



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

NOV 25 2013

Ref: EPR/N

Mr. Jim Hartman
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228

Re: Reauthorization of Permits,
Maintenance, and Vegetation Management
on Western Area Power Administration
Transmission Lines on Forest Service Lands,
Colorado, Nebraska, and Utah
CEQ #20130283

Dear Mr. Hartman:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Reauthorization of Permits, Maintenance, and Vegetation Management on Western Area Power Administration Transmission Lines on Forest Service Lands Draft Environmental Impact Statement (Draft EIS) prepared by the Western Area Power Administration (Western) and the U.S. Forest Service (USUSFS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. It is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project, which includes a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information present, the EPA is rating the Proposed Action Alternative LO (Lack of Objections). We do not rate the No Action Alternative. A full description of the EPA's rating system is included as an enclosure.

PROJECT DESCRIPTION

Western proposes improving the way it manages vegetation using an integrated vegetative management approach along approximately 273 miles of transmission line right-of-way (ROW) that it owns, operates or maintains on USFS lands in Colorado, Nebraska and Utah. Western and the USFS are the joint lead agencies for this project. The USFS would reauthorize Special Use Permits for each transmission line and authorize Western to manage vegetation along the ROWs.

The primary purpose and need for the project is to ensure that Western can safely and reliably operate and maintain its existing electrical transmission facilities to deliver power. The need for action was demonstrated when two major power outages occurred—one in Portland, Oregon, that affected power users as far away as southern California in 1996, and another in 2003 in the Northeast and Midwest that impacted 55 million people in the U.S. and Canada. Both outages were caused by transmission line sag into overgrown trees. Subsequently, Congress passed the Energy Policy Act of 2005 that authorized the certification of an electric reliability organization to create mandatory and enforceable reliability standards, including vegetation management standards.

The major difference between the Proposed Action and the No Action alternatives is the proposal to change from a need-driven, reactive vegetation management approach to a proactive maintenance strategy that does not let vegetation become an immediate threat. Treatments could include manual trimming, hand-pulling and hoeing; herbicide application; and mowing, logging, chipping, and grinding trees and existing debris using mechanized equipment.

GENERAL COMMENTS

Implementing an integrated vegetation management approach would improve efficiencies in scheduling maintenance activities, minimizing emissions so that impacts to air quality are expected to be negligible and comparable or less than the No Action Alternative. And, while the Proposed Action Alternative would likely result initially in more short-term direct impacts to surface water than the No Action Alternative, the long-term impacts to water quality would be greatly reduced.

The EPA notes that although seven waterbody segments impacted by the transmission line ROWs are listed as impaired (Clean Water Act Section 303(d)), "...only one of Western's transmission lines (the Ault-Craig ROW) directly intersects and traverses a specific stream...that is listed as impaired." (p.3-49). No further degradation is anticipated since neither alternative involves new road construction, the greatest potential for additional impacts on water resources, and because there are environmental protection commitments in place. The EPA supports these commitments that Western and the USFS have developed in their design features as part of the Proposed Action (Table 2-13) and standard maintenance procedures listed in Table 2-15.

Thank you for the opportunity to provide comments on the Reauthorization of Permits, Maintenance, and Vegetation Management on Western Area Power Administration Transmission Lines on Forest Service Lands Draft EIS. If you have any questions or would like to discuss our comments or rating, please contact me at 303-312-6925 or Carol Anderson of my staff at 303-312-6058.

Sincerely,



 Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Enclosure: EPA's Rating System