

memorandum

DATE: July 16, 2002

REPLY TO
ATTN OF: KEP/Z-992

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-88-Sifton-Ross and McNary Ross).

to: Ed Tompkins – TFO/Ross

Proposed Action: Vegetation Management for the segments of the Sifton-Ross and McNary-Ross Transmission Lines.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted danger trees and vegetation in the rights-of-ways, along access roads and around tower structures that may impede the operation and maintenance of the subject transmission line. See Section 1.4 of the attached checklist for a complete description of the proposed action.

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.

Work will take place on a 32 mile stretch of the McNary-Ross 345kV transmission line between towers 144/1 and 160/6 having a 300 foot easement width and along a 9 mile stretch of the adjacent Sifton-Ross 115 kV line between 1/1 and 9/2 as well as between 175/6 and 176/2 with a 200 foot easement width. The ROW is located in Clark and Skamania Counties, 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.

All off right-of-way trees that are potentially unstable and will fall within a minimum distance or into the zone where the conductors will swing will be removed.

This vegetation management program is designed to provide a 4-5 year maintenance free interval. Future cycles of work will involve cut stump, basal, foliar treatments or tree cutting.

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

The subject corridor traverses residential, rural, grazing lands, industrial Forestlands and Washington State DNR lands. Landowners along the ROW will be contacted two weeks prior to initiation of the work by letter or by door-to-door contact.

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 riparian zones and T&E streams. 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.

The work corridor crosses steep slopes. Mitigations include selective methods as described in Section 3.7 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 chip, lop and scatter or mulch techniques as described in Section 5 of the attached checklist.

5. *Determine revegetation methods, if necessary.*

Native grasses are present along the entire length of the ROW that will seed into areas that have been lightly disturbed.

6. *Determine monitoring needs.*

Follow up inspection will be performed in the spring. Cut stump/basal or foliar treatment of target vegetation will be conducted as needed based on the inspection results. The proposed mixture of herbicides is identified in Section 6.1 of the attached checklist. The herbicide mixture is consistent with the EIS. The line will be patrolled annually thereafter to monitor the effectiveness of the treatment 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

Elaine Stratton
Environmental Protection Specialist

CONCUR: /s/ Thomas C. McKinney

Thomas C. McKinney
NEPA Compliance Officer

DATE: 07/19/2002

Attachment

cc:

L. Croff – KEC-4
T. McKinney – KEC-4
M. Hermeston – KEP-4
J. Meyer – KEP-4
J. Sharpe – KEPR-4
E. Stratton – KEP/Z992
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)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
McNary-Ross	32 mi., 345Kv	300 Ft.	16 mi.
Sifton-Ross	9 mi., 115kv	200 Ft.	9 mi.

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.

Right Of Way:

Right-of-Way – clearing in right-of-way - 496 Acres

Transmission Structures – clearing around - 62

Access Road clearing - approximate miles – 0.8 mi.

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:

Douglas Fir

True Fir

Hemlock

Alder

Maple

Willows

Cottonwood

Wild Cherry

Noxious Weeds - Scotch Broom

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 hardwood species will be chemically treated on the stumps to prevent grow-in trees. Access, right-of-way roads and structure sites are to be cut and treated. The danger trees will be cut that are adjacent to the lines. A follow-up chemical treatment to begin in the late summer of 2002.

Subsequent entries – Every 4-5 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:

Residential

Rural

Grazing lands

Industrial Forest lands

Washington State DNR

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.

Ross District will send letters to the property owners about 2 weeks prior to cutting the brush. Phone calls and door hangars have been used in specific cases.

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		
8-mile on North Bonneville-Ross		Crown Zellerbach	No. 19890139, Christmas Tree Agreement. Tract No. MB-V-30.

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.

All the trees agreement listed above are in compliance.

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.

ORV use of the ROW from 157/2 to 158/1 is keeping low-growing vegetation from getting established and rutting the ROW roads. BPA is working with DNR to stop the use; gates are being locked, but are opened by the public.

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.

N/A

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							
895	145/3+825	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
745	145/7+675	No-nameCk.	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
897	148/1+0	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
900	148/2+0	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
970	148/2+900	No-Name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
900	149/3+350	No-Name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
1070	149/6+1000	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
800	152/3+0	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
2500	152/3+2400	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
885	154/2+815	No name Ck.	No	“	“	“	“	“
535	156/1+465	Ck.No name	No	Cut-Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
600	156/2+400	No-Name	No		“	“	100	“

800	156/4+600	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
300	157/1+0	N0-Name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
745	157/4+675	No name Ck.	No	“	“	“	“	“
800	158/1+650	No name ck.	No	“	“	“	“	“
1400	159/2+800	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
800	159/3+500	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
370	160/5+335	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
560	160/6+360	Little Washougal	Yes	Cut Stump	Garlon 3A	Spot	100	Selective Cutting

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		
560	160/6+360	Anadromous Fish	Selectively cut trees whose tops are within 50 feet of conductor at maximum sag within riparian zone. No herbicide within 100 feet of stream bank.
			No Bald eagles within ¼ mile buffers.

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		

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	Selectively cut trees whose height is greater than 20' in order to maintain a visual buffer on both sides of the freeway.

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		
			Ground disturbing activities will not be performed.

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		
145/3	145/1	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+825	145/3+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+212 5	145/3+ 895	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+550	145/4+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+399	145/5+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+451	145/6+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+675	145/7+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+115 0	145/7+ 745	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+175 0	145/7+ 1225	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
148/2 +970	147/7+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
148/4 +0	148/2+ 1250	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.

+700 0	148/5+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+350 0	149/3+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+170 0	149/3+ 900	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+100 0	149/6+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
151/2 +780	150/2+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
153/2 +200	152/3+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
154/2 +815	154/1+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+202 5	154/2+ 855	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+785	154/4+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
155/3 +400	154/4+ 875	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+465	156/1+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+130 0	156/1+ 535	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+675	157/4+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+215 0	157/4+ 745	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+165 0	158/1+ 800	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.

159/2 +800	159/1+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
159/3 +500	159/2+ 1400	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
160/5 +0	160/3+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
+360	160/6+ 0	Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
		Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.
		Steep Slope	100% ground cover of non-target vegetation will remain to protect soil stability.

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 25% Garlon 4 and 75% Forest Crop Oil (FCO). 50/50 Accord or Garlon 3A/Water for stump treatment in the riparian zones, Stubble treat structure sites and the right-of-way roads with 90% Water, 6% FCO, 3% Garlon 4 and 1% Tordon 22 K. Follow-up treatment-foliar application of the above chemicals as noted under stubble treatment, except FCO. Foliar treat Scotch broom.

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:

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 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.

Monitoring of the success of the brush-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

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 25% Garlon 4 and 75% FCO or 90% water, 3% Garlon 4 with Depo-RTU drift retardant. 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