



December 8, 2017

Grand Mesa, Uncompahgre and Gunnison National Forests
Attention: Plan Revision Team
2250 South Main Street
Delta, CO 81416

Submitted via email to: gmugforestplan@fs.fed.us

RE: Draft Assessment Reports

Dear Plan Revision Team,

Tri-State Generation and Transmission Association, Inc. (Tri-State) is a not-for-profit wholesale electric power supply cooperative providing electric power to 43 member distribution systems that serve customers in a 250,000 square-mile territory including Colorado, Nebraska, New Mexico, and Wyoming. Tri-State provides its member-systems with a reliable, cost-based supply of electricity while maintaining high environmental standards, based on a diverse mix of generation sources including coal, natural gas, hydroelectric, wind and solar power. In 2016, 27% of energy provided by Tri-State to its members was from renewable resources.

Tri-State currently owns and operates various infrastructure on the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests as outlined below, and is currently upgrading its existing Montrose to Nucla transmission line as referenced on page 8 of the Grand Mesa, Uncompahgre, and Gunnison National Forests, DRAFT Forest Assessments: Infrastructure dated November 2017 (Infrastructure Report). Tri-State infrastructure on the GMUG include electric transmission lines, a substation and telecommunications sites. We anticipate that the GMUG already has the locations of Tri-State's existing infrastructure on the GMUG, and that spatial data for Tri-State infrastructure is not part of the "information gap" identified on page 10 of the Infrastructure Report.

Transmission lines

- Sunshine - Wilson Mesa 115kV
- Montrose – Nucla 115kV
- Ames Hydro – Sunshine 115kV
- Sunshine – Telluride 69kV
- Hesperus – Montrose 345kV
- Sunshine – Telluride 69kV
- Sunshine - Wilson Mesa 115kV
- Alkali – Skito 115kV
- Ames Hydro - Burro Bridge 115kV





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Substations

- Sunshine

Communication sites

- Ilium
- Sunshine
- Island Lake
- Monarch - Wapa Comm
- Monarch Pass Usa Comm
- Gray Head
- Monarch Comm

Tri-State provides the following comments on the Infrastructure Report.

Designated Utility Corridors

Tri-State supports the retention of “utility corridor management areas” or a functionally similar designation in potential plan revisions. Tri-State also supports the idea on page 7 of the Infrastructure Report mentioning the designation of new utility corridors to include existing power lines that are not already within a designated corridor, to enable expedited environmental review of reconstruction or additional construction on or near these lines under a categorical exclusion (36 CFR §220.6(e)(2)).

Co-location of Utilities

The Infrastructure Report makes several references to the co-location of utilities and other infrastructure (Pages 8, 11 and 12). It is not feasible to “co-locate” transmission line ROWs because National Electric Safety Code standards require sufficient clearance between power lines. The widths of electrical ROWs are based on these clearance requirements. The appropriate terminology the FS should use in the revised forest plan is to “parallel” existing ROWs or other existing disturbance to the extent practicable. Recommendations on paralleling existing ROWs should also require a review of federal safety standards, industry standards, and technical feasibility (engineering, land use, physical constraints), and cost implications prior to siting infrastructure in proximity to existing ROWs.

Vegetation Management in Transmission Line ROWs

In the decades since development of the current GMUG forest plan, there has been a significant increase in the attention and focus on vegetation management along power lines. This increased attention has been driven by a large power outage in the eastern U.S. and several wildfires in the western U.S. that were linked back to vegetation contacting electrical conductors. Trees and other types of vegetation that come into contact with electrical facilities can result in widespread power outages that pose a threat to human health and safety. After a blackout in 2003 in the





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northeast, Midwest, and Canada left over 50 million people without power, the Energy Policy Act of 2005 mandated creation of nationwide, mandatory, enforceable standards to ensure the reliability of the power grid. The North American Electric Reliability Corporation (NERC), certified by the Federal Energy Regulatory Commission began enforcing a Reliability Standard, FAC-003-3, on July 1, 2014 with the goal of eliminating vegetation induced outages of the electrical grid. Failure to meet this zero-outage mandate on regulated lines can result in fines up to \$1 million per day. Vegetation induced outages are caused when vegetation grows, falls, or blows onto transmission lines. The goal of Tri-State's integrated vegetation management plan is to maintain compatible (low-growing) vegetation communities in transmission line ROWs to reduce vegetation induced outages and wildfire risk. This may include the removal of danger trees outside of the transmission ROW when necessary. Based on the above, Tri-State recommends that the GMUG explore potential plan revisions, in consultation with electric utilities that streamlines vegetation management projects that may not be currently authorized under existing Special Use Permits so utilities can expeditiously meet NERC requirements.

Tri-State appreciates the opportunity to provide these comments. Should you have any questions or need additional information, please contact Chris Reichard at 303-254-3097 or Karl Myers with project or line-specific questions at 303-254-3448.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara A. Walz".

Barbara A. Walz
Senior Vice President
Policy and Compliance
Chief Compliance Officer

BAW:cfr:der