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April 1, 2020

***Via Electronic Submission***

Scott Fitzwilliams, White River Forest Supervisor  
% Matt Klein  
PO Box 190  
Minturn, CO 81645

<https://cara.ecosystem-management.org/PublicCommentInput?Project=57224>

Re: *Holy Cross Energy Avon-to-Gilman Electric Transmission Line*

Dear Mr. Fitzwilliams:

The undersigned, Michael J. Heaphy and Melissa L. Decker, hereby submit the following specific written comments concerning a proposed action to take place on United States Forest Service (FS) land in and around Minturn, Colorado, as described in correspondence dated March 2, 2020 and the associated Notice of Proposed Action for Scoping and Comment Period.

At the outset, we note that the “purpose and need” for the proposed project is maddeningly imprecise and vague. Holy Cross Energy (HCE) asserts that the purpose of the project is to provide increased service reliability to its customers in Vail, EagleVail, Avon, Edwards, and parts of Eagle, which purpose is driven by current risks of electrical outages and service interruptions due to a lack of redundancy in the current local transmission circuit. However, none of the documentation produced by HCE and the FS puts any meat on the bones of this assertion. How significant is the risk of electrical outages and service interruptions due to a lack of redundancy in the current local transmission circuit? Is the lack of redundancy unusual locally, regionally, or nationally? Is this push for redundancy best practices or overkill? Presumably, HCE will pass the cost of this project on to its consumers. Will they actually benefit? None of this can be determined from the information heretofore presented. We expect and anticipate that the Environmental Assessment (EA) to be prepared by the FS will endeavor to flesh out these issues and demonstrate that there is an actual compelling purpose and need for the project.

We are also concerned by the fact that the alternatives to the proposed project are needlessly limited and ignore one obvious, glaring alternative that would undoubtedly satisfy HCE's purported purpose and need for the project. Specifically, it appears that neither HCE nor the FS considered the obvious alternative of under grounding more of the proposed new transmission line and thereby avoid the substantial impacts on scenery occasioned by the line. The project already contemplates under grounding a significant portion of the proposed transmission line. Yet, no consideration is apparently given to the alternative of under grounding more of line as it crosses Forest Service land. We anticipate and expect that the EA will either consider this alternative or, at minimum, offer some cogent compelling reason why this alternative was not considered.

Putting aside these concerns and taking the project as proposed at face value, it is evident that there are significant potential impacts from the project on the human and natural environment that must be considered. Most significantly, the project as proposed will undoubtedly negatively impact scenic values along the I-70/Minturn/Eagle River Valley corridor. As presently planned, the new transmission line will be a visible industrial scar from virtually every vista and vantage point stretching from EagleVail to Gilman. We anticipate and expect that the EA will include an in depth, comprehensive analysis of the significant impacts on scenery.

Similarly, we are concerned that the project will have a substantial negative impact on recreational values, both during construction of the line and once completed. In particular, it appears that the transmission line will bisect the Two Elk Trail parking lot and initial stretch of trail. Will project construction close the Two Elk Trail? Once constructed, how will the transmission line affect the recreational experience? Clearly, the potential impacts on this popular recreational trail (and all other affected trails) requires significant analysis in the EA.

Of course, it's not just the human environment that may be negatively impacted by the project. As is well understood at this point in time, elk populations in the project area are in decline. We anticipate that the EA will look closely at the potential impacts of the project on local elk herds both during and after construction.

We further note that the Project contemplates significant utilization of helicopters to place the transmission line in two locations. We anticipate that the EA will include a comprehensive analysis of the likely impacts on the human and natural environment from extensive helicopter usage. In this regard, we expect that your analysis will assess the real world impact of helicopter usage based on the recent experience of Minturn residents subjected to extensive helicopter logging.

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We further expect that the analysis will comprehensively assess the evident safety concerns implicated by the proposed use of helicopters to place the transmission line immediately above and along the Dowd Junction portion of I-70, one of the most dangerous stretches of interstate in the United States. The idea of helicopters carrying transmission line poles through an extremely tight, twisty valley over a dangerous, heavily used transportation corridor is chilling. We expect that the EA will carefully assess these dangers.

Finally, last but certainly not least, we are concerned about the project proposal to run the new transmission line on and across a known significant landslide risk immediately south of I-70 between EagleVail and Down Junction. We expect that the EA will assess the increased likelihood of a catastrophic landslide across I-70 as a result of the project.

In addition to these specific concerns, we hereby incorporate by reference all other comments submitted in response to the invitation for comments.

We look forward to receipt of the EA for this proposed action.

Very truly yours,

/s/ Michael J. Heaphy

/s/ Melissa L. Decker

Michael J. Heaphy

Melissa L. Decker

*Original Signatures Available On Request*