Section 2.8 of the Final EIS addresses the rationale for Western's selection of its Agency Preferred Alternative. An underground option was not selected for the reasons discussed in that section.	Larry Pearson
Visual	West	General	Public	And one of the things I think is really important is to -- if you're going to go backwards, if you decide to put the poles in and just kind of keep on the same route, you need to -- if you put in higher poles -- and even the poles that are there, they do affect the property values extensively. And it is not minor. It's a lot. And the fellow that talked about power poles in cities where you see the same kind of structures and people don't notice them, that's probably true. But up in Meadowdale Hills, it's a real factor. By replacing those existing poles into taller poles and then just keeping on with the same old, same old, let's not do that. Let's protect what we have. Views are important. Absolutely. But everything is important. Let's move forward, burying the lines, doing whatever needs to be done. If it takes longer, fine. And then asking for help from the community of Estes Park, too, because I think WAPA would be surprised as to the feeling, the general feeling, about this as far as getting the lines buried. But also coming down 36. That just -- and up in Meadowdale Hills. Let's do it right while we have the chance.	There have been several alternative routes studied in the EIS, all involve some sort of resource trade-offs, and most, including the Agency Preferred Alternative, include the removal of one of the two existing lines and abandonment of the ROW. This would result in an improvement to the existing visual setting that would more than offset the incremental impact of taller structures on the other ROW. Western's rationale for the selection of the Agency Preferred Alternative is presented in Section 2.8 of the Final EIS. Commenter may well be correct that proximity to a transmission line and EMF source may cause a potential buyer to not purchase a particular property. However, as detailed in Section 4.13 , property valuations are based on actual property transactions, and the studies done on transmission lines and property values largely show no or minor negative impacts to property values, and that any impacts tend to diminish over a few years. What the studies indicate is that while some people may object to the presence of a transmission line, there are still enough ready buyers that property values are not greatly affected, and the longer a line is present the more it becomes part of the background, and the less of a factor it is. Western also notes that these studies look at the impact of a new transmission line on property values, and not an upgrade of an existing line, where valuation considerations would be expected to be embedded in the present value of the property, and the presence of a line has been accepted. In the case of this project, many of the residences have property values that have already taken into account the existing transmission lines and easements.	Connie Phipps
Visual	West	General	Public	The views are why we live here. When I come home from traveling the world, which I seem to be doing more and more often these days, everything is pretty good view-wise coming up here. You get to the top of Pole Hill, and it's still pretty good, pretty good, pretty good coming down Pole Hill. But then somewhere around in here, this area here -- and I can't see where Highway 36 actually intersects the lines -- things get pretty bad. Being a rock climber, one of the first things I look at, other than the view when I come over the hill and say, "Okay. I'm home. This is great," one of the thirteenth things I look at is Lumpy Ridge because I spend a lot of time on those rocks over there. To have those big 115 kilovolt lines obstructing that view is entirely offensive to me. Then I come down here and, of course, the great evil of all times put in in the late '40s, the huge structures going across the lake.	Western is very much aware of the value residents place on the visual aspects of their environment. Alternative C, the Agency Preferred Alternative, has been selected for the western portion of the project area. New ROW would be required near U.S. Highway 36, which is intended to reduce visibility from the highway. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources that would more than offset the incremental impact of taller structures on the other ROW. An underground option was not selected for the reasons discussed in that section. Western knows that the removal of the lattice steel structures along the causeway would greatly improve the visual situation coming into Estes Park, but that segment is not included in the proposed Project, and is beyond the scope of this EIS.	Chris Reveley

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	West	General	Public	One thing we can agree on is that we don't want to make our town uglier. In fact, we might even all be able to agree on the idea that we want to make our town more attractive. That's a win, win, win for every individual and every faction in this town.	Thank you for your comment.	Chris Reveley
