

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: 7/31/00

REPLY TO
ATTN OF: KECP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-1)

TO: Tom Murphy - TFS/BELL-1
Natural Resource Specialist

Proposed Action: Vegetation Management on Taft-Bell Transmission line

Location: Taft-Bell 500-kV transmission line extends from Taft Substation in western Montana to Bell Substation near Spokane, Washington. The project area extends from Taft Substation to the western edge of the Idaho Panhandle National Forest in Idaho.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposed Action: BPA proposes to clear unwanted vegetation from the 105-foot-wide Taft-Bell 500-kV single-circuit transmission line right-of way and access roads during the 2000 maintenance season, beginning in July. BPA would conduct the vegetation control with the goal of promoting low-growing plant communities in the right-of-way.

Analysis: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (EIS) and Record of Decision (ROD).

Planning Steps

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

The facility is a 500-kV transmission line right-of-way and accompanying access roads in mountainous terrain. The minimum clearance requirement for a 500-kV line is 25 feet. Vegetation control occurring in the action is designed to provide a 10-15 year maintenance free interval.

The vegetation needing control includes dense bushy broad leaf vegetation and conifer sprouts (mainly on access roads) and conifers up to and exceeding 40 feet (in the right-of-way). Work would be done in a manner that does not or limits disturbance to existing low-growing plants.

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

The majority of the project area is on National Forest land. Taft Substation is on Lolo National Forest land and the line runs just over three miles through the Lolo to the Montana-Idaho border. At the border, the line enters the Idaho Panhandle National Forest. Between mile six and mile 16 the line crosses FS, private, and BLM lands and then returns to the Panhandle NF. The rest of the line remains in the Panhandle NF except for in a couple of spots where it crosses private or state lands. Some of the private land may be agricultural, especially in the Coeur d'Alene River valley, but the

vast majority of it is conifer forest. As a precaution, mitigation measures for agricultural lands have been included in the management prescriptions table attached to this document.

BPA met with representatives from the Idaho Panhandle National Forest, Lolo National Forest, and the Bureau of Land Management in mid-May to discuss the project and receive input. The proposed herbicides and clearing methods were discussed.

A preliminary letter was mailed to all landowners in the project area in mid-June. The project manager will notify specific landowners when the contractor's crews will be in their area. In areas where herbicides would be used, signs would be posted advising a 4-hour (for glyphosate) or 48-hour (for triclopyr) non-entry period after treatment.

Five tribes were contacted by letter and phone calls for comments: Coeur d'Alene Tribe; Confederated Salish and Kootenai Tribes of the Flathead Nation; Kalispel Tribe of Indians; Kootenai Indian Tribe of Idaho; and the Spokane Tribe of Indians. To date, no concerns have been raised by the different tribes.

3. Identify natural resources.

The Right-of-way Operation and Maintenance Plan for Taft-Bell #1 (May 1988) (BPA/BLM/FS) identifies several sensitive resource areas that have been marked on a project map of the transmission line. These areas include sensitive fisheries, erosion hazard areas, visual sensitivity areas, and elk and big game range and security areas. The contractor will be provided with a set of the project maps, as well as with the attached list of management prescriptions from the ROW Plan and from the Vegetation Management EIS.

The transmission line crosses many small streams and the Coeur d'Alene River, including the North and South Forks. Because of the mountainous terrain, the transmission line usually spans the streams at a height that requires no vegetation clearing. However, there are streams that will require some vegetation management. Care will be taken in implementing vegetation removals and herbicide treatments near riparian areas. Vegetation management activities will be conducted only in those areas that have vegetation causing a direct impediment to the proper operation of the transmission line. Both herbicides proposed for use, triclopyr (Garlon 3A) and glyphosate (Rodeo or Accord), are practically non-toxic to microorganisms, aquatic vertebrates, and aquatic freshwater invertebrates. Only glyphosate will be used near water. The Transmission System Vegetation Management Program Final Environmental Impact Statement's buffer width for these herbicides used in spot treatments is up to the edge of streams, wetlands, or sensitive habitat.

The known threatened or endangered species present in the project area are Gray Wolf, Bald Eagle, Bull Trout, Grizzly Bear, Ute Ladies'-Tresses, and Canada Lynx. A biological assessment was submitted to the U.S. Fish and Wildlife Service (USFWS) on July 24, 2000. As a result of subsequent discussions with USFWS, BPA will be submitting an addendum to the BA regarding the non-use of surfactants in the herbicides. Based on this submittal and the discussions with USFWS, BPA anticipates concurrence that the project would have "*no effect*" on Grizzly Bear and "*may affect, but is not likely to adversely affect*" all other populations.

