



COLORADO

Parks and Wildlife

Department of Natural Resources

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27 April 2026

USFS PSICC
Leadville Ranger District

BLM RMD
Royal Gorge Field Office

RE: CPW Comments in the Public Service Company of Colorado (Xcel Energy) Circuits 9254, 9255, and 9257 kV Transmission Line Rebuild Project Draft EA, Chaffee and Lake Counties, Colorado

Colorado Parks and Wildlife (CPW) received your request for comments on the Public Service Company of Colorado (Xcel Energy) 9254/9257 and 9255 Transmission Line Rebuild #68946 Draft Environmental Assessment (the Project), to be developed by Xcel Energy in Chaffee and Lake Counties. CPW staff are familiar with the location of the Project as well as the areas surrounding the site. CPW appreciates that United States Forest Service (USFS), Bureau of Land Management (BLM), and Xcel Project Managers have worked with CPW for scoping and project initial consultation. CPW comments will address potential impacts to wildlife and habitat within the identified Project area.

In addition, CPW requests the incorporation of our recommendations to avoid, mitigate, and minimize impacts to resources on public lands/ forest system lands based on the project proposal. Some of the recommendations are similar to those found in Appendix D - Project Design Features, however, some provide additional detail to improve wildlife conservation outcomes based on best available science and location-specific detail. CPW would appreciate recommendation adoption and



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incorporation into the Special Use Permit (FS) and the BLM's Right of Way (ROW) Grant as terms and conditions to support those outlined in Appendix D.

CPW'S STATUTORY RESPONSIBILITY

CPW has a statutory responsibility to manage all wildlife species in Colorado; as such we encourage protection for Colorado's wildlife species and habitats through responsible energy development and land use planning. Protection of core wildlife areas, quality fisheries and habitat, big game winter range and seasonal migration corridors, and raptor nesting locations are of extreme importance. CPW recommends that all proposed projects be assessed to avoid, minimize, or mitigate impacts to sensitive wildlife habitats and species. That includes species of concern as well as Federal and/or State listed species, big game wildlife (migration corridors, winter range, and parturition areas), breeding and nesting habitats for sensitive ground-nesting birds, and nests of raptors sensitive to development in order to prevent loss of habitat or fragmentation of habitat. US Fish and Wildlife Service should be consulted on any Federally listed Endangered and Threatened Species that might be present at the location.

GENERAL RECOMMENDATIONS

CPW recommends that, when selecting sites for development, the developer prioritizes options that avoid critical wildlife habitats over the use of mitigation strategies. If developers can consolidate facilities and roads to the extent possible, this will minimize the amount of land that is disturbed and fragmented. New transmission lines should follow existing transmission corridors and pre-disturbed areas, such as roads, whenever feasible, to minimize additional impacts on wildlife and habitat fragmentation. If there are multiple developments planned for an area, CPW recommends consideration of wildlife movements at a larger scale. Early consultation between CPW and developers is critical for avoiding impacts to sensitive species, and we appreciate the continuing coordination.

UNDERSTANDING OF THE PROJECT

CPW understands that the 115 kV Transmission Line Rebuild project analyzed within the Draft Environmental Assessment (EA) incorporates scoping and CPW recommendations from previous consultation and is in the process of gathering public



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comments. The proposed Project will be located in Chaffee and Lake Counties, Northeast and Southwest of Leadville, Colorado. The double-circuit portion would be rebuilt by expanding the existing 100-foot 9257 transmission line ROW to 150-feet and abandoning the existing 9254 75-foot transmission line ROW in this section. The single-circuit portions of the 9254 and 9257 would be rebuilt by expanding the existing 75-foot and 100-foot transmission line ROWs, respectively, to 150-foot transmission line ROWs on BLM lands and operating within the existing 75-foot transmission line ROWs on USFS lands. The 9255 would be rebuilt within the existing 75-foot transmission line ROW. The rebuilds would use steel monopole, H-frame, and three-pole structures for construction, and include access (open system route and/or administrative access) to the transmission line ROW. Transmission lines 9254/9257 and 9255, were originally constructed in the 1950s through the 1960s and are approaching the end of their serviceable life. These transmission lines provide power to communities in Chaffee, Eagle, and Lake Counties, Colorado.

For USFS, the proposed action would amend the current Special Use Permit (SUP) LDV733 authorization to permit construction activities for rebuilding the transmission lines within the existing 75- foot ROWs and would add uses of access roads not included in the current SUP. Temporary structure work areas within the existing and abandoned ROWs for 9254/9257 and 9255. Temporary pulling and tensioning sites for 9254/9257 and 9255. This EA analyzes access for construction, patrol and maintenance.

For BLM, the proposed action will create a new Right of Way (ROW) grant to include authorization to permit construction activities for rebuilding of the transmission lines, expansion of the 9254/9257 transmission line ROW, and use of additional access roads. Temporary structure work areas within the existing, expanded, and abandoned transmission line ROWs for the 9254/9257 and 9255. Temporary pulling and tensioning sites for the 9254/ 9257 and 9255. This EA analyzes access for construction, patrol and maintenance.

The Proposed Action includes Design Features listed in Appendix D to be applied to both USFS PSICC and BLM RGFO lands unless specified to a specific area or agency management.

Implementation would occur in phases, primarily in snow free seasons (timing informed by design features). Construction activities would occur over multiple field seasons.



