

January 24, 2024

Mr. Dave Reynolds, Town Administrator  
Town of New Castle  
P.O. Box 90  
New Castle, CO 81647

**RE: Xcel Energy 6584 Mitchell Creek CUP  
Review Comments**

Dear Dave,

Per review of the CUP application prepared by Burns and McDonald on behalf of Xcel Energy for the 69Kv line and pole replacement through the Town of New Castle, please let this letter serve to provide our review comments for the application. We have received the application from Lauren Prentice on 12/27/23. Please note the following:

1. The application states that no new access roads are proposed to be constructed to gain access to and from the new pole constructed sites per Table 2-2. If this is the case, no specific concerns as to the temporary construction for access impacting grading or drainage is anticipated.

However, if there is to be grading and drainage work performed, including removal of vegetation that otherwise retards the rate of runoff movement, the Town will need to be provided more detail as to the specifics of construction that addresses means and methods necessary to control runoff, erosion and sedimentation. Likewise, means and methods for reclamation of the surfaces will need to be provided for review. We note this as review of the second paragraph of Section 2.4.2 "Construction Methods" notes "Access Road improvements, grading, temporary staging area set-up, and vegetation removal will be required prior to construction. Temporary access routes off Colorado River Road will allow construction crews and vehicles to access transmission line pole locations and pulling/tensioning sites."

2. For the poles that are to be set by helicopter, is the Civil work (i.e, foundation excavation, backfilling, compaction and concrete placement) going to require vehicular access or pedestrian access? Are the holes to be dug by hand or by machine and how is access gained to those locations? The access line shown on the maps indicates that access is to be provided, but we are not certain as to the type of access (pedestrian or vehicular).
3. For the pulling/tensioning sites (as reflected on Map 1 of 10), is temporary grading, drainage, vegetation removal proposed? If so, additional detail as noted in note 1, above is necessary.
4. We note that vegetation removal is a critical component of this work and right of way maintenance in the future. For this conditional use permit and for future maintenance of the right of way, various conditions need to be imposed that address the current work and all future work. These conditions should address access, traffic control and extent of vegetation removal complete with use of herbicides.

5. Generally, the maps reflect that most of the poles set from Map 1 through Map 6 will be set by helicopter and likely will have minimal impact to drainage and grading. However, beginning on Map 6, it appears that ground constructed poles will be set that will involve the need for vehicle access. More clarity for each of the locations is necessary to understand the extent of the access improvement that will be necessary to access the poles. Likewise, with the access improvements, the Town will need to be provided more detail as to the specifics of construction that addresses means and methods necessary to control runoff, erosion and sedimentation. Likewise, means and methods for reclamation of the surfaces will need to be provided for review. In addition, for the areas where the access will come in line with existing rockfall and drainage berms, improvements need to be provided in such a manner that the rockfall or drainage hazard to down hill improvements and properties is mitigated.
6. It is likely that much of this work will require access and mobilization from CR 335. As such a R.O.W. permit is necessary. An application to secure such will be necessary with the requisite application fee and traffic control plans. With the right of way permit, a more detailed schedule of work activities should be provided so that coordination with Public Works staff and emergency services can be adequately addressed during the work activities.
7. We trust that given the fact that some of this work will traverse Town owned lands, that the applicant has addressed any additional ROW needs with the Town and has provided specific locations, legal instruments for conveyance of such, compensation, etc.... ?
8. For work that will occur east of the boundaries included within this CUP application but within the Garfield County application, access for construction of new poles will still require access off CR 335 adjacent to River Park Condominiums. The same ROW permit application noted in note 5 above applies to this area as well. It is our recommendation that the Town request and review the application for the location and extent review. Note also that if any temporary grading and drainage improvements are to be performed, a grading permit and/or watershed permit is to be required.

Upon your receipt and review, if you have any questions, please don't hesitate to contact me.

Sincerely,

**SGM**



Jefferey S. Simonson, PE, Principal  
Town Engineer

Characteristic	Existing Poles	New Poles	Additional Details
<b>Additional Easements</b>	Existing easements currently under review	Permanent easements of up to an additional 30 feet in some areas for transmission line on private lands  Temporary easements will be needed for ground access for construction and pulling/tensioning sites	The transmission line was originally constructed in the 1940s through the 1960s

A Plan & Profile for the Project within the Town of New Castle can be found in Appendix C.

Representative photos illustrating coloration of wooden poles and a weathered steel monopole are in Appendix D.


## 2.4.2 Construction Methods

Construction of the Project will occur in phases including the following activities: construction access development and vegetation clearing; equipment mobilization and material delivery; hole auguring and foundation construction; pole placement; conductor stringing; removal of existing poles and conductor, and revegetation of temporary disturbance areas.

Access road improvements, grading, temporary staging area set-up, and vegetation removal will be required prior to construction. Temporary access routes off Colorado River Road will allow construction crews and vehicles to access transmission line pole locations and pulling/tensioning sites.

Pulling/tensioning sites are used to string wire through new structures. There are two proposed pulling/tensions sites located within the town of New Castle. No staging areas will be located within the town of New Castle. Material deliveries from the nearest staging area to the ROW Easement will be made either by truck along the temporary access routes or by helicopter flying along the ROW Easement.

Vegetation management may be required prior to, or in conjunction with, construction within the existing and proposed ROW Easement. Trees and vegetation growing within and near the ROW Easement pose a potential risk to the transmission line by causing downed lines, power outages, and wildfires. Vegetation management crews prevent the risk of these occurrences by implementing various types of treatment including removing, pruning, and mowing vegetation, and application of approved herbicides to treat vegetation to allow safe operation of the transmission line. Depending on current levels of vegetation

encroachment and ROW Easement needs, the extent of vegetation management will vary along the rebuilt ROW Easement. 

Access for vegetation management - is this done indefinitely? How to permit on-going maintenance?

