

**Draft
Environmental Assessment**

**Russell Gates Memorial
Fishing Access Site
Utility Easement**

October 2013



***Montana Fish,
Wildlife & Parks***

*Region 2
3201 Spurgin Road
Missoula, MT 59804*

Draft MEPA Environmental Assessment MCA 23-1-110 CHECKLIST

PART I. PROPOSED ACTION DESCRIPTION

- 1. Type of proposed state action:** Missoula Electric Cooperative (MEC) has requested a permanent utility easement from Montana Fish, Wildlife and Parks (FWP) to replace an existing underground power-line cable and existing overhead power line with a single underground power-line cable through Russell Gates Memorial Fishing Access Site (FAS).
- 2. Agency authority for the proposed action:**
Section 87-1-209, Montana Code Annotated (MCA), provides FWP Parks with the authority to acquire and dispose of interests in land and water, consistent with FWP's responsibilities for fish and wildlife habitat, associated public recreational opportunities and land management objectives. As specifically referenced in 87-1-209 (4), the FWP Director is the decision-making authority for this proposed action.
- 3. Name of project:** Russell Gates Memorial Fishing Access Site Utility Easement
- 4. Project sponsor (if other than the agency):**
Erik Langaunet
Missoula Electric Cooperative, Missoula, MT
- 5. Anticipated Schedule:**
Estimated Construction Commencement Date: Fall of 2013 weather permitting or early Spring of 2014
Installation Period: One week
Current Status of Project Design (% complete): 100 % complete
- 6. Location affected by proposed action:** Russell Gates Memorial FAS is located in Missoula County, Township 15 North, Range 14 West, Section 25. It is approximately 4 miles east of Clearwater Junction along State Highway 200 (Figures 2, 3).



Figure 1. Location Map



Figure 2. Property Map (FAS is in red).

7. Project size -- estimated the number of acres that would be directly affected that are currently:

	<u>Acres</u>		<u>Acres</u>
(a) Developed:		(d) Floodplain	<u>0</u>
Residential	<u>0</u>		
Industrial	<u>0</u>	(e) Productive:	
		Irrigated cropland	<u>0</u>
(b) Open Space/ Woodlands/Recreation	<u>0.2</u>	Dry cropland	<u>0</u>
(c) Wetlands/Riparian Areas	<u>0</u>	Forestry	<u>0</u>
		Rangeland	<u>0</u>
		Other	<u>0</u>

8. Permits, Funding, and Overlapping Jurisdictions:

- (a) **Permits:** None required
- (b) **Funding:** Missoula Electric Cooperative will cover all costs
- (c) **Other Overlapping or Additional Jurisdictional Responsibilities:**
 Montana State Historic Preservation Office – Cultural/historic sites
 Montana Department of Transportation – Right-of-way use
 Montana Department of Natural Resources – Adjacent property access

9. Narrative summary of the proposed action:

Missoula Electric Cooperative (MEC) is requesting an easement from FWP to replace an overhead power line with an underground power line. As a component of this replacement a portion of an existing aging underground power line would be abandoned. Figure 3 shows the existing overhead line, the proposed new underground line, and the existing aging underground power line.