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Rebuild construction activities would include:

- temporary structure work areas within the existing transmission line ROWs,
- temporary pulling and tensioning sites,
- temporary construction authorizations,
- rehabilitation of temporary ground disturbance,
- use of helicopters at some locations, and
- removal of existing wood and steel poles and structures, old line material and hardware.

Equipment: The ground would be excavated for the poles using a mini excavator, backhoe, digger, or mounted auger (truck or tracked vehicle is typical) if access and conditions permit; otherwise, the holes for the poles would be hand dug using jackhammers (electric or air) and other tools. Up to twenty vehicle trips could be required for the work at each pole. Helicopters would be used in some areas. Access typically is established with dozers, loaders, graders, skid-steers, and mowers.

Within the existing transmission line ROW on USFS land, 17 acres of permanent and 12 acres of temporary impacts would occur from structure work areas, pull sites, and access. 17 acres of permanent and 10 acres of temporary impacts would occur outside of the existing transmission line ROW on USFS land due to pull sites and access roads.

On BLM land, 31 acres of permanent and 19 acres of temporary impacts would occur within the existing transmission line ROW from pull sites, structure work areas, and access. Outside of the existing transmission line ROW, 19 acres of permanent and 12 acres of temporary impacts would occur from the transmission line ROW expansion, pull sites, and access.

Access roads would be maintained for operation and maintenance (O&M) activities. Construction access to poles would remain for patrol access, gates would be installed according to agency requirements. Ground disturbance on access roads includes the following:

- clearing/grading and leveling terrain using cut and fill at some pole locations,
- compaction from construction vehicle passes, and
- implement equivalent permanent erosion reduction methods.

Vegetation Management: Short-term cutting of trees and shrubs followed by long term maintenance of vegetation structure for safe operation of the line would be



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completed. For construction, shrubs would be mowed for safe access and operations on access roads, pull sites and pole locations. Adjacent trees would be trimmed for safe vehicle access and safe conductor clearance requirements. Vegetation at structure work areas would be restored following construction. Transmission line ROW vegetation would be trimmed or removed for safe conductor clearance requirements.

Temporary Work Areas: Within the transmission line ROW, a 75-foot by 75-foot work area would be required for replacing and removing poles. After pole placement, a 50-foot by 50-foot maintenance pad around the new pole would remain, where feasible. In resource concern areas, work pads would be restored. All poles would be placed within the existing transmission line ROW and each hole for the poles would require a circular area of approximately 12.5 square feet. Once ground disturbance is complete and during the appropriate season, Xcel Energy would revegetate disturbed areas to individual plant densities of at least 70-percent pre-disturbance levels per the Storm Water Management Plan (SWMP) or regulatory requirements. Excess spoil material from the installation of the structures is expected to be less than one cubic yard per pole as materials are used for backfilling and restoration.

Construction Access: To accommodate the types of equipment listed above, BLM or USFS administered access routes would be up to 24 feet wide (20-foot travel surface with 2-feet of shoulder on each side) using both existing and new routes. The routes identified for construction access exist on the ground either as agency designated roads or undesignated routes. Some construction access routes would be reclaimed/revegetated, while others would be gated, limiting access for administrative uses only or left open for public access, depending on agency needs.

Construction access routes have been located to avoid wetlands areas as much as possible. However, in some locations where avoidance is not practicable, temporary timber matting or erosion control materials would be placed in wetland areas. Stream crossings would consist of constructed fords or temporary bridges. Activities on construction access routes would follow the seasonal timing restrictions identified in the Design Features for the project. Highway entrances that aren't currently being used and would be required for intermittent patrol/maintenance access would be closed with barriers or other controlled measures as recommended by CDOT.

Temporary safety closures of some routes may be implemented during construction activities.



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Long-Term Patrol and Maintenance Access: If a construction access route is needed for long-term patrol and maintenance the width would be reduced/reclaimed to approximately 12 feet (8-foot travel surface with 2-foot shoulder on each side), or to a width needed for long-term agency purposes. Patrol and maintenance work would typically be accomplished with light trucks and UTVs on an intermittent basis. Most of the long-term patrol and maintenance access routes that are not open for public travel would be administrative routes kept in a partially vegetated condition. However, stormwater drainage features or stream crossings (fords) would be inspected and maintained even when the route is not in use. The Proposed Action also includes reclaiming and removing currently authorized routes that are no longer needed due to line consolidation. These routes would be used for tower removal and then reclaimed.

Access Route Analysis: Approximately 25-miles of intermittent and permanent access roads would be used on USFS and BLM lands to construct, operate, and maintain the Project. Roughly 12 miles of access roads would be utilized on USFS lands. Of those 12 miles, 5.7 miles would occur inside the transmission line ROW, and 6.3 miles would occur outside. On BLM lands, approximately 13 miles of access roads would be utilized. Roughly 6.3 miles of access roads would overlap the transmission line ROW and 6.5 would occur outside.

Approximately 73 percent of the proposed permanent access roads currently exist on the landscape as a two-track or dirt road, some of which are unauthorized. Permanent access roads not included in the USFS MVUM and BLM TMP would be added as administrative use or open to the public as determined by the USFS and BLM. Where roads cross wetlands and waterbodies, intermittent access roads would be matted or a temporary crossing structure used (such as an air bridge) to avoid permanent impacts. Intermittent access roads would be reclaimed (0.44 miles on USFS and 2.26 miles on BLM, Table 4) following construction. Future patrol access on intermittent roads would occur as overland travel during the dry season to the extent possible.

