



November 19, 2021

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

Submitted via online comment tool:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>

RE: Comments on the Draft Revised Land Management Plan

Dear Plan Revision Team,

Tri-State Generation and Transmission Association (Tri-State) is a not-for-profit cooperative power supplier serving 45 members, including 42 electric distribution cooperatives and public power districts in Colorado, Nebraska, New Mexico, and Wyoming. With our members, we power more than a million electricity consumers across nearly 200,000 square miles of the West. Our mission is to provide our members a reliable, affordable, and responsible supply of electricity in accordance with cooperative principles. Tri-State's transmission system includes approximately 5,770 miles of high-voltage transmission lines and an extensive network of substations, telecommunications facilities, maintenance centers and field offices.

Tri-State owns and operates transmission lines, communication sites, and substations on the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests as outlined below, and recently completed upgrading its Montrose to Nucla transmission line.

**Existing transmission lines**

- Montrose – Maverick 230kV
- Sunshine – Telluride 115kV
- Ames Hydro – Sunshine 115kV
- Ames Hydro - Burro Bridge 115kV
- Sunshine - Wilson Mesa 115kV
- Alkali – Skito 115kV

**Existing substations**

- Sunshine



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### **Existing communication sites**

- Sunshine
- Monarch Passive
- Monarch Comm
- Gray Head

Tri-State appreciates the opportunity to provide comments on the Draft Revised Land Management Plan (Draft Plan) for the GMUG. Tri-State has commented previously during other stages of this plan revision process including the Working Draft, Draft Forest Assessments, Wilderness Inventory and in response to the Notice of Intent (NOI) to revise the GMUG land and resource management plan published April 3, 2018 (83 FR 14243). Tri-State very much appreciates that the GMUG released the Working Draft for public input and that several of Tri-State's suggestions have been incorporated into the Draft Plan. Below are Tri-State's comments on the Draft Plan.

### **Utility Corridor Overlay**

The Utility Corridor Overlay boundaries appear to have captured Tri-State's transmission lines that occur on the GMUG. Tri-State supports this overlay designation and is hopeful it remains in the final plan. Tri-State also owns and operates the Blue Mesa-Lake City 115-kV transmission line that parallels a part of the GMUG. We have access that comes from Forest Service land to the transmission line right-of-way (ROW) and can provide these shapefiles if requested. Tri-State observed what appears to be a different mapping approach used near our Crested Butte-Alkali-Skito 115-kV transmission line. There, two small portions of the Utility Corridor Overlay are mapped to the west of the actual line. The mapped overlay areas along Alkali to Crested Butte are offset from the transmission line by 1,000 feet or more in locations where the transmission line is not also on the GMUG. Using a similar approach, the Planning Team should consider adding Utility Corridor Overlay polygons along and offset from our Blue Mesa-Lake City line. Tri-State can provide updated maps and shapefiles to support the final Utility Corridor Overlay layer.

### **Gunnison's prairie dog**

Tri-State's comments on the Working Draft Forest Plan requested the addition of the word "active" to FW-STND-SPEC-24, to make the wording similar to that of FW-GDL-SPEC-25 which references active colonies. Tri-State requests that the Forest Service re-consider FW-STND-SPEC-24 (a prohibition on surface disturbing activities in Gunnison's prairie dog colonies) and make it a Guideline, to allow agency, and future and existing permittees the flexibility to manage these areas consistent with the long-term conservation of the species. Additional flexibility could allow relatively small, short-term surface disturbing activities in inactive colonies without the administrative burden of a plan amendment, while also maintaining population viability.



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### **Recreation Emphasis Corridors**

Electric utilities regularly need to perform vegetation management activities along power lines for safety, reliability, and sometimes regulatory compliance reasons. Tri-State provided additional detail regarding vegetation management needs in its June 2018 scoping comments. As drafted, MA-GDL-EMREC-06 indicates that vegetation management should only be for maintaining or improving the recreation setting. Tri-State requests an exception be added that allows vegetation management along power lines that cross Recreation Emphasis Corridors for reasons unrelated to the recreation setting. This exception should also apply to power lines not incorporated into a Utility Corridor Overlay.

Tri-State appreciates the opportunity to provide these comments on the Draft Plan. 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.

Sincerely,

DocuSigned by:  
*Barbara Walz*  
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Barbara A. Walz  
Senior Vice President  
Policy and Compliance  
Chief Compliance Officer

BAW:cfr:der

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