



COLORADO

Parks and Wildlife

Department of Natural Resources

Area 8 - NW Region
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Glenwood Springs, CO 81601
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White River National Forest
Scott Fitzwilliams, Forest Supervisor
c/o Adam Bianchi, Acting District Ranger & Matt Klein, Realty Specialist
Eagle-Holy Cross Ranger District
PO Box 190, Minturn, CO 81645

Dear Mr. Fitzwilliams,

Thank you for the opportunity to provide comments on the proposed Holy Cross Energy (HCE) Avon-to-Gilman 115-kV Transmission Line project. As you know, Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embraced and fulfilled through CPW's mission to perpetuate the wildlife resources of Colorado and to provide sustainable outdoor recreation opportunities that educate and inspire future generations.

CPW has reviewed the proposed transmission line alignment from HCE, and offers the following information and recommendations:

- The current proposed alignment passes through or immediately adjacent to a variety of sensitive wildlife habitats. This includes, but is not limited to:
 - Elk production areas, elk winter range, elk severe winter range, elk winter concentration areas, and elk migration corridors.
 - Mule deer concentration area, mule deer migration corridor, mule deer highway crossing, and mule deer summer range.
 - Moose summer and winter range.
 - Canada lynx summer and winter range and potential lynx habitat.
 - Peregrine falcon nesting sites.
 - Golden eagle nesting sites.
- The Dowd Junction area and surrounding U.S. Highway 24 corridor in the Dowd/Minturn area is all mapped as CPW Category 1 and Category 2 Crucial Habitat, defined as:
 - Category 1: Habitats, including wildlife corridors, that are rare or fragile and are essential to achieving and/or maintaining wildlife species viability or exceptional diversity. The habitat contains a unique combination of location or composition or complexity of the habitat or corridor which cannot be duplicated, and is therefore considered irreplaceable. KEY: Irreplaceable intact habitats and migration corridors for T&E/Big Game/Exceptional Diversity of Species. Loss of which would cause significant impact on wildlife species.
 - Category 2: Habitat, including wildlife corridors, which is limiting to a fish or wildlife community, population, or metapopulation. Loss of any of this habitat or corridor could result in a significant local or population-level decline in species distribution, abundance,



or productivity. The habitat or corridor is essential to achieving and maintaining fish and wildlife target population or management objectives. Restoration or replacement is difficult, or may be possible only in the very long term. KEY: Habitats essential to achieving target T&E/Big Game target populations. Examples include wetlands, significant breeding grounds, the loss of which would have negative impacts to wildlife populations.

- The proposed action by HCE lies entirely within Game Management Unit (GMU) 45. Furthermore, GMU 45 exists with the elk Data Analysis Unit E-16. E-16 has been experiencing a significant decline in its elk population, equating to a roughly 50-60% reduction over the last 10 years. This decline is likely due to a variety of complex factors, including habitat loss and fragmentation, habitat connectivity impairment, and anthropogenic disturbance. In recent years, CPW has taken dramatic action to limit elk harvest and protect the calf-bearing portion of the E-16 elk herd. E-16 has subsequently seen a 99% reduction in limited elk hunting licenses. Ostensibly, there is no cow elk hunting within E-16 anymore.
- Given the sensitivity of both habitat and species within the project area, CPW recommends that a variety of wildlife closures be considered during the construction phase and for maintenance associated with the transmission line.
 - For portions of the line running adjacent to elk production areas and elk winter range in and around Dowd Junction, recommended closure dates are Nov 23 to June 20. This is consistent with Forest Service trail closures in the immediate vicinity.
 - For portions of the line generally running southeast from Dowd to Gilman, recommended closure dates are Nov 23 to April 15, with the area in and adjacent to Two Elk Creek further closed till June 30. This is consistent with Forest Service trail and area closures for wintering wildlife and calving/fawning season.
 - CPW recommends that the Forest Service conduct raptor nest surveys and monitoring along the U.S. Highway 24 corridor to determine the status of documented golden eagle and peregrine falcon nesting sites. If active golden eagle nesting sites are identified, CPW encourages HCE to consult with staff to discuss precautions or actions that can buffer disturbance to these sites.
- CPW recommends basic Best Management Practices (BMPs) for Right-of-Way (ROW) construction, and maintenance be employed. BMPs specific to ROW management may include following the most updated and appropriate Integrated Vegetation Management (IVM) framework. Understanding each site-specific ecosystem, the species impacted, and then establishing treatment options will allow for more adaptive management of ROW vegetation. If correctly employed, IVM can minimize the negative effects of utility ROWs. Noxious weed management is also a crucial part of effective IVM, and recommends that the Forest Service work with HCE to develop noxious weed controls for the lifetime of this project. In areas where it is most appropriate and to discourage human use and disturbance, CPW also recommends coarse woody debris, deadfall and felled trees be utilized in the ROW corridor.
- CPW recommends that HCE directly engage with CPW for portions of the project that overlap on State Wildlife Areas or leased properties that fall under CPW's Public Access Program. This will help establish consistency for mitigation efforts associated with this project.



CPW looks forward to future review of the WRNF's draft EA, and appreciates the opportunity to provide comment for this project. If there are any questions or concerns please reach out to District Wildlife Manager, Devin Duval at 970-930-5264.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Yamashita', with a stylized, cursive script.

Matt Yamashita,
Area Wildlife Manager

Cc. Devin Duval, District Wildlife Manager
File

