

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: March 29, 2004

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA – 197 - Lower Monumental-Hanford/Ashe-Hanford/Scooteny Tap
Corridor Maintenance

TO: William Erickson – TFP/Walla Walla
Natural Resource Specialist

Proposed Action: Vegetation Management for the subject transmission line corridors in the areas indicated on the attached checklist. All lines are 500 kV and have easement widths ranging from 125 to 250 feet.

Location: The subject rights-of-way are located in Benton County, WA. being in the Walla Walla Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: The work will include vegetation management in the areas indicated on the attached checklist. Maintenance will include the control of all brush species within 50 feet of steel transmission structures and control of vegetation in and along the associated access roads. Vegetation control will be by manual, mechanical and herbicidal treatments. Around the transmission line structures, cut stumps are not to be taller than 4 inches. In access roads, cut stumps will be no taller than 2-3 inches and will be cut horizontal to the ground to prevent personal injuries and tire puncture. All un-mulched debris and slash will be pulled out of the cut area around the tower structures while all un-mulched debris will be pulled back 10 feet from the access roads. Ground broadcast of appropriate herbicides to prevent re-establishment of treated brush will be utilized.

Analysis: A checklist was completed for this project in accordance with the requirements identified in the BPA Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). The checklist evaluated the following areas:

- *Description of right-of-way and vegetation management needed*
- *Vegetation to be controlled*
- *Surrounding land use and landowner*
- *Natural Resource*
- *Vegetation control methods*
- *Debris disposal*
- *Monitoring*
- *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/ Ken Hutchinson
Ken Hutchinson
Environmental Scientist

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

DATE: 4/2/2004

Attachment

cc:

L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
J. Sharpe – KEPR-4
K. Hutchinson – KEPR/Walla Walla
P. Key – LC-7
J. Hilliard Creecy – T-DITT2
K. Rodd – TF/DOB1
R. Duncan – TFP/Walla Walla
M. Richardson – TFP/Walla Walla
G. Wilfong – TFPF/Pasco
Environmental File – KEC
Official File – KEP-4 (EQ-14)

Hhutchinson:kh:4722:3/24/2004 (KEP-KEPR/WALLA WALLA-W:\EP\2004 FILES\EQ\EQ-14-Supplement Analasys\FEIS-0285-SA-197-LoMo-Hanford.doc)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way. Lower Monumental-Hanford/Ashe-Hanford/Scootenev Tap Line. Access road repair and Vegetation Management

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
Lower Monumental-Hanford	54 mile 500 kV	160	48/2 to 53/2+ 450 ft
Ashe Hanford		250	15/2-50 to 17/2 + 323
Scootenev Tap		125	4/1+50 ft to 6/3

Excludes last span into River- Sensitive Cultural Area from River (48/1) to 48/2 of the Lower Monumental-Hanford Line – any maintenance ¼ mile from river contact Bill Erickson or Natural Resource Specialist immediately.

Access Roads

Maintenance crews use access roads to get to the transmission-line towers, substations, and other facilities.

Requirements Access roads have to be sufficiently free of vegetation so that our crews and their necessary machinery and vehicles can safely and efficiently travel over them to the electric facility for emergency and routine maintenance work. Vegetation management will also reduce the potential of fire hazards from vehicles that use these roads during dry weather. Also to control Noxious Weeds

Current Practice Access roads that we maintain are generally unimproved dirt or gravel roads. We keep them clear of trees and brushy vegetation, using manual cutting tools, machines on wheels or tracks, and herbicide sprayed with backpack sprayers and truck-mounted booms.

Access roads and Tower sites will be treated using non-selective methods that include, hand cutting, herbicides and mechanical means.

Right Of Way:

Transmission Structures – 40 structures

Access Road clearing - approximate miles 9+ miles– up to 18 acres

Tower Clearing Specifications:

- Control all brush species within 50 ft. of steel transmission structures. Cut stumps are not to be taller than 4 in. These species include big sagebrush, gray rabbitbrush, green rabbitbrush, and other vegetation that, by size or density, might hinder routine inspection and maintenance work or make roads and work areas hazardous.
- Pull all un-mulched debris and slash out of the cut area around transmission structures.
- Ground broadcast an appropriate herbicide to prevent re-establishment of treated brush species.