The majority of access roads exist on the ground either as authorized or undesignated routes (such as existing two-track or other established routes). Approximately 1 mile of existing access roads on 9254 would be fully reclaimed where the transmission line ROW is relinquished.



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The Project would utilize one access road that overlaps a portion of Cache Creek Road, included in BLM's TMP. The Project would use access roads that overlap with Chalk Mountain, Columbia Gulch, Columbine Ditch, Columbine Spur, Dry Columbia Gulch, and Private Access Number, included in USFS's MVUM roads.

Helicopter Access: Helicopter flight paths would be restricted to the existing transmission line ROW and paths from staging areas directly to construction sites within or adjacent to the transmission line ROW. Helicopters would fly and hover 200 to 300 feet above the ground surface and deliver equipment via a winch line. Helicopters are not expected to set down on USFS or BLM managed lands except in the case of emergency or where permission has been granted. No refueling would occur on public lands.

Staging Areas: Construction staging areas would all be located on private lands and would not include any USFS or BLM managed lands.

Superfund Site: The 9254/9257 transmission line passes through the California Gulch superfund site from proposed pole locations 1 to 15 on private land. The 9255 transmission line passes through the California Gulch superfund site at proposed pole locations 20, 23 to 26, and 33 to 35 on City of Aurora land. Work in this area would follow USEPA and Colorado Department of Public Health and Environment (CDPHE) guidelines.

For the project, the term 'Project Design Features' is a term used to describe those actions committed to by the project proponent that would be applied during the rebuild. The terms Resource Protection Measure, Best Management Practice (BMP), and Applicant Committed Measure are all considered Project Design Features which are displayed in Appendix D. The Maps in Appendix J include the locations of proposed new pole structures, access roads and the location of some of the Project Design Features such as matting, temporary bridge or culverts. In addition, a Plan of Development (POD) should be prepared that provides a detailed description of operations proposed for this Project. The POD would be approved by USFS and BLM prior to NTP.



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POTENTIAL IMPACTS TO WILDLIFE RESOURCES

High Priority Habitats (HPH) are sensitive areas identified using CPW's Species Activity Mapping (SAM) database, which incorporates scientific data and wildlife observations. These publicly available maps inform environmental assessments and planning. CPW review and GIS analysis showed that the proposed project area overlaps with the following HPH.

- Aquatic Gold Medal Waters
- Aquatic Native Species Conservation Waters HPH
- Aquatic Sportfish Management Waters HPH
- Bighorn Sheep Production Area, Winter Range, and Migration Corridor HPH
- Elk Production Area, Severe Winter Range, Winter Concentration Area, and Migration Corridor HPH
- Mule Deer Severe Winter Range, Winter Concentration Area, and Migration Corridor HPH
- Pronghorn Migration Corridor HPH
- Bald Eagle Active Nest Site
- Bald Eagle Roost or Communal Roost
- Golden Eagle Active Nest Site
- Northern Goshawk Active Nest Site
- Peregrine Falcon Active Nest Site
- Townsend's Big-eared Bat, Mexican Free-tailed Bat, and myotis winter hibernaculum.

CPW also considers Species of Greatest Conservation Need (SGCN) and Species of Concern (SC) identified in the State Wildlife Action Plan (SWAP). SGCN and SC are species experiencing population declines, habitat threats, or ecological vulnerabilities requiring proactive conservation. These may include federally or state-listed threatened, endangered, or special-concern species.

A number of SGCN and SC species have been documented in the area or may be present based on modeling and range maps. These SGCN species include fourteen (14) bird species, two (2) invertebrate species, sixteen (16) mammal species, two (2) amphibian species, and fourteen (14) plants. All SGCN and SC are listed in the table below.



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CPW Project Area Species of Greatest Conservation Need*			
Major Group	Scientific Name	Common Name	CPW Status#
Birds	<i>Accipiter atricapillus</i>	American Goshawk	SWAP Tier 1
Birds	<i>Flaco peregrinus</i>	Peregrine Falcon	SWAP Tier 2
Birds	<i>Athene cunicularia</i>	Burrowing Owl	SWAP Tier 2
Birds	<i>Selasphorus rufus</i>	Rufous Hummingbird	SWAP Tier 2
Birds	<i>Flaco mexicanus</i>	Prairie Falcon	SWAP Tier 1
Birds	<i>Gymnorhinus cyanocephalus</i>	Pinyon Jay	SWAP Tier 1
Birds	<i>Leucosticte australis</i>	Brown-capped Rosy Finch	SWAP Tier 1
Birds	<i>Leucosticte atrata</i>	Black Rosy Finch	SWAP Tier 1
Birds	<i>Circus hudsonius</i>	Northern Harrier	SWAP Tier 2
Birds	<i>Aquila chrysaetos</i>	Golden Eagle	SWAP Tier 1
Birds	<i>Haliaeetus leucocephalus</i>	Bald Eagle	SC
Birds	<i>Lagopus leucura</i>	White-tailed Ptarmigan	SWAP Tier 1
Birds	<i>Leiothlypis virginiae</i>	Virginia's Warbler	SWAP Tier 2
Birds	<i>Melanerpes lewis</i>	Lewis's Woodpecker	SWAP SGIN
Fish	<i>Oncorhynchus virginalis</i>	Rocky Mountain Cutthroat Trout	SWAP Tier 1
Mammals	<i>Lasionycterus noctivagans</i>	Silver-haired Bat	SWAP Tier 2
Mammals	<i>Myotis ciliolabrum</i>	Western Small-footed Myotis	SWAP Tier 1
Mammals	<i>Myotis evotis</i>	Long-eared Myotis	SWAP Tier 1
Mammals	<i>Myotis lucifugus</i>	Little Brown Myotis	SWAP Tier 1
Mammals	<i>Myotis volans</i>	Long-legged Myotis	SWAP Tier 1
Mammals	<i>Corynorhinus townsendii</i>	Townsend's Big-eared Bat	SWAP Tier 2
Mammals	<i>Corynorhinus townsendii pallescens</i>	Pale Lump-nosed Bat	SC, SWAP Tier 2
Mammals	<i>Ochotona princeps</i>	American Pika	SWAP Tier 1
Mammals	<i>Lepus americanus</i>	Snowshoe Hare	SWAP Tier 2
Mammals	<i>Lepus townsendii</i>	White-tailed Jackrabbit	SWAP SGIN