Following civil work, holes will be augured for transmission poles. Once holes are augured, the poles are set and backfilled. Some poles may require foundations that are set in the augured holes with a concrete enforced steel cage. Transmission poles will be placed in the holes or on the foundation using a crane or helicopter. Ground installation of poles involves assembling poles in the material staging areas. Once assembled, the poles are transported via truck to the installation locations where a crane will lift the poles into place. Helicopter installation involves assembling the poles in a material staging area, then transporting them via helicopter to the installation locations to be lowered into the hole or onto a foundation. Additionally, some existing poles will be removed by helicopter depending on terrain and access. Thus, the existing poles will be either flown or driven to a staging area for off-site disposal. No staging areas are located in the Town of New Castle.

There are advantages to using a helicopter for installation because it permits access to areas that are not feasible for vehicle ground access, minimizes construction impacts due to erosion and disturbance, and improves construction efficiency. Nine poles within the Town of New Castle will be installed using a helicopter. Any areas requiring helicopter construction methods will follow Federal Aviation Administration (FAA) safety requirements. Xcel Energy and their construction contractor will coordinate with the FAA and the Town during helicopter operations and obtain any necessary permits. Currently, there is no plan for evacuations as all poles near businesses will be set using trucks and cranes.

Following setting of the transmission poles, conductor wire is strung using a temporary pulley system which is attached to the insulators. Pulling/tensioning sites are required at specific angles, so the conductor wire is pulled in line with the poles, remaining in alignment. Once the conductor is in place, the existing poles and conductor will be removed by crane or by helicopter depending on terrain and access, and the Project will be energized. Throughout construction, wind erosion control BMPs, including the application of water or other dust palliatives, will be implemented as required. Following construction, the two pulling/tensioning sites within the ROW Easement will be restored to a condition reasonably similar to the pre-construction condition.

### 2.4.3 Visual Mitigation

The presence of the existing transmission line has previously created a visual impact. The Project will rebuild the existing line to update its materials and bring it into compliance with current industry design standards. Accordingly, it is not anticipated the Project will negatively impact the character of the



surrounding area or create new significant visual disturbances for several reasons: (1) the new transmission line route will be rebuilt within the existing ROW Easement; (2) the total number of transmission poles will be reduced from 20 to 18; and (3) the updated materials for the new transmission poles and their corresponding current design standards will minimize negative visual impacts. While some new poles will be taller than the existing poles, their overall appearance will not materially change or substantially impact the area because they will be weathered steel to blend in with the surrounding landscape. Any visual disturbance resulting from Project construction will be temporary due to the use of temporary roads and vegetation clearing. Visual disturbance due to vegetation clearing in temporary work areas will be restored in a manner reasonably similar to pre-construction conditions lessening the visual impact resulting from construction of the Project.

#### 2.4.4 Easement and Access Information

Proposed construction access routes will allow construction crews and vehicles to safely access transmission line pole locations and pulling/tensioning sites. Existing public and private roads will be utilized during construction, operation, and maintenance of the Project. Access permissions through

private property are being obtained from landowners by Xcel Energy.

← Do we need to see proof of access for private properties?

Where road improvements are needed, Xcel Energy will secure the necessary permits to comply with Town of New Castle regulations including grading, stormwater, and erosion control permits. If new access is required, Xcel Energy will secure the necessary permits from the Town of New Castle, Garfield County, or the Colorado Department of Transportation (CDOT), as required.

