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: January 29, 2003

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-119 Snohomish-Murray No. 1 Transmission Line

TO: Don Atkinson – TFN/Snohomish

Proposed Action: Vegetation Management along the Snohomish-Murray No. 1 Transmission Line from structure 2/6 through structure 18/6. Right of way width is 95 feet.

Location: The project area is located within Snohomish County, Washington.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, access roads and around tower structures along the subject transmission line corridor. Total right-of-way acreage is approximately 182.8 acres. Approximately 17 miles of access roads will be cleared. Approximately 136 tower sites will be treated. See Section 1 of the attached checklist for a complete description of the proposal.

Analysis: Please see the attached checklist for the resources present. Applicable findings and mitigation measures are discussed below.

Planning Steps:

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

   Vegetation management is required for unimpeded operation and maintenance of the subject transmission line. Unwanted vegetation, reclaim trees and danger trees will be removed and/or controlled.

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

   The subject corridor traverses private rural residential, farm and grazing properties. No federal, state or tribal lands are involved. Landowners requiring notification or under tree and brush agreements are shown in Section 2.4 of the attached checklist. Any remaining landowners will be contacted (letters, personal contact, door hangers, etc.) by BPA before and during the project. Any input received will be incorporated into the prescription/cut sheets.

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. The following resources found along with applicable mitigation measures:

Riparian Habitat: Includes all wetlands, streams, and creeks meeting the definition of riparian habitat. Many areas were identified. See Section 3.1 for a complete listing.

Riparian Habitat Mitigation:

- County or private lands, within 30.5 m (100 ft.) of a stream or open water. Available: all manual, spot and localized herbicide, and biological treatments, except grazing. On slopes less than 20% there will be no disturbance within 35ft. of the stream or wetland. On slopes greater than 20% there will be no disturbance within the buffer.
- Within 50 ft. to edge of surface water only cut-stump and localized chemical treatments using practically non-toxic to slightly toxic formulations of glyphosate, imazapyr, and metsulfuron-methyl (Escort). Moderately toxic to very highly toxic herbicides (to aquatic species) or those herbicides containing a groundwater or surface water label advisory will not be used in this zone. Triclopyr (Garlon 4) may be used only more than 100 ft. from streams or water.

Sole Source Aquifer: See section 3.2 of the attached checklist for a complete listing. Snohomish County does not at this time have sole source aquifer mitigation plan. Cut, lop and scatter and stump treat. No high volume foliar spraying. No chemical application within a 100-foot radius of springs and water wells.

T & E Species:

Review of BPA databases, TVIEW and Stream Net show no T & E within rights of way, access roads or within ¼ mile.

4. Determine vegetation control and debris disposal methods.

Vegetation will be removed using manual, mechanical and chemical methods. Debris will be disposed on-site using either chip, lop and scatter, or mulch techniques as described in Section 5 of the attached checklist

5. Determine re-vegetation methods, if necessary.

Re-vegetation needs will be determined onsite. Any areas identified with limited ground cover will be replanted with native plant species.

6. Determine monitoring needs.

The entire project will be inspected during the work period, and, the line will be patrolled annually after treatment to monitor the effectiveness of the treatment measures. Environmental monitoring to ensure sound application practices will be determined in the future as outlined in the BPA/NMFS/USFWS Biological Assessment currently being prepared

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. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA or ESA documentation is required.

/s/ Mark A. Martin
Mark A. Martin
Environmental Protection Specialist

CONCUR */s/ Thomas C. McKinney* DATE: 01/31/2003
Thomas C. McKinney
NEPA Compliance Officer

Attachment

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
M. Hermeston – KEP-4
J. Meyer – KEP-4
J. Sharpe – KEPR-4
M. Martin – KEPR/Covington
P. Key – LC-7
D. Hollen – TF/DOB-1
L. Alvarez – TFN/Snohomish
A. Dela Cruz – TFN/Snohomish
R. Sweet – TFNF/Snohomish
Environmental File – KEC-4
Official File – KEP-4 (EQ-14)

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Vegetation Management Checklist

Snohomish - Murray No.1
2/6 to 18/6 mile

Prepared By: **Don Atkinson**
Natural Resource Specialist
January 23, 2003

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
Snohomish – Murray No. 1	2/6 to 18/6 230kv	95’	Approx. 16 miles

Right Of Way:

Right-Of-Way – Clearing trees and brush within the right-of-way and treating with herbicides. The right-of-way will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Herbicide treatments will include spot treatment (stump treatment, basal treatment, and/or spot foliar), or localized treatments (including broadcast application and cut stubble treatments). The total project area consists of approximately 182.8 acres. It is estimated that approximately 182.8 acres of the project area will be cut.