Alternative	All	General	Public	So I would be in favor of making these lines disappear. I looked into undergrounding. It's expensive, but very, very feasible with 115 kilovolt lines. In fact, they underground 230 kilovolt lines in other parts of the world. It's done all the time these days.	Please see Section 2.8 of the Final EIS for a discussion of the rationale for the selection of the Agency Preferred Alternative. For the reasons given there, an underground option was not selected for the Agency Preferred Alternative. Please see Appendix C in the Final EIS for comparisons of visual simulations.	Chris Reveley
General	West	General	Public	The other thing everybody in town would agree on, I believe, is that hydroelectric power is a good source of energy. So really if you back off several frames, the two alternatives are to rip down all the infrastructure and quit generating power in Estes Park or try and make this better for everybody. Well, I don't think anybody wants to tear it all down. So let's do everything we can to make this more attractive to the people who live here, the visitors, and all the people in the future who are going to be coming here from all over the world. If it costs 25 million bucks to do that, that's a bargain.	Western has endeavored to balance the many factors it needs to consider in its decision making. Please see Section 2.8 of the Final EIS for a discussion of the rationale behind the Agency Preferred Alternative.	Chris Reveley
Electrical		General	Public	I have an easement, and so we have power lines going over our property. So we're mainly concerned about the health effects. We just don't know. And we're going to have a lot more power going within -- you know, pretty close to our house. So that's our main concern. I agree with everything everyone else said, but that's our main thing. It just seems like if you can avoid putting those huge power lines through a crowded neighborhood, we should do it. That's all.	The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within the 110-foot ROW. A more detailed description of EMF found in Sections 3.14.1.3 and 4.14.5.1 .	Mary Elizabeth Smith
Proposed Project		General	Public	...we want Western Power to think beyond this project. I want them to think how this actually might be a hundred-year project. We're planning for now, and undergrounding in this phase will facilitate what comes next. That is possibly widening the causeway, setting the conduits to get rid of the lattice work that's there now. Essentially, that's what I wanted to say. I think it's let's get our planning horizon beyond this ten-year project, or however long it's going to take, and get to the future and make it as easy for those coming after us to tie into that system and just complete the project as an underground project.	Section 2.8 of the Final EIS describes the methods and considerations for choosing the Preferred Alternative. For the reasons discussed there, no underground options were included in the Agency Preferred Alternative for this project. Western agrees that when the time comes to replace the lattice steel structures along the causeway, underground construction would likely be the preferred course of action. At that time the location of the transition structures would need to be determined, and the extent of the underground segment defined.	Chip Sproule
Visual	West	General	Public	Just really briefly, when I first came to Colorado and came up to Estes Park, I was stunned by the power poles. I thought it was so ugly coming into Estes that it was hard to notice the gorgeous valley. So our family decided to buy a cabin over in Grand Lake. We've been going to Grand Lake for about 25 years. We took our family dollars, vacation dollars, to Grand Lake. Here we are in Estes, finally after 25 years paying attention to what this incredible community has to offer after years of Grand Lake. But we didn't see it because I was so blinded by those ugly, ugly, power poles.	Western is well aware that the removal of the lattice steel structures along the causeway would greatly improve the visual situation coming into Estes Park, but that segment is not included in the proposed Project, and is beyond the scope of this EIS.	Carol Thomas
Alternative	East	A	Public	I have lived in the Pinewood area for 17 years and purchased my 20 acre parcel in 2010 to build my dream home. Now the proposed new lines will cross directly over my new building site. I plan to go forward with the building of structures, so please be advised that the home and all the outbuildings will be in place within this next year. I would also like to note that my property is very unique and remote. It is only accessed by a very narrow steep mountain road which is on the north slope and stays icy all winter long, which makes large truck travel out of the question. As proposed now, the huge granite outcroppings would have to be blasted out for large truck access to be feasible. We understand the need to upgrade the power transmission lines, but we do not understand why, with all of the existing easements and power lines in place now, we need an additional new scar to our landscape. The environmental, economic and logistical feasibility of Alternative A with all of the existing alternatives makes no sense at all.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	George L. Archey, Jr.