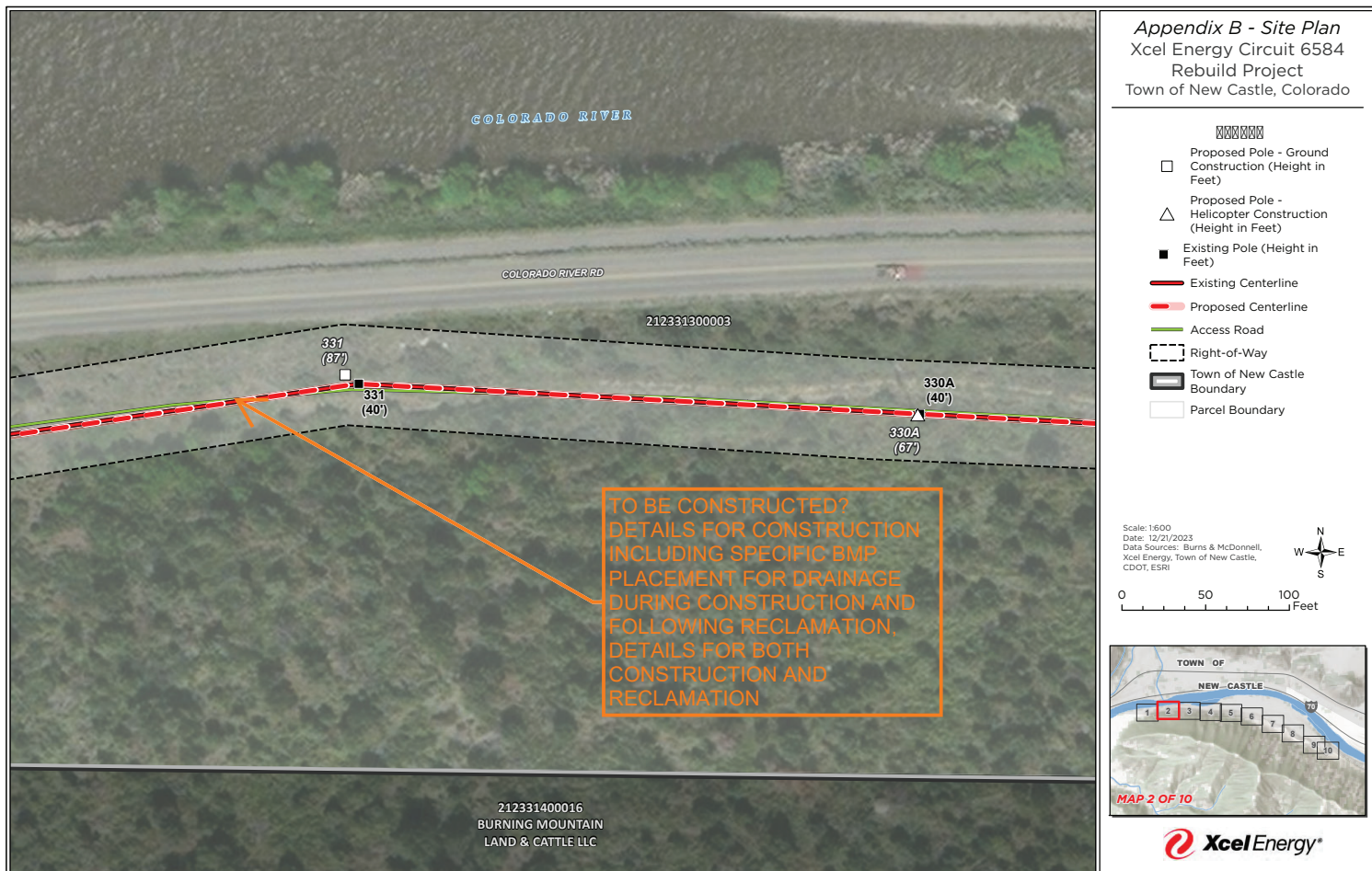
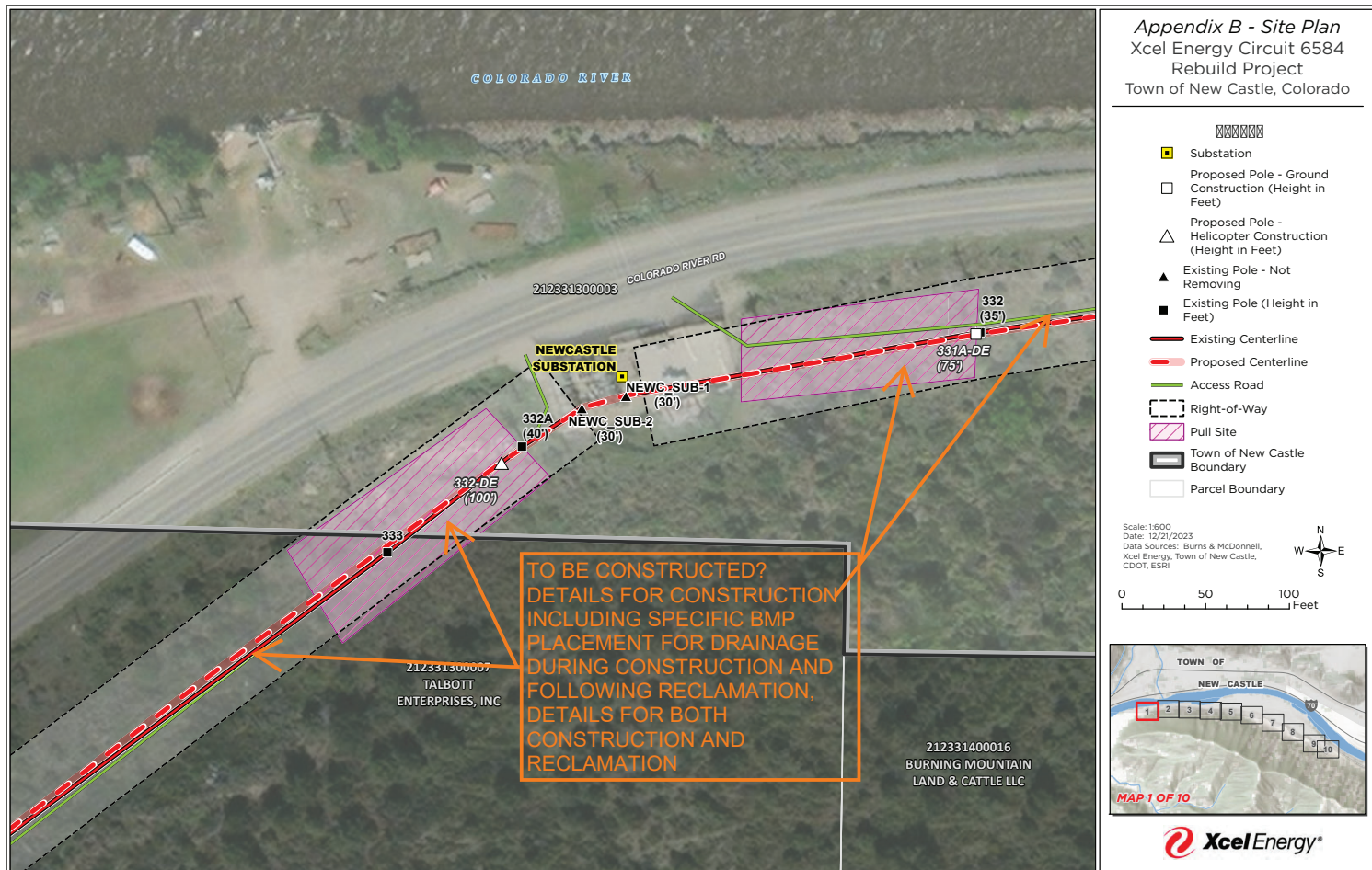
Additional easements will be necessary for temporary pull sites to accommodate placement of pulling and tensioning machines for stringing conductor wire. Grading may be required at some pulling/tensioning sites to level out the area for equipment placement. Any permits required for grading these sites will be obtained for this work. Upon completion of construction, all equipment will be removed from the sites and will be restored in a manner reasonably similar to pre-construction conditions.

