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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: June 19, 2001

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-15)

TO: Jim Jellison – TFO/Olympia
Natural Resource Specialist

Proposed Action: Vegetation management on selected sections of ROWs in the Ross-St. John and Ross-Carborundum transmission line ROWs. The ROWs include sections of the Ross-St. John 230Kv line; the Ross-Rivergate 230Kv line; the Ross-Alcoa 115Kv line; the Ross-Carborundum 115Kv line and the Clark PUD 115Kv line.

Location: The ROWs span sections of Vancouver Washington and Portland Oregon and are all located in the Olympia Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposed Action: BPA proposes to clear unwanted vegetation in the rights-of-ways and around tower structures that may impede the operation and maintenance of the subject transmission lines. Work also includes clearing of a small (<1/4 mile) section of access road. All work will be in accordance with the National Electrical Safety Code and BPA standards. See Section 1.1 of the attached checklist for detailed information on each section of the referenced transmission lines. BPA will conduct the vegetation control with the goal of removing tall-growing vegetation that is currently or will soon be a hazard to the transmission lines and where possible to promote 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 (FEIS) and Record of Decision (ROD).

Planning Steps

1. Identify facility and the vegetation management need.

The vegetation needing control is mainly Douglas Fir, Alder, and blackberries as indicated in Section 1.2 of the attached checklist.

The work involved in the ROW includes: clearing tall growing vegetation that is currently or will soon pose a hazard to the lines; treating the associated stumps and re-sprouts with herbicide to ensure that the roots are killed preventing new sprouts; and selectively eliminating tall growing vegetation before it reaches a height or density to begin competing with low-growing vegetation. All work will take place in existing rights-of-ways and around transmission structures. All work will be accomplished by selective vegetation control methods to assure that there is little potential harm to non-target vegetation and to low-growing plants. The work will provide system reliability and fire protection. Also, all off right-of-way trees that are potentially unstable and will fall within a minimum distance or into the zone where the conductors swing will be removed. Access roads will be treated using mowing and herbicide applications. The work will provide system reliability.

The subject transmission lines range from 115kV to 230kV and are made up of accompanying access roads, steel and wooden transmission line structures and associated switching platforms. The minimum clearance ranges from 21 feet for 115kV lines to 23 feet for 230kV lines. ROW easement widths vary along the length of the project. Vegetation control for this project is designed to provide a 3 year maintenance free interval.

In summary, the overall vegetation management scheme will be to selectively remove tall growing vegetation then apply selective herbicide treatment using cut stump applications.

2. Identify surrounding land use and landowners/managers.

The subject corridors traverse residential and urban lands as well as lands owned by the Cities of Vancouver and Portland. They are either all fee-owned, all easement or a combination of the two. Surrounding landowners and land managers were all contacted by mail and informed of the planned project. Those landowners with vegetation management agreements in place have also been contacted regarding their responsibilities for compliance with their agreements.

Other potentially affected agencies include the Grand Ronde Tribe because a portion of this project traverses ceded lands. The Tribe was contacted and there are no special concerns that affect the project. Coordination with the City of Portland has occurred regarding control of Canary Grass around the banks of Bybee and Smith Lake.

3. Identify natural resources.

There are three water resources that the project has the potential to affect. They include Cold Creek, Burnt Bridge Creek and Smith/Bybee Lake. Mitigation measures include the use of buffers as follows: No application of herbicides within 100 feet of any water body; between 100 to 200 feet of the water body "Accord" brand herbicide will be applied; further than 200 feet from water bodies "Garlon 4" brand herbicide will be applied. Herbicides will only be applied to cut stumps. The herbicides and buffer zones proposed for use for vegetation management on this project are consistent with what is specified in the Vegetation Management EIS. Section 3.1 of the attached checklist specifies herbicides, methods, application techniques and buffers used for particular instances of application.

Anadromous and resident fish species are present in the watersheds affected by this project. Avoidance/mitigation methods include maintenance of 50 to 100 foot shade/silt buffers along creek

and lake banks; selective cutting of only tall vegetation that would affect the transmission system; and no herbicide applicationwithin 100 feet of any water body.

Habitat for the Western Painted Turtle, a State of Oregon listed Sensitive Species, is located along one reach of the project. Herbicide application in this reach will be prohibited.

No other T&E/wildlife issues, visually sensitive areas, cultural resources or other natural resource issues have been identified along the other work corridors.

4. Determine vegetation control and debris disposal methods.

A licensed contractor will undertake the proposed work. The contractor will receive a list of required mitigation measures (management prescriptions) to follow that will identify potential sensitive resouce areas as well as a set of maps delineating the transmission line.

The unwanted vegetation will be removed by employing manual (hand cutting), mechanical and herbicide application methods. Chemical means will be employed to prevent resprouts of broad leaf species. Herbicides used will be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions consistent with the guidance outlined in the Vegetation Management EIS. Debris disposal methods will be by lop and scatter and mulching. Chipping will be done where needed. Section 4.1 of the attached checklist lists the proposed herbicides, methods of application, application techniques and buffers to be used.

5. Determine revegetation methods, if necessary.

No re-vegetation will be conducted at this time.

6. Determine monitoring needs.

An inspector will monitor the work being performed at the time of the initial work. A follow-up inspection will also be performed within one year to evaluate the effectiveness of the herbicide treatment on the target species.

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/ Joseph C. Sharpe for
Elaine Stratton
Environmental Protection Specialist - KEP

CONCUR: */s/ Thomas C. McKinney* DATE: 6/22/01
Thomas C. McKinney
NEPA Compliance Officer

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Environmental File – KEC (EQ-14)
Official File – KEP-4 (EQ-14)

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