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
General		General	Public	<p>Duplicate, see comment letter 74</p> <p style="text-align: center;">ALTERNATIVE A</p> <p>As outlined in the Pinewood community group statement (titled "WAPA Rebuild Project-Group Statement.pdf"), Alternative A would require the acquisition of new rights-of-way (RoWs) and the development of access roads through steep, heavily forested terrain on the north side of Green Mountain. The resulting loss of trees would not only irreparably destroy the visual beauty of the area, but would also likely lead to severe erosion. Wildlife would be displaced – not only mammals, but also (according to my next-door neighbors, who are dedicated birdwatchers) more than 50 species of birds.</p> <p>Like many of my neighbors, I bought a home in the Pinewood community because I wanted to enjoy the peace and beauty of the mountain and its wild creatures. Although my house is on the south side, I walk almost every day (both for pleasure and for health reasons) to the top of Green Mountain and along the north side. If Alternative A is chosen, the peace and beauty would be gone forever. Walking would become a distressing chore rather than a pleasure, and this would surely have an adverse effect on my health. A third issue is that of cell phone reception. Currently, we have little reception in our area, but as one goes up Green Mountain Drive toward the top, there are some spots where it is possible to get a signal. I have been advised by a Verizon customer service representative that a high-voltage transmission line on the north side of Green Mountain would reduce what little cell reception we have by approximately 50%. This situation would be more than inconvenient; it could be dangerous. Some of my neighbors have no land line; they have Skybeam phone service, which utilizes the internet. If their internet service goes down (as it sometimes does), their only way of communicating with the outside world (short of leaving home) is by cell phone. During times of severe fire danger, I have often carried my cell phone with me on my walks, so that I can call 911 if I see smoke. It appears that Alternative A would not only increase our fire risk, it could also decrease our ability to respond rapidly in the event of a fire.</p> <p style="text-align: center;">A third issue is that of cell phone reception. Currently, we have little reception in our area, but as one goes up Green Mountain Drive toward the top, there are some spots where it is possible to get a signal. I have been advised by a Verizon customer service representative that a high-voltage transmission line on the north side of Green Mountain would reduce what little cell reception we have by approximately 50%. This situation would be more than inconvenient; it could be dangerous. Some of my neighbors have no land line; they have Skybeam phone service, which utilizes the internet. If their internet service goes down (as it sometimes does), their only way of communicating with the outside world (short of leaving home) is by cell phone. During times of severe fire danger, I have often carried my cell phone with me on my walks, so that I can call 911 if I see smoke. It appears that Alternative A would not only increase our fire risk, it could also decrease our ability to respond rapidly in the event of a fire.</p> <p style="text-align: center;">ALTERNATIVES C/D</p> <p>Currently, the north transmission line goes almost directly over my next-door neighbor's house. Although it is very close to my house, it is not visually obtrusive for me, because it is downslope from my property. Alternatives C or D would move it further away, but might also mar my view, depending on the exact location of the poles. Even so, my major concern about C and D is not so much the view, but the fate of the old schoolhouse on County Road 18E. The schoolhouse was built in 1910 – so it belongs to an era that was even before my mother's time. The current owners bought it in order to restore it as a historical site. Several years ago, they gave an open house for the community. My mother and I went to the open house, and saw the inside of the building, as well as photographs showing what it looked like when it was still in use as a schoolhouse. Alternatives C or D would likely put an end to the restoration plans. This would harm not only the owners, but all – including myself – who care about remembering the past. How sad it would be to lose this unique historical and cultural resource.</p>	<p>Alternative A was not selected to be a part of the Agency Preferred Alternative in this area. Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative. EMF from modern transmission lines is at a very low 60 hertz, far lower than the 800-2,500 megahertz ultra-high frequency ranges used by cell phones. EMF at 60 hertz do not cause cell phone or landline interference. In fact, cell phone transmitter/receiver equipment found on typical cell towers is routinely mounted to transmission line structures in developed areas where space is limited. For similar reasons the transmission line would not affect radio or TV frequencies. In isolated instances loose or damaged conductors or hardware can cause arcing, which can result in broadband interference at close distances. Once reported these issues are easily resolved. Removal of the section of existing line through the subdivision is part of all alternatives. One pole of each structure and a fiber optic ground wire would be left in place to maintain communications with the Bureau of Reclamation's dam.