

Quiet Use Coalition comments regarding the Transmission Line Rebuild project

Comments submitted electronically via email

[Pike-San Isabel National Forests & Cimarron and Comanche National Grasslands | Project Summary \(#68946\) | Forest Service](#)

Ryan Nehl, Supervisor
Pike-San Isabel National Forest

Dear Mr. Nehl;

Please accept and consider the following comments regarding the draft EA (DEA) for the proposed Public Service Company of Colorado (Xcel Energy) 9254/9257 and 9255 Transmission Line Rebuild project on behalf of the Quiet Use Coalition.

The Quiet Use Coalition is a 29 year-old non-profit environmental organization working to preserve and create quiet use areas on our public lands and waters while protecting natural soundscapes and wildlife habitat. Our members are very familiar with the existing transmission line and the lands it exists on.

Protect values in the Top of the World ACEC

The BLM Eastern Colorado Resource Management Plan designated the 8700 acre Top of the World Area of Critical Environmental Concern (ACEC) in 2024.¹

Approximately .93 miles of the proposed powerline project will pass through the BLM Top of the World ACEC.

The DEA fails to identify and consider this special designated area and the EA must fully consider this ACEC.

This ACEC was created to protect the important and relevant values of this area, which include Flora (*Eutrema pendlandii*) and fauna (boreal toad, Canada lynx, bighorn sheep), scenic resources and cultural resources.²

ACEC management Actions for this area include:

- Right of Way avoidance area
- Excluding utility and non-utility scale renewable energy Right of Ways.³
- Allow vegetation management as long as it can be demonstrated that relevant and important values would not be impacted⁴

¹ BLM Approved Eastern Colorado Resource Management Plan and Record of Decision, January 2024. Table II-32. Page II-99. Available online April 2026 via <https://eplanning.blm.gov/Documents/?id=5ac83188-a7f2-f011-8407-001dd80bcf93&spid=44c30743-a8f2-f011-8407-001dd806295a#>

² BLM Preliminary Evaluation of Potential ACECs—Royal Gorge Field Office Relevance and Importance Criteria, 2017. Top of the World ACEC. Table 3.17. Page 43. Available online April 2026 via <https://eplanning.blm.gov/Documents/?id=5ac83188-a7f2-f011-8407-001dd80bcf93&spid=44c30743-a8f2-f011-8407-001dd806295a#>

⁴ BLM Approved Eastern Colorado Resource Management Plan and Record of Decision, January 2024. Table II-32. Manage Actions 2, Management Common to all ACECs, Page II-99. Available online April 2026 via <https://eplanning.blm.gov/Documents/?id=5ac83188-a7f2-f011-8407-001dd80bcf93&spid=44c30743-a8f2-f011-8407-001dd806295a#>

- Designate Canada lynx landscape linkages as a ROW avoidance area (including renewable energy sites such as solar, wind, hydro, and biomass development).⁵

It must be clarified if the exclusion and avoidance of Right of Ways within this ACEC applies to both new and existing utility Right of Ways.

Management direction to avoid and exclude Right of Ways within this ACEC emphasizes that utility Right of Ways have potentially very significant negative impacts on ACEC, and that modifications to existing Right of Ways must be prohibited or limited to minimize any potential negative impacts to the resource values of that ACEC.

In 2015 the USFS identified and mapped two Lynx Linkage areas that will be impacted by the proposal. There is an extensive Tennessee Lynx Linkage area extending from Leadville to Fremont Pass which includes most of Circuits 9254 and 9257. There is also the Clear Lynx Linkage area extending from Granite to just north of County Road 371 and the Otero Pump Station.⁶

Design feature BIO-2 on page D-3 of Appendix D of the DEA states, “Special status species or other species of concern will be considered in accordance with management policies set forth by appropriate federal and state agencies.”

Colorado Parks and Wildlife (CPW) specify a best management practice for lynx linkages areas that states. “Avoid trail/route placement and habitat fragmentation within identified lynx linkages to maintain landscape connectivity.”⁷

In this ACEC, the project must not approve new/additional access roads as these will compromise scenic resources, fragment habitat and potentially compromise lynx movement. Significantly widening of the transmission line corridor in the ACEC will also potentially compromise lynx movement and scenic resources. The addition of taller transmission line poles will compromise scenic values. All of these actions should be avoided within this ACEC.

It is very clear that the 2024 BLM Eastern Colorado RMP does not want Right of Ways in Lynx Linkage areas.

The RMP Table II-8. Special Status Species Allowable Use 9. Page II-43 states, “Designate Canada lynx landscape linkages as a ROW avoidance area (including renewable energy sites such as solar, wind, hydro, and biomass development).”

