United States Government **Department of Energy**

Bonneville Power Administration

DATE: October 15, 2002

REPLY TO ATTN OF: KEP/Z-992

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-112-Ross-Alcoa 1&2, 3&4 and Bonneville Alcoa 1&2.

Ed Tompkins – TFO/Ross

Proposed Action: Vegetation Management for portions of the Ross-Alcoa transmission lines 230kV & 115kV and Bonneville-Alcoa 115kV.

Proposed by: Bonneville Power Administration (BPA).

Location: Project location is within Clark County, Washington and is within the Olympia Region.

Description of the Proposal: BPA proposes to clear targeted vegetation within the Right-of-Ways along access roads and around tower structures that may impede the operation and maintenance of the subject transmission lines. See Section 1.4 of the attached checklists for a complete description of the proposed action.

Analysis: See the attached checklists (Ross-Alcoa and Bonn-Alcoa) for the resources present. Applicable findings and mitigation measures are discussed below.

Planning Steps:

1. Identify facility and the vegetation management need.

Work will take place along portions of the Ross-Alcoa 230 kV transmission line and along portions of the Bonneville-Alcoa 115 kV transmission line. The project extends between towers 3/1 and 4/7 (Ross-Alcoa) having an easement width of 150 feet and between towers 39/7 and 41/4 (Bonneville-Alcoa) having and easement with of 60 feet. The ROW's are located in Clark County, Washington in the BPA Olympia Region.

Tall growing vegetation of the types and densities listed in section 1.2 of the attached checklist are present in the ROW and will soon pose a hazard to the lines. Project involves clearing this tall growing vegetation and treatment of the associated stumps and re-sprouts with herbicides to ensure that the roots are killed.

Vegetation on access roads and around tower sites that impede the operation and maintenance of the transmission line will also cleared and/or treated.

This vegetation management program is designed to provide a 3-4 year maintenance free interval.

2. Identify surrounding land use and landowners/managers and any mitigation.

The subject corridor traverses a mixture of residential, urban, rural, and agricultural lands. It includes private and public (Clark County) lands.

A letter will be sent by mail, notifying landowners in proximity to the project transmission lines of the upcoming vegetation control activities. Door-to-door contact may also be employed to notify landowners, if warranted.

3. Identify natural resources and any mitigation.

Section 3 of the attached checklist identifies the natural resources present in the area of the proposed work.

Water resources identified include wetland areas. Mitigation measures include selective cutting and herbicide use in addition to the use of buffer zones as described in Sections 3.1 and 3.2 of the attached checklist. These mitigation measures are consistent with the EIS.

No other natural resource or cultural resource issues were identified.

4. Determine vegetation control and debris disposal methods.

Vegetation will be removed using manual or mechanical methods. Herbicide applications include spot, localized and foliar techniques. Debris will be disposed of using either mulching or lop and scatter techniques as described in Section 5 of the attached checklist.

5. Determine revegetation methods, if necessary.

Seeding was determined to be unnecessary.

6. Determine monitoring needs.

A follow-up inspection will be made the following year, in areas where herbicides were applied to evaluate control measure. In addition, the line crew and the Natural Resource Specialist will periodically monitor the right-of-way for effective mitigation measures.

7. Prepare appropriate environmental documentation.

Findings: 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
(Environmental Protection Specialist)

CONCUR: */s/ James M. Kehoe for* DATE: 10/17/2002
Thomas C. McKinney
NEPA Compliance Officer

Attachments

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
M. Hermeston – KEP-4
E. Stratton – KEP/Z992
J. Meyer – KEP-4
J. Sharpe – KEPR-4
P. Key – LC-7
M. Johnson – TF/DOB-1
D. Kraus – TFO/Olympia
S. Martin – TFO/Olympia
J. Jellison – TFO/Olympia
D. Swanson – TFOP/Ross
Environmental File – KEC
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.

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**.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Bonn-Alcoa 1&2	115KV		1.8 mi.

Right Of Way:
Right-of-Way – clearing in right-of-way
Transmission Structures – clearing around.
Reclaim ("C") Trees

1.2 Describe the vegetation needing management.

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

Vegetation Types:
Willows
Cottonwood
Blackberries

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.

Cut stump or follow-up herbicide treatments on sprouting-types species will be carried out to ensure 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.

1.4 Describe overall management scheme/schedule.

See Handbook - **Overall Management Scheme/Schedule**.

