DOE F 1325.8 e Electronic Form Approved by CGIR - 01/20/95
(8-89)

United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: April 10, 2002

REPLY TO ATTN OF: KEP/Z992

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-57)

TO: Jim Jellison – TFO/Olympia

Proposed Action: Vegetation Management along the Trojan-Allston Transmission Lines 1 & 2 ROW between 1/1 and 9/1. The lines are 230 kV Single Circuit Transmission Lines having an easement width of 125 feet. The proposed work will be accomplished in the indicated sections of the transmission line corridor.

Location: The ROW is located in Columbia County, OR, 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. 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 at a future date. 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.

The vegetation control is designed to provide a 5-year maintenance free interval. The overall vegetation management scheme will initially include selective removal and treatment of tall growing species utilizing cut and stump treat methods using practically non toxic to slightly toxic herbicides as outlined in the attached checklist.

Subsequent work may be needed in the fall of 2002 or spring of 2003 if weather conditions preclude herbicide treatment at initial entry. Noxious weed treatments may be needed at this time.

Future cycles - As tall growing species are controlled, 5-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, and pasture lands. Landowners are notified of the upcoming work by letters. The City of Rainier has also been notified as the project traverses a portion of their watershed.

3. Identify natural resources.

Some small streams have been identified in the areas of the proposed work. In addition, some areas with slopes over 20% have been identified. No ground-disturbing mechanical equipment or Hebrides with a high potential for surface runoff will be used in these areas.

No T&E/wildlife issues, visually sensitive areas, steep slopes, cultural resources or other natural resource issues have been identified along the other work corridor.

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

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 stump, basal and foliar treatment methods. Chemical means would be employed to prevent resprouts from the cut stumps. 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 FEIS.

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.)

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 preformed 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/ Elaine Stratton
Elaine Stratton
Environmental Protection Specialist

CONCUR: */s/Thomas C. McKinney* DATE: *04/25/02*
Thomas C. McKinney
NEPA Compliance Officer

Attachments

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
M. Hermeston – KEP-4
J. Meyer – KEP-4
E. Stratton – KEP/Ross
J. Sharpe – KEPR-4
P. Key – LC-7
M. Johnson – TF/DOB-1
D. Kraus – TFO/Olympia
S. Martin – TFO/Olympia
D. Swanson – TFOP/Ross
Environmental File – KEC
Official File – KEP-4 (EQ-14)

EStratton:es:4722:4/17/02 (KEP-KEP/Z992-W:\EP\2002 FILES\EQ\EQ-14\FEIS-0285-SA-57-trojan-allston1.doc)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Trojan-Allston	9.45 miles/230kV	125 feet	8 miles

See Handbook — **List of Right-of-way Components** for checkboxes and the requirements for the components **Rights-of-way**, **Access Roads**, **Switch Platforms**, **Danger Trees**, and **Microwave Beam paths**.

Right Of Way:

Right-of-way – clearing in right-of-way

Transmission Structures – clearing around.

1.2 Describe the vegetation needing management.

See handbook — **List of Vegetation Types**, **Density**, **Noxious Weeds** for checkboxes and requirements.

Vegetation Types:

Douglas Fir

Alder

Noxious Weeds - Scotch Broom

Other/Description – other coniferous trees

Density:

Medium (50 – 250 stems/per acre)

Low (50 stems or less/ per acre)

1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why.

See Handbook — for requirements and checkboxes.

Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed. (In places where tall growing vegetation must be left in place, it may not be possible to promote low-growing plants.)

Cut-stump or follow-up herbicide treatments on re-sprouting-type species will be carried out tensure that the roots are killed.

Vegetation that will grow tall will be selectively eliminated *before* it reaches a height or density to begin competing with low-growing species.

Desirable low-growing plants will not be disturbed. Only selective vegetation control methods that have little potential to harm non-target vegetation will be used.

1.4 Describe overall management scheme/schedule.
See Handbook - **Overall Management Scheme/Schedule**.

Initial entry – In summer of 2002 the Trojan-Allston lines 1&2 will be maintained by selective cutting of tall growing species and herbicide control of hardwood species (cut stump treatment)

Subsequent entries – If weather conditions preclude herbicide treatment a follow-up application will be needed in the fall of 2002 or spring 2003.

Future cycles – This transmission line corridor is managed on a 5-year entry cycle by means of selective cutting and herbicide application applied to promote a low growing plant community.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.
See Handbook — **Landowners/Managers/Uses** for requirements, and **List of Landowners/Managers/Uses** for a checkbox list.

Landowners/Managers/Uses: Residential, Rural, and Pastureland

Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.
See Handbook — **Methods for Notification and Requesting Information** for requirements.

