

Screening Form for Determining Low-Effect HCPs

I. Project Information

A. Project name:

Michigan Electric Transmission Company, LLC (METC)
Cobb to Brickyard Reconductoring Project

B. Affected species:

Karner blue butterfly (*Lycaeides Melissa samuelis*)

C. Project size (preferably in acres):

Total project size: 4.07 mile powerline right-of-way (ROW) segment, 66 feet wide. Total area 32.56 acres. Total Karner blue habitat within ROW: 14.23 acres. **Total estimated Karner blue habitat affected: 5.75 acres.**

D. Brief project description including minimization and mitigation plans:

The proposed work involves reconductoring a 4.07-mile segment of electric power transmission line within this ROW segment. Construction activities for the reconductoring project are scheduled to begin in February 2005 and will be completed by early spring 2005. All construction activities will take place within the existing 66-foot wide utility ROW. The reconductoring project will require METC's contractors to replace existing metal towers with new wooden utility poles (selected poles will require guy wires), and hang new 138 KV power lines on new insulators. There are 40 towers spaced approximately 300 to 400 feet apart along the 4.07-mile stretch of ROW that will be replaced with wooden poles. During construction activities METC expects to disturb an area approximately 200 feet long by 66 feet wide (13,200 square feet) surrounding each tower; centered at the current location of the towers to be replaced. Approximately 300-400 feet of undisturbed ROW will remain unaffected by the project between towers.

Minimization:

- Use the existing ROW access road, minimizing the disturbance to wild lupine and other vegetation between pole locations. All truck and heavy equipment (cranes and earthmovers) traffic will stay on the existing access road that runs along the ROW when not located at one of the active construction areas.
- In areas where wild lupine cover is prevalent locations will be marked where wild lupine cover is least dense. To the extent possible, contractors or sub-

contractors will perform construction work in areas where wild lupine is less prevalent (i.e. dropping towers and/or poles in a certain direction to minimize impact).

- When wild lupine cover is dense in all directions around the towers dismantle the existing metal towers in place before removing them.
- Limit all truck and heavy-equipment traffic to existing disturbed areas such as the access road that runs within the ROW,
- Employ a minimum of one Environmental Inspector (EI) for the duration of the construction activities that is familiar with the KBB and its habitat. This Inspector shall provide environmental training to the construction manager and foreman and will perform surprise field visits to monitor adherence to the environmental requirements of the project.

Mitigation

- Create additional KBB habitat equal to 25% of the area of lupine disturbed during the reconductoring project. The calculated acreage for creation of new KBB habitat during proposed mitigation is 5.75 acres x 0.25 or approximately 1.4 acres.
- Disturbed or reseeded areas that do not recover in accordance with the monitoring plan included as an appendix to the HCP will be reseeded or retreated as needed to establish suitable lupine cover.

II. Does the HCP fit the low-effect criteria in the HCP Handbook?

A. Are the effects of the HCP minor or negligible on federally listed, proposed, or candidate species and their habitats covered under the HCP? (Handbook pg. 1-8 and 1-9)

Project effects on Karner blue butterfly will be minor. The affected 5.75 acres of habitat are a very small proportion of occupied habitat in Michigan. Surveys in 2002 on the Huron-Manistee National Forest within the Newago and Muskegon Recovery Units identified the presence of KBB on 2,026 acres in 267 locations. Karner also occupies additional substantial acreage on state and private lands in Michigan. Karner also occupies considerable acreage in Wisconsin. The effects resulting from the permitted activity will be temporary. With the exception of the relatively insignificant area occupied by transmission poles, KBB habitat and lupine will only be temporarily disturbed, and will either recover naturally or be reseeded with lupine to assure restoration.

B. Are the effects of the HCP minor or negligible on other environmental values or resources (e.g. air quality, geology and soils, water quality and quantity, socio-economic,

cultural resources, recreation, visual resources, etc.) prior to implementation of the mitigation plan? (Handbook pg. 1-8 and 1-9)

Yes. With regard to other environmental values, the project site will be essentially unaffected and unchanged, or slightly improved. Visual resources, for example, may be slightly improved by the replacement of 4 miles of steel transmission towers by individual wooden utility poles, although this is a qualitative judgment. Replacement of a worn and outmoded stretch of electric transmission system with a current high probability of failure with a new system is likely to improve local socio-economic conditions.

C. Would the impacts of this HCP, considered together with the impacts of other past, present and reasonably foreseeable similarly projects not result, over time, in cumulative effects to environmental values or resources which would be considered significant? (Handbook pg. 5-3).