</p> <p>Alternatives C and D were designed to accomplish the removal of the line in the neighborhood with minimal relocation and maximum use of existing ROW. After consideration of all of the factors Western must take into account, including public input, Alternative B was selected as part of the Agency Preferred Alternative in this area. This alternative would avoid the Pinewood Schoolhouse. For a discussion of the rationale used for selecting the Agency Preferred Alternative, please see Section 2.8 of the Final EIS. An underground alternative for the western end of the Project was not selected. The commenter's suggestion is not a viable option as a result of the short ruling span, fire risk, increased visual impact, and increased maintenance of the double-circuit 115-kV wood-pole H-frame structures. Self-weathering steel monopoles were considered, and resemble wood poles in color. Opinions vary as to whether self-weathering or galvanized poles are visually superior; however, the latest field experience information from the utility industry on self-weathering structures indicates that ongoing corrosion weakens these structures, therefore shortening their expected service life. For this reason, and the fact the Forest Service prefers dull galvanized steel, self-weathering steel structures would not be used for this project. Commenter is correct that 40-odd years of research has not demonstrated a link between EMF exposure and human health effects. While some suggestions of a relationship have been reported, the degree of association has been weak, and study results have not been replicated, a critical factor in scientific proof. The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines, due to the cancellation effects from conductor arrangement on double-circuit lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within a 110-foot ROW. Alternative B has been included as part of the Agency Preferred Alternative, but not because of EMF concerns. As detailed in Section 4.14.3.5, the maximum induced electrical field of any of the proposed alternatives is estimated at 0.5 kV/m, well below the estimated interference threshold of 3.4-kV/M. Therefore, with operation at 115 kV, the proposed project would not pose a risk to pacemaker wearers. A more detailed description of EMF as they relate to potential health effects is found in Sections 3.14.1.3 and 4.14.5.1. EMF is further expounded upon in Appendix D.</p>	Pamela Mausner, MD

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
				<p>ALTERNATIVE B</p> <p>In the Pinewood area, this alternative corresponds to the current south transmission line, running through the ranchlands on the south side of Pinewood Reservoir. As outlined in the group statement, the already-existing RoW is adequate; it is also easy to access because the terrain is relatively flat and open, with few trees. With this alternative, the transmission lines would be a good distance away from our subdivision. Even with the taller steel monopoles, I believe the view from the subdivision and from County Road 18E would be minimally impacted.</p> <p>Understandably, the ranchers do not want Alternative B. However, it is my understanding that the RoWs and transmission lines were already present when they purchased those properties. It's like buying a house near an airport, and then complaining about the noise. Furthermore, to offload the transmission lines onto a new group of landowners (as in Alternative A), who bought their homes with no expectation that this could ever happen, would be extremely unfair. This deeply violates my sense of justice. What's more, some of my friends are among the people who would be most severely impacted by Alternative A – and if they are harmed, then so am I.</p> <p>For these reasons (as well as those discussed below in my statement about possible health effects), I feel strongly that, for the Pinewood Reservoir area, Alternative B is the only acceptable alternative. The ideal solution would be to bury the lines through the ranchland and open space areas. I understand that the Estes Park end of the project will have buried lines, but this is considered not to be cost effective on the Pinewood end. In that case, I strongly recommend the use of wooden H-frames, rather than steel monopoles, in the ranchland and open space areas. Although taller than the current structures, the H-frames would blend in much better than steel monopoles so that, visually, they would not be much worse than what we have now -- and might even be better, because there would be fewer of them. This would ameliorate the impact on the ranchers, as well as on subdivision residents who may be concerned about having the monopoles in their viewshed.</p> <p>POSSIBLE HEALTH EFFECTS OF HIGH-VOLTAGE TRANSMISSION LINES</p> <p>The presence of transmission lines in populated areas raises the issue of possible health effects. When I first learned of the Estes-to-Flatiron Transmission Lines Rebuild Project 2 years ago, I scanned the medical literature and submitted comments to WAPA summarizing what I found. Recently, I updated my previous literature search. Although time limitations do not permit a comprehensive review, I believe I have a good overall impression of where these issues currently stand. In the following comments, I will focus on two persistent concerns: childhood leukemia and interference with cardiac pacemakers.</p> <p>Childhood leukemia</p> <p>To summarize: In 2014, it is still unclear whether exposure to high-voltage transmission lines causes childhood leukemia – and, if it does, how far away from the lines the risk extends. Further research is needed to resolve these uncertainties. Meanwhile, the safest course of action is to locate high-voltage transmission lines as far away as feasible from more populated areas. For the Pinewood Reservoir area, this would best be accomplished by choosing Alternative B.