

December 8, 2017

Attn: Forest Plan Revision Team
Grand Mesa, Uncompahgre and Gunnison National Forests
2250 South Main St.
Delta, Colorado 81416

Re: Grand Mesa, Uncompahgre and Gunnison National Forests – Forest Plan Revision

Please accept these comments regarding the **Grand Mesa, Uncompahgre and Gunnison National Forests – Forest Plan Revision (GMUG Plan Revision)** Draft Assessment Reports on behalf of Public Service Company of Colorado (PSCo), a Colorado corporation doing business as PSCo. These comments are likely to be adapted and enhanced in the future as the plan revision evolves and our discussion and participation in the GMUG Plan Revision continues.

PSCo owns and operates multiple transmission lines within the Grand Mesa, Uncompahgre and Gunnison National Forests, as well as the Ames Hydro Electric Plant. PSCo offers the following comments regarding the Assessment Phase of this project.

These comments are based on the Draft Assessment Reports that were published on November 6, 2017.

- **Topic Area – Designated Areas:** In identifying new designated areas (ex: wilderness areas, roadless areas, etc.) please consider the current location of PSCo transmission lines and access to these lines does not conflict with those designations.
- **Topic Area – Watersheds, Water, and Soil Resources:** If placing restrictions regarding equipment use on steep slopes, please consider the current location of PSCo transmission lines and access to these lines does not conflict with these restrictions.
- **Topic Area – Land Status: Ownership, Use, and Access Patterns:** When working with counties and private land owners as it relates to securing and maintaining access, please consider the current location of PSCo transmission lines and access to these lines. PSCo would be agreeable to consulting with USFS, counties, and private landowners concerning access to transmission lines.
- **Topic Area – Infrastructure:** The draft assessment references a potential need for change as the “consideration for adding major fiber optic lines as an emphasis in utility corridors, and consider plan direction relevant to fiber optic lines. For example, collocate with existing power or telephone lines where possible.” Should this language ultimately be included in the final “Need to Change” please ensure that emphasis is placed on the fact that collocation as it relates to transmission line corridors would need to be evaluated on a case-by-case basis to ensure compatibility.
- **Vegetation Management:**
 - Protection of assets against risk:

- Maintain ability to protect electric facilities from naturally-occurring events such as wind storms, ice events, and wildland fires (include defensible spaces around facilities)
- Maintain ability remediate dangerous situation adjacent/outside to the ROW
- Maintain accessibility for inspections of various types
- Routine maintenance operations
 - Maintain ability to manage the conditions within the ROW for multiple uses
 - Maintain accessibility to complete routine work
 - Maintain permission to use proven cost savings techniques such as mechanical equipment and use of EPA registered herbicides
 - Reduce the variation of interpretation and local agendas from district offices within the same National Forest
- **Overall: PSCo requests to be involved in all future stakeholder meetings.**

PSCo looks forward to participating in the GMUG Plan Revision process as it progresses. We thank you for reviewing and considering these comments.

Sincerely,

Carly Rowe
PSCo
Senior Agent
Siting and Land Rights