Access Roads Specifications:

- Control all vegetation except grasses, to enable safe driving.
- The access road is to be 16 ft. wide. Cut stumps are not to be taller than 2-3 inches in the roadbed.
- Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.
- Pull all un-mulched debris back 10 feet from the access road.
- Ground broadcast an appropriate herbicide to prevent re-establishment of treated brush species.

1.2 Describe the vegetation needing management.

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

Rangeland: Sagebrush Bunchgrass. Rainfall 6-10 inches

Big sagebrush, gray and green rabbitbrush, and other brush species

Sandy and Sandy Loam soil to silt loam. 6-12 inch

Noxious weeds:

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.

Not Promoting Low Growing Plant Communities, Describe Why?

Project only entails the clearing of roads and tower sites to facilitate access maintenance.

1.4 Describe overall management scheme/schedule.

See Handbook - Overall Management Scheme/Schedule.

Description of the Proposed Action: BPA proposes to clear unwanted vegetation in the access roads and around tower structures that may impede the operation and maintenance of the subject transmission line. All work will be in accordance with BPA standards. BPA plans to conduct vegetation control with the goal of removing growing vegetation that is currently encumbering access to the transmission line.

The work will provide system reliability.

Initial entry –

Using hand cutting or mechanical means, BPA will complete brush management on the access roads and towers. Vegetation is currently encumbering the access roads and towers of the power lines; If needed, treat the associated stumps and stubble with herbicides (spot, localized, and broadcast treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines or creates a fire hazard.

Vegetation management will occur before and after access road maintenance that may include grading, blading and shaping, and rock placement. Reseeding will occur if there is limited vegetation to re-establish the site, or soil disturbance has removed the existing vegetation. Areas with disturbed soils will be replanted or reseeded with low-growing grasses.

Keeping trucks and equipment on designated access roads will not disturb desirable plants on the ROW. All work will take place in existing access roads or ROW.

Slash and debris will be pulled at least 10 feet from the road surface and loped and scattered, or it will be mulched mechanically. Herbicides may be used to prevent the re-growth of bush species.

Subsequent entry-

The vegetation management program will be designed to provide a 3-8 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all encumbering vegetation using a combination of manual, herbicide and mechanical treatments as outlined in the initial treatment

Future cycles -

Future cycles of work will involve hand cutting and mechanical treatments. During routine patrols, the ROW will be examined for encumbering vegetation and removed as necessary.

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 entire site is on the Hanford Reservation. East of the Columbia Generation Plant. The area can be considered as rangeland. The area is secured so no casual use by the public is allowed.

2.2 See Handbook — [Methods for Notification and Requesting Information](#) for requirements.

BPA is to contact DOE before work begins.

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](#).

The PNNL has identified various mitigations for biological issue and Cultural issue. Note Specific Sections for details

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.

See above

The following landowners have responsibility for vegetation maintenance.

None

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.

Site currently closed to the public, no casual use is allowed.

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.

BPA has contracted with Pacific Northwest National Laboratory to perform a cultural and Ecological review during this process. They will lead the consultation with the Yakama, Umatilla, Wanapum, Colville, and Nez Pierce tribes. Results of this review are noted in the Cultural section of this checklist.

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.

NONE Columbia River ¼ mile away from 48/2 LOMO HANF

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.

NONE

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.

BPA contracted with the Pacific Northwest National Laboratory to perform a Biological review of the project. THE PNPL has identified the biological nature of the area.



Based on the submitted ecological resources report, it is the finding of PNNL that no plant or animal species protected under the Endangered Species Act, candidates for such protection, or species listed by the Washington State government as threatened or endangered were observed in the vicinity of any of the sections of the Lower Monumental-Ashe Transmission line access roads.

The following recommendations need to be implemented in order to limit biological effects of our maintenance activities.

Areas of concern are as follows:

An active red-tailed hawk (*Buteo jamaicensis*) nest was observed on structure 4/2 of the Scootenev Tap

PNNL recommends that work in the vicinity of the active red-tailed hawk nest on Tower 4/2 and in the vicinity be avoided during the nesting season. If work is to be initiated, it should be accomplished outside of the nesting season, **or during emergency situations only.**

Nesting season for the red tailed hawk is generally from February 15th through August 31st.

