

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: July 18, 2002

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA 90 Kitsap-Bangor No.1 and Olympia-Kitsap No. 3)

TO: Jim Jellison – TFO/Olympia

Proposed Action: Vegetation Management along the Kitsap-Bangor No. 1 115 kV from structure 1/1 through structure 14/7 and the Olympia-Kitsap No.3 230kV from structure 50/3 to 500 ahead of structure. Corridor width is 125 feet. The project area is located within Mason 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 corridors. The right-of-way will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Approximately one half mile of access roads will be cleared using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Tower sites will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Vegetation management is required for unimpeded operation and maintenance of the subject transmission line. 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.

Unwanted vegetation, reclaim trees and danger trees will be removed and/or controlled using selective and nonselective methods that will include hand cutting, mowing, and herbicidal treatment. All methods of herbicide treatment will be used (except aerial) dependent on site conditions/restrictions.

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

The subject corridor traverses both private and state lands; residential, rural, grazing and industrial forest land. No federal or tribal lands are involved.

Other 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.

Drinking Water Supply: A well and cistern were identified. See Sections 3.1 and 3.2 for a complete listing.

Drinking Water Supply Mitigation: No chemical application within a 100-foot radius of all wells and cisterns.

Aquatic Species: No threaten or endanger species have been identified. See Section 3.3 of the attached checklist.

Terrestrial Species (Bald Eagle): Two Bald Eagle nesting areas were found through BPA GIS and the Washington DNR Natural Heritage. The nesting areas are approximtaley 1500 feet right of the span between 8/1 to 8/3.

Terrestrial Species Mitigation (Bald Eagle):

- No vegetation management activity within .25 mile of the nesting site between January 1st. to August 15th. Unless State or Federal wildlife biologist has determined that the nest site to be unoccupied. No restrictions after August 15th.

4. *Determine vegetation control and debris disposal methods.*

Vegetation will be removed using manual, mechanical, and chemical methods. Debris will be disposed onsite 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 the threatened specie, bull trout, since the mitigation measures in place for this project are more protective of similar species (T&E salmonids) in identical working situations having previous findings of no affect. Therefore, no further NEPA or ESA documentation is required.

/s/ Mark A. Martin

Mark A. Martin
Environmental Protection Specialist

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

DATE: 07/22/2002

Attachment

cc:

L. Croff – KEC-4
T. McKinney – KEC-4
P. Key – LC-7
M. Hermeston – KEP-4
J. Meyer – KEP-4
J. Sharpe – KEPR-4
M. Martin – KEPR/Covington
M. Johnson – TF/DOB-1
D.Krauss – TFO/Olympia
S. Maritn – TFO/Olympia
G. Westling – TFOF/Olympia
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
Kitsap-Bangor No. 1 ADNO 8312	14 mi. 115kV	125	18 mi.
Olympia-Kitsap No. 3 ADNO 8330	50/3 to 50/4 230kV	125	1 span

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.

Danger Trees: Along the Olympia-Kitsap No.3 only, from 50/3 to 50/4

Right Of Way:

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

Transmission Structures – clearing around

Access Road clearing - approximate miles – 0.46 miles

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 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:

Where appropriate, follow-up chemical treatment to begin in the late summer of 2002.

Future cycles:

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.

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.

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

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
From	To		
1/4+200	3001000	City of Bremerton	Xmas Tree Agreement LU#930599
5/5+550	850	Greg Salo	Tree & Brush Agreement: LU#84058
11/1+450	11/2+200		Application of T&B Agreement
12/2+500	825	Michael Bachand	LU#91119 Hedge, Cherry Tree 15' ht. LU#83058 Fruit Orchard Agreement
14/2+0	750	Franz Schulxe-Oechtering	

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.

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.

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.

See handbook — Other Potentially Affected Publics for requirements and suggestions.

I have contacted Port Gable tribe near Kingston, WA. They are not aware of any cultural sites.

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
From	To							
2/3+850	1200	Ck No name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
2/4+375	550	Wetld.	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
3/2+765	835	Ck No name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
4/5+400	600	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
5/1+415	485	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
5/2+550	850	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
6/2+700	750	Pond	No	Cut Stump	Garlon 3A	Spot	100	Selective Cutting
10/7+515	585	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
11/4+615	685	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
11/5+215	285	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	Selective Cutting
11/5+500	700	Ck. No-name	No	Cut Stump	Garlon 3A	Spot	Waters Edge	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
From	To				
10/7+1000	1100	Well	Garlon 3A	164'	75' Rt edge of easement
11/5+525	525	Concert Cistern	Skip zone	164'	Located Rt edge of R/W

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		
8/2+0	7/4+0	Bald Eagle	Foliar/basal treat vegetation, no chainsaw operations. Seasonal restriction from Jan. 1 to August 15. Basal/foliar treat vegetation only.

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
From	To		
2/3+850	1200	Resident fish	Select cut trees whose tops are within 50' of the conductor at max sag. Fall trees away from creek channel.
4/5+400	600	Resident fish	Select cut trees whose tops are within 50' of the conductor at max sag. Fall trees away from creek channel.

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
From	To		
		N/A	

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
From	To		
1/1	14/7	Cultural sites	Port Gamble tribe does not know of any cultural sites on this transmission corridor. Upon discovery of any cultural sites, work stoppage in the vicinity will occur and the local tribe will be contacted as well as 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.

See Handbook – Steep/Unstable Slopes for requirements.

Span		Describe sensitivity	Method/mitigation measures
From	To		
		N/A	

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

See Handbook – Spanned Canyons for requirements.

Span		Methods, cutting
From	To	
		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, Herbicides for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
From	To	
1/1	14/7	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.

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. This treatment is utilized in backyards, active pastures and near busy highways.

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. This treatment is the predominantly utilized throughout the corridor.

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. This treatment is utilized primarily along access, right-of-way roads and structure sites.

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?
From	To			
		N/A		

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

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.

5.4 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