January 15, 2016

U.S. Forest Service
Rocky Mountain Region
740 Simms St.
Golden, CO 80401

Submitted electronically via:
https://cara.ecosystem-management.org/Public/CommentInput?project=46470

Re: Comments on the Proposed Road Construction Exemption for the Colorado Roadless Rule

Dear U.S. Forest Service:

On behalf of the Interwest Energy Alliance, thank you for the opportunity to comment on the proposed inclusion of a road building exemption in the Colorado Roadless Rule. The Forest Service’s proposed exemption would allow road construction in 19,000 acres of currently protected designated Roadless Areas within Colorado’s national forests in order to facilitate the expansion of one underground coal mine. The Forest Service’s own analysis in the Draft Supplemental Environmental Impact Statement (available at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd485194.pdf) (cited hereafter as “DEIS”) presents the stark policy choices: approving the exemption would open up 170 million tons of publicly-owned coal from federal lands, result in billions of dollars in climate-related economic damages, and prevent 40,000 gigawatt hours of clean, renewable energy from entering the marketplace. We urge the Obama Administration to continue its strong climate leadership by implementing policies that promote a swift transition to a clean energy economy and reject proposals that slow national progress on this critical issue.

The Interwest Energy Alliance is a non-profit trade association that brings the nation’s renewable energy industry together with the advocacy community in a collaborative approach to market development in the Western United States. We partner with a unique mix of industry and non-governmental advocacy groups, which helps facilitate consensus-based approaches to new project and transmission development throughout the West. With partners in Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, the Interwest Energy Alliance advocates for clean energy policies throughout the Intermountain West. We promote the expansion of renewable energy markets for utility-scale wind, solar, and geothermal projects and work to educate
decision makers about renewable energy integration and the benefits for utilities, commercial interests and electricity consumers.

President Obama’s administration continues to lead on climate action, with strong domestic and international policies that have rightly placed the United States at the forefront of the international climate movement. In November, President Obama declared that “America is now a global leader when it comes to taking serious action to fight climate change,” highlighting improvements in fuel efficiency standards for automobiles and huge increases in wind and solar generation, noting that “thanks in part to the investments we’ve made, there are already parts of America where clean power from the wind or the sun is finally cheaper than dirtier, conventional power.”

In order to advance the historic and critically important shift to clean, renewable energy, it is imperative that America’s public lands are used to help rather than hinder the President’s climate objectives.

We applaud the Forest Service’s decision to model the energy market impacts of the proposed coal road exemption for National Forest lands in Colorado. Changes to the energy market are clearly an important consideration in weighing the climate impacts of the proposal. The Forest Service’s analysis concludes that the proposal would displace approximately 40,000 gigawatt hours of renewable energy production nationwide over the period 2016-2054. SDEIS at 96, Table 3-19. In the Forest Service’s own words: “decreases in electricity generation from renewable energy sources” as a result of the proposed coal road exemption would be “approximately 40,000 GWh.” SDEIS at 97.

We think it is important to put 40,000 gigawatt hours of renewable energy in context so that both decision makers and the public have a sense of impact of the proposed exemption. To put this into context, this renewable energy potential would save significant greenhouse gas emissions, and would save millions of dollars for electricity consumers. Wind energy is increasing in the U.S., with over 61,000 MW of operating wind turbines. These turbines produce over 20% of the electricity used in some states, and at times has exceeded 60% of Xcel Energy’s production to serve electricity demand requirements here in Colorado. Nationwide, in 2013, wind energy produced over 4% of total electricity production, and comprised 13.8% in Colorado. Colorado’s production in 2013 was 7,382,000 MWhs available to serve 681,000 homes across the state.

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3 Ibid.
4 Ibid.
In 2014, U.S. renewable electricity grew to 15.5% of total installed capacity and 13.5% of total electricity generation.\(^5\) Installed renewable electricity capacity exceeded 179 gigawatts (GW) in 2014, generating 554 terawatt-hours (TWh), compared with the entire nation’s overall electricity production of 4,113 TWhs in 2014.\(^6\) Since our total national electricity generation from all sources in 2014 was just over 4,100,000 GWhs, the 40,000 GWhs of renewable electricity generation pushed out of the market by the proposed exemption equals 10% of our current total annual output. In 2014, the average annual electricity consumption for a U.S. residential utility customer was 10,932 kilowatt hours (kWh), an average of 911 kWh per month.\(^7\) Therefore, this exemption would eliminate renewable energy potential for 3,658,983 homes around the US (equivalent to the Denver metropolitan area) in future decades.

Renewable energy has become a critical driver in our national and state economies. In Colorado alone, the wind industry supports between 6,000 and 7,000 jobs.\(^8\) The solar industry is also a growing force in our economy. Colorado ranked ninth in the nation for installed solar capacity, with 430 MW of solar energy installed as of January 2016. Colorado is home to more than 388 solar companies, employing over 4,200 people throughout the state. Capital investments of $212 million was invested in solar installations in Colorado in 2014, a figure which is increasing due to falling costs: average installed photovoltaic system prices in Colorado have fallen 18% between 2014 and 2015.\(^9\)

Thank you for the opportunity to comment on the proposed coal road exemption under consideration for inclusion in the Colorado Roadless Rule. The Forest Service’s evaluation of the market, economic, and climate impacts of the proposed exemption is an important step in a fair, informed, and transparent dialogue on our country’s energy choices.

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6 Ibid.
Very truly yours,

ALPERN MYERS STUART LLC

By: Lisa Tormoen Hickey

cc: Sarah Cottrell Propst
    Executive Director
    Interwest Energy Alliance