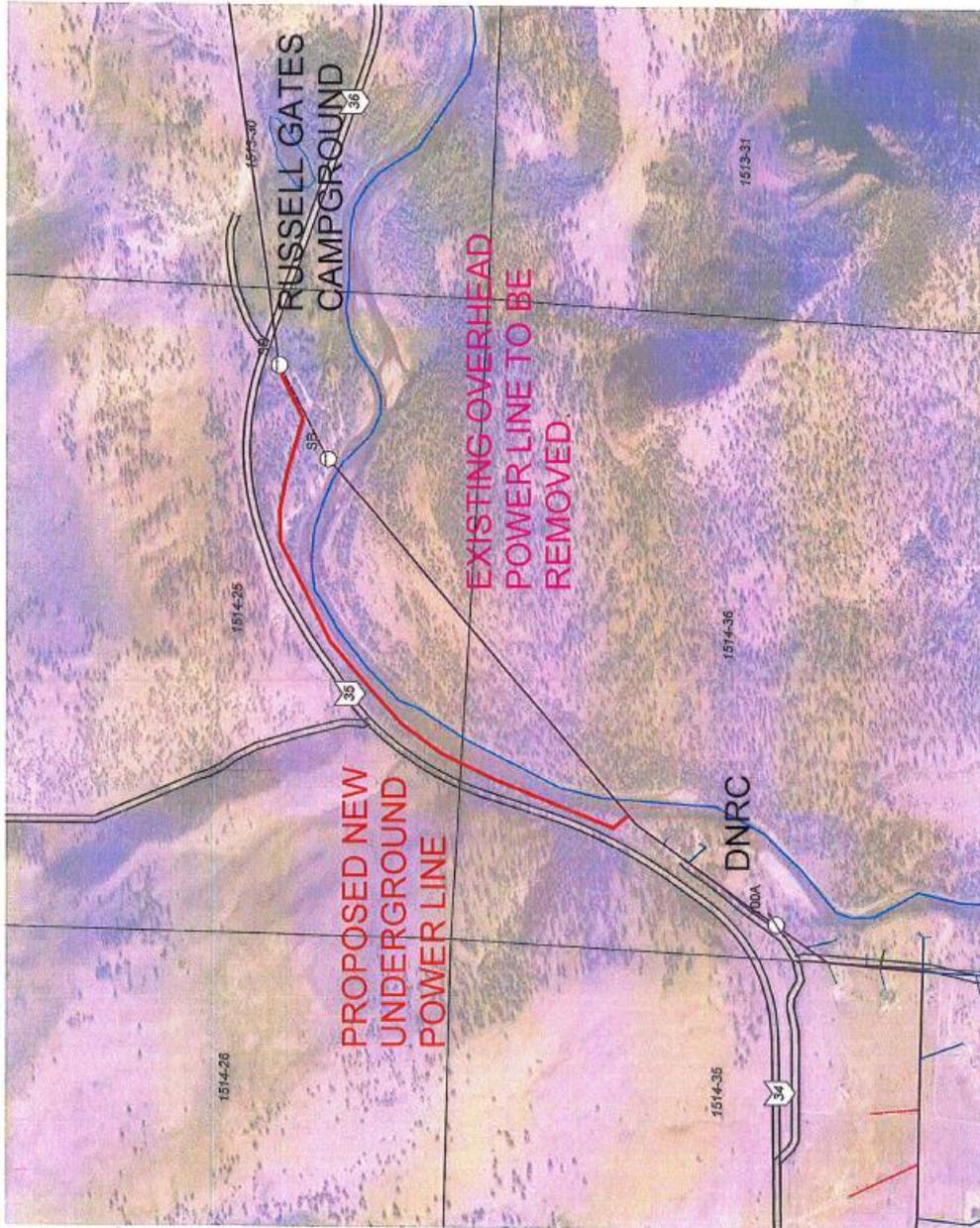


Figure 3. MEC Power Line Location Map. Existing power poles are denoted as white circles and power line is denoted as a black line. The power line proposed to be abandoned within the FAS is between the power poles. Red line is the proposed new underground power line.

The proposed new underground power line would be installed along the path of the old Chicago, Milwaukee, St. Paul and Pacific Railroad that was on the north side of the Blackfoot River and would be adjacent to an existing optic communication line.

The installation of the new underground power line would be completed by plowing a hollow cable in which the power line would be threaded through. The plowing technique requires less equipment and would disturb existing vegetation and soil less than using a backhoe. The length of the underground cable under FWP's FAS would be

approximately 4,250 feet. The cable would be placed three-feet below surface elevation and the disturbed width of the trench is expected to be approximately two feet.

As part of the project, the existing power pole in the FAS's campground would be cut-off at ground level. Upon completion of cable installation, the easement area would be compacted and reseeded with native grasses to rehabilitate the disturbed area. Fiber-optic marker stakes would be placed at line of sight intervals along the length of the easement. MEC would be responsible for weed control costs for a three-year period after cable installation.

Current Attributes of the FAS

The Russell Gates FAS is open year-round and its facilities include a boat ramp, campground (12 camp sites), latrines, and parking area. The location is a popular put-in and take-out access point on the Blackfoot River for floaters and fishermen. In 2012, roughly 22,000 visitors used the FAS, with the majority of the visits between May and September.