The intent and expectation is that any lupine that is impacted during the process will regenerate, either naturally or with supplemental seeding. HCP mitigation requirement will result in creation of an additional 25% of lupine habitat through seeding. If other utilities were to follow similar procedures, there should be no negative cumulative impacts. Instead, this should produce a modest positive cumulative impact.

III. Do any of the exceptions to categorical exclusions apply to this HCP?

Would implementation of the HCP (refer to 516 DM 2.3, Appendix 2):

A. Have significant adverse effects on public health or safety?

No. The power line right-of-way has been in place for decades, and except for visual change in appearance due to the change from steel lattice towers to wooden poles, and technical improvements to electric transmission capability for the affected segment, no other changes will occur. The HCP imposes minor activities on the site involving vegetative restoration and manipulation using established techniques that are unlikely to result in any health or safety effects.

B. Have adverse effects on such unique geographic characteristics as historic or cultural resources, park, recreation or refuge lands, wilderness areas, wild or scenic rivers, sole or principal drinking water aquifers, prime farmlands, wetlands, floodplains, or ecologically significant or critical areas, including those listed on the Department's National Register of Natural Landmarks?

No. The power line right-of-way has been in place for decades, and except for visual change in appearance due to the change from steel lattice towers to wooden poles, and technical improvements to electric transmission capability for the affected segment, no other changes will occur. Construction activity will be

temporary, and have only superficial and temporary effects on the ground surface. The right of way section is in a rural area. A clearance request has been submitted to the State Historic Preservation Officer (SHPO) and no construction activities will commence until the clearance has been obtained. The HCP is designed to protect, restore and create a vegetative community that is already present on the site.

C. Have highly controversial environmental effects?

No. Construction activity will be temporary, and have only superficial and temporary effects on the ground surface. The site is already occupied by electric transmission infrastructure, so site use will not change significantly. The HCP is designed to protect, restore and create a vegetative community that is already present on the site.

D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?

No. The powerline right-of-way segment is not unusual in any way, and replacement of the system with modern structures will pose no unusual, significant or uncertain effects or risks of any kind. Construction methods employed are routine and well established. The vegetative management practices resulting from implementation of the HCP are not new, unusual or risky.

E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?

No. The HCP employs methods, such as impact avoidance and seeding of new and disturbed sites, that have already been developed and employed elsewhere without significant effect.

F. Be directly related to other actions with individually insignificant but cumulatively significant environmental effects?

No. The methods and practices resulting from implementation of this HCP are standard and routine, and have been and will be used elsewhere, but not as a direct relation to this HCP. There may be a modest positive cumulative impact if similar procedures are followed in other rights-of-way.

G. Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places?

No. A clearance request has been submitted to the State Historic Preservation Officer (SHPO) and no construction activities will commence until the clearance has been obtained.

H. Have adverse effects on listed or proposed species, or have adverse effects on designated Critical Habitat for these species?

No. No other listed or proposed species or critical habitat is found on the HCP site.

I. Have adverse effects on wetlands, floodplains or be considered a water development project thus requiring compliance with either Executive Order 11988 (Floodplain Management), Executive Order 11990 (Protection of Wetlands), or the Fish and Wildlife Coordination Act?

No. The reconductoring project will pass over a stream, but no adverse effects are likely. Implementation of the HCP will affect only upland sites along the powerline right-of-way.

J. Threaten to violate a Federal, State, local or tribal law or requirement imposed for the protection of the environment?

No. Implementation of the HCP will be in full compliance with all other laws and regulations.

IV. ENVIRONMENTAL ACTION STATEMENT (EAS)

If the proposal fits the above criteria for a low-effect HCP, the proposal can be categorically excluded from the NEPA documentation in accordance with 516 DM 6, Appendix 1.4C (1) and (2). The following EAS should be prepared to provide an administrative record of the decision to categorically exclude the proposal in accordance with 550 FW 3.3C.

Within the spirit and intent of the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA), and other statutes, orders, and policies that protect fish and wildlife resources, I have established the following administrative record. Based on the analysis above, the Michigan Electric Transmission Company, LLC (METC), Cobb to Brickyard Reconductoring Project HCP qualifies as a "Low Effect" HCP as defined in the U.S. Fish and Wildlife Service Habitat Conservation Planning Handbook (November 1996). Therefore this action as is a categorical exclusion as provided by 516 DM 2, Appendix 1 and 516 DM 6, Appendix 1 and no further NEPA documentation will be made.

Other supporting documents (list):

Habitat Conservation Plan

Signature Approval:

(1) Field Supervisor

Date

(2) Regional Historic
Preservation Officer

Date

(3) Regional Environmental
Coordinator

Date

(4) ARD Ecological Services

Date