#### 2.4.5 Traffic Information

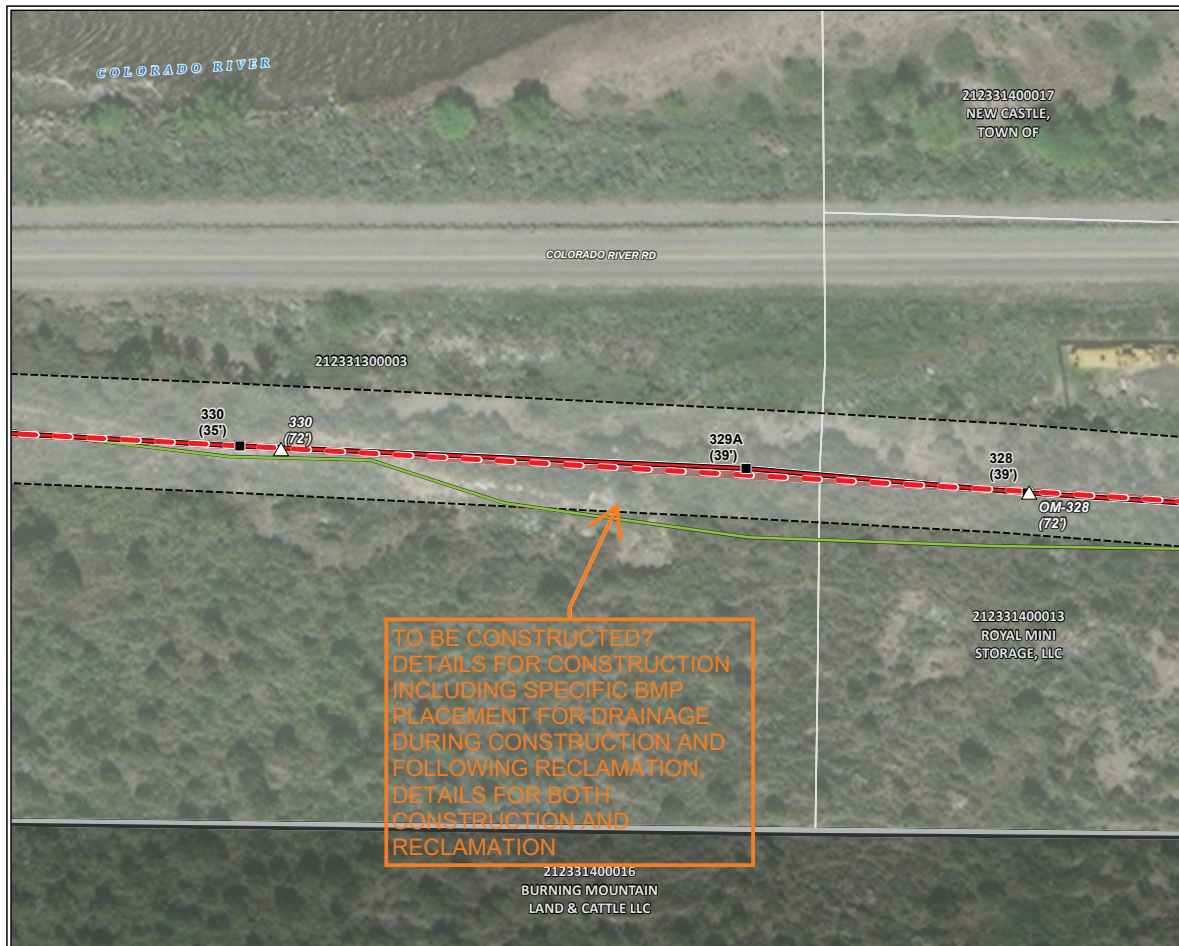
If public roadway traffic controls are determined to be necessary, approval of Traffic Control Plans as applicable by the Town of New Castle will be obtained prior to such roadway use for specific construction activities.

### 2.5 Names and Addresses of Property Owners within 250 feet

Names and addresses of property owners within 250 feet of the outside boundary of the Project ROW Easement in the Town of New Castle are provided in Appendix E.







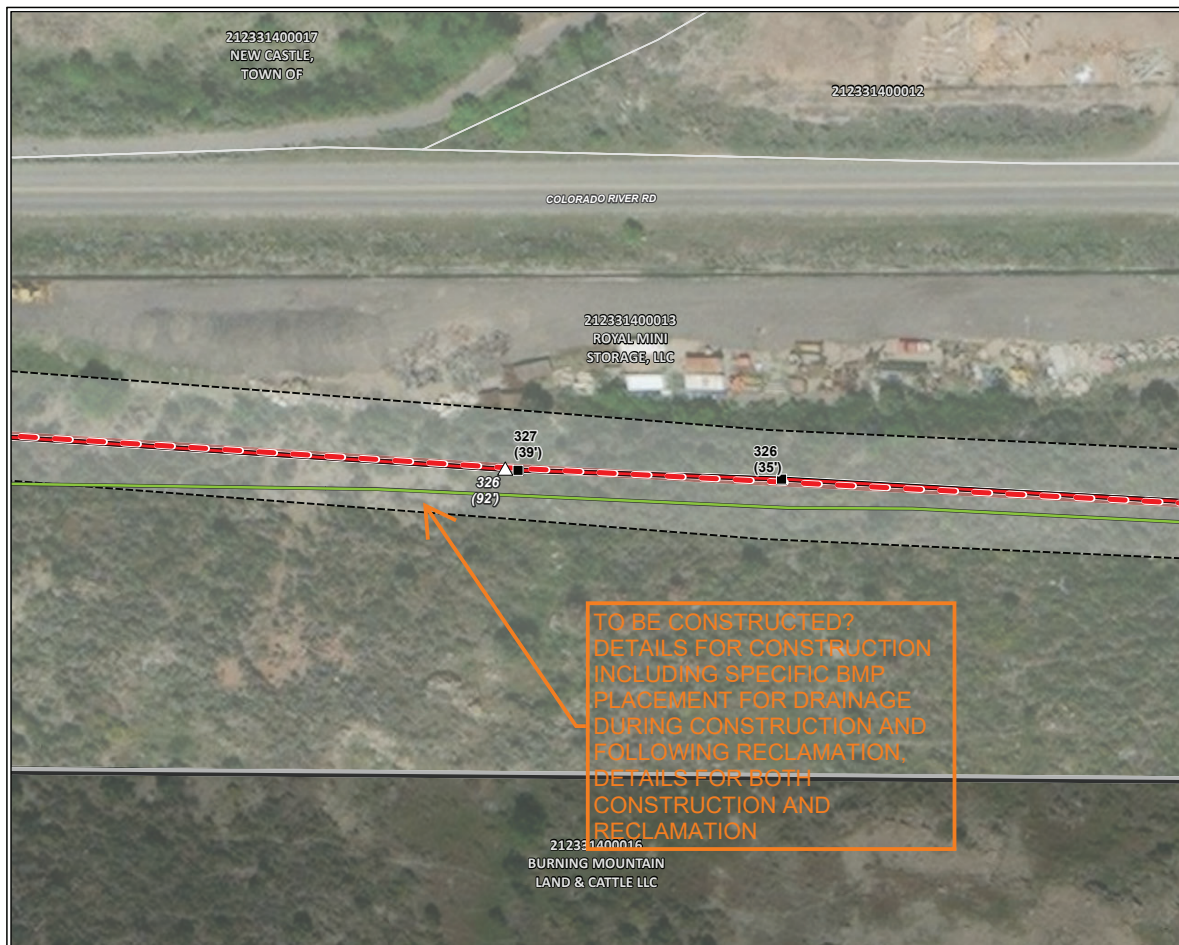
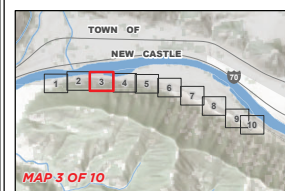
**Appendix B - Site Plan**  
Xcel Energy Circuit 6584  
Rebuild Project  
Town of New Castle, Colorado