Portions of the FAS are covered by conifer forest (ponderosa pine) and upland grasslands (snowberry, grasses, huckleberry, etc.), and willows flourish along the river's bank. Spotted knapweed is also present especially along the railroad bed west of the campground.

10. Alternatives:

a. Alternative A: No Action

The easement would not be granted by FWP and MEC would not replace the overhead power line with an underground cable. No impacts to the FAS's existing physical and human resources would occur.

b. Alternative B: Approval of the MEC Utility Easement

The preferred alternative is for FWP to grant an easement to MEC which would permit MEC to replace the existing overhead power line with an underground power line and upgrade an existing old underground with the new power line. The easement would include conditions requiring MEC to mitigate impacts to soil and vegetation, including weed control. MEC would provide fair-market value compensation for the easement.

11. Evaluation and listing of mitigation, stipulation, or other control measures

enforceable by the agency or another government agency: MEC would be responsible to undertake or to pay FWP for weed control in the easement area for a period of three years following cable installation project completion and for the same time period following any future ground disturbance related activities such as cable maintenance. Weed control activities would be done in accordance with FWP and Missoula County weed control plans.

PART II. ENVIRONMENTAL REVIEW CHECKLIST

Evaluation of the impacts of Alternative B including secondary and cumulative impacts on the Physical and Human Environment.

A. PHYSICAL ENVIRONMENT

1. <u>LAND RESOURCES</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Soil instability or changes in geologic substructure?			X		Yes	1a
b. Disruption, displacement, erosion, compaction, moisture loss, or over-covering of soil, which would reduce productivity or fertility?			X		Yes	1b.
c. Destruction, covering or modification of any unique geologic or physical features?		X				
d. Changes in siltation, deposition or erosion patterns that may modify the channel of a river or stream or the bed or shore of a lake?		X				
e. Exposure of people or property to earthquakes, landslides, ground failure, or other natural hazard?		X				
f. Other:		X				

1a/b. Soil would be disturbed during plowing of the underground power-line cable. The new underground cable's path would be approximately 4,250 feet in length, three-feet deep, and two-feet wide. An estimated 940 cubic yards (c.y.) of soil would be disturbed. Upon completion of placement of the cable, the plow scar would be cleaned of rocks and compacted to its original condition. Reseeding of disturbed areas would be performed as required by the terms of the easement with a mixture of native grasses and forbs approved by FWP.

The path of the new underground cable is approximately 60 feet above the river at its closest point. After the path's restoration, no new erosion courses are anticipated to be established that could have added particulates to the river.

2. <u>AIR</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Emission of air pollutants or deterioration of ambient air quality? (Also see 13 (c).)			X		No	2a.
b. Creation of objectionable odors?		X				
c. Alteration of air movement, moisture, or temperature patterns or any change in climate, either locally or regionally?		X				
d. Adverse effects on vegetation, including crops, due to increased emissions of pollutants?		X				
e. For P-R/D-J projects, will the project result in any discharge, which will conflict with federal or state air quality regs? (Also see 2a.)		N/A				
f. Other:		X				

2a. Minor and temporary dust and vehicle emissions would likely be created by operation of equipment during the plowing of underground cable, restoration of the cable's path, and removal of the upper portion of the existing power pole near the FAS's campground.

Emissions resulting from equipment usage on the site for one week would be negligible considering the short duration.

3. <u>WATER</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Discharge into surface water or any alteration of surface water quality including but not limited to temperature, dissolved oxygen or turbidity?		X				
b. Changes in drainage patterns or the rate and amount of surface runoff?		X				
c. Alteration of the course or magnitude of floodwater or other flows?		X				
d. Changes in the amount of surface water in any water body or creation of a new water body?		X				
e. Exposure of people or property to water related hazards such as flooding?		X				
f. Changes in the quality of groundwater?		X				
g. Changes in the quantity of groundwater?		X				
h. Increase in risk of contamination of surface or groundwater?		X				
i. Effects on any existing water right or reservation?		X				
j. Effects on other water users as a result of any alteration in surface or groundwater quality?		X				
k. Effects on other users as a result of any alteration in surface or groundwater quantity?		X				
l. For P-R/D-J, will the project affect a designated floodplain? (Also see 3c.)		N/A				
m. For P-R/D-J, will the project result in any discharge that will affect federal or state water quality regulations? (Also see 3a.)		N/A				
n. Other:		X				

It is unlikely that the proposed action would result in any changes of runoff into the nearby Blackfoot River.

