November 20, 2014

Cibola National Forest and National Grasslands Attention: Elaine Kohrman Forest Supervisor 2113 Osuna Road NE Albuquerque, NM 87113-1001

RE: Response to Request for Public Input on Potentially Suitable Lands for Wilderness in the Cibola National Forest and National Grasslands

To Ms. Kohrman:

Tri-State Generation and Transmission Association, Inc. (Tri-State) is a not-for-profit wholesale electric power producer/supplier that serves 44 rural electric cooperatives and public power districts in Colorado, Nebraska, New Mexico and Wyoming. Tri-State's member distribution systems serve nearly 578,000 metered customers (translating to a population of more than 1.4 million people). Tri-State's 200,000-square-mile member service territory includes all or parts of 27 counties throughout New Mexico, all or parts of 56 of Colorado's 64 counties, all or parts of 20 counties in western Nebraska and all or parts of 14 counties in Wyoming. Tri-State's system currently includes approximately 5,300 miles of high voltage transmission line, 219 substations and switching stations, and 100 communication sites. The Cibola National Forest and National Grasslands (Forest) fall partially within Tri-State's service territory, and Tri-State and its Members own and operate transmission and distribution lines, substations, and communication sites within the following Ranger Districts: Mt Taylor, Mountainair, and Sandia. Tri-State's members within the Cibola National Forest and National Grasslands include: Central New Mexico Electric Cooperative, Inc., Socorro Electric Cooperative, Inc., and Continental Divide Electric Cooperative.

Tri-State is providing the following input to assist the Forest in the identification of lands potentially suitable for wilderness consideration as part of their revision to the 1985 Forest Plan and as required by the 2012 Forest Service Planning Rule

Tri-State's facilities within the Mount Taylor Ranger District include approximately 1.8 miles of the 42-mile Pegs-Gallup 115- kilovolt (kV) transmission line, and La Mosca telecommunication site (**Figure 1**). The Pegs-Gallup transmission line has been in operation since the 1970s and has a Special Use Permit from the Forest Service (FS-2700-4, OMB 0596-0082). La Mosca communication site occurs within "Areas greater than 5000 acres" in the Wilderness Inventory. Tri-State also owns or partially owns communication sites within the Mountainair Ranger District (Capilla Peak) and the Sandia Ranger District (Sandia Crest). The Capilla Peak site and its access road occur within "Areas adjacent to existing Wilderness" in the Wilderness Inventory. The Sandia Crest site occurs within the Sandia Mountain Wilderness and portions of the access road to the site are within the "Areas adjacent to existing Wilderness".



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Tri-State requests that the Forest take into account these existing facilities when identifying lands potentially suitable for wilderness. Additionally, access is a critical component to existing facility authorizations and Tri-State asks that the Forest considers designated and non-designated roads that may be critical to maintaining our existing facilities within the Forest when evaluating lands potentially suitable for wilderness. Tri-State is required to comply with standards developed by the North American Electric Reliability Corporation (NERC) and enforced by the Federal Energy Regulatory Commission (FERC) for the safe and reliable operation of our transmission facilities. Access to our existing facilities is crucial to providing a reliable source of electricity to our Members and their customers. Tri-State requests that existing facilities and access to those facilities be considered when evaluating lands potentially suitable for wilderness.

Thank you for the opportunity to comment on this stage of the process. Please feel free to contact me (303-254-3448) or Selina Koler (303-254-3720) with any questions regarding this response and please include us on future notices regarding development of the revised Forest Plan.

Sincerely,

ZcuhM<sub>y</sub> \_\_\_\_\_ Karl W. Myers

Manager, Transmission Siting and

**Environmental Planning** 

Enclosure: Figure 1

cc: Selina Koler

Curtis Miller Tommy Chavez

