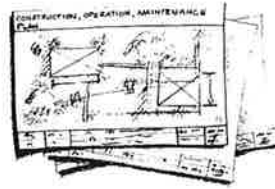


What's a COMP?

Dave Davies



How to prepare a Construction Operation Maintenance Plan after the Federal Government has issued a special use authorization.

Some of you who work for the Federal Government or who have dealt with the Federal Government (especially the Forest Service) may have heard the acronym "COMP" or "COM Plan." This article will tell all about the "COMP."

In 1976, Congress passed the Federal Land Policy and Management Act, commonly referred to as the "FLPMA" Act. That act requires construction plans be prepared when a authorization is issued for the use of National Forest System lands and Bureau of Land Management. Also, in 36 CFR 251.54(e), it states that "The applicant's proposed measures and plans for the protection and rehabilitation of the environment during construction, operation, maintenance, and termination of the project shall be required." Thus was born the "Construction, Operation, and Maintenance Plan." Otherwise known as the "COMP" or "COM Plan."

You ask, what's so different about this act than in the past. In the past, construction plans were required, but with no force of law. However, the "FLPMA" act now requires that any earth-disturbing activity on National Forest System lands and Bureau of Land Management lands must have a approved COMP by that Federal Agency. Also, in the past only a construction plan was needed, but now a construction plan

as well as a "Operation and Maintenance" plan must be a part of the package.

Now we know what prompted the COMP! Let's explore what is needed in the plan to make the Fed's happy.

The Construction, Operation, Maintenance Plan (COM Plan) is prepared by the permit holder after the Agency (in this case the U.S. Forest Service) has issued a special use authorization and has agreed to the alignment and the individual structure site locations, which in this case, is the Electrical Transmission line.

The COM Plan, which consists of many phases, is the key in the success of the construction and operation of the project.

There are a number of phases of the COMP. They are listed as follows:

- A. Construction of the Electrical Transmission or Pipeline
- B. Vegetative Treatment of the Right of Way
- C. Revegetation
- D. Erosion Control
- E. Operation and Maintenance of the Line and Right of Way

The phases are not necessarily separate, except for the operation and maintenance, but are intertwined together.

A brief description of the various phases within the COMP and what might go into the "Plan" are listed. Keep in mind these are suggestions and other various combinations would work as well.

1. *Land Survey Phase*—This phase of the COMP is submitted prior to the field work and before the other phases of the plan are started. The alignment is determined in this phase and will be the basis for the COMP.

2. *Construction Phase*—The COMP is developed and written, as well as the actual construction of the project. The following information is listed as a guide on what should be in the COMP and is only minimum, since projects vary from area to area. This has been developed for Electrical Transmission and Pipeline development. However, it can be used for any type of project.

- A. Plan view of the centerline of the structure and all phases of the transmission electrical conductor or pipeline.
- B. The location, number, and size of the following: structure sites; crane pads; pull sites; concrete batch plants; assembly sites (individual or group); office areas; storage areas; and other items.
- C. Show type, number, and size of: towers; footings; equipment (if possible); insulators; and pipe (type and size).
- D. Show percent of reflectivity that the shiny metals will be dulled. This will include: towers; conductors; guy wires; hardware; overhead ground-wire; pump stations; fences; and any other materials that would be shiny.

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- E. Show pump station locations and electrical requirements for the stations.
 - F. Describe and show the location of various roads and other access needs, such as helicopter landing pads or sites.
 - G. Show location and size of various road culverts, bridges, etc.
 - H. Develop a fire plan. This will be developed in cooperation with the forest district(s) or local landowners.
3. *Vegetative Treatment Phase*—This is probably the most important in the plan, and it would show and describe the various types of vegetative management treatment that should be done on and adjacent to the right of way. The following are some suggestions.
- A. The cutting treatment for trees: selective topping; selective tree removal (percent removal); and patch cutting (clear-cutting).
 - B. The cutting pattern for the trees.
 - C. Density and species of grasses, shrubs, and trees to be planted and locations.

Also in this phase, in plan view, the location of skid trails, log decks, landings, wood chipping, lop and scatter slash areas, slash burning, and firewood decks are shown.

4. *Revegetation and Erosion Control Phase*—The revegetation and erosion con-

trol phase shows areas to be mulched, seeded (along with rate per acre), and fertilized; also, water bars that are needed for water diversion on disturbed areas, including roads and trails.

5. *Operation and Maintenance Phase*—This is the last phase of the COMP and is written in conjunction with the construction phase, but is upgraded into a final document after the construction is completed. This should show the “as built” centerline, location of the various structures, roads, and any other item on the right of way.

A narrative description should be prepared which describes the vegetative management requirements for the right of way, the cutting cycle for retopping trees (number of years), and the selective tree removal cutting cycle (dangerous trees and reduction of growth of younger trees that would danger the structures); and of course, the erosion control of roads, trails, and around-structure sites, and buildings.

Whew! What a task. But it is not as difficult as it looks. Most companies must go through this process before they bid the project. It just may not be as organized as described in this article. I hope this information will aid in preparing a COMP and getting it approved without as much strain as possibly it may have been in the past. (IRWA)

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