



June 1, 2018

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: Scoping Comments: Notice of Intent to revise the Grand Mesa, Uncompahgre and Gunnison National Forests Land and Resource Management Plan (83 FR 14243)

Dear Plan Revision Team,

Tri-State Generation and Transmission Association, Inc. (Tri-State) is a not-for-profit wholesale 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.

Tri-State currently owns and operates transmission lines, communication sites, and substations on the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests as outlined below, and is currently upgrading its existing Montrose to Nucla transmission line. The location and legal descriptions for these facilities is included in the individual special use permits for these facilities. However, if geographic information system (GIS) shapefiles would help with the analysis and development of the Revised Land and Resource Management Plan (Revised Plan) and associated Environmental Impact Statement (EIS), Tri-State may be able to provide them upon request.

Existing transmission lines

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

Existing substations

- Sunshine





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Existing communication sites

- Sunshine
- Monarch - Wapa Comm
- Monarch Passive USA
- Monarch Comm
- Gray Head

Tri-State provides the following comments in response to the Notice of Intent (NOI) published April 3, 2018 (83 FR 14243), some of which expand on Tri-State's previously submitted comments dated December 8, 2017 on the report titled Draft Forest Assessments: Infrastructure. Tri-State reviewed the report titled Revised Draft Forest Assessments: Infrastructure dated March 2018 (Revised Infrastructure Report) and acknowledges and thanks the GMUG for considering and/or incorporating Tri-State's previously submitted comments into the revised report, such as changing to the term paralleling rather than co-locating utilities.

Foundation for the Revised Forest Plan document, Forest Plan Revision: Scoping

Part I: Forest Plan Vision, Roles and Contributions

Tri-State supports themes that recognize multiple-use management which clarify to the public that portions of the GMUG are managed as working landscapes where human presence and existing and new activities and infrastructure should be expected. These reminders help the public compare and contrast management of National Forests with that of National Parks for example.

Part titles I and II in the scoping guide and the foundation document appear to be transposed between the two documents.

Part II: Key Needs for Change

Tri-State supports the GMUG's goal of revising the Forest Plan to make it more adaptable to change, as well as reducing its current complexity and unwieldiness. The themes of *Providing Strategic, Adaptive Direction* and *Build an Accessible, Useful Plan* are valid and deserve attention in the Revised Plan. However, as with any adaptive plan, it is important that the GMUG include a robust stakeholder notice and involvement process if and when changes are considered in the future.

Similarly, the theme *Incorporate Best Available Science, Update to Existing Law and Policy*, is valid. There have been several changes to existing law and policy surrounding electric utility lines and vegetation management since adoption of the current Forest Plan and since the 2007 Proposed Forest Plan (2007 Plan) that should be incorporated into the Revised Plan. Additional details on these subjects are provided elsewhere in this letter.



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Tri-State supports the consideration of adding major fiber optic lines and other broadband infrastructure as an emphasis in utility corridors.

Part III: Management Area Framework

Tri-State supports the inclusion of utility corridors as part of the *Highly Developed Areas (non-recreation emphasis, i.e., utility corridors)* theme and in addition, the utility corridors description on Page 149 of the 2007 Plan that they “...are managed as permanently altered areas, primarily for operating and maintaining the infrastructure associated with these corridors and areas.” Additional details regarding Tri-State’s recommendations related to utility corridors and management direction are provided below.

Utility Corridor Management Area

Tri-State supports the retention of “utility corridor management areas” or a functionally similar designation in the Revised Plan as a Management Area (MA). Tri-State also supports the idea on page 7 of the Revised Infrastructure Report that the designation of new utility corridors includes 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)) where appropriate. Since the GMUG plan revision process may overlap with the ongoing Forest Service rulemaking to revise its NEPA procedures (83 FR 302 dated January 3, 2018), the Revised Plan should attempt to incorporate and complement changes that may occur within that rulemaking process. Utility corridors should be recognized as the primary management direction rather than as an overlay or subordinate to another designation that the utility corridor passes through. This MA should incorporate both established and planned 368 corridors as well as other existing power lines regardless of voltage. Tri-State requests that as a Desired Condition, this MA should also recognize the essential nature of access roads to the operation and maintenance of electrical infrastructure and telecommunication facilities. Tri-State requests that access is also addressed in future travel management planning efforts.