Initial entry – All tall growing vegetation will be cut and chemically treat the stumps to prevent grow-in trees Access, right-of-way roads and structure sites are to be cut and treated. A follow-up chemical treatment to begin in the late summer of 2003.

Subsequent entries – Every 3-4 years, a maintenance contract will be necessary to treat sprouts. The use of herbicides on the initial and subsequent cycles should reduce the quantity and cost of work.

Future cycles – Same as above.

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:
Rural
Pasturelands
Orchards

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). Develop landowner mail list, if appropriate.

See Handbook — **Methods for Notification and Requesting Information** for requirements.

Olympia will send letters to the property owners about 2 weeks prior to cutting the brush. Door to door contact will be made where it is warranted.

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.**.

Span		Landowner/use	Specific measures to be applied
To	**From**		
39/1	38/7+750	Burnt Bridge Creek County Park	Cut, Lop, Scatter tall-growing veg.
39/6	39/1	Residential Homes	Cut & chip haul off chips
41/2 Bonn-Alcoa	39/7 Bonn-Alcoa	Hay Fields	Clearing structures and cut, lop & scatter tall-growing veg.
41/4 Bonn-Alcoa	41/2 Bonn-Alcoa	Wetlands	Cut, lop & scatter tall-growing veg.

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.

N/A

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.

N/A

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.

None

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							
785	38/6+715	Burnt Bridge Creek	No	Skip				
400	40/2+200	Wetlands	No	Skip				
400	40/7+50	Pond	No	C, L&S	Garlon 3A	Spot Treatment	Water edge	Selective cutting
700	41/2+125	Pond	No	Skip				
41/4 Bonn Alcoa	41/3 Bonn-Alcoa	Wetland	No	Cut, Lop, Scatter tall-growing veg, or mulch blackberries at towers.	Garlon 3A	Chemically treat cut stumps and foliar spray sprouts in late summer.	No creeks to buffer. Herbicide application during dry season.	

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				
		N/A			

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		
		N/A	

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		
		N/A	

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		
		N/A	

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		
			No known cultural sites.

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		
		N/A	

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

See Handbook – **Spanned Canyons** for requirements.

Span		Methods, cutting
To	From	
		N/A

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	
1/1	43/3	For non-sensitive areas (spans) cut stump/basal treatment with 50% Garlon 3A and 50% water. Summer foliar application on re-sprouts of 3% Garlon 3A and 97% water, and dye.

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.

Debris Disposal:

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.)

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.

Span		Reason for Reseed/plant	Type of Seed or Plants	Native?
To	From			
		N/A		

Native grasses are present on the entire right-of-way that will seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads. BPA expects 2-3 vehicles of the brush contractor and 1 contract inspector's vehicle will be present on the site. A brush machine will mulch the structure sites and right-of-way roads where Scotch Broom and Black Berries are present.

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

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.

Monitoring of the effectiveness of the herbicide treatment will begin in the spring and follow up treatment of cut stump/basal or foliar treatment of target vegetation. The mixture of the product is 3% Garlon 3A and 97% water. There is virtually no drift that occurs with this mixture.

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

Annually patrol the transmission line by the line crew and the Natural Resource Specialist will periodically monitor the right-of-way for effective mitigation measures.

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".

All proposed brush cutting and chemical treatment activities on this corridor is noted in the EIS.

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

No

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Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Ross-Alcoa No. 3&4	230Kv	Variable	2.1 mi.
Ross-Alcoa No. 1&2	115KV		2.1 mi.

Right Of Way:

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

Transmission Structures – clearing around.

Reclaim ("C") Trees

1.2 Describe the vegetation needing management.

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

Vegetation Types:

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Span		Landowner/use	Specific measures to be applied
To	**From**		
3/2 Ross-Alcoa	3/1 Ross-Alcoa	Fruit Orchard	Treatment of blackberries at structure only.
4/3 Ross-Alcoa	3/3 Ross-Alcoa	Hay Fields	Clearing structures.
4/9 Ross-Alcoa	4/3 Ross-Alcoa	Wetlands	Cut, Lop, Scatter tall-growing veg.

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.

N/A

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.

N/A

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.

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Span		Water body	T&E	Method	Herbicide	Application Technique	Buffer
To	From						
4/8 Ross-Alcoa	4/3 Ross-Alcoa	Wetland	No	Cut, Lop, Scatter tall-growing veg, or mulch blackberries at towers.	Garlon 3A	Stump treat cut trees, foliar spray re-sprouts.	No creeks to buffer. Herbicide application during dry season.

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).

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

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