During planning for vegetation control activities letters will be mailed to 1) notify landowners where Bonneville has a right-of-way easement to inform them of upcoming activities, 2) request any information that needs to be considered.

2.3 List the specific land owner/land use measures — determined from the handbook or through your consultations with the entities — that will be applied.
See handbook — **Requirements and Guidance for Various Landowners/Uses** for requirements and guidance, also **Residential/Commercial**, **Agricultural**, **Tribal Reservations**, **FS-managed lands**, **BLM –managed lands**, **Other federal lands**, **State/ Local Lands.**.

Post herbicide treatment areas with application and reentry intervals in accordance with label instructions.

Span		Landowner/use	Specific measures to be applied
To	From		
3/2	4/2	City of Rainier	Watershed- they are concerned that BPA only applying Garlon 3A near creek that will run into the watershed area, there are not creeks in this control area.

2.4 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.
See handbook — **Landowner Agreements** for requirements.

None

2.5 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure's to take due to the informal use.
See handbook — **Casual Informal Use of Right-of-way** for requirements.

Little or no informal use was identified; most of the areas to be treated are gated or have controlled access.

2.6 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.
See handbook — **Other Potentially Affected Publics** for requirements and suggestions.

The Grand Rhonde Tribal cultural representative has requested BPA contact them if any cultural sites have been identified as a result of our cutting activities.

3. IDENTIFY NATURAL RESOURCES

See Handbook — **Natural Resources**

3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.
See Handbook — **Water Resources** for requirements for working near water resources including buffer zones.

Span		Water body	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
1/1 2/1	1/2 2/2	No Name Cr. +350' Creek @ 2/2 –35'	No	Selective Cut	Garlon 3A	Stump treatment	35' each side	Fall trees away from the creek channel
2/2	2/3	Creek @ 2/2 +770'	No	Selective Cut	Garlon 3A	Stump Treatment	35' each side	Fall trees away from the creek channel
5/2	5/3	Creeks @ 5/2 +570 &	No	Selective Cut	Garlon 3A	Stump Treatment	35' each	Fall trees away

5/3 +800	5/4	+825 Pond	No	Cut Selective Cut		Treatment	side	from the creek channel
8/3	8/4	Creek @83+230	No	Selective Cut	Garlon 3A	Stump Treatment	35' each side	Fall trees away from the creek channel

3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).
See Handbook — **Herbicide Use Near Irrigation, Wells or Springs** for buffers and herbicide restrictions.

Span		Well/irrigation/or spring	Herbicide	Buffer	Other notes/measures
To	From				
		None			

3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.
See Handbook — **T&E Plant or Animal Species** for requirements and determining presence.

Span		T&E Species	Method/mitigation or avoidance measures
To	From		
		None	

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.
See Handbook — **Protecting Other Species** for requirements.

Span		Species	Measures
To	From		
7/3	7/5	Livestock	Contact landowner before herbicide treatment

3.5 List any visually sensitive areas and the measures to be taken at these areas.
See Handbook — **Visual Sensitive Areas** for requirements.

Span	Describe sensitivity	Method/mitigation measures

To	From		
		None	

3.6 List areas with cultural resources and the measures to be taken in those areas.
See Handbook – **Cultural Resources** for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
		None	

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.
See Handbook – **Steep/Unstable Slopes** for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
all	all	**Some slopes > 20%**	▪ **Do not use ground (soil)-disturbing mechanical equipment to clear on slopes over 20%.** Do not use herbicides with a high potential for surface runoff.

3.8 List areas of spanned canyons and the type of cutting needed.
See Handbook – **Spanned Canyons** for requirements.

Span		Methods, cutting
To	From	
		None

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — **Methods**

4.1 List Methods that will be used in areas not previously addressed in steps above.
See Handbook — **Manual**, **Mechanical**, **Biological**, **and Herbicides** for requirements for each of the methods.

Span		**Methods,** including herbicide active ingredient, trade name, application technique
To	From	
		No prescription that is not already noted in the EIS.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.
See Handbook — **Debris disposal** for a checkbox list and requirements.

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.)

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).
See Handbook — **Reseeding/replanting** for requirements.

None

5.3 If not using native seed/plants, describe why.

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

6. DETERMINE MONITORING NEEDS

See handbook — **Monitoring** for requirements.

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

Follow-up one season after to assure herbicide treatment was successful

6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — **Prepare Appropriate Environmental Documentation** for requirements. . Also prepare Supplement Analysis — **Supplement Analysis** — for signature.

7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are "substantial".

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

No additional documentation is necessary