

United States Government

Department of Energy

Bonneville Power Administration

# memorandum

DATE: February 3, 2005

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA 239) Port Angeles-Sappho No. 1 **Project #: V-O-05/05**

TO: Jim Jellison  
Natural Resource Specialist TFO/Olympia

**Proposed Action:** Vegetation Management along the Port Angeles-Sappho No. 1, 115 kV Transmission Line Corridor from structures 1/1 to 9/4.

**Location:** The project line is located in Clallam County Washington, from Port Angeles substation ahead on line 9 to the west. The project is located in BPA's Olympia Region.

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

**Description of the Proposal:** BPA proposes to conduct vegetation control activities that include cutting, chemical treatment, and cut lop and scatter of Danger Trees adjacent to the right of way. Danger Trees are located off of the Right of way and have been determined to pose a threat to the transmission line. The subject danger trees have a greater potential to fall into the line and interfere with the safety, operation, maintenance, and reliability of the transmission line

**Analysis:** A Vegetation Management Checklist was completed for this project in accordance with the requirements identified in the Bonneville Power Administrations Transmission System Vegetation Management Program FEIS (DOE/EIS-0285).

The subject corridor traverses public and private lands in Clallam County Washington. Landowners include Washington State DNR, US Forest Service, Olympic National Park, private timber companies, and private rural residential lands. No tribal lands are involved.

Section 3 of the checklist identifies the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in section 3.1 of the Vegetation Management Checklist. Trees in riparian zones will be selectively cut to include only those that are within 50 feet of the conductor at maximum sag. Trees will be topped where shrubs are not present to provide shade and a silt buffer. No ground disturbing vegetation management methods will be implemented thus minimizing the risk for soil erosion and sedimentation near the streams. The following herbicide buffers will be implemented for the project. Outside a 100' buffer from any stream, ponds, or wetlands Triclopyr BEE (common formulations, Garlon 4 & Tahoe 4E) may be applied. Formulations of Triclopyr TEA (common formulations Garlon 3A & Tahoe 3A) may be applied for spot or localized applications up to the waters edge. For any initial or follow up broadcast treatment with

Triclopyr TEA on sprouting stumps or brush a 35' buffer will be maintained from any stream, ponds, wetlands, or sensitive areas.

**Threatened and Endangered Species/Essential Fish Habitat:** Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. A species list was reviewed from the United States Fish and Wildlife Service (USFWS) on January 5<sup>th</sup>, 2005 identifying threatened and endangered species and Critical Habitat Units potentially occurring in the project area. In addition a review of species under the jurisdiction of NOAA Fisheries was conducted. A determination of "No Effect" was made for all ESA listed species and designated critical habitat for the project. A determination of "No Effect" was made for Essential Fish Habitat waters that occur in the project area.

**Cultural Resources:** No cultural resources are known for the project area. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the appropriate tribe, the BPA Environmental Specialist, and the BPA archeologist will be contacted.

**Monitoring:** The entire project will be inspected during the work period. Additionally the line will be patrolled annually after treatment to monitor the effectiveness of the treatment and any issues associated with the project.

**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 documentation is required.

/s/ James Meyer for \_\_\_\_\_  
Greg P. Tippetts  
Physical Scientist

CONCUR /s/ Thomas C. McKinney \_\_\_\_\_  
Thomas C. McKinney  
NEPA Compliance Officer

DATE: 2/8/2005

Attachment:  
Vegetation Management Checklist

cc:

L. Croff – KEC-4

T. McKinney – KEC-4

J. Meyer – KEP-4

J. Sharpe – KEPR-4

G. Tippetts – KEPR/Olympia

P. Key – LC-7

J. Hilliard Creecy – T-DITT2

M. Johnson – TF/DOB-1

D. Krauss – TFO/Olympia

T. Grover – TFOF/Olympia

Environmental File – KEC-4

Official File – KEP (EQ-14)

**Vegetation Management Checklist  
Port Angels-Sappho Corridor**

Project #: V-O-05/05

**1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED**

**1.1 Describe Right-of-way.**

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Port Angels-Sappho No. 1, ADNO's 8350,	8 miles -115	100.0' R/W widths	8 mi. starting at str. 1/1 to str 8/9

**Right Of Way:** N/A

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

A combination of mulching the easement because of the Scotch broom and the cut, lop and scatter of tall growing species will be utilized to treat hazardous vegetation and this will be followed up with a herbicide treatment.

**Transmission Structures** – no clearing around structures at this entry

All structures will be cut and chemically treated to 30 feet from the center of the pole or from the legs of each steel tower.