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Mammals	<i>Clethrionomys gapperi</i>	Southern Red-backed Vole	Swap Tier 2
Mammals	<i>Lynx canadensis</i>	Canada Lynx	SE, SWAP Tier 1
Mammals	<i>Ovis canadensis</i>	Bighorn Sheep	SWAP Tier 2
Mammals	<i>Cynomys gunnisoni</i>	Gunnison's Prairie Dog	SWAP Tier 1
Mammals	<i>Sciurus aberti</i>	Abert's Squirrel	SWAP SGIN
Mammals	<i>Sorex eximius</i>	Western Pygmy Shrew	SWAP SGIN
Amphibians	<i>Anaxyrus boreas pop. 1</i>	Boreal Toad	SE, SWAP Tier 1
Amphibians	<i>Lithobates pipiens</i>	Northern Leopard Frog	SWAP Tier 1
Insects	<i>Bombus occidentalis</i>	Western Bumblebee	SWAP Tier 1
Insects	<i>Lestes alacer</i>	Plateau Spreadwing	SWAP Tier 2
Plants	<i>Delphinium alpestre</i>	Colorado Larkspur	SWAP SGIN
Plants	<i>Ptilagrostis porteri</i>	Porter Feathergrass	SWAP Tier 1
Plants	<i>Eriogonum coloradense</i>	Colorado Wild Buckwheat	SWAP Tier 1
Plants	<i>Eriogonum brandegeei</i>	Bradegee Wild Buckwheat	SWAP SGIN
Plants	<i>Castilleja puberula</i>	Downy Indian Paintbrush	SWAP Tier 2
Plants	<i>Delphinium robustum</i>	Wahatoya Creek Larkspur	SWAP SGIN
Plants	<i>Sisyrinchium pallidum</i>	Pale Blue-eyed Grass	SWAP Tier 2
Plants	<i>Draba grayana</i>	Gray's Peak Whitlow Grass	SWAP Tier 2
Plants	<i>Saussurea weberi</i>	Weber Saussurea	SWAP Tier 2
Plants	<i>Draba exungiculata</i>	Clawless Draba	SWAP Tier 1
Plants	<i>Ipomopsis globularis</i>	Hoosier Pass Ipomopsis	SWAP Tier 1
Plants	<i>Luzula subcapitata</i>	Colorado Wood Rush	SWAP Tier 2
Plants	<i>Physaria alpina</i>	Avery Peak Twinpod	SWAP Tier 1
Plants	<i>Townsendia rothrockii</i>	Rothrock Townsend Daisy	SWAP Tier 2

* All species listed in this table have been documented in or within one mile of the Project area or have the potential to occur in the project area.

State Wildlife Action Plan=SWAP; Species of Concern=SC; Listed Threatened=LT; State Threatened=ST; State Endangered=SE CPW Project Area Species of Greatest Conservation Need* SGIN=Species of Greatest Information Need



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IMPACT AVOIDANCE, MINIMIZATION AND/OR MITIGATION RECOMMENDATIONS

Aquatic Habitats: Aquatic Sportfish Management Waters & Native Fish and Aquatic Species Conservation Waters

The proposed Project is within one mile of the Arkansas River, designated as Aquatic Gold Medal Waters HPH. Site plans indicate planned crossings which are designated as Aquatic Sportfish Management Waters HPH. The Arkansas River and its tributaries flow through the proposed transmission rebuild project footprint at multiple crossings.

Further, the Project location contains Aquatic Native Species Conservation Waters (HPH) which are lakes and river segments containing species under population conservation and recovery management. Native Colorado cutthroat trout species (including Greenback cutthroat trout), Long-nosed dace, and Arkansas darter are found within the Arkansas River and its tributaries throughout the project area. Additionally, seasonally wet areas provide crucial breeding and foraging habitat for native fish and amphibians such as boreal toads, Northern leopard frogs, and tiger salamanders.

CPW agrees with the FS/BLM requirements for structural (e.g., diversion structures, silt fences, plant buffers, slope roughening, and retention ponds) and nonstructural (e.g., preserving natural vegetation, preventative maintenance, training, inspections, and spill response procedures) mitigation measures to minimize the effects of potential groundwater contamination from stormwater runoff associated with construction activities.

CPW also appreciates Design Feature LU-7 as a protection for amphibians:

“LU-7: Construction operations will avoid, to the extent feasible, the disturbance during the wet season. Wet conditions include periods after precipitation events, with saturated soil conditions, and vehicles cause deep rutting (four or more inches deep)”.

