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Title:

Comments: PUBLIC COMMENT R.E. HOLY CROSS ENERGY AVON-TO-GILMAN 115-kV TRANSMISSION LINE

TO: Mr. Scott Fitzwilliams, Forest Supervisor, c/o Matt Klein Realty Specialist, White River National Forest, PO Box 190, Minturn, Co 81645

FROM: Lynn D. Feiger

I am writing this letter as part of the permitted public comment with regards to the proposed Holy Cross Energy transmission line which is planned to traverse through the town of Minturn from Avon to Gilman. Holy Cross Electric Association ("Holy Cross") claims the high voltage transmission line is necessary for electrical supply redundancy and to avoid potential future extended power outages for Holy Cross customers in Vail and elsewhere.

Holy Cross is requesting that permission be granted for three of the 8.6 miles of the potential transmission line to run through the White River National Forest property.

The real question is not whether the construction of the transmission line is appropriate, but how much of the transmission line should be buried underground. At the current time, Holy Cross is planning to bury only three miles of the transmission line, while constructing five miles of the transmission line above ground with exposed high voltage transmission wires atop wood or steel poles. The current plan calls for exposed above ground transmission wires on top of immense poles to cross the Eagle River at Dowd Junction and then run along the Eagle River across from Meadow Mountain towards town along property, currently planned for intensive development and for a bike park. The line would be buried through downtown Minturn and would emerge above ground again across from Maloit Park.

The environmental impact of the buried portion of the transmission line is negligible, but that is not true of the above ground portion of the transmission line. As currently planned, the above ground portion of the transmission line is likely to have a catastrophic impact on the environment.. Specifically the following issues are of great concern with respect to the above ground portion of the power line:

FIRE DANGER

Minturn is in a narrow forested valley and is particularly vulnerable to wildfires. Two years ago, a wildfire erupted near the Two Elks Shooting Range in immediate proximity to where the currently unburied portion of the transmission line is planned. The Shooting Range is not actively managed and shooters using prohibited ammunition ignited the fire. Moreover Minturn has been increasingly subjected to extreme fire danger because of climate change and has been repeatedly under Stage Two Fire Restriction (denoting extreme fire danger).

Because of the risk of fire danger, above ground transmission lines are particularly inappropriate near a populated area. Although Holy Cross currently proposes to bury the lines across from downtown Minturn where the majority of current Minturn residents reside, it is significant that extensive future high density residential developments are currently planned in immediate proximity to the proposed above ground portion of the line. In fact, based on planning documents, most of the future population of Minturn would eventually be located in close proximity to the proposed above ground transmission lines.

The high voltage transmission lines proposed by Holy Cross are the exact same type that resulted in widespread destructive fires throughout California and other parts of the Western United States. High speed transmission lines are not insulated and when downed, they are a major fire hazard.

As documented by the California Department of Forestry and Fire Protection, (CALFIRE), power lines were the cause for over a dozen Northern California wildfires including the devastating Santa Rosa fire, specifically tied to above ground high voltage transmission lines. In 2015, power lines were responsible for burning more acres in California than all other causes of fire put together. In Southern California distribution and transmission lines were responsible for more than 240 fires between 2014 and 2016. Finally and most significantly, Pacific Gas and

Electric Co. recently filed bankruptcy as a result of the catastrophic 2019 California fires resulting from high voltage transmission lines.

The Minturn valley is subjected to high winds, electrical storms and rock slides. Rock slides, downed trees, negligent maintenance and electrical storms can all result in transmission lines sparking major wildfires. Several years ago, a major rock slide occurred when approximately half of the Lionshead Rock formation rolled down the mountain taking out sections of the railroad track. Based on the proposed path for the above ground transmission lines, these lines would have also been destroyed by the rock slide and a catastrophic wild fire may well have been ignited.

IMPACT ON RECREATIONAL USE

Meadow Mountain is currently one of the major recreational areas in Eagle County. County residents currently safely ski, snowmobile, snowshoe and hike trails in the area, and enjoy a large expanse of trails through easily accessible meadows, forests, historic cabins, vegetation and wildlife. The proposed overhead transmission lines would be visible to all residents enjoying Meadow Mountain and the transmission lines, together with the zones around them stripped of trees and vegetation, would certainly be a disturbing discordant element. Fishermen also make use of that stretch of the Eagle River, and overhead high voltage transmission lines would disrupt the tranquility of their experience.

On the other side of town, near the Two Elks hiking trail, the exposed transmission lines would be equally glaring and inconsistent with the heavy recreational use of the area.

VISUAL IMPACT ON TOWN OF MINTURN

Not only does the transmission line, as proposed, recklessly risk the lives of Minturn residents, but it jeopardizes the aesthetics and preservation of one of the oldest and most historic towns in Eagle County. If Holy Cross is permitted to build its overhead transmission lines as planned, future tourists and other visitors intending to enjoy Minturn's annual events, restaurants, historic architecture and summer market would be greeted by high speed transmission lines blighting the charm of Minturn's otherwise lovely river valley.

ECONOMIC ISSUES

In reality, the real argument here simply involves economics -- Holy Cross could build its power line all underground without the above destructive impacts, but it would be more expensive. Rather than pass on additional costs to future developers and customers of Holy Cross or risk future profits, Holy Cross has chosen to destroy a beautiful river valley, heavily used by residents for recreation throughout Eagle County. Holy Cross buried its transmission lines leading up the valley to the town of Snowmass; there is no reason why they should not agree to do the same through the town of Minturn.

In the past reliability of electrical service has not been a significant problem for Holy Cross users -- in public meetings, Holy Cross representatives have used projections of future growth and development to justify concerns, in part, for the need for enhanced reliability and redundancy requiring the proposed high voltage transmission line.

Short term utility profits and lower cost development and utility costs for Holy Cross users must not take precedence over creating a dangerous fire hazard and the destruction of a historic community and core county recreation gateway. Future development in Vail and Holy Cross profits should not be permitted at the expense of the town of Minturn, Minturn's future, Minturn residents and the very special recreational areas which the unburied transmission lines would degrade and put in harm's way. Holy Cross MUST be required to bury the entire transmission line through the Minturn Valley

Lynn D Feiger

