



COLORADO

Parks and Wildlife

Department of Natural Resources

Glenwood Springs Area Office
0088 Wildlife Way
Glenwood Springs, CO 81601

May 11, 2016

Scott Fitzwilliams
c/o Steve Goodson, Project Lead
White River National Forest
900 Grand Avenue
Glenwood Springs, CO 81601

RE: CPW Scoping Comments for the Xcel Transmission Tower Vegetation Management Project

Dear Mr. Fitzwilliams,

Colorado Parks and Wildlife (CPW) thanks you for the opportunity to provide scoping comments for the proposed Transmission Tower Vegetation Management Project. The Public Service Company of Colorado (PSCO), a subsidiary of Xcel Energy, intends to conduct vegetation treatments, on primarily tree species, surrounding existing transmission line towers in order to diminish the threat of damage from large wildfires. The project area consists of 1,224 acres, with actual treatments occurring on approximately 700 acres, and will take place over the next five to ten years.

CPW has mapped the proposed treatment areas with regard to sensitive wildlife habitats (CPW Species Activity Maps) and found that portions of the project area occur within mule deer and elk winter range, severe winter range, winter concentration areas, and summer range; elk production areas; rocky mountain bighorn sheep winter range, winter concentration areas, and summer range; mountain goat summer range; moose summer range, winter range, and priority habitat; black bear fall concentration areas and human conflict areas; cutthroat trout designated critical habitat; and Canada lynx potential habitat. Additionally, numerous raptor nesting sites and roost areas likely occur within or adjacent to the treatment areas.

Protecting the integrity of big game habitats, riparian corridors, aquatic habitats, raptor nest sites and roost sites, and Colorado Species of Special Concern are of extreme importance to CPW. Therefore, CPW offers the following recommendations and best management practices to avoid and minimize impacts to wildlife and their associated habitats.

Big Game Habitats

CPW has examined the transmission line ROW segments and treatment areas and found many of them occur within important habitat types for big-game species. Wildlife habitat maps have been prepared and provided with this comment letter (Appendix A) for your



reference while reviewing the recommendations. For these identified habitat types where work is to occur, CPW recommends the following:

- Elk and Mule Deer Severe Winter Range & Winter Concentration Areas - Conduct all work outside the period of December 1st to April 15th.
- Elk Production Areas - Conduct work outside the period of May 15th to June 30th.
- Bighorn Sheep Winter Concentration Areas - Conduct all work outside the period of November 1st to April 15th.
- Bighorn Sheep and Mountain Goat Summer Range - Conduct work outside the period of May 15th to June 30th.

Workers should not be allowed to bring pets on-site to eliminate the threat of domestic animals harassing wildlife, and all work should be conducted during daylight hours to protect important feeding and movement periods. CPW recommends tailoring the treatment methods within big-game winter range to favor regeneration of browse species most beneficial to mule deer and elk. By thinning the overstory vegetation, treatments may actually increase big-game forage opportunities and benefit winter range habitats. In all treatment areas, CPW discourages the clearing of any sage-brush or blading/grubbing vegetation; however, if lower growing vegetation must be treated, CPW recommends using a brush hog to mow vegetation and leave several inches of the stem and roots intact so that the vegetation can regenerate over time. Mowing will also help prevent the spread or introduction of undesirable non-native vegetation.

Additionally, the entire project area is within black bear overall range with portions occurring in mapped human conflict areas. It is imperative (for human and bear safety) that all contractors and workers store their food and garbage in bear-proof containers and haul it off-site on a daily basis.

Riparian Corridors and Aquatic Habitats

Several sections of the project area bisect or parallel riparian corridors and perennial streams/rivers. Riparian habitat is essential for a vast number of Colorado's wildlife species and is one of the most biologically diverse habitat types in the state. Measures must be taken to minimize impacts within these areas and vegetative clearing should be kept to a minimum. Low water crossings of all waterways (excluding existing roadways) should be avoided, and any new culverts or crossings should be constructed during dry periods and allow for fish passage. Any equipment used within or adjacent to riparian habitat should be disinfected per CPW protocol (Appendix B) both before and after its use. Chytrid fungus and whirling disease are known pathogens that can be spread across watersheds and negatively affect fish and wildlife species.

A segment of the project area will cross through the southern portion of the Cunningham Creek drainage which contains known populations of green-lineage cutthroat trout. Strict

measures to reduce sedimentation, weed introductions, disease transmission, etc. should be implemented and the construction of new roads and/or crossings should be prohibited in this area. Additionally, CPW recommends avoiding work within 300 feet of any waterway in this drainage from May 1st to September 1st to protect the cutthroat trout spawning, egg incubation, and fry emerging periods.

Treatment areas in Summit County north of Montezuma bisect two historic boreal toad breeding locations along the Snake River. CPW recommends avoiding disturbance in these areas from May 1st to August 30th to protect the boreal toad breeding period.

Raptor Nests and Roost Areas

CPW supports conducting avian nesting surveys prior to project implementation for all migratory birds protected under the Migratory Bird Treaty Act. CPW requests that *Buffer Zones and Seasonal Restrictions for Colorado Raptors* (Appendix C), be referenced throughout the planning and implementation phases for raptor impact minimization and mitigation measures, and act as the minimum avoidance and mitigation document on a site-specific basis.