**Access Road clearing** - approximate miles – 0.0 miles

All access roads will be either C, L&S, mulched or chipped due to the encroachment of Scotch broom, blackberries, low and tall growing brush and trees then either stump or foliar chemical treatment will be applied.

5103-danger tree cutting with 92 reclaim trees during this entry.

**1.2 Describe the vegetation needing management.**

**Vegetation Types:**

Douglas fir	Hemlock	Cottonwood
True Fir	Alder	Wild Cherry
Maple	Willows	

**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.**

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.**

**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.

**Subsequent entries** – A follow-up chemical treatment is scheduled to begin in the late spring or early summer of 2005.

**Future cycles** – Every 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.

**2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS**

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

**Landowners/Managers/Uses:**

Rural Residential Property  
Green Crow Company  
Washington State DNR  
USFS  
Olympia Park Service

**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.**

Olympia Region will send letters to the property owners about 2-4 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.**

N/A

**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.**

I need to work with the property owners who do not have an approved Xmas tree agreement and request that they submit an application for a formal agreement.

**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.**

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.**

I have contacted Tom Strong, Cultural Resource Specialist of the Skokomish Tribe his knowledge of any cultural sites on the Longview-Chehalis#3 easement. He is not aware of any cultural sites.

### 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.

Span		Water body	T&E/ EFH	Method	Herbicide	Application Technique	Buffer	Other
From	To							
2/2+435	635	Peabody Creek	EFH	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
2/3+500	560	Wetlands	No	C, L&S	No herbicide			
2/4 +0	800	Pond & Wetland	No	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
2/5 +265	335	Wetlands	No	Skip	No herbicide			
2/6 + 225	325	Pond	No	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
2/8 +215	415	Valley Creek	EFH	Cut & Stump treat	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
3/2 +165	235	No name creek	No	C,L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
3/8 + 640	710	No name creek	No	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
3/9+225	600	Tumwater Creek	EFH	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
5/7+300	500	Dry Creek	EFH	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
5/8+140	210	No name creek	No	Cut & Stump treat	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
7/2+50	120	No name creek	No	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
7/2+165	235	No name creek	No	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
7/2+365	435	No name creek	No	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
8/3 + 100	550	Elwha River	T&E/ EFH	C, L&S	Garlon 3A	Spot Treat w/in buffer	3' of Waters Edge	Selective Cutting

8/7 + 590	660	No name creek	No	C, L&S	Garlon 3A	Spot Treat w/in buffer	Waters Edge	Selective Cutting
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**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).**

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.**

Span		T&E Species	Method/mitigation or avoidance measures
From	To		
5/1	5/2	Marbled Murrelet Critical Habitat	Critical habitat for Marbled Murrelets has been designated in the area between the spans listed. The habitat unit starts approximately 800 feet North West of the transmission line corridor. Visual and audible sightings of the species have been identified in the area. Marbled Murrelets may also occur in other areas along the transmission line corridor. Vegetation Management activities will occur outside of the Critical timing periods for Marbled Murrelets from 4-26 to 9-18. No trees exhibiting the characteristics of nesting trees for the species will be removed.
6/6+0	6/8+0	Marbled Murrelet Critical Habitat	Critical Habitat Unit. Same measures as noted in 5/1 to 5/2
8/3+100	550	Elwah River Chinook Salmon Fall Chinook Salmon Summer	Only spot and localized Herbicide treatments within 100' up to 1 Yard of waters edge with the practically non-toxic (to Aquatic species) chemical Triclopyr TEA ("Garlon 3A" / "Tahoe 3A" trade names). No chemical treatment within one yard of the waters edge. Most of the span near the river will be skipped other than selective cutting of a few trees in the riparian zone were the tops are within 50' of the conductor at max sag.
8/2	8/4	Marbled Murrelet	Visual and audible sightings of the species have been identified in the area. Vegetation Management activities will occur outside of the Critical timing periods for Marbled Murrelets from 4-26 to 9-18. No trees exhibiting the characteristics of nesting trees for the species will be removed.
8/3+100	550	Elwah River Bull Trout	Same as listed in 8/3+ 100 to 550 for Chinook Salmon.
8/4+0	9/1+0	Marbled Murrelet Critical Habitat	Line crosses through Critical Habitat. Same measures as noted in 5/1 to 5/2