Table II-31. Lands and Realty Allowable Use 1. Page II-91 and 92 Canada Lynx Landscape Linkage Areas and Scenic Byways in the RMP states, “ROW and 43 CFR 2920 authorizations (Permits, Leases and Easements, except for minimum impact permits) Exclusion Areas: Manage 181,600 acres of BLM-

⁵BLM Approved Eastern Colorado Resource Management Plan and Record of Decision, January 2024. Table II-41. Top of the Rockies ACEC Allowable use 5, Rights-of-Way. Page II-102. Available online April 2026 via <https://eplanning.blm.gov/Documents/?id=5ac83188-a7f2-f011-8407-001dd80bcf93&spid=44c30743-a8f2-f011-8407-001dd806295a#>

⁶ Welker, Mike, et al, 2015. Pike & San Isabel National Forests Lynx Habitat Re-Mapping of Primary and Secondary Habitat, Analysis Units, and Linkage Areas. USFS document.

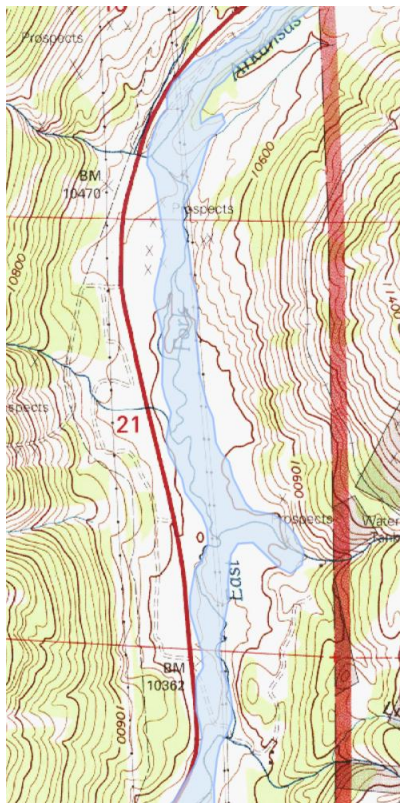
⁷ Trails with Wildlife in Mind Taskforce, 2021. Colorado’s Guide to Planning Trails with Wildlife in Mind. Supported by Colorado Parks and Wildlife and numerous others, including the USDA Forest Service (see Appendix D). Pages 29 and 47 Accessed online February 2026 via https://material-civet.files.svdcn.com/production/images/documents/Planning_Trails_with_Wildlife_in_Mind_full_plan.pdf?dm=1741885420 This document is also attached.

administered surface land as ROW exclusion areas that are not available for the location of ROWs or other land use authorizations under any conditions”.

Protect Ptarmigan Habitat

The Southern white-tailed ptarmigan is listed as a USFS and BLM Sensitive Species and considered a Tier 1 Species of Greatest Conservation Need in the 2025 CO State Wildlife Action Plan⁸

Colorado Parks and Wildlife Species activity mapping GIS data indicates that there is an area of BLM land east of Highway 91 where this power line passes through approximately 1.53 miles of ptarmigan overall range and winter habitat. See image below.



CPW Ptarmigan winter habitat and overall range as blue shading.

CPW specifies a best management practice for White tailed ptarmigan winter habitat and overall range to seasonally close trails within those habitats to all use May 1- July 15.⁹

Project activity should not occur within this ptarmigan habitat during that time. Future project related human visitation for monitoring or other reasons should be avoided in those habitats during that time period.

⁸ Colorado State Wildlife Action Plan, 2025. online via <https://cpw.state.co.us/state-wildlife-action-plan>

⁹ Trails with Wildlife in Mind Taskforce, 2021. Colorado's Guide to Planning Trails with Wildlife in Mind. Supported by Colorado Parks and Wildlife and numerous others, including the USDA Forest Service (see Appendix D). Page 49. Accessed online April 2026 via https://material-civet.files.svcdcn.com/production/images/documents/Planning_Trails_with_Wildlife_in_Mind_full_plan.pdf?dm=1741885420 This document is also attached.

Protect Scenic Vistas along the Top of Rockies Scenic Byway

The Top of the Rockies National Scenic Byway was designated by the U.S. Secretary of Transportation as a National Scenic Byway in 1998. Much of the transmission lines considered in this proposed project run adjacent to/over and are visible from segments of Highways 24 and 91 that are part of this Byway.

The USFS and BLM were included in and agreed with this Byway designation, and with comprehensive management of this Byway.

Forest Service Manual 2380.13 1. States that Byways have “strategies for . . . protecting and enhancing the landscape and view corridors surrounding such a highway.”

Forest Service Manual 2380.3 states that it is Forest Service policy to “3. Ensure scenery is treated equally with other resources.” FSM 2380.5 states “Scenic integrity objectives are an integral part of Forest plan revisions, environmental assessments, environmental impact statements, and project level planning.”

The 2024 BLM Eastern Colorado Resource Management Plan includes direction for Byways management. This includes Byways Objective 2. “Protect the scenic qualities of the byway using tools such as the VRM criteria.” Also, Allowable Use 2. “Avoid ROW within 0.5 mile (0.8 kilometer) of byways.”¹⁰

The DEA fails to mention or consider this Scenic Byway, and the EA must fully consider it.

The utility towers along this section of this Scenic Byway have long been regarded as “unsightly...visual intrusions” that are “considered an eyesore and a detractor from the otherwise natural appearance of the Byway.”¹¹

Proposed changes to the existing power line, including but not limited to replacement of line support towers, creation and improvement of access roads, vegetation cutting to widen the corridor, etc., are likely to introduce new and additional unnatural appearing shapes, forms, colors and other elements that will compromise and detract from the high natural scenic integrity of this segment of the Scenic Byway.