A plant survey was conducted the week of July 10, 2000, to satisfy National Forest sensitive species requirements and to search for Ute Ladies'-tresses. No Ute Ladies'-tresses or other forest sensitive species were found in areas of the right-of-way where clearing would take place and habitat conditions would support these species.

Archaeological and Historical Services conducted a literature search and submitted a report in April 2000. There are 31 cultural resources located within, partially within, or immediately adjacent to the ROW or access roads, nine of which are eligible for the National Register of Historic Places. The majority of the eligible sites in the project area can be easily avoided as they are adjacent to existing access roads or have no eligible features within the ROW. Of the four eligible sites crossed by the ROW or access roads, only one (the Jackass Trail) is in an area that needs clearing. The archaeological survey has been provided to Idaho and Montana State Historic Preservation Offices (SHPO), and to the Coeur d'Alene Tribe, Confederated Salish and Kootenai Tribes of the Flathead Nation, Kalispel Tribe of Indians, Kootenai Indian Tribe of Idaho, Spokane Tribe of Indians, and Cort Sims, Idaho Panhandle National Forests Archaeologist. The Idaho SHPO has requested that clearing and removal of vegetation near the Jackass Trail be done by hand. They also recommend archaeological monitoring of work conducted within the vicinity of that site, which BPA will arrange for. Therefore, the proposed action would have no adverse effects to properties on or eligible for the National Register of Historic Places.

The Coeur d'Alene NF provided BPA with current visual sensitivity information, which is marked on the project maps to be given to the contractor. Mitigation measures have been provided for clearing in these areas, and are attached.

4. Determine vegetation control and debris disposal methods.

Approximately 60 miles of the right-of-way and 50 miles of access roads would be checked and unwanted vegetation removed. The proposed work would be undertaken by a licensed contractor using an integrated vegetation management approach. The unwanted vegetation would be removed by employing manual methods on the ROW, and manual and potentially mechanical methods on access roads. Chemical means would be employed to prevent resprouts of broad leaf species. Prevention of resprouts encourages low-growing plant communities to establish themselves and flourish on the right-of-way. This impact avoidance approach both maximizes the use of limited resources and minimizes environmental impacts. Herbicides used would be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions.

The work would likely be undertaken by two, four-person crews, and could be completed in two months time. Woody brush on the right-of-way would be lopped and scattered by use of chain saws, and the cut stumps of deciduous trees would be spot treated with EPA-approved herbicides (glyphosate (Rodeo or Accord formulation) and triclopyr (amine formulation – Garlon 3A)). Herbicides used would be on BPA's approved herbicide list and also approved for use on National Forest lands. The herbicides would be applied by use of a hand-held applicator connected to a backpack (spot treatment).

The access roads would also be cleared using chain saws, and the woody debris would be disposed of by use of a chipper mounted on the back of a pick-up truck. Herbicides would be applied to cut stumps of deciduous trees along the access roads by use of a hand-held applicator connected to either a backpack or tank mounted sprayer mounted on the back of a pickup truck (spot treatment).

The only herbicide that would be used near riparian areas or near fish-bearing streams would be glyphosate, using the Rodeo or Accord formulation. Rodeo and Accord are practically non-toxic to freshwater fish, and can be applied within ten feet of water with spot or localized application techniques.

The Idaho Panhandle National Forests' Noxious Weed EIS restricts herbicide amounts used in any given watershed in the NF. To help comply with this requirement, the contractor will use the amine formulation of triclopyr instead of the ester formulation since the ester is particularly restricted. Glyphosate is somewhat more restricted than triclopyr amine but BPA does not anticipate reaching critical herbicide levels in any watershed. Contractor spray records will be provided to the Coeur d'Alene NF for input into their cumulative database for their tracking purposes.

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 sensitive resource areas. The contractor will also be provided with copies of Appendix C: Herbicide Application Guidelines, from the Idaho Panhandle National Forests' Noxious Weeds EIS to be followed on both the Idaho Panhandle and Lolo National Forests. As noted in the Statement of Work, the contractor will follow manufacturers' label instructions when applying herbicides.

5. Determine revegetation methods, if necessary.

There is no revegetation currently planned for this project. However, if areas are found that require reseeding BPA will provide for that work to be done.

6. Determine monitoring needs.

An inspector will monitor the work being performed. The frequency and interval between inspections are dependent on the availability of the inspectors and the work load. The BPA Safety Office will make unannounced, on-site safety observations. Ten percent of payment due the contractor will be held by BPA until after inspection of the completed work by the project manager or his appointee.

Five to seven years after treatment, BPA will survey the transmission line and, if budget allows, cut tall-growing species to promote the low-growing plant communities.

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/ Tiffany B.B. Branum
Tiffany B.B. Branum
Environmental Project Lead - KECP

CONCUR: /s/ Thomas C. McKinney
Thomas C. McKinney
NEPA Compliance Officer

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