4. <u>VEGETATION</u> Will the proposed action result in?	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Changes in the diversity, productivity or abundance of plant species (including trees, shrubs, grass, crops, and aquatic plants)?			X		Yes	4a
b. Alteration of a plant community?		X				
c. Adverse effects on any unique, rare, threatened, or endangered species?		X				
d. Reduction in acreage or productivity of any agricultural land?		X				
e. Establishment or spread of noxious weeds?			X		Yes	4e
f. For P-R/D-J, will the project affect wetlands, or prime and unique farmland?		N/A				
g. Other:		X				

- 4a. Existing surface vegetation would be disturbed along the proposed path of the new underground power line, which would likely include grasses, small shrubs, and possibly young pine trees. No mature pine trees are expected to be impacted by the proposed action. The overall diversity of vegetation within the FAS would not be affected. Reseeding of disturbed areas would be performed by MEC as required by the terms of the easement with a mixture of native grasses and forbs approved by FWP.
- 4e. MEC would be responsible for or pay FWP for weed control in the easement area for a period of three years following cable installation and for a period of three years following any future activities resulting in ground disturbance, such as cable maintenance. Such efforts should decrease the spread of knapweed to additional locations within the FAS.

5. FISH/WILDLIFE Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Deterioration of critical fish or wildlife habitat?		X				
b. Changes in the diversity or abundance of game animals or bird species?		X				
c. Changes in the diversity or abundance of nongame species?		X				
d. Introduction of new species into an area?		X				
e. Creation of a barrier to the migration or movement of animals?		X				
f. Adverse effects on any unique, rare, threatened, or endangered species?		X				
g. Increase in conditions that stress wildlife populations or limit abundance (including harassment, legal or illegal harvest or other human activity)?		X				
h. For P-R/D-J, will the project be performed in any area in which T&E species are present, and will the project affect any T&E species or their habitat? (Also see 5f.)		N/A				
i. For P-R/D-J, will the project introduce or export any species not presently or historically occurring in the receiving location? (Also see 5d.)		N/A				
j. Other:		X				

A search of the Montana Natural Heritage Program (MNHP) database showed that four species of mammals (wolverine, Canada lynx, fisher, and Preble's screw) and nine bird species (great blue heron, American bittern, pileated woodpecker, common loon, Cassin's finch, Lewis's woodpecker, flammulated owl, black-backed wood pecker, and great grey owl) are verified to exist within the same township and range as the FAS. Of those species, only the Clarks nutcracker, great blue heron, Cassin finch, and Lewis's woodpecker have been recorded within the FAS.

Beyond those species, many small mammals use the FAS, as well as larger mammals (e.g. mule deer, black bear, and elk) are known to pass through the site. Since the FAS is used year-round and adjacent to a major traffic route, the FAS is not an important location for wildlife. The proposed easement and subsequent replacement of the power line would have no impact on wildlife as determined by Jay Kolbe, FWP Region 2 Wildlife Biologist.

The river corridor is used for nesting sites and foraging by bald eagles. Since 1991, numerous eagle sightings and three different nesting sites have been recorded near the FAS. Currently, there is only one active nesting site near the FAS per a conversation with Kristi Dubois, FWP Region 2 Non-game Wildlife Biologist.

The bald eagle nest is located approximately one-third of a mile upstream from the location where the power line crosses the river at the FAS. While bald eagles were officially delisted in 2007, the USFWS has jurisdiction protecting this species under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. The *Management Guidelines of the Montana Bald Eagle Management Plan* recommend seasonal restrictions from February 1 through August 15 for construction and maintenance of roads and trails, among other activities, within direct line of sight of an active nest. In addition, in the absence of a visual buffer, there should be a distance buffer of at least .25 mile from any construction of infrastructure, such as roads and trails. There should also be a .25-mile distance buffer for recreation during the breeding season. Because construction would begin in fall 2013 or the early spring of 2014, take one week to complete, the nest is over .25 mile from the construction site, and the line of site between the nest and the project area is blocked by numerous trees, the proposed project would not impact bald eagle nesting. In addition, the brief increase in public use at the FAS during the installation period would have no or minor impact on bald eagles as they have been accustomed to human activity, such as floating, fishing and camping at the FAS for years. Additionally, the removal of the power line across the river would be a net benefit for the eagles as they use the river corridor heavily when foraging for fish.

