memorandum

Bonneville Power Administration

DATE: April 15, 2002

REPLY TO

ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS

(DOE/EIS-0285/SA-61

To: Tom Murphy - TFS/Bell-1 - Natural Resource Specialist

<u>Proposed Action</u>: Vegetation Management along the Bell-Boundary No.3, 84/4 to 96/1 Transmission Line ROW. The line is a 230kV Double Circuit Transmission Line having an easement width of 100 feet. The proposed work will be accomplished in the indicated sections of the transmission line corridor.

<u>Location</u>: The ROW is located in both Stevens and Pend Oreille County, WA, being in the Spokane Region.

Proposed by: Bonneville Power Administration (BPA).

<u>Description of the Proposed Action</u>: 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.

<u>Analysis</u>: 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 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 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.

The vegetation control is designed to provide a 10-year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all tall growing brush utilizing machine and hand cutting methods as outlined in the attached checklist.

Future cycles - As tall growing species are controlled, a 10-year entry treatment 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, USFS lands and Tribal 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 either telephone and/or letters. All issues seem to be resolved at this time.

3. Identify natural resources.

No water resources have been identified at this time. No other T&E/wildlife issues, visually sensitive areas, cultural resources or other natural resource issues have been identified along the 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.

4. Determine vegetation control and debris disposal methods.

A licensed contractor would undertake the proposed work. The unwanted vegetation would be removed by employing manual selective cutting methods along selected spans of the right-of-way.

Debris will be disposed by:

Lop and Scatter – Branches of a fallen tree are cut off (lopped) by axe 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.

Chip – Mechanical brush disposal unit cuts brush into chips 4 inches or less in diameter and spread over the 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.

Mulched – Mulching is a debris treatment that falls between chipping and lop and scatter. The debris is cut into 1 to 2 foot 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.

5. Determine revegetation methods, if necessary.

No revegetation will be conducted at this time due to very low ground disturbance, equipment to be power washed to prevent the spread of weeds.

6. Determine monitoring needs.

Follow-up monitoring in the fall of 2002 and the summer of 2003 to determine effectiveness of control will occur.

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/ Michael A. Rosales

Michael A. Rosales

Environmental Protection Specialist - KEPR

CONCUR: /s/Thomas C. McKinney DATE: 04/16/02

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Environmental File – KEC (EQ-14)

Official File – KEP-4 (EQ-14)

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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
Bell-Boundary No. 3	12 miles; 230-kV	100 feet	12

Vegetation on approximately 2.0 miles of road will be controlled.

1.2 Describe the vegetation needing management.

Primarily Ponderosa Pine and Douglas Fir. Minor amount of Alder, Cottonwood, Poplar and Willow. Vegetation density varies from moderate (15 ft. x 15ft. spacing) to very dense (5 ft. x 5ft.). Noxious weeds are present on most travel ways open to the public. BPA has committed to cooperating with the USFS to control noxious weeds at such time the project area, and contiguous/adjacent areas undergo USFS conducted control efforts.

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.

Control tall-growing vegetation.

Except for roads and structure sites, protect low-growing vegetation.

Perform minor stump treatment of sprouting species.

1.4 Describe overall management scheme/schedule.

This project is the initial programmatic entry since this portion of the transmission line was constructed. Anticipate subsequent programmatic re-entry in approximately 10 years. Anticipate fall, 2002, follow-up to determine need for spot re-treatment of sprouting stumps.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

Primary adjacent land use is forest management for timber production.

Primary adjacent ownership is USFS managed lands.

USFS, Colville NF, manages approximately 95% of the lands in the project area, including the grazing allotment areas.

2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, letter, phone call, e-mail, and/or meeting).

Methods of attempted notification include letters, phone calls, door hangars, and on-site meetings. Ongoing discussions are taking place with the USFS. Individual, private p/o notification (approximately 5% of project area) will be concluded approximately one month prior to the commencement of activities.

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.

Span		Landowner/use	Specific measures to be applied		
To	From	Landowner/use	Specific measures to be applied		
90/3	90/1	All areas shown in this section are potential	For stump treated areas, post signage with re-entry		
94/6	94/3	grazing allotment areas.	intervals.		
96/2	95/3				

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.