CPW appreciates and agrees with the operations within aquatic ecosystems design features listed under AQU-2, AQU-3, AQU-5, AQU-8, AQU-9, AQU-10 and AQU-11. In addition to those design features and to avoid or minimize adverse impacts to the Arkansas River, CPW recommends the following:



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- Due to heavy equipment usage in the Project area, spills are possible and have the potential to severely impact Gold Medal waters. Strict adherence to OG-8 Appendix 2 for spill reporting and response is advised. This includes, but is not limited to, immediate notification of CPW Area Wildlife Manager Sean Shepherd, Assistant District Wildlife Manager Zachary Baker, District Wildlife Manager Jackson Baroni, Area 13 Aquatic Biologist Alexander Townsend as well as Spill Response, Assessment, and Documentation.
- Fish spawn at specific times of the year. Excessive sedimentation can smother egg incubation and trout species can be further affected by pathogens carried in the sediment. CPW recommends in-water work that will least impact the aquatic environment and adversely impact fish spawning activities. Please consult with CPW prior to planning and initiating work to identify optimal timelines for work adjacent to or within 300 feet of the ordinary high-water mark. Fish spawning dates are:
 - Rainbow Trout: March 1- June 15.
 - Brown trout: October 1 - May 1.
- CPW's requested period for in-stream construction or general work is limited to August 15 to September 30.
- If tools, construction mats, and/or heavy equipment are to be used for instream work that were previously working in another stream, river, lake, pond, or wetland, remove all mud, plants, and organic materials away from water bodies, and apply one of the following procedures to prevent the spread of Aquatic Nuisance Species and other pathogens:
 - Immerse tools and/or other equipment in a solution of a quaternary ammonium-based institutional cleaner and clean water (six ounces of Green Solutions High Dilution Disinfectant 256 or Super HDQ Neutral per gallon of clean water) for at least ten minutes prior to, and after, work within a waterway. Rinse with clean water, and dispose of chemicals properly, away from water bodies.
 - Spray or soak tools and/or equipment with clean water (must be 140°F or warmer) for at least ten minutes prior to, and after, work within a waterway. Gear and equipment should be sprayed or soaked away from water bodies. All equipment should be completely drained of water and



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dry before use in the water bodies.

- Avoid construction activities within 500 feet of the Ordinary High-Water Mark of the Arkansas River and its tributaries. This includes both temporary construction impacts as well as the construction of permanent transmission lines and associated access road features.
- Avoid impact to the creek bed during construction and after reclamation. The stream bed should be handled as a stream crossing, whether or not water is present at the time of construction. Minimizing impact to creek beds is a priority for CPW, and avoidance is best whenever possible to protect seasonally wet sections of the creek that provide native amphibians with important breeding and foraging habitats in the spring and summer months.
- Due to the potential of amphibian species being within the Project area and near the creek, CPW recommends preconstruction surveys in the spring, when amphibian species are most active. CPW would be happy to have further consultations on survey methods and timing.
- Utilize stormwater control best management practices and construction controls for sediment control.
- Avoid any increased sedimentation in nearby drainages to avoid impacts to nearby aquatic habitat.
- Ensure creek crossings are perpendicular to reduce habitat disruption and use structures outside riparian zones where possible.
- During construction, creek crossing by vehicles should be avoided, whether or not water is present at the time of construction. All trucks or heavy equipment should be restricted from crossing the creek, and if required, we recommend placement of culverts in streams in such a way that they do not impede seasonal surface water flow.
- Finally, CPW recommends that native riparian canopy or stream bank vegetation be conserved where possible.



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Big Game

CPW has documented high bighorn sheep, elk, mule deer, and pronghorn use of this area during the winter months and especially during severe winter months as snow accumulates at higher elevations and animals move into the area. Habitat for big game winter range and migration corridors are both a federal and state priority and supported by Federal Secretarial Order (SO) 3362 Improving Habitat Quality in Western Big-Game Winter Range and Migration (2018) and Executive Order D 2019 011 from Colorado Governor Jared Polis, Conserving Colorado's Big Game Winter Range and Migration Corridors (2019).

In assessing potential impacts to wildlife, CPW considers potential negative impacts on big game species through direct habitat loss and fragmentation. CPW also considers negative impacts from the displacement of big game during parturition, displacement from identified winter range, and the functional habitat loss associated with increased human activity in these habitats. Mule deer and elk typically display high site fidelity to winter range; however, recent studies have shown that deer avoid areas near construction activities and may be displaced or shift their distribution on winter range in response to development activities (Hebblewhite 2008, Sawyer 2009). Crucial winter habitats and migratory corridors are known to be a limiting factor on big game populations in western Colorado and other high mountain areas of the western United States (Sawyer et al. 2009, Bishop et al. 2009, Bartman et al. 1992). Disturbance to big game in the winter can lead to poor body condition, shift distributions to suboptimal habitat types, reduce the likelihood of over-winter survival of adults, and/or result in a decrease in neonatal survival rates (Ciuti et al 2012).

Big game movement corridors and other High Priority Habitats are mapped and updated on a yearly basis. Habitats and wildlife use of those habitats change due to disturbance, construction, development, fencing, variations in weather including precipitation and temperature, seasons of habitat use, available vegetation for foraging, breeding, and cover, and other factors. CPW has knowledge and experience with big game and other wildlife populations, habitat use, and seasonal movements within the project area. CPW is available for consultation regarding avoidance or mitigation for construction, maintenance, and reclamation activities, especially related to migration/ movement, winter range, and concentration areas for big game and other wildlife species.