Access Road Clearing – Approximately 17 miles of clearing using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Note, when the access roads traverse a riparian area they will not be treated with herbicides.

Transmission Structures – Approximately 136 tower sites will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. The herbicide treatments include spot (cut stump or basal treatment), localized and broadcast applications including cut stubble treatments. Structures located within riparian areas will not be treated with herbicides.

Clearing Requirements:

- Control all tree and brush species within about 30 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 inches.
- Pull all debris and slash out of the 30-ft. area around transmission structures.
- Access Road Clearing Requirements: - (there are approximately 17 miles of machine and hand cutting)
- Control all vegetation except grasses and forbs, to enable safe driving.
- The access road is to be 14 to 25 ft. wide with a 15-ft.- high clearance. Limbs should not hang down into the access road.
- Cut stumps are not to be taller than 2 – 4 inches in the roadbed.
- Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.
- Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.
- Pull all debris back from the access road as prescribed.
- Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.

- Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.
- Pull all debris back from the access road as prescribed.

Reclaim ("C") Trees – C trees will be cut as part of this project.

Danger Trees (off right-of-way): – All off-right-of-way trees (danger trees) that are marked as potentially unstable, or trees that are identified during the project, that would fall within the minimum approach distance (MAD) or into the safety zone of the power line, may be cut as part of this project. Danger trees may be treated with herbicides to prevent resprouting.

1.2 Describe the vegetation needing management.

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

Vegetation Types:

Western Red Cedar

Douglas fir

Grand fir

Hemlock

Alder

Willows – mid span or where ground to conductor clearance is low

Cottonwoods

Scotchbroom: along access roads and around structures or mid span where ground to conductor clearance is low

Blackberries: along access roads and around structures or mid span where ground to conductor clearance is low

Density: The density is variable through the project and ranges from low (50 stems or less per acre) to as high (250 + stems 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.

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.

Cut-stump or follow-up spot herbicide treatments on species that re-sprout will be carried out to ensure that the roots are killed (follow-up treatment may take place during the next growing season). Herbicides will not be applied using high volume methods to ensure that non-target species are not treated.

1.4 Describe overall management scheme/schedule.

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

Description of the Proposed Action: The project consists of clearing unwanted vegetation within the right-of-way, around structures, and along access roads 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. It is the goal of this project to remove the tall growing vegetation that is currently or will soon be a hazard to the transmission line. The overall goal is to develop low-growing plant communities within the right-of-way.

Initial entry – Using hand cutting or mechanical mowers, BPA will complete brush management activities on the right-of-way, access roads and towers sites, chemically treat stumps and stubbles with herbicides (spot and localized treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines. Areas may be replanted or re-seeded with low-growing vegetation or grasses if there is limited vegetation for re-establishment of the site. Cut, lop and scatter, and stump treatment (where possible to prevent re-sprouting) are the preferred methods on State and Private lands. Areas where densities are high, or that have a lot of Scotch Broom and /or blackberries will be mowed using a track mounted mowing head. Access roads and structure sites will also be mowed and chemically treated.

Subsequent entries – Follow-up/re-treatment, within the right-of-way, around structure sites, and along access roads, is planned within the next growing season. This will be done with herbicides in areas that were not treated due to adverse weather conditions, there was not a good kill, or that were not treated in the initial entry.

Future cycles – This area is being managed on a 3 to 5 year maintenance free cycle for brush and danger trees. During routine patrol, the right-of-way will be examined for tall growing trees on the right-of-way and danger trees (DT's) off the right-of-way. The overall vegetation management scheme will be to cut and treat all encumbering vegetation on the right-of-way using a combination of manual, mechanical and herbicide treatments as outlined in the initial treatment every 3 to 5 years.

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.

The project area consists of rural residential, farms, grazing lands, private lands and many private landowners.

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.