If any work is done during March 1st to July 31 contact PNNL at 509 372-1026 for site specific buffers.

If any shrub or ground nesting migratory birds are observed in the vicinity of BPA maintenance activities contact the PNNL staff at the above #.

VEGETATION MANAGEMENT SENSITIVE PLANT SPECIES:

None found

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

See Handbook — **Protecting Other Species** for requirements.

See above

- Grass seeding with mixtures indicated in Section 5.2.
- The proposed activities are not likely to adversely affect the local population of jackrabbits.
- Workers should stay on established roads, except to access the poles, and disturbance to sagebrush should be minimized to the extent possible. Workers need to minimize the off road use to the extent needed to do the work and maintain safety of the job.
- If any

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

See Handbook — **Visual Sensitive Areas** for requirements.

NONE

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

See Handbook – **Cultural Resources** for requirements.

A no effect determination has been completed for the project.

In the future, during all BPA activities, BPA workers shall ensure that the following stipulations are implemented when conducting maintenance:

All workers will watch for cultural materials (e.g. bones, artifacts) during all work activities.

If any are encountered, work in the vicinity will stop until an HCRL archaeologist has been notified, assessed the significance of the find, and, if necessary arrange for mitigation of the impacts to the find.

BPA employees and contractors will also follow the policy for discovery of cultural materials if artifacts are encountered.

BPA will avoid ground disturbance outside existing rights-of-way and road easements. All activities and staging areas must remain on the BPA Right of Way.

The HCRL will be notified of any changes to project locations or if the scope of and future projects change.

The TLM Foreman III will be responsible for making crews aware of the sensitivity of the island and the requirements of this tech note before work begins in the area.

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.

Erosion treatments and seeding will be applied to eroding areas.

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

See Handbook – [Spanned Canyons](#) for requirements.

None

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — [Methods](#)

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

When there are No Environmental Constraints

Land with no environmental constraints. Available: all manual, mechanical, biological, and herbicidal treatments

Manual: Hand tools and chainsaws.

Mechanical: Can be used on roads and towers, all areas suitable for mechanical treatment. No ground disturbing activities on slopes over 20%.

Herbicide: Glyphosate, Picloram, Imazapyr, picloram, 2,4-d, Triclopyr (Garlon 3A and Garlon 4), Dicamba may be prescribed for spot-foliar, cut stubble and broadcast-foliar treatments. In addition, Escort and clopyralid can be used for spot foliar and broadcast treatments.

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.

- 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.)
- Other – Pull un-mulched debris back 10 feet from road surface and 50 feet from tower area.

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

See Handbook — [Reseeding/replanting](#) for requirements.

If re-seeding is needed, mixtures of the following grasses will be used

Approved and Suggested seeds	*Native	Reason for seeding
Mixes can be developed from the following seed species. Based on site and adaptation. Sandy and Sandy loam soils, silt loams 6-12 inch precipitation <u> Name</u>	N=Native I=Introduced	Re-vegetate area where soil disturbance has occurred and to re-establish ground cover to prevent erosion.
Indian Ricegrass	N	
Thickspike wheatgrass	N	
Bluebunch Wheatgrass	N	
Sand dropseed	N	
Needlegrass	N	
Siberian wheatgrass	I	
Crested Wheatgrass	I	
Sheep Fescue	N	
Big Bluegrass	N	

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

Natives will be considered in all mixes.

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

Native seeds will be considered in all mixes. Seeding should be completed in the early fall when there is enough moisture to allow for seedling to develop to the 4-5 leaf stage before winter or in the late fall or winter when the soil temperature is below 40 degrees F. Broadcast seeding with follow up harrowing is one method of seeding for small area. Mulching with weed free straw or hydro mulching may be required to prevent wind erosion in the spring.

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.

Site will be inspected during treatment. In addition routine patrols by BPA ground and aerial patrols.

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

Routine patrols by BPA ground and aerial patrols.

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”.

No

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

No