Desired Conditions from the 2007 Plan

Section 1.A.11 of the 2007 Plan appears to mostly be appropriate to carry forward as Desired Conditions in the Revised Plan. Tri-State appreciates the recognition in Section 1.A.11 that: utility lines are long-term commitments; vegetation management within the right-of-way (ROW) is the responsibility of the utility owner; and communications sites are included within the MA. However, Tri-State requests that the last sentence in Section 1.A.11 of the 2007 Plan not be carried forward in the Revised Plan or at least be revised by adding recognition that vegetation management requirements will supersede visual impact concerns. Tri-State also supports the reference to utility corridors and electronics sites within the Forest-wide Desired Conditions description for the wildland-urban-interface (WUI) in Section 1.A.4 of the 2007 Plan. However, Tri-State cannot assume responsibility and/or costs for vegetation management activities outside of transmission and telecommunication facility authorized rights-of-way. Tri-State suggests it



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would be worthwhile to include a Desired Condition or Objective in the Revised Plan to address the need for collaborative, multi-party vegetation and/or fuels treatments management projects within designated wildland-urban interfaces (WUIs) as well as areas that are at high risk of catastrophic wildfire that may impact natural, cultural, or economic resources. Tri-State has successfully worked in the past with the Uncompahgre National Forest on such a project and it was a comprehensive strategy that benefitted multiple stakeholders and Forest resources.

The GMUG should consider including an additional Desired Condition found in the recently revised Apache-Sitgreaves National Forests Land Management Plan which describes that vegetation within Utility Corridors consists predominantly of grasses, forbs, shrubs, low-growing trees, and sapling sized trees.

Objectives from the 2007 Proposed Plan

Tri-State supports the Objective in Section 2.A.10 and requests that it or something similar be carried forward in the Revised Forest Plan.

Standards

In the decades since development of the current GMUG forest plan, there has been significantly increased attention to vegetation management near power lines due to a large power outage in the eastern U.S. and several wildfires in the western U.S. that resulted from vegetation contacting electrical conductors. Trees and other vegetation that encroach into the ROW of electrical facilities can cause widespread power outages, via either direct contact or flash-over. Ultimately, these outages can threaten human health and safety. After a 2003 blackout in the 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 Reliability Standard FAC-003-4 on October 1, 2016 which has a goal of eliminating vegetation induced power outages. Failure to meet the 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 or near power lines.

The goal of Tri-State's integrated vegetation management plan is to maintain compatible (low-growing) vegetation in transmission line ROWs to reduce vegetation induced outages, and to reduce fuel loading within ROWs to reduce wildfire risk to our infrastructure as well as the landscapes on which they occur. This includes selective removal of danger trees outside of the transmission ROW when necessary. Compliance with FAC-003 is mandatory for electric utilities on regulated lines and therefore should be referenced as a Standard in the Revised Forest Plan. Since NERC standards are periodically updated, the GMUG should reference it generically, as FAC-003, rather than citing a specific version, such as FAC-003-4, to avoid Forest Plan language from becoming outdated.



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Guidelines from the 2007 Proposed Plan

Tri-State provides the following comments on some of the Guidelines for utility corridors from Section 3.K of the 2007 Plan. (Numbers below correspond to Guideline numbers in the 2007 Plan)

- 1 Tri-State supports the reference to technical feasibility but requests that it be expanded to also require economic feasibility, if it is carried forward.
- 2 The website link in this Guideline appears to be inactive. Tri-State suggests that if this Guideline is carried forward, it instead references the Avian Power Line Interaction Committee's (APLIC) Suggested Practices for Avian Protection on Power Lines and Reducing Avian Collisions with Power Lines. Since APLIC guidance is periodically updated to reflect new science or improved design practices, Tri-State suggests that APLIC guidance be referenced generally rather than by specific document date or version in the Revised Plan. Tri-State supports incorporating Colorado Parks and Wildlife's Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors to provide guidance on raptor nest protection on the GMUG.
- 4 Tri-State understands the desire to minimize aesthetic effects from vegetation clearing along utility corridors. However, it is often impractical to implement visual resource objectives and still ensure compliance with NERC standards or a utilities' integrated vegetation management program. The only way to incorporate visual resource concerns into ROW management (in non-pinyon-juniper forested communities) and maintain compliance with NERC reliability standards is to manage vegetation off-ROW. As previously indicated, Tri-State cannot be responsible nor are we permitted to maintain vegetation conditions off authorized ROWs. The other concern to be considered is the liability language specific to fire in special use authorizations. If a utility is going to be liable for wildfire that may result from the operation of the transmission line, it is imperative that the permit holder be able to manage the ROW to reduce this risk in a manner approved by federal standards (NERC). The combination of these factors will likely limit the ability of a utility "to provide an aesthetic edge effect" in the majority of forested vegetation community types, as is suggested in this Guideline. Accordingly, Tri-State requests that Guideline 4 from the 2007 Plan not be carried forward as a Guideline (or a Standard) in the Revised Plan.
- 5 Tri-State is not opposed to public access, including vehicular access, within utility corridors, but does work with GMUG staff to limit access during construction and major maintenance activities. Tri-State does support excluding public access to substations and communication sites on the GMUG for safety reasons.

Tri-State appreciates the opportunity to provide these comments and looks forward to the future ability to review and comment on the Draft Revised Land and Resource Management Plan and EIS. Should you have any questions or need additional information, please contact Chris Reichard at 303-254-3097 or Karl Myers with Tri-State projects or transmission and substation specific questions at 303-254-3448.





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Sincerely,

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

BAW:cfr:der

File: P3-12.1