- Proposed Pole - Helicopter Construction (Height in Feet)
- Existing Pole (Height in Feet)
- Existing Centerline
- Proposed Centerline
- Access Road
- Right-of-Way
- Town of New Castle Boundary
- Parcel Boundary

Scale: 1:600  
Date: 12/21/2023  
Data Sources: Burns & McDonnell,  
Xcel Energy, Town of New Castle,  
CDOT, ESRI



0 50 100 Feet



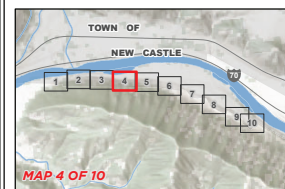
**Appendix B - Site Plan**  
Xcel Energy Circuit 6584  
Rebuild Project  
Town of New Castle, Colorado

- Proposed Pole - Helicopter Construction (Height in Feet)
- Existing Pole (Height in Feet)
- Existing Centerline
- Proposed Centerline
- Access Road
- Right-of-Way
- Town of New Castle Boundary
- Parcel Boundary

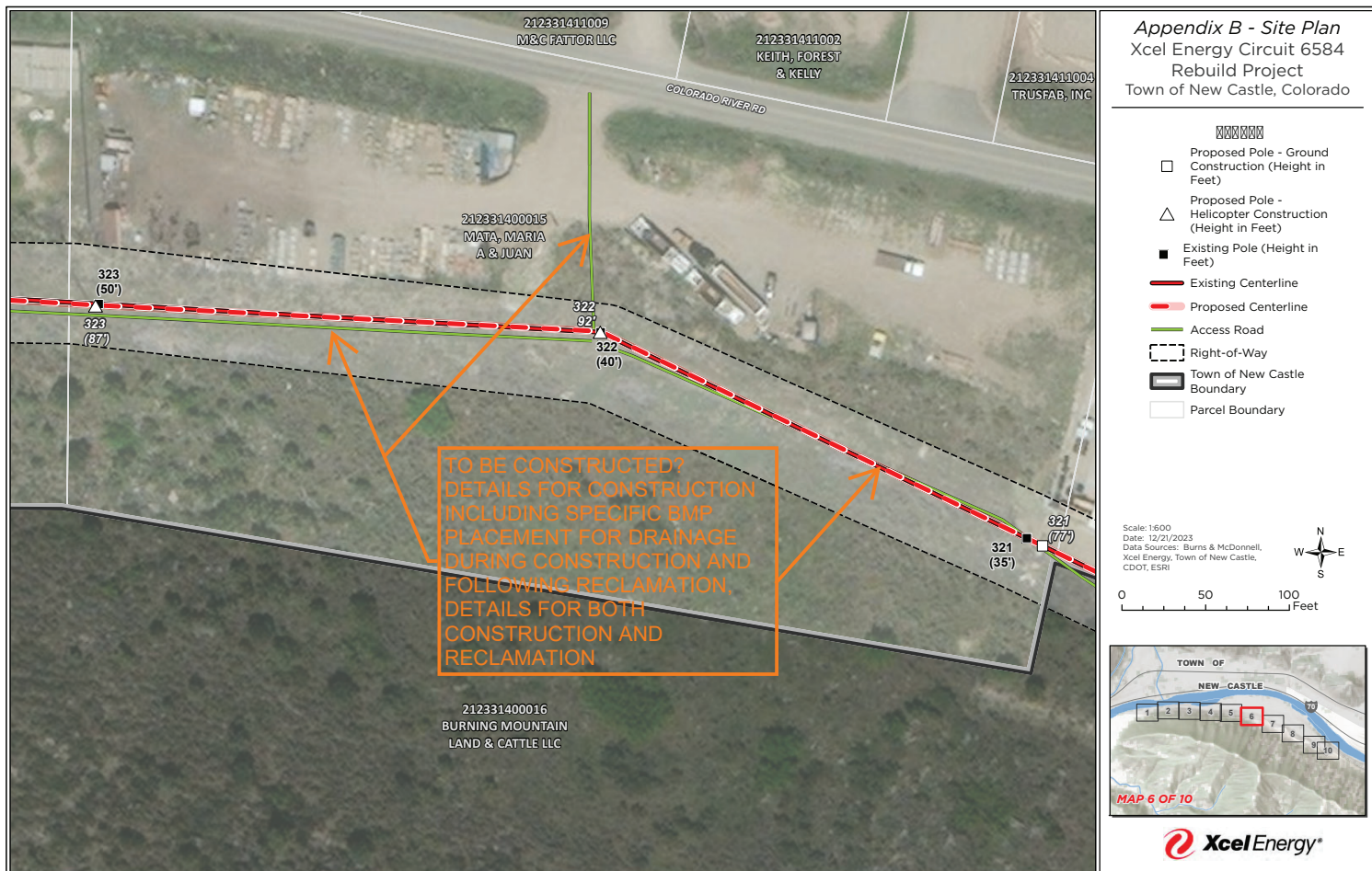
Scale: 1:600  
Date: 12/21/2023  
Data Sources: Burns & McDonnell,  
Xcel Energy, Town of New Castle,  
CDOT, ESRI