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

Span		Species	Measures
From	To		
2/2+435	635	Peabody Creek Essential Fish Habitat (EFH) Coho Salmon	Selective cutting of trees in riparian zone and/or cutting trees tops that are within 50' of the conductor at max sag. Shrubs will not be cut that are less than 10' height where the ground to conductor clearance is less than 50' at max sag. Only spot and localized Herbicide treatments within 35' up to the waters edge with the practically non-toxic (to Aquatic species) chemical Triclopyr TEA ("Garlon 3A" / "Tahoe 3A" <i>trade names</i> ). Top trees when shrubs are not present to provide shade and a silt buffer.
2/8+215	415	Valley Creek Essential Fish Habitat (EFH) Coho	Same treatment as noted in 2/2+435 to 635.
3/9+225	600	Tumwater Creek Essential Fish Habitat (EFH) Coho	Same treatment as noted in 2/2+435 to 635.
5/7+300	500	Dry Creek Essential Fish Habitat (EFH) Coho	Same treatment as noted in 2/2+435 to 635.
8/3+100	550	Elwah River Essential Fish Habitat (EFH) Chum Steelhead Coho Salmon	Same treatment as noted in 2/2+435 to 635.

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

N/A

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

Span		Describe sensitivity	Method/mitigation measures
From	To		
1/1	9/1	Cultural Sites	The Lower Elwah Tribe does not know of any cultural sites on this transmission corridor. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the local tribe(s) will be contacted as well as the BPA Environmental Specialist.

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

Span		Describe sensitivity	Method/mitigation measures
To	From		
2/2+435	635	Steep Slopes	Selective cutting of trees in the draw to maintain soil stability.
2/8+215	485	Steep Slopes	Selective cutting of trees in the draw to maintain soil stability.
3/2+165	235	Steep Slopes	Selective cutting of trees in the draw to maintain soil stability.
3/9+225	600	Steep Slopes	Selective cutting of trees in the draw to maintain soil stability.
5/7+300	500	Steep Slopes	Selective cutting of trees in the draw to maintain soil stability.
8/3+100	550	Steep Slopes	Selective cutting of trees in the draw to maintain soil stability.

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

Span		Methods, cutting
From	To	
2/2+ 435	635	Ground to conductor clearance is greater than 125', selective cutting of conifer trees when the tops of the trees are within 50' of the conductor at max sag.
2/8 + 215	485	Selectively cut conifer trees when the tops of the trees are within 50' of the conductor at max sag.
3/2 +165	235	Selectively cut conifer trees when the tops of the trees are within 50' of the conductor at max sag.
3/9 + 225	600	Selectively cut conifer trees when the tops of the trees are within 50' of the conductor at max sag.
5/7 +300	500	Selectively cut conifer trees when the tops of the trees are within 50' of the conductor at max sag.
8/3 +100	550	Selectively cut conifer trees when the tops of the trees are within 50' of the conductor at max sag.

**4. DETERMINE VEGETATION CONTROL METHODS**

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

Span		Methods, including herbicide active ingredient, trade name, application technique
To	From	
1/1	9/1	For non-sensitive areas (spans) cut stump/basal treatment with 25% Garlon 4/Tahoe 4E and 75% Forest Crop Oil (FCO). A 50/50 % mixture of Garlon 3A/Tahoe 3A and water for stump treatment will be used within 35' up to the waters edge in the non-T&E listed creek riparian zones and within a 100' buffer up to one yard of the high water mark of a T&E listed creek riparian zone. A late spring and early summer follow-up foliar treatment with Garlon 3A/Tahoe 3A and Escort on all hardwood species except the use of Arsenal on Big Leaf Maple, Wild Cherries and Cottonwood sprouting stumps and/or brush in non-T&E/EFH buffers. Initially, foliar treat Scotch broom as well as a follow up treatment in the spring-summer. Basal treatment is essential for Big Leaf Maple, Cottonwood and Wild Cherries sprouts, outside the buffer zones, rather than foliar treatment in order to deliver enough herbicide product to the roots to cause mortality of the target trees.

**5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION**

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

**Debris Disposal:**

**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.)

**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).**

N/A

Native grasses and vegetation 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. This is only a DT Project remove

**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.**

Monitoring of the success of the danger tree-cutting program will begin the spring in which evaluation of soil erosion as a result of the brush-cutting program will be made. If grass seeding is necessary, native grass seed will be applied.

**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.**

Monitoring of the effectiveness of the herbicide treatment will begin in the spring and follow up treatment of cut stump/basal treatment of target vegetation. Depo-RTU will be utilized to reduce drift when necessary.

**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**

**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 tree cutting and chemical treatment activities on this corridor are 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