Letters or personal contact by BPA and/or the contractor along with door hangers. This will be done before and during the project. The Prescription/Cut Sheets will be modified as needed based on any input received during the project.

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.**.

No specific landowner measures needed except to notify the landowners at 3/3 (Allen Maser) and at 17/6 (Joan Opdaht) before cutting. Note – not all areas within the project area will be treated with herbicides. Riparian areas and property where landowners do not want herbicides will not be treated.

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.

Snohomish - Murray No. 1 (See attached maps for locations)

Span		Landowner/use	Specific measures to be applied
From	To		
3/3 + 120	3/4 + 30	Verbal Agreement – Allen Maser	Landowner has bees, contact before cutting or using herbicides
4/6 + 770	4/7 + 250	Tree & Brush Agreement – Michael Smith	Landowner will maintain
15/5 + 190	15/7 + 390	Tree & Brush Agreement – Gary Summer	Landowner will maintain
17/6 + 60	17/6 + 250	Verbal Agreement – Joan Opdahl	Landowner has horses, call before cutting
3/4 + 30	18/6 + 663	Sole Source Aquifer	No high volume foliar spraying

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.

None Known

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 Known

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.

Snohomish - Murray No. 1 (See attached maps for locations)

Span		Waterbody	T&E?	Treatment Zone	Herbicide	Application Technique	Buffer
From	To						
3/6 +290	3/6 + 700	Creek	No	Riparian	See below	See below	See below
4/4 + 860	4/4 + 1062	Pond	No	Riparian	See Below	See below	See below
4/7 + 330	4/8 + 370	Creek	No	Riparian	See below	See below	See below
5/5 + 140	5/5 + 775	Creek	No	Riparian	See below	See below	See below
5/7 + 0	5/7 + 540	Creek	No	Riparian	See below	See below	See below
6/4 + 360	6/4 + 675	Wetland	No	Riparian	See below	See below	See below
6/6 + 110	6/6 + 510	Creek	No	Riparian	See below	See below	See below
7/1 + 390	7/2 + 380	Creek	No	Riparian	See below	See below	See below
7/2 + 560	7/3 + 460	Creek	No	Riparian	See below	See below	See below
7/4 + 320	7/4 + 750	Ponds	No	Riparian	See below	See below	See below
7/9 + 520	8/1 + 220	Wetland	No	Riparian	See below	See below	See below
9/8 + 50	9/8 + 870	Creek	No	Riparian	See below	See below	See below
10/8 + 310	10/8 + 730	Creek	No	Riparian	See below	See below	See below
13/5 + 220	13/6 + 330	Wetland	No	Riparian	See below	See below	See below

14/5 + 0	14/5 + 440	Wetland	No	Riparian	See below	See below	See below
15/4 + 220	15/5 + 400	Wetland	No	Riparian	See below	See below	See below
15/6 + 220	15/7 + 260	Wetland	No	Riparian	See below	See below	See below

Riparian	**RIPARIAN**: County or private lands, within 30.5 m (100 ft.) of a stream or open water. Available: all manual, spot and localized herbicide, and biological treatments, except grazing. On slopes less than 20% there will be no disturbance within 35ft. of the stream or wetland. On slopes greater than 20% there will be no disturbance within the buffer. **Herbicides**: Within 50 ft. of a stream, only cut-stump and localized treatments using practically toxic or Slightly toxic formulations of glyphosate, imazapyr, and Escort can be used up to the waters edge. Highly Toxic and very highly toxic (to fish) herbicides will not be used in this zone. Triclopyr (Garlon 4) may be used only more than 100 ft. from streams or water. See Table 111-1: Buffer width to Minimize Impacts on non-target Resources. (Transmission Vegetation Management EIS)

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 restriction

Snohomish - Murray No. 1 (See attached maps for locations)

Span		Wells, Irrigation or Springs	Treatment Zone	Buffer
From	To			
3/4 + 30	18/6 + 663	Sole Source Aquifer	No high volume foliar spraying	Whole right-of-way

- Note- any treatments in this area will be localized spot treatments.

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.

No T&E plant or animal species found.

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

None mapped. Machines will not be used with the high water level of the creeks or within the wetlands. Shrubs along the creeks will be maintained to provide shade and debris.

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

None known within the project area.

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

None known within the right-of-way.