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CPW appreciates the FS/BLM analysis for terrestrial wildlife resources and agrees with the Appendix D Project design features to include:

- Appropriate speed limits would be followed on access roads to minimize the risk of injury or mortality to wildlife and lessen dust creation.
- Trenches and holes created by construction work would be fenced or covered each day to prevent the entrapment of wildlife. Impacts would be avoided or minimized by reclaiming temporary workspaces to restore habitat and keeping disturbance to the minimum area necessary to complete the work safely.
- A noxious weed management plan would be implemented to minimize and avoid spread or establishment of non-native plants and noxious weeds.
- Any temporary disturbance would be reclaimed and reseeded following activities.
- Work within wetlands and waterways would be avoided and stormwater management and spill control and countermeasures plans would be implemented to protect habitat and waterbodies in the action area.

CPW also recognizes the big game seasonal restrictions under BIO-9, 9C that states:

“Avoid construction or maintenance activities within big game fawning, calving, lambing, and wintering areas according to CPW guidelines. If construction or maintenance activities must occur during this time period, qualified biologists will conduct clearance surveys prior to activity. Based on survey results, agency coordination and approval may be required prior to work starting”.

CPW also appreciates the recommendations under BIO-10 and BIO-10A:

“BIO-10: Access roads for maintenance will have restricted access to protect the resources in that area from further disturbance by limiting other motorized vehicles.

BIO-10A: Off-road travel will be restricted to the designated work areas”.

In addition to the Appendix D project design features, CPW recommends the following best management practices for big game species.

Bighorn Sheep



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Bighorn sheep Winter Range is the overall range for the species where 90 percent of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up, or during a site-specific period of winter as defined for each portion of the range. The project area also contains HPH for Bighorn Sheep Production Area and Migration Corridors. This information was derived from CPW field personnel. These data are updated on a four-year rotation with one of the four CPW Regions updated each year. Given that the proposed project location is immediately adjacent to a residential structure, impacts to this species are anticipated to be negligible, however CPW recommends the following best practice to avoid or minimize adverse impacts to the species:

- Conduct development activities outside the winter range seasonal occupancy period (November 1 to April 30).
- Avoid construction activities (including overflights) from April 15 to June 30.

Elk

Elk Production Area, Severe Winter Range, Winter Concentration Area, and Migration Corridor HPH are all intersected by the proposed transmission line rebuild and associated infrastructure.

To avoid, minimize, or mitigate adverse impacts to elk, CPW requests the following:

- The transmission line intersects Elk Production Area, where CPW recommends no human activity during May 15 - June 30.
- Most of the transmission line rebuild project area occurs within Elk Severe Winter Range, where there should be no human activity from December 1 - April 30.
- There are multiple segments within the project area in an Elk Migration Corridor, so construction activities should not occur in the fall (September - November) when animal migration may be disrupted by construction activities.

Mule Deer



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Mule Deer Severe Winter Range, Winter Concentration, and Migration Corridor HPH are intersected by the proposed transmission line and associated infrastructure and roads.

To avoid, minimize, or mitigate adverse impacts to mule deer, CPW requests the following:

- The proposed transmission line occurs in Mule Deer Severe Winter Range, where CPW recommends no human activity from December 1 - April 30.
- The transmission line intersects Mule Deer Migration Corridor. CPW recommends no construction activities to minimize adverse impacts to Mule deer from December 1 - April 30.

Pronghorn

The proposed construction rebuild and associated infrastructure project bisects Pronghorn Migration Corridor HPH in Transmission segment 9255.

To avoid, minimize, or mitigate adverse impacts to pronghorn, CPW requests the following:

- Human activities disrupt and bisect suitable migration habitat. Migrating pronghorn may be pushed onto the highway if migration occurs when construction activities occur (May 1 - November 1).
- CPW recommends seasonal closure if wildlife conflicts or wildlife-vehicle incidents increase during September - November.
- CPW is available to consult on pronghorn winter range, concentration areas and migration corridors within transmission segment 9255.

Bears

Black bears are known to inhabit the proposed project areas and adjacent properties. Improperly managed trash receptacles, bins, and storage areas can become strong attractants for bears, leading to increased bear-human conflicts, habituation, and



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potential threats to both human safety and wildlife health. Bears attracted to readily available food sources, including garbage, frequently become habituated to human presence, increasing risks of property damage, vehicle collisions, and management actions, including lethal removal of problem bears (Beckmann & Berger, 2003; Spencer et al., 2007). District staff respond to numerous bear incidents directly adjacent to the proposed campground annually due to trash cans being flipped and/or destroyed.

To minimize the potential property damage and/or human-bear conflict, CPW recommends the following in addition to Appendix D Gen-6:

- Ensure regular trash removal schedules to prevent accumulation and potential attraction. This is particularly important in May through August when local bear activity is highest.
- Secure storage for waste bins and dumpsters in bear-resistant enclosures or fenced areas.