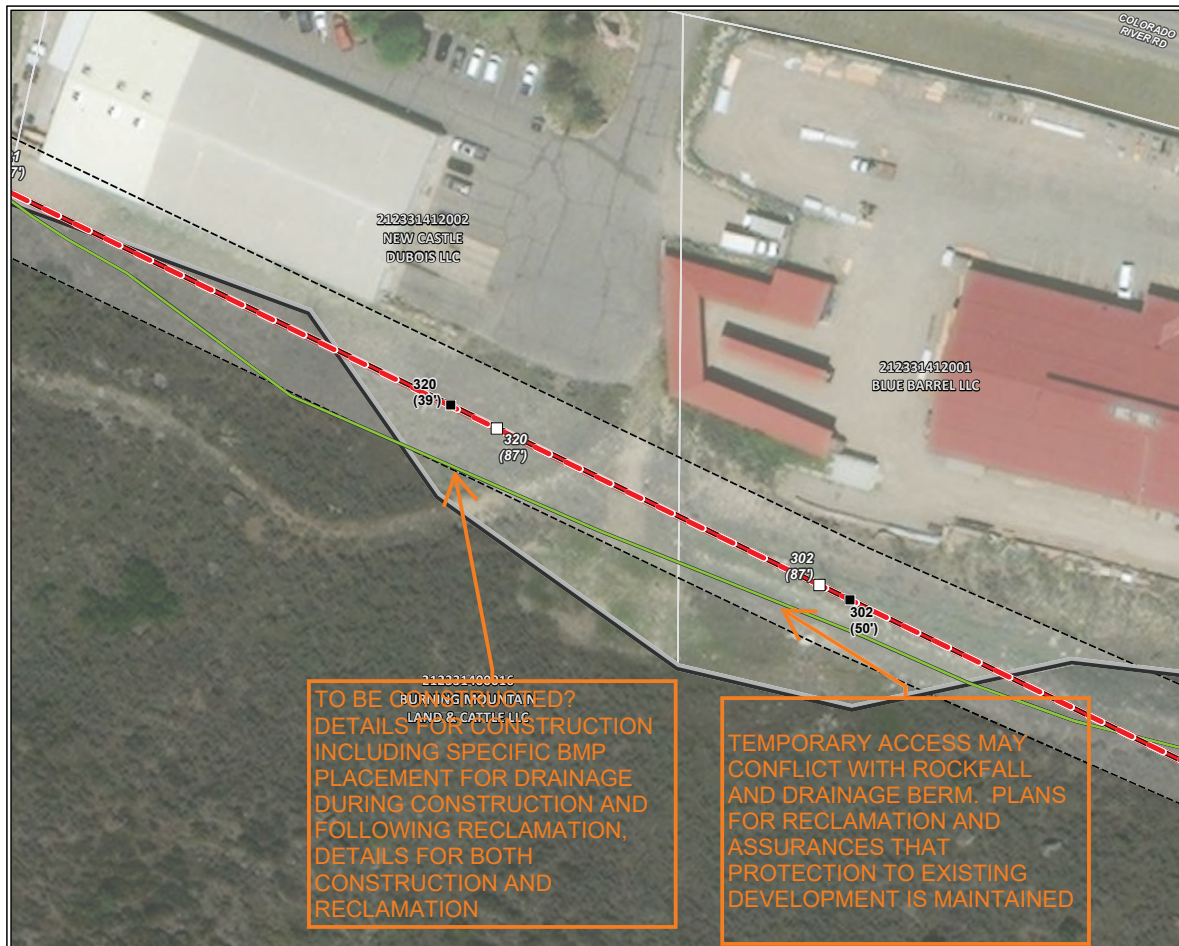
0 50 100 Feet











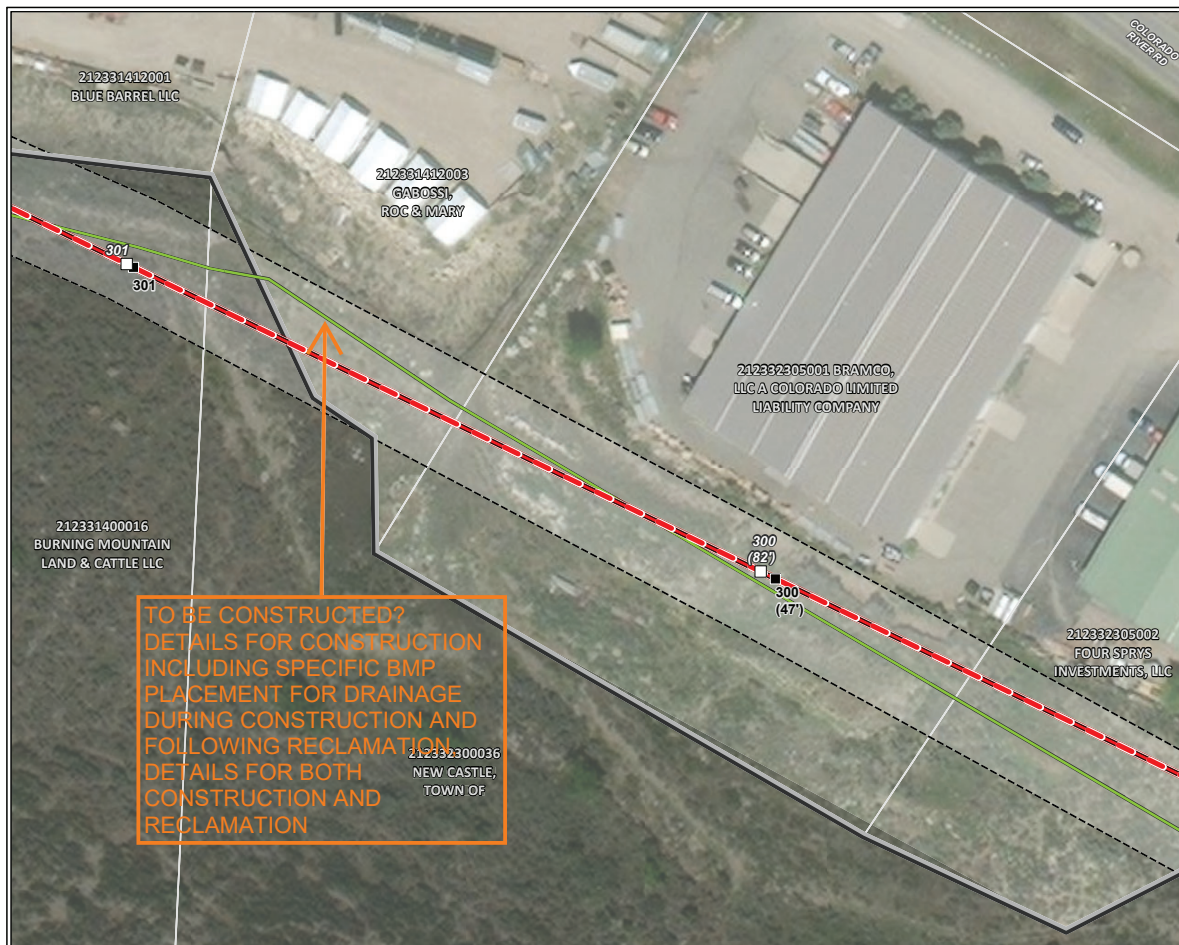
**Appendix B - Site Plan**  
Xcel Energy Circuit 6584  
Rebuild Project  
Town of New Castle, Colorado

Scale: 1:600  
 Date: 12/21/2023  
 Data Sources: Burns & McDonnell, Xcel Energy, Town of New Castle, CDOT, ESRI

0 50 100 Feet

