



Flathead Audubon Society

**PO Box 9173
Kalispell, MT 59904**

Bonneville Power Administration
Public Affairs - DKE-7
P.O. Box 14428
Portland, OR 97291-1442

February 21, 2016

**Draft Environmental Assessment
Kalispell-Kerr Transmission Line Rebuild (DOE/EA-1961)**

Dear Sirs:

We have reviewed the Draft Environmental Assessment for the Kalispell-Kerr Transmission Line Rebuild (DOE/EA-1961) and submit the following comments.

The lack of bird electrocution potential is a relief to hear although bird strikes remain a hazard with power transmission lines. The installation of "bird flight diverters" as described should help reduce the number of bird strikes.

The project as described will entail working in and around numerous wetlands. Numerous "best management practices" (BMP's) are described to minimize effects on these wetlands, however, the phrase "avoid....where possible" is commonly used which indicates that the BMP's can be avoided and therefore effects to wetlands will occur. Not implementing wetland related BMP's will result in effects and those effects are not adequately addressed in the Draft EA. We encourage you to more strongly protect the wetlands (not just avoid when possible) especially around the Veery habitats (such as in the Dayton Creek drainage) and perhaps even restore the Veery habitats.

As with wetlands, we encourage you to vigorously implement the BMP's for roads to minimize adverse effects to soils and reduce soil erosion.

It appears there are many measures (BMP's) relating to weeds to minimize further spread due to reconstruction activities but nothing related to control of existing weed populations along the right-of-way. We encourage you to actively control existing weeds.

On page 3-34 the description of Hoary Bat indicates that there is a low potential for occurrence due to lack of documented occurrence. It is highly likely that Hoary Bats do frequently occur in and near the project area due to their high mobility and widespread

occurrence around the state and the project area. Hoary Bats are frequently captured in similar habitats. Perhaps none have been captured along the right-of-way but that's undoubtedly due to lack of trying. Deployment of acoustic detectors could easily document their occurrence without physically capturing them. We encourage you to adjust the description to recognize that Hoary Bats are very likely to be found in the project area.

Thank you for considering our comments.

Kay Mitchell, President
Flathead Audubon Society