</p> <p>Cardiac pacemakers and defibrillators</p> <p>It is well known that EMFs at power line frequencies (50-60 Hz) can interfere with pacemakers and defibrillators. Whether or not electromagnetic interference (EMI) occurs depends on numerous variables, including: [THOSE LISTED IN COMMENT]</p> <p>Multiple experts have concluded that, with appropriate pacemaker settings, symptomatic or dangerous EMI due to transmission lines is unlikely to occur in everyday life – but that the possibility cannot be completely ruled out, especially with unipolar pacemakers.</p>	<p>Alternative A was not selected to be a part of the Agency Preferred Alternative in this area. Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative. EMF from modern transmission lines is at a very low 60 hertz, far lower than the 800-2,500 megahertz ultra-high frequency ranges used by cell phones. EMF at 60 hertz do not cause cell phone or landline interference. In fact, cell phone transmitter/receiver equipment found on typical cell towers is routinely mounted to transmission line structures in developed areas where space is limited. For similar reasons the transmission line would not affect radio or TV frequencies. In isolated instances loose or damaged conductors or hardware can cause arcing, which can result in broadband interference at close distances. Once reported these issues are easily resolved. Removal of the section of existing line through the subdivision is part of all alternatives. One pole of each structure and a fiber optic ground wire would be left in place to maintain communications with the Bureau of Reclamation's dam.</p> <p>Alternatives C and D were designed to accomplish the removal of the line in the neighborhood with minimal relocation and maximum use of existing ROW. After consideration of all of the factors Western must take into account, including public input, Alternative B was selected as part of the Agency Preferred Alternative in this area. This alternative would avoid the Pinewood Schoolhouse. For a discussion of the rationale used for selecting the Agency Preferred Alternative, please see Section 2.8 of the Final EIS. An underground alternative for the western end of the Project was not selected. The commenter's suggestion is not a viable option as a result of the short ruling span, fire risk, increased visual impact, and increased maintenance of the double-circuit 115-kV wood-pole H-frame structures. Self-weathering steel monopoles were considered, and resemble wood poles in color. Opinions vary as to whether self-weathering or galvanized poles are visually superior; however, the latest field experience information from the utility industry on self-weathering structures indicates that ongoing corrosion weakens these structures, therefore shortening their expected service life. For this reason, and the fact the Forest Service prefers dull galvanized steel, self-weathering steel structures would not be used for this project. Commenter is correct that 40-odd years of research has not demonstrated a link between EMF exposure and human health effects. While some suggestions of a relationship have been reported, the degree of association has been weak, and study results have not been replicated, a critical factor in scientific proof. The transmission lines would be designed to minimize EMF and would produce electric fields that are 70 percent less at the edge of the ROW than the existing lines, due to the cancellation effects from conductor arrangement on double-circuit lines. Additionally, the new double-circuit line would reduce magnetic field levels to less than the existing H-frame line within a 110-foot ROW. Alternative B has been included as part of the Agency Preferred Alternative, but not because of EMF concerns. As detailed in Section 4.14.3.5, the maximum induced electrical field of any of the proposed alternatives is estimated at 0.5 kV/m, well below the estimated interference threshold of 3.4-kV/M. Therefore, with operation at 115 kV, the proposed project would not pose a risk to pacemaker wearers. A more detailed description of EMF as they relate to potential health effects is found in Sections 3.14.1.3 and 4.14.5.1. EMF is further expounded upon in Appendix D.</p>	
Socioeconomics	West		Public	<p>It is my opinion that constructing a large power line above the Meadowdale Hills subdivision would constitute a large intrusion into the valuation of the properties in that area and could be viewed as "takings" in Colorado. Please consider the contents of the letter and respond per your best judgement to the large number of homeowners and property owners in the Estes Park Valley, especially Meadowdale Hills Subdivision.</p>	<p>Alternatives that maximize the use of existing ROWs are considered to have the least economic effects. Any influence on property values should already be factored into the current existing valuation due to the presence of the existing transmission line, and the easement is already an encumbrance on the property. The replacement of an existing line with a new one should not have a substantial effect on a given property, and landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses. The economic effect of the proposed project is detailed in Section 4.13. In order to reduce visibility, special design measures would be considered for the Meadowdale Hills subdivision, including the use of structures with a lower height and shorter span. Lower height structures, if selected, would be approximately 10 to 20 higher than the existing H-frame wooden poles. Visual simulations of the structures are depicted in Appendix C. Rationale for the selection of the Agency Preferred Alternative is detailed in Section 2.8.</p>	Carol Barsch Bontrager