Additional Considerations

The project proponent and contractors should be aware that big-game hunting seasons typically begin the last week of August with the start of archery season, and run through mid November ending with the 4th rifle season. Forest Service roads and dispersed camping areas typically receive high levels of use during this time of year and CPW asks that contractors avoid road closures and staging/storing equipment in camping areas utilized by hunters.

Noxious weeds continue to be a major issue in areas of the White River National Forest and special care should be taken to ensure the project does not spread-unwanted weed species. Clear cuts and areas subjected to soil disturbance are typically more prone to weed infestations. CPW encourages PSCO to treat any weeds within the project area prior to project implementation. Additionally, weed monitoring and treatment should be conducted within the transmission line ROW and vegetation treatment areas on a regular basis to keep weeds under control.

CPW is also concerned about administrative use routes for the transmission line ROWs being effectively closed off to the public. In the past, certain power-line roads have not been properly closed, and over time, have become regularly traveled public routes. CPW recommends a robust program of gating and signing these administrative routes wherever they come into contact with public roads and trails. For this project it is recommended that no new administrative roads be constructed. For treatment areas that cannot be accessed from existing roads, we recommend the use of hand crews and accessing these areas by foot.

Colorado Parks and Wildlife appreciates the opportunity to comment on this project. We look forward to any forthcoming environmental reviews to analyze potential impacts of

the project in greater detail. If there are any questions or needs for additional information don't hesitate to contact Land Use Specialist, Taylor Elm, at (970) 947-2971 or by email at taylor.elm@state.co.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Perry Will".

Perry Will, Area 8 Wildlife Manager

Cc. Lyle Sidener, Area 9 Wildlife Manager
Bill Andree, District Wildlife Manager
Craig Wescoatt, District Wildlife Manager
Matt Yamashita, District Wildlife Manager
Tom Davies, District Wildlife Manager
Elissa Knox, District Wildlife Manager
Taylor Elm, Land Use Specialist
File

Appendix A:

(See Wildlife Habitat Maps PDF attached by email)

Appendix B:

CPW's Recommended Disinfection Protocol for Equipment

Disinfect heavy equipment, hand tools, boots and any other equipment that was previously used in a river, stream, lake, pond, or wetland prior to moving the equipment to another water body. The disinfection practice should follow this outline:

- a. Remove all mud and debris from equipment and spray/soak equipment with a 1:15 solution of disinfection solution containing the following ingredients:
 - Dialkyl dimethyl ammonium chloride, 5-10% by weight;
 - Alkyl dimethyl benzyl ammonium chloride, 5-10% by weight;
 - Nonyl phenol ethoxylate, 5-10% by weight;
 - Sodium sesquicarbonate, 1-5%;
 - Ethyl alcohol, 1-5%; and
 - Tetrasodium ethylene diaminetetraacetate, 1-5%;
 - and water, keeping the equipment moist for at least 10 minutes and managing rinsate as a solid waste in accordance with local, county, state, or federal regulations; or:
- b. Spray/soak equipment with water greater than 140 degrees Fahrenheit for at least 10 minutes.
- c. Sanitize water suction hoses and water transportation tanks (using methods described above) and discard rinse water at an appropriately permitted disposal facility.

Appendix C:

Recommended Buffer Zones and Seasonal Restrictions Around Raptor Use Sites

Species and Use	Buffer	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Bald Eagle													
ACTIVE NEST - No Surface Occupancy	1/4 Mile												
ACTIVE NEST - No Human Encroachment	1/2 Mile												
ACTIVE WINTER NIGHT ROOST without a direct line of sight- No Human Encroachment	1/4 Mile												
ACTIVE WINTER NIGHT ROOST with a direct line of sight - No Human Encroachment	1/4 Mile												
HUNTING FERCH - No Human Encroachment													
Golden Eagle	Contact CDDW												
ACTIVE NEST - No Surface Occupancy	1/4 Mile												
ACTIVE NEST - No Human Encroachment	1/2 Mile												
Osprey													
ACTIVE NEST - No Surface Occupancy	1/4 Mile												
ACTIVE NEST - No Human Encroachment	1/4 Mile												
Ferruginous Hawk													
ACTIVE NEST - No Surface Occupancy	1/2 Mile												
ACTIVE NEST - No Human Encroachment	1/2 Mile												
Red-tailed Hawk													
ACTIVE NEST - No Surface Occupancy	1/3 Mile												
ACTIVE NEST - No Human Encroachment	1/3 Mile												
Swainson's Hawk													
ACTIVE NEST - No Surface Occupancy	1/4 Mile												
ACTIVE NEST - No Human Encroachment	1/4 Mile												
Peregrine Falcon													
ACTIVE NEST - No Surface Occupancy	1/2 Mile												
ACTIVE NEST - No Human Encroachment	1/2 Mile												
Prairie Falcon													
ACTIVE NEST - No Surface Occupancy	1/2 Mile												
ACTIVE NEST - No Human Encroachment	1/2 Mile												
Northern Goshawk													
ACTIVE NEST - No Surface Occupancy	1/2 Mile												
ACTIVE NEST - No Human Encroachment	1/2 Mile												
Burrowing Owl													
ACTIVE NEST - No Human Encroachment	150 feet												

= time period for which seasonal restrictions are in place.