Raptors and Migratory Birds

The Project is in the breeding range of golden eagle (*Aquila chrysaetos*), bald eagle (*Haliaeetus leucocephalus*), Northern goshawk (*Accipiter atricapillus*), peregrine falcon (*Flaco peregrinus*), and active nest sites are located within the mile buffer of the project area in Transmission segment 9255. Bald eagle roosts or communal roosts are also located within the mile buffer zone of Transmission Segment 9255. The Project area contains suitable habitat for nesting raptors and migratory birds, including SGCN and SC species listed above. To ensure compliance with the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, CPW recommends consultation with USFWS. All migratory birds are protected under the Migratory Bird Treaty Act, and any removal or disturbance of an active migratory bird nest requires prior consultation with CPW and USFWS. Both active and potential nest sites, as well as winter night roosts, should be considered when evaluating potential disturbance during ground-disturbing activities.

CPW agrees with the FS/BLM Design Features limiting disturbance to the greatest practicable extent, using native seed mixtures for revegetation activities and to facilitate understory growth, and that avian surveys should occur prior to removal of



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trees during the nesting season, and if avian nesting is found, tree removal would halt until proper nest removal techniques are implemented.

CPW has more specific timing limitations and restrictions for raptors than described under the Design Features incorporated in the Draft EA (Bio-9, 9A) as follows:

“9A. Avoid construction activities near active raptor nests according to Colorado Parks and Wildlife (CPW) raptor nest buffer and timing restriction guidelines. If construction or maintenance activities must occur during this time period, qualified biologists will conduct clearance surveys prior to activity. Based on survey results, agency coordination and approval may be required prior to work starting”.

And based on analysis in the Draft EA:

“If an active raptor nest is documented within 0.25 miles or an active bird nest is located within the proposed disturbance areas during construction, the nest would be flagged for avoidance and coordination with BLM and/or USFS would occur to determine appropriate avoidance measures and buffer requirements to reduce potential impacts”.

In general, a buffer of 0.25 mile of an active bird nest is adequate to reduce disturbance during construction activities, however, seasonal timing can alter this standard as described below for bald eagle, Northern goshawk, and peregrine falcon. Timing of project construction adhering to seasonal timing limitations and avoidance using variable distance buffers can lead to nest success or failure depending on the tolerance of the bird species.

CPW mapping data includes the presence of nests in transmission segment 9255, and results from field surveys conducted for the Project indicate that nesting habitat for raptors is present. CPW appreciates the commitment to conducting preconstruction surveys and adhering to seasonal buffers and time restrictions to mitigate impacts on nesting migratory birds to the greatest extent feasible.

CPW appreciates the FS/BLM design feature BIO-9, 9B with a bird breeding restriction of March 1 to July 31 but recommends an extended season in August for preconstruction surveys and avoidance as described under CPW’s recommendations to capture late or second nesting attempts.



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To minimize impacts on nesting migratory birds, CPW recommends the following:

- Conduct ground disturbance and vegetation clearing activities outside of the breeding season (March 15 -August 31). If construction must occur during the breeding season, surveys for active nests of ground-nesting species as well as tree-nesting raptors should be conducted prior to groundbreaking.
- For bald eagle, CPW recommends no construction and disturbance within 0.5 miles of an active nest site from December 1 to July 31. Also, no permitted activities within 0.25 miles of an active winter night roost or communal roost site from November 15 to March 15.
- For golden eagle, CPW recommends no construction or disturbance within 0.25 miles of an active nest from December 15 to July 15.
- For Northern goshawk, CPW recommends no construction or disturbance within 0.5 miles of an active nest from March 1 to September 15.
- For peregrine falcon, CPW recommends no construction or disturbance within 0.5 miles of an active nest from March 15 to July 31.
- Since prairie dog colonies occur within the Project area near the lower half of transmission segment 9255, the colonies should be surveyed for burrowing owls. If development in prairie dog colonies occurs during the spring through late summer months (Feb 1 to Oct 31), the presence of burrowing owls and whether they are actively nesting should first be determined. If nesting Burrowing owls are present, no human encroachment or surface disturbance should occur within 100 meters of nesting burrows during March 1-August 15. If Burrowing owls merely occupy the site, it is recommended that earthmoving and other disturbance activities be delayed until late fall after they have migrated.
- Preconstruction surveys should be conducted to identify raptor nests within the Project area and implement appropriate restrictions. CPW recommends adherence to the recommended buffer distances and timing stipulations identified in the CPW document "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors," available on the CPW website.

Burrowing Owl Active and Potential Nest Sites



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Burrowing owls are listed as State Threatened, and nest in active or inactive prairie dog (black-tailed or white-tailed) burrows.

To minimize potential impacts to Burrowing Owl, CPW recommends the following:

- If development is proposed to occur in a prairie dog colony that has been active within the past 10 years, CPW recommends the adherence to CPW's Burrowing Owl survey protocol if development occurs from March 15 through August 31.
- If nesting burrowing owls are present, no human encroachment or surface disturbance should occur within a 656 ft (200 meters) buffer of nesting burrows from March 15 to August 31.
- If burrowing owls occupy the site, CPW recommends that earthmoving and other disturbance activities be delayed until after they have migrated away from the site.

Native Bat Species

In Colorado, native bat species, including those known to occur within the project area, use buildings, caves, mines, concrete culverts, and other structures for maternity roosts, night roosts, and hibernacula as well as for transition roosts. They may utilize existing swallow nests for these purposes. Roosting bats are sensitive to disturbance and could leave roost sites following human visitation. Protection of roosting bats from human disturbance, especially at significant winter hibernation sites and summer maternity sites, is important for the conservation of the *Myotis* species.

