



BOARD OF COUNTY COMMISSIONERS

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May 25, 2016

Scott Fitzwilliams, Forest Supervisor
c/o Steve Goodson, Project Lead
900 Grand Ave.
Glenwood Springs, CO 81601

Dear Mr. Fitzwilliams:

Thank you for your April 25, 2016 Scoping Notice of the pending Public Service Company of Colorado transmission tower vegetation/fuel management project that would involve removal of dead and dying trees and creation of a shaded fuel-break within 150-feet of each transmission tower located on national forest system lands within the White River National Forest. Based on our review of the information in the notice we would like to express our support of the project to enhance the resiliency of Public Service's electrical power delivery system against future wildfires. We would however like to make the following comments regarding the proposed fuel management prescription discussed in the scoping notice:

Aesthetics

There are 722 transmission towers on national forest systems lands within Summit County. We noted from the Scoping Notice that proposed fuel management plan would involve removal of all dead/dying timber and up to 60% of the live, healthy timber within a 150-foot radius of each transmission tower. This translates into a treated circle of 1.62 acres/tower or a total of 1,170 affected acres within Summit County. At a 60% timber removal prescription such clearing could have significant, adverse visual and aesthetic impacts on public views of national forest system lands within the County. As you are aware, the visual quality of the White River National Forest within Summit County is one of our greatest assets; both from the perspective of our quality of life and the County's recreation based economy. Therefore, while the Board strongly supports efforts to improve the resiliency of the electrical grid to wildfires, we urge the Forest Service to minimize, to the extent practicable, the removal of healthy trees within these treatment areas.

In that same regard we recognize that much of the forest where such fuel management would occur is dominated by lodgepole pine, a shallow rooted species that is susceptible to blow-down when thinned, especially if the outer, "wind-hardened" trees of a stand are removed leaving previously interior stand trees directly exposed to prevailing winds. As such, the Board recommends that tree-thinning efforts focus on the interior of tree strands within fuel management circles thereby hopefully leaving more wind-hardened trees on the perimeter to provide protection of interior trees that may not be as resilient to blow-down during wind events.

Fuel Treatments

We noted from the Scoping Notice that tree thinning would be accomplished by crews using hand treatment methods without any heavy equipment or construction of new access roads for project implementation. Obviously this would preclude the opportunity for logging or chipping the resulting cut timber/slash. Instead, it appears from the Scoping Notice that the felled timber would be left in place and the tree-limbs/tree tops would be subject to a "lop and scatter" treatment with a requirement that downed timber be no more than two (2) feet above the ground surface. The Board is concerned that leaving this much downed material in this condition could significantly increase the surface-fuel load and could contribute to extreme fire behavior conflicts with the intent of the project to improve transmission tower resiliency to wildfires. For instance past transmission line/tower fuel reduction efforts in the Peak 7 neighborhood of the County resulted in timber being dropped and basically left in place, thereby substantially increasing surface-fuel loads and heightening the wildfire hazard in that area.

In a mature lodge pole forest, the probability of a surface fire is greater than the probability of a crown fire. As the fuel is placed on the ground, it may cause a greater heat flux along with increasing ladder fuels to generate a crown fire. As such, the Board requests that this prescription be revised to require that **all** downed timber be treated so that it is in contact with the ground to facilitate natural decay. Fuel should also be dispersed far enough apart as not create fuel loading. The Board acknowledges that other methods of fuel reduction are limited due the remoteness of these towers and the close proximity of power lines to the areas to be mitigated. As such, we understand that pile burning in the proximity of transmission lines is typically not allowed due to the potential for particulate matter/smoke from slash pile burning to cause power outages and power lines to arc. However, where feasible from a safety and forest health context, the Board recommends that the more flammable tree limbs/tree-tops be removed from the site or burned during the winter months when weather and snow cover conditions allow. The Board further recommends that mechanical mastication be utilized on more flammable fuels where feasible. Promoting firewood collection should also be considered in areas that are more accessible and where such collection would not create additional impacts on the land. This would help reduce 100 and 1,000 hour fuels that could increase surface fire activity. The Board notes that there have been good outcomes in the past with contractors working with neighborhoods and HOAs to successfully reduce fuels while creating better aesthetics in the aftermath; a win/win situation for the contractor, Public Service Company of Colorado, individual citizens, and surrounding neighborhoods.

When appropriate the Board recommends that healthy “wind hardened” trees within the mitigation areas not be removed as this will help reduce further blow down of remaining trees. We also recommend that live aspen trees not be removed. Live aspen trees would not increase fire behavior or generate sufficient radiant heat to impact adjacent fuels or infrastructure. Again, while wildfire mitigation around critical infrastructure is fully supported in Summit County, the Board wants to ensure that the methods chosen are as effective as possible and would not create a larger fire hazard issue.

Finally, we would like to express our appreciation for opportunity to comment on the proposed project. If you have any questions or wish to respond to this letter please contact Doug Cupp, Summit County Wildfire Mitigation Specialist in the Summit County Community Development Division at (970)668-4139 or Doug.Cupp@SummitCountyCO.gov.

Sincerely,



Thomas Davidson
Chair,
Summit County Board of County Commissioners

c: Karn Stiegelmeier, County Commissioner
Dan Gibbs, County Commissioner
Gary Martinez, County Manager
Thad Noll, Assistant County Manager
Scott Vargo, Assistant County Manager
Jim Curnutte, Director, Community Development
Doug Cupp, Summit County Wildfire Mitigation Specialist
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