

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: August 2, 2001

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-20)

TO: Bill Erickson - TFP/Walla Walla - Natural Resource Specialist  
Jim Jellison - TFO/Olympia - Natural Resource Specialist

**Proposed Action:** Vegetation Management along the McNary-Ross 161/1 to 166/5+346 Transmission Line ROW. The line is a 345kV Single Circuit Transmission Line having an easement width of 175 feet. The proposed work will be accomplished in the indicated sections of the transmission line corridor.

**Location:** The ROW is located in Clark County, WA, being in the Olympia Region.

**Proposed by:** Bonneville Power Administration (BPA).

**Description of the Proposed Action:** BPA proposes to clear unwanted vegetation in the rights-of-ways and around tower structures that may impede the operation and maintenance of the subject transmission line. Also, access road clearing will be conducted. All work will be in accordance with the National Electrical Safety Code and BPA standards. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation.

**Analysis:** This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

## Planning Steps

### *1. Identify facility and the vegetation management need.*

The work involved will be to clear tall growing vegetation that is currently or will soon pose a hazard to the lines; treat the associated stumps and re-sprouts with herbicides to ensure that the roots are killed preventing new sprouts and selectively eliminating tall growing vegetation *before* it reaches a height or density to begin competing with low-growing vegetation. All work will take place in existing rights-of-ways.

Also, all off right-of-way trees that are potentially unstable and will fall within a minimum distance or into the zone where the conductors swing will be removed. All work will be accomplished by selective vegetation control methods to assure that there is little potential harm to non-target vegetation and to low-growing plants. Desirable low-growing plants will not be disturbed. The work will provide system reliability.

Access roads will be treated using mowing and herbicide applications.

The vegetation control is designed to provide a 5-8 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all trees utilizing cut and stump treat methods using practically non toxic to slightly toxic herbicides as outlined in the attached checklist.

Subsequent work will be needed as follow-up to treat misses and any other re-growth from 2-3 years after initial treatment. Noxious weed treatments may be needed at this time.

Future cycles - As tall growing species are controlled, 5-8 year entry treatments will be needed. Also a review of Danger trees and other hazards will take place at that time.

## *2. Identify surrounding land use and landowners/managers.*

The subject corridor traverses residential, rural, grazing lands, industrial forest lands and State DNR lands. During routine patrols, tall, encroaching trees and vegetation issues are identified and marked. If a danger or reclaim tree is identified as a potential threat to the integrity of the transmission line, appropriate action to remove the tree is taken. Landowners were notified of the upcoming work by letters. There were e-mail responses with questions. The State DNR has been notified by mail. All issues seem to be resolved at this time. In addition, homes within 200 feet of the ROW will be contacted 2 days will be given prior to the beginning of any work.

Also, there are some landowner and tree agreements in effect along the work corridor.

## *3. Identify natural resources.*

Some riparian and wetland areas have been identified in the areas of the proposed work. Also, one well has been identified in the proposed work area. These areas have been tentatively identified during patrols and by using existing data sources. The Project Manager will positively identify them as work progresses along the corridors. No other T&E/wildlife issues, visually sensitive areas, cultural resources or other natural resource issues have been identified along the other work corridor.

Prior to the beginning of the work, the contractor will be provided with a set of the project maps, as well as with a list of management prescriptions from the Vegetation Management EIS.

The herbicides used for vegetation management will be consistent with what is specified in the Vegetation Management EIS.

## *4. Determine vegetation control and debris disposal methods.*

A licensed contractor would undertake the proposed work. The unwanted vegetation would be removed by employing cut and stump treatment methods. Chemical means would be employed to prevent resprouts from the cut stumps. Prevention of resprouts encourages low-growing plant communities to establish themselves and flourish on the right-of-way. This impact avoidance approach both maximizes the use of limited resources and minimizes environmental impacts. Herbicides used would be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions. Herbicide used would be consistent with the guidance outlined in the Vegetation Management EIS. The contractor will receive a list of required mitigation measures (management prescriptions) to follow as well as a set of maps delineating the transmission line and potential sensitive resource areas. The contractor will follow manufacturers' label instructions when applying herbicides.

Debris will be disposed by:

Lop and Scatter - (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

Mulch - (Mulching is a debris treatment that falls between chipping and lop-and-scatter. The debris is cut into 1-to-2-ft. lengths, scattered on the right-of-way and left to decompose. This method is used when terrain and conditions do not allow the use of mechanical chipping equipment.)

Chip - (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

5. *Determine revegetation methods, if necessary.*

No re-vegetation will be conducted at this time.

6. *Determine monitoring needs.*

An inspector will monitor the work being performed at the time of the initial work. Follow-up inspections will be performed during routine regular patrols. Additional required work would be identified at that time.

7. *Prepare appropriate environmental documentation.*

This Supplement Analysis finds that 1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; 2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Joseph C. Sharpe for

Ken Hutchinson

Environmental Scientist - KEPR

CONCUR: /s/ James Kehoe for

Thomas C. McKinney

NEPA Compliance Officer

DATE: 8/6/01

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Environmental File – KEC

Official File – KEP-4 (EQ-14)

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(KEP-KEPR/WALLA WALLA-W:\EP\2000 & 2001 FILES\EQ\Eq-14\FEIS-0285-SA-20-McNary-Ross.doc)