To avoid or minimize impacts to native bat species, CPW recommends the following:

- When maintenance and replacement of power poles and structures is planned to occur, maintenance technicians should conduct a visual bat survey in crevices, cracks, and seams of any campground feature larger than approximately three feet tall or wide before performing maintenance. CPW is happy to provide additional information regarding the completion of visual bat surveys if maintenance will be performed in an area where bat use is suspected.



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- CPW recommends that the operator avoid construction or disturbance within 350 ft. of a cave or mine entrance of a hibernacula/ winter roost from October 15 to April 15.

OTHER CPW RECOMMENDATIONS

Habitat Loss and Fragmentation

The Project location provides habitat to big game, including elk, bighorn sheep, moose, pronghorn and mule deer. Security fencing prevents the movement of wildlife throughout the site and without breaks in the Project fences (including staging areas), wildlife species will be forced to move to one end or completely go around the entire Project. That impact would be in addition to the habitat loss and the wildlife displaced by the planned infrastructure and fencing. To minimize habitat loss and fragmentation impacts that could adversely impact big game, CPW recommends the following:

- Ensure wildlife movement corridors are sufficiently wide (200-300 meters) to accommodate large herds.
- CPW is happy to provide more detailed suggestions as Project plans progress.

Native Plant Management

Soil disturbance from construction activities may introduce invasive plant species that degrade habitat quality, reduce forage availability for wildlife and livestock, and increase fire risk. Land cover in much of the Project is forested lands, native grassland and shrublands, which provides critical habitat for numerous species, including identified SGCN. Proper reclamation is essential not only for soil stabilization but also for fostering plant communities that provide the structural diversity and resources necessary to support wildlife. FS/BLM's Design Feature BIO-5 allows for non-native seed mixtures in disturbed areas with non-native species presence. If possible, CPW recommends the following additional measures:



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- CPW prefers that native vegetation be retained on site during the operational lifespan of the Project, both as habitat for wildlife and to ensure successful reclamation of the Project area.
- Where ground disturbance occurs, re-establish a diverse plant community including native grasses, woody plants, and broadleaf forbs, to support wildlife nutrition and cover.
- Revegetate with native species; use a native seed blend that closely matches the surrounding vegetation to restore ecological function and maintain habitat integrity. Strict adherence to the Natural Resources Conservation Service's recommendations for seed mixes is advised.
- Prevent the spread of invasive plant species and listed noxious weeds by incorporating a comprehensive weed management plan, including monitoring and treatment as needed. CPW would appreciate the opportunity to review the Project's Noxious Weed Management Plan prior to the start of construction.
- Conduct long-term monitoring to assess revegetation success and complete weed control and maintenance to ensure the establishment of a functional, native plant community.

Fencing

The CPW document "Fencing with Wildlife in Mind" provides general suggestions for wildlife-friendly fencing. In addition to the measures outlined in the report, CPW recommends the following:

- For security fencing, CPW requests that the security fence be tall enough to discourage deer from jumping, at least 8 feet in height, and have a smooth top with no protrusions or wire that can risk entanglement or impalement.
- Security fencing should allow for movement of small and medium sized wildlife by providing a 6-inch gap at the bottom of the fence or using woven wire fencing as described in the Colorado Department of Transportation Standard Plan No. M-607-4. CPW is happy to discuss this recommendation in more detail with the developer as site plans progress.



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- Anywhere that security fencing is not required on the site, CPW recommends the use of wildlife-permeable fencing (wildlife-friendly) to allow movement of wildlife to the extent possible.
- Project design should continue to consider wildlife movement and the inclusion of wildlife movement corridors through the Project to avoid potential impacts to big game and other wildlife moving through the area. Any planning should consider the entire Project area with the goal of allowing wildlife movements through the larger development site.

Above-ground Electrical Infrastructure

The Project is in the golden eagle, bald eagle, peregrine falcon, prairie falcon, Northern goshawk, and Northern harrier breeding range, nesting, and foraging. The Avian Power Line Interaction Committee (APLIC) provides guidance on power line design that reduces collision and electrocution risk (<https://www.aplic.org/documents>). APLIC also provides recommendations for riser poles associated with underground collection systems (<https://www.aplic.org/poles-at-wind-energy-facilities>), which can reduce the risk of electrocution for eagles and other raptors that may perch on above-ground electrical infrastructure associated with the project.

Wildlife Movement Corridors

The project area bisects multiple movement corridors along the transmission line. Although, most of the transmission line is a rebuild, removing structures and facilities from those areas that will be abandoned and adhering to recommended timing restrictions that are described above under big game would be most advantageous to wildlife in the area. CPW requests that corridors be maintained through any project areas and that activities are limited during crucial winter and breeding periods to reduce road collisions and displacement.

Public Land Access

State Trust land parcels in and around the Project provide public access to lands with quality wildlife habitat, and CPW requests that there be no limitations to continued



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public access. To maintain habitat integrity for wildlife and access for the public, CPW suggests that access roads, facilities, and other developments be planned to limit fragmentation of state and federal land parcels. Gates and signage should be used to prevent unlawful public access on newly developed Project roads.



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CLOSING

We appreciate your consideration of our comments and recommendations. As always, CPW staff are available to work with operators on how best to minimize development impacts to both wildlife and their habitats. If you have questions or would like clarification about any of our comments, please contact District Wildlife Manager Jackson Baroni 719-539-8415 or jackson.baroni@state.co.us or Energy Liaison Melissa Garcia at 719-714-1970 or melissa.k.garcia@state.co.us.

Sincerely,



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