

Data Submitted (UTC 11): 7/26/2019 6:00:00 AM

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Organization: Tri-State Generation and Transmission Association, Inc.

Title: Senior Environmental Policy Analyst

Comments: Dear Plan Revision Team,

Tri-State is a not-for-profit wholesale electric power generation and transmission cooperative that provides cost-based electricity to 43-member distribution systems across 200,000 square miles of rural Colorado, Nebraska, New Mexico and Wyoming. Tri-State believes reliable and affordable power, responsibly generated and delivered, is the lifeblood of the rural West. The farms, ranches, towns and rural residents and businesses that Tri-State's member systems serve are close to the landscape and depend on a reliable and affordable power supply.

Tri-State derives electric energy from an owned and contracted portfolio of resources including hydroelectric, wind, solar, coal, natural gas, and oil, facilities. Nearly one-third of the electricity consumed by Tri-State cooperative members comes from renewable resources. Tri-State's transmission system includes approximately 5,600 miles of high-voltage transmission lines and an extensive network of substations, telecommunications facilities, maintenance centers and field offices that maintain a safe, reliable, affordable and secure electric power delivery system.

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

Existing transmission lines

- [bull] Montrose - Nucla 115kV
- [bull] Sunshine - Telluride 115kV
- [bull] Ames Hydro - Sunshine 115kV
- [bull] Ames Hydro - Burro Bridge I 15kV
- [bull] Sunshine - Wilson Mesa 115kV
- [bull] Alkali- Skito 115kV

Existing substations

- [bull] Sunshine

Existing communication sites

- [bull] Sunshine
- [bull] Monarch Passive
- [bull] Monarch Comm
- [bull] GrayHead

Tri-State provides the following comments on the Working Draft of the Revised Land Management Plan for the GMUG. Tri-State has commented previously during other stages of this plan revision process including the 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 has chosen to release the Working Draft for public input because it provides an early opportunity for stakeholder review and input prior to completing the draft plan and associated Environmental Impact Statement (EIS). Tri-State's review of the Working Draft is ongoing and we expect to provide additional future feedback.

Riparian Management Zones and Groundwater-Dependent Ecosystems (RMGD)

Tri-State requests that Standards, FW-STND-RMGD-08 and FW-STND-RMGD-09 include an exception for the removal of trees within and danger trees adjacent to transmission rights-of-way in riparian management zones to ensure compliance with electric utilities vegetation management plans.

Fire and Fuels Management (FFM) - Management Emphasis Areas

Tri-State supports the inclusion of communication sites, transmission lines and other utility corridors within the "Protection Emphasis Areas" category and requests that it is carried forward in the final plan revision.

Native Species Diversity (SPEC)

Tri-State suggests additional clarity and flexibility be added to Standard FW-STND[shy] SPEC-20 and Guideline FW-GDL-SPEC-21 regarding Gunnison's prairie dog. There could be future situations where some level of new disturbance within a colony is necessary and as written, this type of activity would appear to require a plan amendment in order to be authorized regardless of the magnitude of disturbance. Additionally, there is no

mention of whether SPEC- 20 applies to inactive colonies. Tri-State suggests that the GMUG provide additional flexibility regarding SPEC-20, perhaps by re-categorizing it as a Guideline, and also adding the word "active" to SPEC-20, similar to the use of that word in SPEC-21.

Guideline FW-GDL-SPEC-38 regarding Gunnison sage grouse (GuSg) implies that burial of utility lines may be considered. Tri-State requests that this Guideline acknowledges that burying transmission lines may not be technically or economically feasible. Underground construction of transmission lines can result in 5-14 times the cost of constructing overhead lines, and also results in operation and maintenance challenges and shorter operational life span.

Burial of transmission lines can also result in long-term impacts to native vegetation and increase the spread of noxious weeds. Accordingly, Tri-State requests some form of exception to this Guideline to exclude high-voltage transmission lines.

Guideline FW-GDL-SPEC-40 would require the most effective perch deterrents for all new and reauthorized infrastructure. Perch deterrents were originally designed to move birds to safe perching locations to prevent electrocutions rather than to prevent perching altogether. Perch discouragers are not effective at preventing perching by raptors and corvids because they are able to perch on the wires and other hardware on power poles. Perch discouragers can increase avian electrocution risk on certain structure types and are no longer a best practice for utilities operating in sage-grouse habitats. The Avian Power Line Interaction Cqmmitttee (APLIC) drafted and issued a Best Management Practices Electric Utilities in Sage-Grouse Habitat in June of 2015 (available at:

<http://www.a lic.orn/u loads/files/15646/SAGR%20BMP%20FINAL June%202015. d> . This document goes into detail regarding the limitation of the use of perch discouragers as mitigation for special status species. This restrictive language would seem to prohibit the Forest from considering other forms of mitigation for Gunnison Sage-Grouse and does not address adaptive management as we learn more about the types of mitigation strategies that are effective and those that are not. Management recommendations for special status species should rely on the best available science and evolving technology. Tri-State requests that this Guideline be revised to clarify that perch discouragers are one tool in the tool box and their use should be reviewed on case by case basis, rather than being a blanket recommendation or requirement.

Scenery (SCNY)

Guideline FW-GDL-SCNY-05 suggests that vegetation management associated with power lines should be managed to enhance the scenic quality within the immediate foreground of Concern Level 1 routes. Tri-State suggests that the Plan Revision Team consider adding an exception to recognize the need for electric utilities to manage vegetation along power lines in order to meet integrated vegetation management standards and to also reduce fuel loading in rights-of-way. There could be situations where this Guideline would conflict with vegetation management standards where power lines cross or are near Concern Level 1 routes.

Wilderness and Areas where Natural Processes Dominate (MA 1) - Designated Wilderness

- MA 1.1 (WLDN)

Standard MA-STND-WLDN-10 would prohibit drone use in Designated Wilderness.

Since Designated Wilderness can change over time and utilities may periodically use drones for

inspection of electric power infrastructure and other survey purposes, Tri-State requests an exception be added to this Standard to accommodate such activity.

Appendix 3. Management Approaches and Possible Actions - Utility Corridors and Communication Sites

Tri-State appreciates the recognition on page 152 of the Working Draft regarding the need to expedite vegetation management to meet industry standards for public safety, protection of property, and reliability. This management approach should be retained in future draft and final plans.

Tri-State appreciates the opportunity to provide these comments on the Working Draft and looks forward to the future ability to review and comment on the Draft Revised Land and Resource Management Plan and EIS. 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.