

## Wallingford-Ingo, Gail

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**From:** Matthew Moorhead <m Moorhead@TNC.ORG>  
**Sent:** Tuesday, November 12, 2019 3:03 PM  
**To:** Wallingford-Ingo, Gail  
**Cc:** Boutilier, Seth; McWharter, Pamela; Greg Lambert; Terri Schulz  
**Subject:** Pueblo County 1041 Permit Application Comments  
**Attachments:** Black Hills Transmission Permit Comments 11 12 2019.docx

Please find attached comments from The Nature Conservancy for the current Black Hills Energy 1041 permit application 2019-003.

Please consider the environment before printing this email.

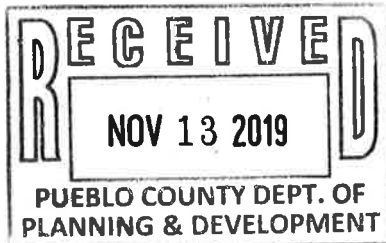
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Gail Wallingford-Ingo  
Interim Planning Director  
Pueblo County Dept. of Planning and Development  
229 W. 12<sup>th</sup> St.  
Pueblo, CO 81003

November 12, 2019

Dear Ms. Wallingford-Ingo,

I am writing to provide comments to the pending 1041 permit application 2019-003 for Black Hills Energy's proposed transmission project. The preferred alternative for the project is slated to cross land conserved by The Nature Conservancy (the Conservancy) under a conservation easement funded by the U.S. Department of Defense.

By and large, the permit application appears to adhere to the routing and implementation recommendations made to Black Hills Energy's project team by the Conservancy and ecologists familiar with the easement property and the suite of rare plants and other conservation priorities that reside there. However, the Conservancy does have some minor requests for the permit. Those requests are as follows:

- While the permit application notes that there are Conservancy easements in the preferred and some alternative routes, we request that the body of the permit have more detailed acknowledgement of the presence of the easement(s) and their purpose to protect populations of rare plants. The section on page 36 (Conservation Areas and Associated Sensitive Plants) appears to be an appropriate place to note not only the biological resources but the active efforts to protect them through the easement held by the Conservancy.
- Protection and management of the habitat on the transmission line right-of-way requires that invasive species (weeds) be mapped, monitored, and, if necessary, controlled post-construction. Black Hills Energy expressed an intent and willingness to do so for the Walker Ranch and the easement held by the Conservancy. The permit should note this.
- The Conservancy also requests that the permit note that Black Hills Energy will consult with the Conservancy and the Walkers about any seed mixes utilized on the easement property for restoration as needed.

Thank you for your attention in this matter. Please feel free to contact me with any questions.

Sincerely,

Matt Moorhead  
The Nature Conservancy  
Director of Business Development & Strategic Partnerships

cc. Mr. Seth Boutilier (Project Manager), Ms. Pamela McWharter (Project Manager)