No known landowner agreement areas.

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.

No known uses. To date, the USFS has not identified any other public uses in project area.

2.6 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with.

No known other potentials. Inquiries made to Colville and Spokane Tribes. Their only interest was a request that project managers report any potential historically significant field identifications to their office.

3. IDENTIFY 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.

Only tall growing vegetation will be controlled, that at maturity will grow to a height that could endanger the safe operation of the transmission line. All vegetation control will be selective. Where possible, a lower canopy of vegetation will be undisturbed in order to minimize the exposure of direct sunlight to water resources. All live stream courses shall be considered to be potential T & E bearing waterbodies. Accordingly, all activities will be performed to minimize, as close to zero as practical, any effects to vegetation in the riparian habitats.

Span		Waterbody	T&E?	Method	Herbicide	Application	Buffer	Other
То	From	- Water body	Tab.	Michiga	Witthou Herbicide	Technique	Duller	Other
See Section			See Section 2.3		Upland areas: triclopyr	Hand-held bottle/canister	100 ft.	Fill-in
2.3					Lowland areas: glyphosate		25 feet.	

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).

Span		Well/irrigation/spring	Herbicide	Buffer	Other notes/measures	
To	From	wen/n rigation/spring	Herbicide	Dullel	Other notes/measures	
		All known water resources are shown in Section 2.3				

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.

U.S.F.S. states that no Caribou and Grizzly Bear recovery areas are within project area. No other known T & E plant or wildlife species in or near project area. USFS wildlife biologist on the Colville NF provided Caribou and Bear comments. USFS has recently updated T & E fauna database. It will be reviewed/incorporated into management plan prior to commencement of activities.

(This section to be updated regarding T & E plant species after USFS provides mapping.)

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.

No other measures.

3.5 List any visually sensitive areas and the measures to be taken at these areas.

No visually sensitive areas in project area.

3.6 List areas with cultural resources and the measures to be taken in those areas.

Colville and Spokane Tribes have been consulted regarding this project. No known cultural resources in or near project area. Documentation is on file.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.

Insignificant erosion potential/activity anticipated in project area. Topography ranges from gentle slope (10%) to steep (60+%). Ground disturbance is neither planned nor anticipated.

3.8 List areas of spanned canyons and the type of cutting needed.

Span		Methods, cutting
To	From	Methods, cutting
84/9	84/8	Manual – Selective
94/4	94/3	Manual – Selective
95/4	95/3	Manual - Selective

4. DETERMINE VEGETATION CONTROL METHODS

4.1 List Methods that will be used in areas not previously addressed in steps above.

Span		Mathada
To	From	Methods
96/1	84/8	134.2 acres on right-of-way will be manually cut.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

128.8 acres: lop and scatter

5.4 acres: chip debris

In areas where vegetation debris is anticipated to exceed 10 tons/acre, the debris will be chipped/mulched.

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

Span		Descen for Desced/plant	Type of Seed on Dients	Native?
To	From	Reason for Reseed/plant	Type of Seed or Plants	Nauve:
		No known areas to reseed. NOTE: The need for re-seeding will be continually assessed as project progresses. Reseeding will be performed if need arises.		

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

n/a

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

n/a

6. DETERMINE MONITORING NEEDS

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

Anticipate follow-up monitoring in the fall of 2002, and the summer of 2003 to determine effectiveness of control.

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

Significant exposure of mineral earth is not expected. If exposure is encountered, grass seeding, with a recommendation mixture from the USFS, will be re-seeded to the exposed areas.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

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".

No known potential effects different than those previously disclosed.

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

BPA will complete the supplemental analysis. U.S. Forest Service requires BPA assess the existence of, and therefore potential impacts to: cultural resources, and T & E fauna/flora species. USFS has made a "split decision" regarding the project; 30-day comment period/appeal process will be required prior to the use of herbicide. Supplemental information required by the USFS will be detailed by the USFS. Hand/chainsaw clearing does not require the comment period, and may be categorically excluded.