N  
W E  
S

TOWN OF NEW CASTLE  
 1 2 3 4 5 6 7 8 9 10  
 MAP 7 OF 10



**Appendix B - Site Plan**  
Xcel Energy Circuit 6584  
Rebuild Project  
Town of New Castle, Colorado

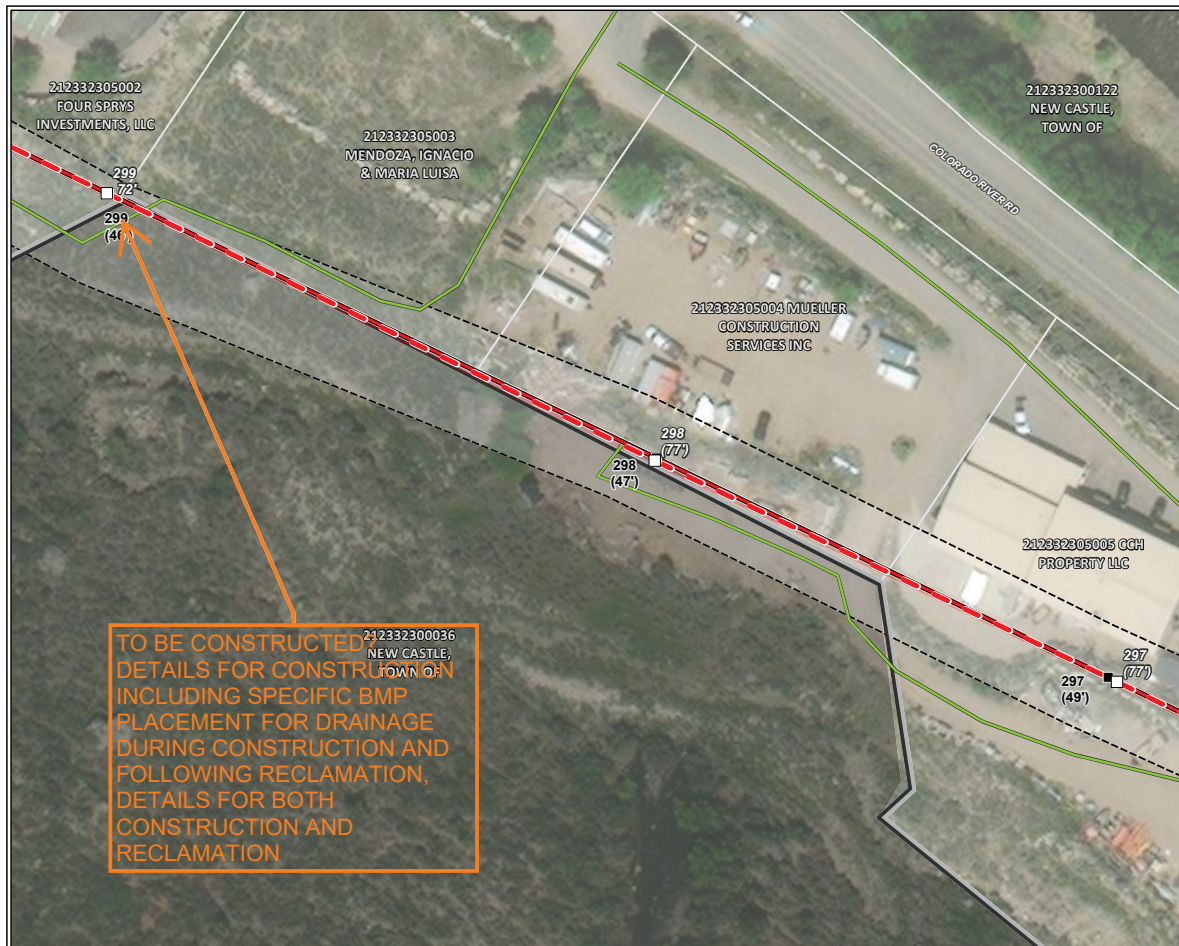
Scale: 1:600  
 Date: 12/21/2023  
 Data Sources: Burns & McDonnell, Xcel Energy, Town of New Castle, CDOT, ESRI