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. See attached maps for exact locations.

Snohomish - Murray No. 1 (See attached maps for locations)

Span		Describe sensitivity	Method/mitigation measures
From	To		
2/6 + 0	3/1 + 682	Steep slope	See below
3/6 + 00	3/6 + 490	Steep slope	See below
4/2 + 00	4/3 + 510	Steep slope	See below
4/5 + 00	4/5 + 653	Steep slope	See below
4/8 + 00	4/8 + 370	Steep slope	See below
6/6 + 150	6/6 + 440	Steep slope	See below
6/7 + 100	6/7 + 300	Steep slope	See below
7/1 + 390	7/2 + 380	Steep slope	See below
7/2 + 560	7/6 + 575	Steep slope	See below
8/6 + 0	8/6 + 1200	Steep slope	See below
9/8 + 50	9/8 + 870	Steep slope	See below
10/8 + 310	10/8 + 730	Steep slope	See below
11/6 + 60	11/6 + 625	Steep slope	See below
17/8 + 470	17/8 + 750	Steep slope	See below

Resource	Treatment Alternatives
SS	BPA Fee owned State DNR, or private lands where a steep slope or visual resources precludes mechanical treatments except on access roads and around structures. Available: all manual and biological treatments. All herbicide treatments including cut-stubble treatment following a mechanical treatment on access roads and structure sites. **Herbicides:** glyphosate, triclopyr (Garlon 3A and 4), imazapyr, dicamba may be prescribed for cut-stump, stem-injection, and basal-stem treatments. In addition to the above herbicides, Escort, and clopyralid can be used spot foliar and broadcast treatments. 2,4-d amine can be added to the list to control noxious weed species. See Table 111-1: Buffer width to Minimize Impacts on non-target Resources. (Transmission Vegetation Management EIS)

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

None within the project area.

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.

MANUAL: Manual control methods include the following: cutting with shears, clippers, or chainsaws; and girdling by cutting a ring around the tree. When chainsaws are used cut conifers below the lowest live limb to eliminate continued growth of the lateral branches and cut all stumps flat where possible.

MECHANICAL: Mechanical methods include the use of brush mowers and feller bunchers. Ground-disturbing mechanical equipment will not be used on slopes over 20% or in riparian areas (Refer to 3.1). Work will be done when the ground is sufficiently dry enough to sustain heavy equipment and minimize excessive rutting.

HERBICIDES: The herbicide treatments prescribed for the project area are spot stump treatment, localized basal treatment, and localized foliar treatment. Where possible the deciduous stumps will be treated to prevent resprouting. If we are unable to treat the stumps during the project, we will wait until the next growing season and do a localized foliar treatment. In areas where the trees are less than 6ft. tall and the density is light we may do a localized basal treatment.

PROPOSED HERBICIDES*:* Glyphosate, triclopyr (Garlon 3A and 4), imazapyr, and dicamba may be prescribed for cut-stump, stem-injection, and basal-stem treatments. In addition to the above herbicides, Escort, and clopyralid can be used for spot foliar and Broadcast treatments. 2,4-d amine may be added to the list to control Noxious weed species. See Tables 111-1: Buffer width to Minimize Impacts on non-target Resources, and 5-7: Herbicide Ecological Toxicities and Characteristics. (Transmission Vegetation Management 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.

Mulching/Mowing – This will be done on access roads and around structure sites.

Lope and Scatter – These areas are identified in the VEGETATION CONTROL PRESCRIPTION as Cut, Lope, and Scatter.

Some areas may require that the brush be chipped. These areas are identified in the VEGETATION CONTROL PRESCRIPTION as cut and treat as needed, and will depend on the requirements of the landowners.

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.

Not planned at this time. However, if soil disturbance occurs during the project the area will be reseeded.

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

Native seed will be considered in all mixes. Introduced species may be more competitive against invading tree species and protecting against erosion.

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

Not planned at this time. However, if reseeding is necessary it will take place in the fall just before the fall rains.

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.

The project area will be inspected during treatment. In addition, it will be reviewed during routine patrols by the line crew and within one year by the NRS.

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

Will review during line patrol by the line crew and within one year by the NRS.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — **Prepare Appropriate Environmental Documentation** for requirements.

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".

Effects are expected to be the same or less than the description provided 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