

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana State Office
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Billings, Montana 59107-6800
<http://www.mt.blm.gov/>

In Reply To:
2800 (924.5) P

June 3, 2004

EMAIL TRANSMISSION -
Instruction Memorandum No. MT-2004-067
Expires: 9/30/05

To: Field Managers

From: Deputy State Director, Division of Resources

Subject: Vegetation Management Practices on BLM-Administered Electrical Distribution and Transmission Line Rights-of-Way (ROW)

In anticipation of an intense fire season this year, Field Offices should take a close look at the vegetative management practices on BLM- administered ROWs, particularly those ROWs for electrical distribution and transmission lines.

A hot, dry summer with a corresponding intense fire season is being forecasted for the western U.S. The recent snow and rain in many portions of the western U.S. may actually exacerbate the fire situation by providing moisture for spring plant growth. This spring growth will cure off into a very hazardous fire fuel situation. The BLM-authorized ROW may bear the burden of the increased plant growth. Additionally, plant height may be taller than normal because normal ROW vegetative management may have been deferred by ROW holders for various reasons. During hot weather, demand for electricity increases and the combination of increased atmospheric temperatures and increased conductor loads will cause increased "sag" of transmission line conductors. If the sag is greater than normal in an area of taller than normal plant height, there is an increased potential for flash over and a corresponding loss of service (blackout).

Also, August 14, 2003, saw the worst blackout in North American history. Of interest to BLM is that among the many findings presented in the Final Report of the U.S. - Canada Power System Outage Task Force, released on April 5, 2004, inadequate tree trimming was identified as one of the groups of causes of the blackout.

Field Offices are encouraged to conduct routine ROW compliance inspections to ensure vegetative management stipulations identified in grants are being implemented and that reasonable fire prevention actions are being taken by the ROW holders. Although this is very important on electrical distribution and transmission line ROWs, it is also applicable to all ROWs and land use permits when it comes to fire prevention. For ROW grants that do not specifically require vegetative management, the regulations at 43 CFR 2801.2(a)(4) require the holder to do everything reasonable within his or her power, "...to prevent and suppress fires on or in the immediate vicinity of the right-of-way area...."

Second, Field Managers should send the attached “Notice” to all electrical distribution and transmission line ROW holders in their area of jurisdiction to remind them of their responsibility to manage the vegetation within their ROW, especially during this time with intense fire seasons being forecasted in the western U.S.

Transmitting a friendly reminder of the concerns noted above, and a reasonable increase in Field Office compliance activity can go a long way in reducing the threat of a flash over caused blackout on our BLM administered lands. It would be a sign of poor ROW management on the part of BLM if a blackout were to occur because the agency failed to enforce reasonable, existing vegetative management (tree trimming and brush control) ROW stipulations or fire prevention regulations.

Please direct any questions to Craig Haynes at the Montana State Office or call 406 896 5040.

Signed by: Chun C. Wong *for* Howard A. Lemm

Authenticated by: Janie Fox (MT920)

1 Attachment

1-Notice (1 p)

Distribution

Asst. FM, Havre – 1

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NOTICE

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Vegetation Management Practices on BLM-Administered Electrical Distribution and Transmission Line Rights-of-Way (ROW).

In anticipation of an intense fire season this year, the Bureau of Land Management (BLM) is issuing this notice to ROW holders as a reminder to routinely check their BLM-administered ROW areas to monitor the vegetative growth, and to take appropriate vegetative management action on the ROW area where needed. Some ROW grants contain specific stipulations for tree trimming and brush control that should be adhered to. For ROW grants that do not specifically require vegetative management, the regulations at 43 CFR 2801.2(a)(4) require the holder to do everything reasonably within his or her power, "...to prevent and suppress fires on or in the immediate vicinity of the right-of-way area..." The BLM will be conducting compliance inspections on the ROW areas to ensure compliance with the terms, conditions and stipulations of the ROW grants.

The BLM is concerned with vegetation management practices on BLM ROW areas because a hot, dry summer with a corresponding intense fire season is being forecasted for the western U.S. The recent snow and rain in many portions of the western U.S. may actually exacerbate the fire situation by providing moisture for spring plant growth. This spring growth will cure off into a very hazardous fire fuel situation. The BLM authorized ROW may bear the burden of the increased plant growth. Additionally, plant height may be taller than normal because normal ROW vegetative management may have been deferred by ROW holders for various reasons. During hot weather, demand for electricity increases and the combination of increased atmospheric temperatures and increased conductor loads will cause increased "sag" of transmission line conductors. If the sag is greater than normal in an area of taller than normal plant height, there is an increased potential for flash over and a corresponding loss of service (blackout).

Further, August 14, 2003, saw the worst blackout in North American history. Of interest to BLM and industry is that among the many findings presented in the Final Report of the U.S. - Canada Power System Outage Task Force, released on April 5, 2004, inadequate tree trimming was identified as one of the groups of causes of the blackout.

We appreciate your cooperation and prompt attention to address this concern, especially at a time when an intense fire season is being forecasted in the western U.S. Through actions including ROW holders making routine vegetative management practices on the ROWs and BLM increasing compliance activities, we can go a long way in reducing the threat of a flash over caused blackout.

Please direct any questions to your local BLM Field Office or contact Craig Haynes at the Montana State Office; phone 406.896.5040.

Dated this 3rd day of June, 2004

Signed:

Chun C. Wong

For Howard A. Lemm
Deputy State Director, Division of Resources