B. HUMAN ENVIRONMENT

6. <u>NOISE/ELECTRICAL EFFECTS</u> Will the proposed action result in:	IMPACT					Comment Index
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	
a. Increases in existing noise levels?			X		Yes	6a.
b. Exposure of people to serve or nuisance noise levels?		X				
c. Creation of electrostatic or electromagnetic effects that could be detrimental to human health or property?		X				
d. Interference with radio or television reception and operation?		X				
e. Other:		X				

- 6a. There would be a temporary increase in noise level during the installation of the underground power line, the restoration activities, and the removal of the upper portion of the power pole near the campground. The noise from the installation may be an annoyance to daytime visitors at the FAS. The installation work would be during daylight hours, thus overnight campers at the site would not be disturbed. Additionally, since the installation would be done mainly during the work week when camping occupancy is at its lowest, disturbances to overnight campers should be minimal.

7. <u>LAND USE</u> Will the proposed action result in:	IMPACT					Comment Index
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	
a. Alteration of or interference with the productivity or profitability of the existing land use of an area?		X				
b. Conflicted with a designated natural area or area of unusual scientific or educational importance?		X				
c. Conflict with any existing land use whose presence would constrain or potentially prohibit the proposed action?		X				
d. Adverse effects on or relocation of residences?		X				
e. Other:		X				

The proposed action would not alter or interfere with the productivity or profitability of the existing land use, nor does it conflict with a designated natural area or area of unusual scientific or educational importance

8. <u>RISK/HEALTH HAZARDS</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Risk of an explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation) in the event of an accident or other forms of disruption?		X			Yes	8a.
b. Affect an existing emergency response or emergency evacuation plan, or create a need for a new plan?		X				
c. Creation of any human health hazard or potential hazard?		X				
d. For P-R/D-J, will any chemical toxicants be used? (Also see 8a)		N/A				
e. Other:		X				

8a. The terms of the utility easement would require MEC to provide assistance for weed management activities along the path of the new underground power line for three years. Weed management at the site follows the guidance of the FWP's Statewide Integrated Noxious Weed Management Plan that uses an integrated method of managing noxious weeds, including the use of herbicides.

9. <u>COMMUNITY IMPACT</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of the location, distribution, density, or growth rate of the human population of an area?		X				
b. Alteration of the social structure of a community?		X				
c. Alteration of the level or distribution of employment or community or personal income?		X				
d. Changes in industrial or commercial activity?		X				
e. Increased traffic hazards or effects on existing transportation facilities or patterns of movement of people and goods?		X				
f. Other:		X				

The plowing equipment and project staff vehicles may cause additional traffic within the campground for the one-week installation effort. The project is not expected to impact traffic flow on Montana State Highway 200 which is adjacent to the FAS.

10. <u>PUBLIC SERVICES/TAXES/UTILITIES</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Will the proposed action have an effect upon or result in a need for new or altered governmental services in any of the following areas: fire or police protection, schools, parks/recreational facilities, roads or other public maintenance, water supply, sewer or septic systems, solid waste disposal, health, or other governmental services? If any, specify:		X				
b. Will the proposed action have an effect upon the local or state tax base and revenues?		X				
c. Will the proposed action result in a need for new facilities or substantial alterations of any of the following utilities: electric power, natural gas, other fuel supply or distribution systems, or communications?		X				
d. Will the proposed action result in increased use of any energy source?		X				
e. Define projected revenue sources	X					
f. Define projected maintenance costs.		X				
g. Other:		X				

The proposed action would result in the upgrade of a portion of MEC power infrastructure. Currently, the FAS does not have a connection to the power line and there would be no change to this arrangement with the completion of the proposed action. FWP anticipates no additional maintenance costs at the FAS after the installation of the underground cable is completed.