The DEA fails to consider the potential impacts on the scenic integrity of this Byway due to the installation of new poles that will be 40-50% taller and a ROW corridor that will be up to 100% wider than what currently exists. The DEA in Appendices A, B.1 and B.2 fails to provide actual width dimensions for existing and proposed poles, although it appears as though the proposed poles will be wider and thus potentially more of an unsightly eyesore than existing poles. Appendix C poorly provides very limited conceptual photo renderings of proposed changes and existing pole infrastructure.

If approved, this project must not compromise the scenic integrity of this area as viewed from this National Scenic Byway. The EA must fully analyze and consider how the proposed project will avoid and minimize the scenic integrity of lands as viewed from this National Scenic Byway.

It may be possible to widen the corridor of this transmission line in some locations where it is not significantly visible from the Byway and/or will not detract from the natural appearing viewshed, but this will require careful planning, design, and implementation. It may be possible to paint towers other colors aside from brown to help them blend in better with the natural landscape.

¹⁰ BLM Approved Eastern Colorado Resource Management Plan, 2024. Table II-42. National and State Scenic and Historic Byways. Page II-103

¹¹ Top of the Rockies Scenic and Historic Byway Corridor Management Plan, 2008. Statement of Significance 7). Goal: To enhance existing resources and user facilities along the Byway. Page II-13. Document attached.

Transmission line access route comments

Proposed project design features generally adequately protect priority wildlife habitats from seasonal disturbance during construction related activity.

The proposed creation of new access roads within those habitats is not fully considered. The fact that routes have both presence effects and use effects on wildlife is not considered. The widening of transmission line corridors via tree and vegetation removal in these habitats has the potential to compromise habitat effectiveness and security for wildlife. Removal of thermal cover in winter habitats and visual screening near highways, roads and other areas with human presence will compromise the effectiveness of those habitats.

CPW recommends avoiding new route construction to the maximum extent possible in elk production areas; elk and mule deer winter concentration areas and migration corridors, and pronghorn antelope migration corridors. CPW recommends that new route construction be avoided in bighorn sheep production areas, migration corridors, and winter range.¹²

Note that in the 2021 plan CPW considers bighorn sheep winter range a priority habitat, rather than the parts of winter range that are considered winter concentration areas.

This project must consider limiting the creation of new administrative roads within the priority habitats mentioned above. If new roads must be created within these habitats, required compensatory mitigation actions should be considered to restore or enhance similar habitats in other Xcel transmission line corridors.

If new access routes must be created within these habitats, the ongoing use of these routes for transmission line administrative access (for monitoring, patrolling, repairs, etc.) must be seasonally avoided unless absolutely necessary. This will help minimize the adverse impacts of these routes. If possible, access should occur on foot rather than with a motor vehicle during the seasonal time periods most important for wildlife use.

Unauthorized and legally allowed public recreational use/travel on routes and cleared linear corridors by humans travelling on OHVs, over snow vehicles, hiking, mtn biking, etc. must be fully considered.

Design feature ROM-07 on page D-7 of Appendix D of the DEA states, "Install and maintain gates or other closure devices at O&M and non-public USFS roads to prevent motorized use by the general public." This action will help, but gates can be easily bypassed if there is not a physical barrier to deter human use on the sides of gates. Signage on the gates should also be required requesting that all users please do not travel on the route and area behind the gate.

Excluding general recreational use and travel from roads and project corridors will help ensure the safety of the public, help revegetation efforts, and benefit wildlife. Signs and natural or constructed barriers where transmission line administrative routes intersect with other routes open to the public should be present to help keep people on designated routes. QUC has found that the combination of signage and barriers (such as gates) is more effective and educating and guiding the public about responsible travel management decisions than barriers or signage alone.

Design feature LU-2 at page D-7 of Appendix D states, "All existing roads, culverts and bridges will be left in a condition better than or equal to their condition prior to the construction." This is concerning as the use of the word "existing" implies that any road-type route present on the ground. Road type

¹² Trails with Wildlife in Mind Taskforce, 2021. Colorado's Guide to Planning Trails with Wildlife in Mind. Pages 44-45.

routes that are present on the ground may user-created unauthorized routes and not part of the legally designated or permitted/authorized route system.

The project must clearly identify legally designated routes, unauthorized non-system routes, and permitted/ authorized routes. This project must not improve or better any route that facilitates or encourages unauthorized access and use.

It must be noted that most of the BLM lands in the project area do not have a recently completed Travel Management Plan associated with them. Motorized use is restricted to existing routes in those areas as specified by the 1996 Royal Gorge Field Office Resource Management Plan. It may be difficult to determine what routes that currently exist on the ground are legally open to public motorized use because they existed in 1996.

We encourage the inclusion of a design feature that allows the land management agencies and Xcel crews to close routes as part of this plan that provide unauthorized access to transmission line administrative routes and/or corridors.

We thank you for allowing the Quiet Use Coalition to comment on this proposal

Tom Sobal
QUC Director