0 50 100 Feet

N  
W E  
S

TOWN OF NEW CASTLE  
 1 2 3 4 5 6 7 8 9 10  
 MAP 8 OF 10

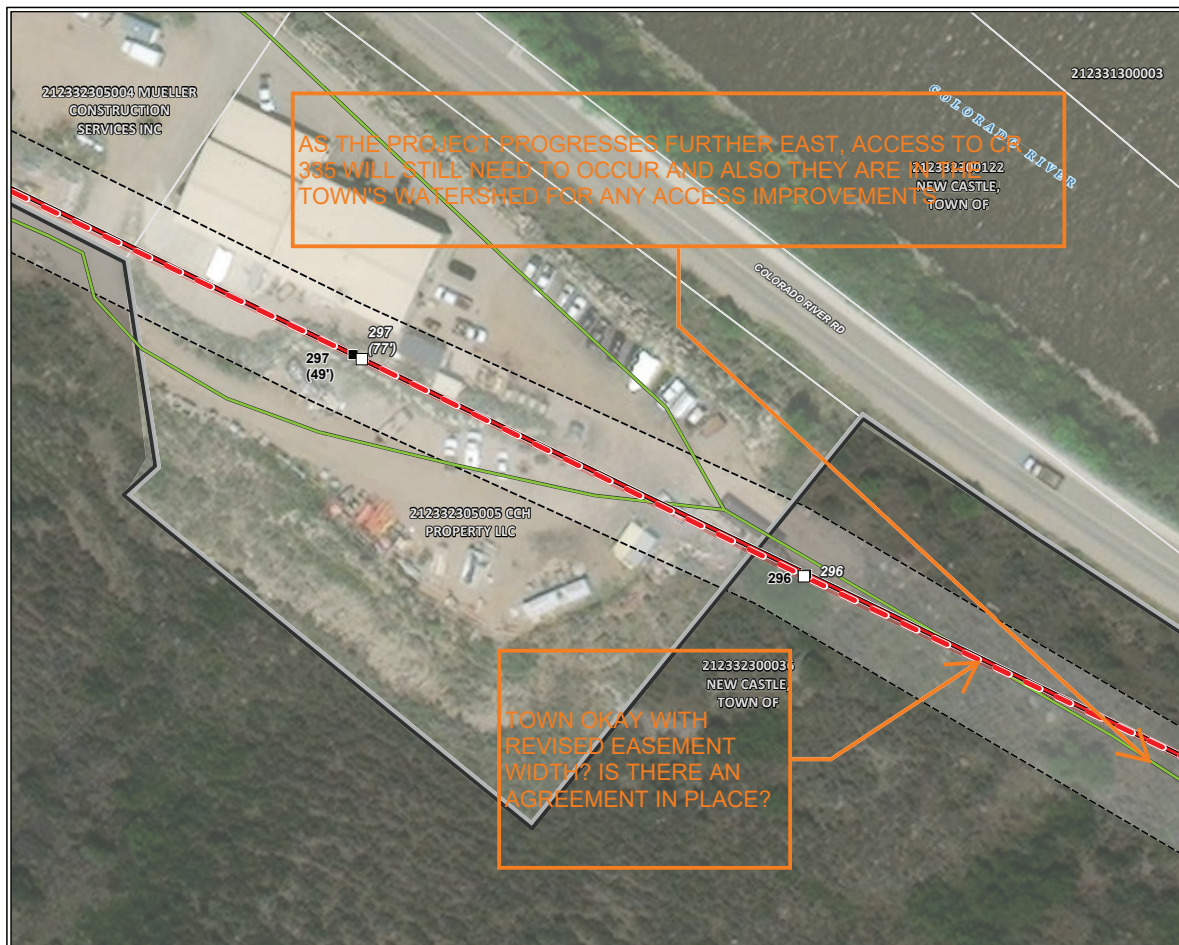
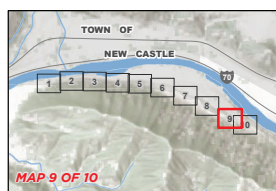




**Appendix B - Site Plan**  
Xcel Energy Circuit 6584  
Rebuild Project  
Town of New Castle, Colorado

- Proposed Pole - Ground Construction (Height in Feet)
- Existing Pole (Height in Feet)
- Existing Centerline
- Proposed Centerline
- Access Road
- Right-of-Way
- Town of New Castle Boundary
- Parcel Boundary

Scale: 1:600  
Date: 12/21/2023  
Data Sources: Burns & McDonnell,  
Xcel Energy, Town of New Castle,  
CDOT, ESRI



**Appendix B - Site Plan**  
Xcel Energy Circuit 6584  
Rebuild Project  
Town of New Castle, Colorado

- Proposed Pole - Ground Construction (Height in Feet)
- Existing Pole (Height in Feet)
- Existing Centerline
- Proposed Centerline
- Access Road
- Right-of-Way
- Town of New Castle Boundary
- Parcel Boundary

Scale: 1:600  
Date: 12/21/2023  
Data Sources: Burns & McDonnell,  
Xcel Energy, Town of New Castle,  
CDOT, ESRI