11. <u>AESTHETICS/RECREATION</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Alteration of any scenic vista or creation of an aesthetically offensive site or effect that is open to public view?			X			11a.
b. Alteration of the aesthetic character of a community or neighborhood?		X				
c. Alteration of the quality or quantity of recreational/tourism opportunities and settings? (Attach Tourism Report.)		X	x			11c.
d. For P-R/D-J, will any designated or proposed wild or scenic rivers, trails or wilderness areas be impacted? (Also see 11a, 11c.)		N/A				
e. Other:		X				

11a. Upon completion of laying and burying the new power line, marker stakes would be placed at line of sight intervals along the length of the buried line's path. The markers are a safety precaution for users of the site.

11c. The FAS would remain open during installation process and the proposed action may result in temporary inconvenience to FAS visitors. The project's timing would occur in a manner to reduce such impacts to visitors campers, such as during low use period in the late fall or early spring. Terms of the utility easement would require that any disturbed areas are returned to condition prior to the power line's installation so that the aesthetic values of the FAS are maintained.

12. <u>CULTURAL/HISTORICAL RESOURCES</u> Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Destruction or alteration of any site, structure or object of prehistoric historic, or paleontological importance?		X				12a
b. Physical change that would affect unique cultural values?		X				12b
c. Effects on existing religious or sacred uses of a site or area?		X				12c
d. For P-R/D-J, will the project affect historic or cultural resources? Attach SHPO letter of clearance. (Also see 12.a.)		N/A				12d
e. Other:		X				

12 a-d Four cultural resource surveys have been completed within the Russell Gates FAS since 1985 with the most recent survey completed in 2010. All the surveys completed multiple location excavations of various depths and sizes. Nearly all the surveys found evidence of previous site use and possible occupation by identification of charcoal layers and discovery of fire-cracked rocks, burned and unburned bones, hearths, and stone chipped tools and chipped flakes. None of the recorded excavation sites were on the proposed path of the underground cable, which would be within the old railroad bed.

Since historic artifacts have been found at the site previously, FWP contacted the State Historic Preservation Office (SHPO) for consultation on the proposed project. After a review of the proposed route of the underground power line, SHPO requested the existing power pole remain intact and to be cut off so that disturbances to cultural material buried adjacent to the pole could be minimized, and that the railroad grade would be graded back to the original contour by MEC following the installation process (Appendix A).

SIGNIFICANCE CRITERIA

13. <u>SUMMARY EVALUATION OF SIGNIFICANCE</u> Will the proposed action, considered as a whole:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Have impacts that are individually limited, but cumulatively considerable? (A project or program may result in impacts on two or more separate resources that create a significant effect when considered together or in total.)		X				
b. Involve potential risks or adverse effects, which are uncertain but extremely hazardous if they were to occur?		X				
c. Potentially conflict with the substantive requirements of any local, state, or federal law, regulation, standard or formal plan?		X				
d. Establish a precedent or likelihood that future actions with significant environmental impacts will be proposed?		X				
e. Generate substantial debate or controversy about the nature of the impacts that would be created?		X				
f. <u>For P-R/D-J</u> , is the project expected to have organized opposition or generate substantial public controversy? (Also see 13e.)		N/A				
g. <u>For P-R/D-J</u> , list any federal or state permits required.		N/A				See pg. 3

This EA found no significant impacts to the human or physical environment from the proposed action. FWP does not anticipate any substantial public controversy to be generated by the proposed project at Russell Gates Memorial FAS.

PART III. NARRATIVE EVALUATION AND COMMENT

The proposed utility easement at Russell Gates Memorial Fishing Access Site (FAS) provides an opportunity for MEC to upgrade their power line in the area for the benefit of their customers in a way that disturbs a minimal amount of ground cover and the aesthetic values of the FAS. Additionally, the removal of the existing overhead power line crossing the Blackfoot River benefits bald eagles and other avian species that uses the river corridor.

PART IV. PUBLIC PARTICIPATION

1. Public Involvement:

The public will be notified in the following manners to comment on this current EA, the proposed action, and alternatives:

- Two public notices in each of these papers: *Independent Record* (Helena), *Missoulian*, and *Seeley Swan Pathfinder*;
- One statewide news release;
- Public notice on the Fish, Wildlife & Parks web page: <http://fwp.mt.gov>.

