



COLORADO PARKS & WILDLIFE

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September 27, 2013

TransWest Express Project
Bureau of Land Management
P.O. Box 20678
Cheyenne, WY 82003

**RE: TransWest Express Transmission Line Draft Environmental Impact Statement
Comments**

Dear Ms. Knowlton:

Thank you for the opportunity to provide comments on the TransWest Express Transmission Line Draft Environmental Impact Statement (DEIS). Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. As such, we encourage the proponent and regulators of this project to include the highest and best design and development protections for Colorado's wildlife species and habitats as this project is permitted and constructed. CPW staff has actively participated in cooperating agency meetings for this project and has previously submitted scoping comments for this project dated March 14, 2011. Subsequent to the submittal of the scoping comments, CPW has identified issues with an important conservation easement and potential wildlife impacts on the south side of Highway 40 and has forwarded these concerns on to the Bureau of Land Management (BLM), the National Park Service (NPS), and the US Fish and Wildlife Service (USFWS) as indicated in the attachments, dated April 26, 2013. CPW staff more recently attended the TransWest Express Transmission Line open house in Craig, CO on August 16, 2013 and reiterated our concerns as formal comments.

CPW's comments for this EIS are focused mainly in two areas of concern: 1) the Tuttle Easement micro-siting options one, two, and three where we strongly oppose any option that crosses the easement (micro-siting option #1); and 2) the general alignment as it relates to greater sage-grouse habitats and impacts. CPW has worked with BLM and other agencies to develop the agency preferred route alignment (Alternative I-D) and are in support of that routing alternative from the Wyoming state line to the east side of Cross Mountain Wilderness Study Area.

STATE OF COLORADO

John W. Hickenlooper, Governor • Mike King, Executive Director, Department of Natural Resources
Steven M. Yamashita, Acting Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: Robert W. Bray • Chris Castilian • Jeanne Horne
Bill Kane, Vice-Chair • Gaspar Perricone • James Pribyl • John Singletary, Chair
Mark Smith, Secretary • James Vigil • Dean Wingfield • Michelle Zimmerman
Ex Officio Members: Mike King and John Salazar

Tuttle Easement Concerns

CPW holds a conservation easement on approximately 15,156 acres of crucial wildlife habitats, which lies predominantly on the south side of Highway 40 for a span of approximately 5 miles. CPW strongly opposes the routing of any new transmission line route south of Highway 40 that would cross the Tuttle CE.

The Tuttle CE is a keystone parcel in an ongoing effort to protect wildlife habitats at a landscape scale, throughout the State. The legal, biological, and financial arguments opposing encroachment of the CE are described in detail in our letter sent to the BLM, NPS, and USF&WS dated April 26, 2013 and signed by the CPW Director (attached).

CPW is concentrating a significant portion of its investment in landscape protection in the area around the Tuttle Easement. CPW is currently working with landowners to develop additional conservation easement projects on approximately 35,500 acres that are located in the near vicinity of the Tuttle Conservation Easement.

An additional part of this landscape-scale habitat protection strategy is the 8,057 acre Bitter Brush State Wildlife Area, located south and southwest of Maybell, CO and approximately 9 miles northeast of the Tuttle Easement. The Bitter Brush State Wildlife Area is managed by CPW primarily for big game winter range for resident and migratory animals, and benefits many of the same big game animals that make use of the Tuttle Easement.

The BLM-managed Cross Mountain Wilderness Study Area provides additional habitat protection in the landscape surrounding the Tuttle Easement. In support of CPW's efforts to create landscape scale habitat protections, CPW requests that north-south routing of the transmission corridor occur to the west and north of the Tuttle easement.

CPW strongly opposes Micro-siting Option 1 (page 2-40) which traverses the Tuttle Conservation Easement and would negatively impact wildlife to a greater extent than the other alternatives considered. CPW prefers micro-site Option 3 (page 2-40), or any variation of a corridor or transmission line alignment which locates the transmission line north of Highway 40 in relation to the Tuttle CE (as noted on map 2-25).

General Alignment as it Relates to Greater Sage-Grouse Habitats and Impacts.

CPW has worked with BLM and other agencies to develop the agency preferred route alignment (Alternative I-D) and are in support of that routing alternative from the Wyoming state line to the east side of Cross Mountain Wilderness Study Area. Alternative I-D has the least impact on priority greater sage-grouse habitat (PPH) of alternatives presented. While significant areas of priority habitat are crossed by the agency preferred alternative these areas support a lower density of birds than the areas avoided, specifically Great Divide, Sand/Powder Wash, and Highway 13 Corridor.

CPW expects that this EIS will incorporate sufficient protective measures for greater sage-grouse and will be consistent with the Programmatic Greater Sage-Grouse EIS.

Northwest Colorado contains unique and, in many cases, irreplaceable habitats for a host of wildlife species. The transmission line routes proposed within Northwest Colorado intersect high value wildlife habitats for numerous species, including greater sage-grouse, Columbian sharp-tailed grouse, raptors, mule deer, elk, pronghorn antelope, white-tailed prairie dogs, native, endangered, and threatened fish species, and black-footed ferret reintroduction sites. Other species of concern that could be impacted by one or more route segments include, but are not limited to, great blue herons, greater sandhill cranes, burrowing owl, and a variety of additional aquatic species. Other concerns include invasive weed establishment, potential impairment of wildlife movements, bird strikes/electrocution, and increased road access from this project.

We appreciate the opportunity to provide feedback and comments on this important project.

Sincerely,



Steve Yamashita, Acting Director, Colorado Parks and Wildlife

cc: Chad Bishop, Assistant Director for Wildlife and Natural Resources
Lisa Dale, Assistant Director for Parks, Wildlife and Lands
Jeff Ver Steeg, Assistant Director for Research, Policy & Planning
Ron Velarde, Northwest Regional Manager
Dean Riggs, Deputy Director NW Region
Brad Petch, Senior Terrestrial Biologist
Sherman Hebein, Senior Aquatic Biologist
file

Attachments:

CPW Letter to BLM, NPS, and USFWS, April 29, 2013