Visual	West	General	Public	<p>3.12.1.1 Visual Resource Definitions</p> <p>Scenic Attractiveness - Identifies Classes A -C with A = distinctive, B = typical and C = Indistinctive. Based on these classification I strongly disagree with the Table 3.12 - 1 classification of Estes Park as a Class B (typical) Scenic Attractiveness. With over 3 Million visitors a year and scenic overlooks of the Estes Valley, Estes Park is definitely NOT a "typical" Visual Resource! I can only believe that the Scenic Attractiveness classification was driven by a desire to decrease the importance given to the visual degradation of the proposed 105' power line structures in the final EIS.</p>	<p>The Scenic Attractiveness inventory was completed by a contractor (ViewPoints West) for the USFS in 2009 and was based on the characteristic landscape at that time, without regard for future changes to the landscape. That study was completed before this Project was proposed, so Western had no input in the analysis. The study results were independent of the proposed Project.</p>	Todd Plummer

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
Visual	West	General	Public	<p>3.12.2.4 State and Local Visual Resource Guidance It is stated that, "Ridgeline protection areas have been designated at the entrances to the valley. Developments in these areas require a special review process. The proposed project does not cross a designated ridgeline protection area." The implication is, since the project "does not cross" a designated ridgeline protection area that ridgeline protection isn't of concern. In fact the ridgeline protection areas, by their very existence, indicate the importance of not creating structures that impact the visual integrity of the ridgeline views. The ridgeline protection areas were created for development that complies with existing zoning height limits. Since the transmission line structures are many times the zoning height limits they need to be assessed based on the intent of the zoning regulations. The ridgeline protection areas for 105' tall structures would far exceed the current designated protection areas.</p>	Thank you for your comment. The designated ridgeline protection areas are important components of scenery management, however, none of the project alternatives cross a designated ridgeline protection area.	Todd Plummer
Visual		A2/C1	Public	<p>Appendix C Key Observation Points and Visualizations KOP 12 Underground Variant A2/C1 This visualization shows the Transition Structure required to go from the overhead lines to underground cables. The height of the Transition Structure shown is 108'. The height of the Transition Structure has a huge impact on the analysis of the impacts of proposed alternatives. Seeing a 108' structure towering above everything else in the visualization, makes one think that "It isn't worth it, if that is what it will look like." My research indicates that 115kv transition structures are more typically 50' - 80' in height. That could make a dramatic difference in the "assessed value" of a design alternative.</p>	Thank you for your comment. The height (108') used in the simulation is the conservative or "worst-case" visualization of the project. Lesser heights could actually be used, depending on the outcome of design and engineering. A shorter structure would of course be less visually intrusive, and micro-siting to take advantage of vegetative screening or topography could further lessen effects. However, shorter structures mean shorter span lengths to maintain necessary ground clearance, and more structures per mile.	Todd Plummer
General and Visual	All	D	Public	<p>There seemed to be little effort put toward minimizing the impact of the reconstruction project. The design seems to be based on decisions that are never mentioned nor alternatives considered. For instance, Option D suggests that the line could be rebuilt with poles of comparable heights to the existing poles, but no visualizations or costing was provided for a rerouting option with shorter poles. Why are all of the rerouting proposals for 105' poles? There are "visually critical" areas along this rebuild proposal that could benefit from reduced pole heights. Isn't that an option worthy of consideration?</p>	<p>Western disagrees with the commenter's first point - the entire EIS process is designed to identify and analyze environmental impacts. Simulations for Alternative D were not considered necessary because that alternative would simply rebuild both lines as they now are. Costing of shorter steel structures was not possible because it has yet to be determined where the use of shorter structures would be considered. Shorter poles require more structures per mile, and there is considerable difference of opinion whether more shorter structures is visually preferable to fewer but taller structures. The taller structures are required for double-circuit lines and were used in the analysis because tall poles represented a worst case scenario for impact most calculations. Shorter structures would be considered during the design and engineering process where advantageous. Conductor-to-ground and circuit-to-circuit clearances are mandated by regulation for safety and reliability reasons, and those clearances establish structure heights. Structures must be high enough to maintain minimum conductor clearance at mid-span and maximum electrical loading (the more current, the more heat, and the more heat, the more the conductors expand and sag). Somewhat shorter structures are an option, but in order to manage necessary conductor clearances, the trade-off is more structures. So the choice becomes one of more structures per line mile that are a few feet shorter or fewer structures that are a few feet taller. Western did not present a preference in the Draft EIS because public input was desired before making that decision; perceptions of visual impact are highly personal and vary widely. Decisions on structure heights would be made based on many factors, including public input and visual resource professional judgement.</p>	Todd Plummer