Copies of this environmental assessment will be distributed to the neighboring landowners and interested parties to ensure their knowledge of the proposed project. The EA, along with opportunity to comment, will be posted on FWP's webpage <http://fwp.mt.gov> ("Public Notices").

This level of public notice and participation is appropriate for a project of this scope having limited impacts, many of which can be mitigated. A public hearing may be scheduled if requested.

2. Duration of comment period:

The public comment period will extend for thirty (30) days following the publication of the second legal notice in area newspapers. Comments will be accepted until 5:00 P.M. on November 14, 2013 and can be mailed or emailed to the address below:

MT Fish, Wildlife & Parks
Attn: Rory Zarling
3201 Spurgin Road
Missoula, MT 59804

or rzarling@mt.gov

PART V. EA PREPARATION

- 1. Based on the significance criteria evaluated in this EA, is an EIS required? (YES/NO)? No**
If an EIS is not required, explain why the EA is the appropriate level of analysis for this proposed action.

Impacts to the human and physical environment are not significant per the criteria described ARM 12.2.431, disturbances are restricted to a very small area and those disturbances to the soils and vegetation can be minimized, and disturbances to visitors to the FAS would be limited to a one-week period during

a low visitation period. Based on the summary above, an environmental assessment is the appropriate level of analysis for the proposed project and an environmental impact statement is not required.

2. Persons responsible for preparing the EA:

Rebecca Cooper, FWP Helena
Chet Crowser, FWP Missoula

3. List of agencies and organizations consulted during preparation of the EA:

Missoula Electric Cooperative, Missoula MT
Montana Fish, Wildlife & Parks:
 Fish & Wildlife Division, Missoula and Seeley Lake MT
 Design & Construction Bureau, Helena MT
 Lands Bureau, Helena MT
Montana State Historic Preservation Office, Helena MT

Appendix:

A – State Historic Preservation Office Correspondence

APPENDIX A



Montana Fish, Wildlife & Parks

20131002094

RECEIVED

OCT 02 2013

BY: SHPO

• Stan
• FWP/FISH
• Russell Gates Memorial FAS
Proposed Underground Power

1420 East Sixth Avenue
P.O. Box 200701
Helena, Montana 59620-0701

RECEIVED

OCT 07 2013

DESIGN & CONSTRUCTION
DEPT. OF FISH, WILDLIFE & PARKS

Stan Wilmoth, PhD
State Archaeologist
State Historical Preservation Office
1410 8th Avenue
Helena, Montana 59620

RE: Russell Gates Memorial Fishing Access Site Proposed Underground Power

September 30, 2013

Dear Dr. Wilmoth:

Montana Fish, Wildlife and Parks (FWP) is proposing granting of a utility easement to Missoula Electric Cooperative (MEC) at the Russell Gates Memorial Fishing Access Site in Missoula County. MEC proposes to abandon existing utilities on the site, including overhead power lines, power poles and some underground power lines. Existing lines would be replaced by approximately 4,250 feet of underground power lines plowed into the abandoned railroad bed alongside an existing fiber optic line. Cable would be laid at an approximate depth of 3 feet. The existing top of grade would be left at the same elevation and grade. Power poles would be cut off above grade to minimize potential disturbance to cultural resources by extracting buried poles.

On April 2, 2010 FWP submitted a copy of the March 29, 2010 Addendum to a report entitled *Results of Archaeological Testing at the Proposed Russell Gates Fishing Access Site Expansion*, prepared by GCM Services, Inc. in preparation for proposed parking area and river access improvements. In an earlier, informal consultation with Kathryn Ore and yourself, you requested further detail and formal consultation as we approached a final design. Attached is a site plan including locations of proposed utility improvements and 2010 shovel test locations.

Funding for the utility work is limited to private MEC funds and no federal funding is anticipated. It is our opinion that the proposed project and construction methods will be sensitive to this regionally significant cultural site and that the project should proceed as proposed. Please feel free to contact me with any questions or concerns regarding the proposed project.

Thank's
Bardell

CONCUR
MONTANA SHPO
DATE 10/04/13 SIGNED Stan Wilmoth

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. Mangum', with a long horizontal flourish extending to the right.

Bardell Mangum, PLA
Landscape Architect
Design & Construction
Montana Fish, Wildlife & Parks

Encl.: Proposed Buried Power Line Plan

cc: File 786A.2