Visual	East	A	Public	<p>Alternative A, as proposed, would run poles and lines parallel and adjacent to our northern property line. The 110' easement and the forest clearing for the lines as well as the road access for each power pole would unnecessarily add another scar to the landscape of the Pinewood area. Alternative A would be over some of the steepest and roughest terrain of anywhere along the Front Range foothills.</p>	Alternative B has been selected as part of the Agency Preferred Alternative in this area.	Gary Bragdon
Vegetation and Visual	East	A	Public	<p>Unique to anywhere I know of along the Front Range foothills is a forest of Douglas Fir on our land and our neighbor's land and Alternative A would slice through the very middle of these trees south of the 2010 burn area. This forest escaped the 2010 fire and now WAPA wants to cut a 110' swath through it.</p>	The exact route that Alternative A would take around the back side of Green Mountain was never established, and siting could take into account the presence of Douglas fir trees and avoid them to the extent possible. However, Alternative A was not included in the Agency Preferred Alternative.	Gary Bragdon
Soils and Wildlife		A	Public	<p>Road access to install and maintain the power poles and lines for Alternative A would create uncontrollable erosion issues due to the 25% to 70% grade of the west side of the mountain. There are caves on the west side of the mountain that native animals habitat that would surely be disrupted with the construction and maintenance of the power lines and poles.</p>	Western analyzed Alternative A and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Gary Bragdon

9.0 Response to Draft EIS Comments

	Section of Route	Alternative	Public or Agency	Comment	Response	Author
General and Socioeconomic		A	Public	We understand the need to upgrade the power transmission lines but we do not understand why, with all of the existing easements and power lines in place now, that we need to add a new scar to our landscape. The environmental, economic and logistical feasibility of Alternative A with all of the existing alternatives makes no sense to us.	Members of the public at the routing workshops hosted by Western identified Alternative A as an option they wanted Western to analyze. Western did so, and found a number of issues with access, steep slopes, and constructability, among others. Alternative A was not selected to be a part of the Agency Preferred Alternative. Alternative B on the east end of the proposed Project has been included as part of the Agency Preferred Alternative.	Gary Bragdon
General	West	A	Public	In this case virtually all the impacted PEOPLE (as well as other entities) are located along the //(North Line". This is recognized in the DEIS Executive Summary S-5 as the top two //(Key Issues" (property owners, customers, viewsheds, residential developments, etc). It should be noted (as shown at S-14) that Park Hill Subdivision is the only subdivision near Estes Park that is affected. Meadowdale Hills, mentioned there, has perhaps 100 vocal residents located well south, none of whom can see the affected area (except for approx. 5 or 6 houses located near the top of Pole Hill). Park Hill Subdivision (including residents on Mall Rd. and the Joel Estes Dr. community) encompasses: 1) Approximately 25 homes 2) An expanse of recreational trail located directly under the power lines 3) A church with many members 4) UTSD facilities and employees 5) Historical ranch (Crocker)	Alternatives that maximize the use of existing ROWs are considered to have the least economic effects. Any influence on property values should already be factored into the current existing valuation due to the presence of the existing transmission line, and the easement is already an encumbrance on the property. The replacement of an existing line with a new one should not have a substantial effect on a given property, and landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses. In order to reduce visibility, special design measures would be locally considered, including the use of structures with a lower height and shorter span. Lower height structures, if selected, would be approximately 10 to 20 higher than the existing H-frame wooden poles. Rationale for the selection of the Agency Preferred Alternative is detailed in Section 2.8.	Gordon Pedersen
General	All	A/A1/A2/B/C/C1	Public	We are very much affected, having lived along or under 3 of the power lines for 76 years (1938) and would be shocked to see the addition of 3 more lines. Accordingly, we are very concerned with Alternative A, without Variant A1, and strongly recommend Alternative B or Alternative C. Variant A2 and Variant C1 would also be very favorable, but we recognize the higher cost factor in today's tight budgets.	The proposed Project would not add any new transmission lines to the area. Most of the alternatives would consolidate the two existing separate transmission lines into one line and abandon one of the existing rights-of-way. If Western understands the comment correctly, commenter is adjacent to one of the existing lines having three conductors. The proposed consolidated double-circuit line would have six conductors. Alternative B has been selected as part of the Agency Preferred Alternative in the eastern portion of the project area and Alternative C in the western portion of the project area.	Gordon Pedersen
Socioeconomics		C/A1	Public	Since cost is a major factor, we were pleased to see (Table S-2) that Alternative C and Alternative A1 are ranked numbers 1 and 2.	Thank you for your comment. Table S-2 in the Draft EIS compared costs for the entire length of each alternative, and were not broken out by east, west, and center sections. In response to public comments, and because Western intended that the Agency Preferred Alternative could be a 'mix and match' of alternative segments from each section, new tables comparing alternatives at each end of the proposed Project have been developed for the Final EIS. Comparative costs for the West Alternatives are provided in Section 2.4 of the Final EIS.	Gordon Pedersen
Visual	West	A/A1/A2/C1	Public	Alternati ve A/Variant A1/Underground A2/C1. Above are the alternatives that are best for the community. The powerlines should stay along Highway 34. That is the right-of-way and there the gas line resides. The power lines should NOT be very visable along Highway 36. Estes Park is a tourist town and does not need the negative impact of 105 ft towers as visitors enter the town. The power lines should not go through the pole hill community. Most of these homes have great views and do not need to be looking through power lines.	Western is very much aware of the value residents place on the visual aspects of their environment. Alternative C, the Agency Preferred Alternative, has been selected for the western portion of the project area. New ROW would be required near U.S. Highway 36, which is intended to reduce visibility from the highway. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources that would more than offset the incremental impact of taller structures on the other ROW. Section 2.8 of the Final EIS addresses the rationale for Western's selection of its Agency Preferred Alternative. An underground option was not selected for the reasons discussed in that section.	Rainer Schelp
Land Use	All	A/B	Public	In relation to the decision on whether to use 'Plan A' and 'Plan B' in where to consolidate the two lines, please consider 'Plan B' the southern route to be the better. 1. Requires less access to private property over time. 2. Lessens WAPA's and property owners' liabilities. 3. Makes private property effected to be more appealing.	Thank you for your comment. Alternative B has been selected as part of the Agency Preferred Alternative.	Bob Sutherland
Visual	West	B/C	Public	I own property on Alpine Dr. in the Meadowdale development on Rt. 36 . It is incredibly important that any new transmission line does not encroach on the viewing field of mine and others properties in the development, or views from the road looking up to our properties.	Western is very much aware of the value residents place on the visual aspects of their environment. Section 2.8 of the Final EIS describes the rationale behind the selection of the Agency Preferred Alternative. The abandonment of one entire existing ROW is a feature of all alternatives except Alternative D and No Action, and would result in a substantial improvement to visual resources.	Jerald Berman
Socioeconomic and Visual	West	B/C	Public	The economic impact of this would be devastating, dropping our land and home values tremendously. There is a lot of land available through the national forest right behind us, and it would be very easy to put these lines out of sight and mind of the people living in Meadowdale. The only value to these properties is the view, period. Most of the properties have virtually no usable land to speak about, and were bought specifically for the spectacular view of the valley below, and the mountains above. Please do not ruin this with an unsightly transmission line.	Alternatives that maximize the use of existing ROWs are considered to have the least economic effects. Any influence on property values should already be factored into the current existing valuation due to the presence of the existing transmission line, and the easement is already an encumbrance on the property. The replacement of an existing line with a new one should not have a substantial effect on a given property, and landowners have an opportunity to adjust the location of structures on their properties to better suit their needs (within certain engineering constraints). It is Western's goal to have the least possible effect to individual landowners, subdivisions as a whole, and businesses. The economic effect of the proposed project is detailed in Section 4.13. In order to reduce visibility, special design measures would be locally considered, including the use of structures with a lower height and shorter span. Lower height structures, if selected, would be approximately 10 to 20 higher than the existing H-frame wooden poles. Visual simulations of the structures are depicted in Appendix C. Rationale for the selection of the Agency Preferred Alternative is detailed in Section 2.8.	Jerald Berman

This page intentionally left blank