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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: September 5, 2001

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-28)

TO: James Jellison - TFO/Olympia
Natural Resource Specialist

Proposed Action: Vegetation Management along the Port Angeles - Sappo No.1 Transmission Line ROW, from struture 1/1 to structure 42/10.

Location: The ROW is located in Clallum County, WA, all in the Olympia Region.

Proposed by: Bonneville Power Administration (BPA), Olympia Region.

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 line. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation. All work will be executed in accordance with the National Electrical Safety Code and BPA standards.

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 work involved will be to clear tall growing vegetation that is currently or will soon pose a hazard to the lines; treat the associated stumps and re-sprouts with herbicides, mow and treat access roads and structure sites. All work will take place in existing rights-of-ways.

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. The width of the ROW is 100 feet. 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.

The vegetation control is designed to provide a 3 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all trees using cut, lop and scatter and basal treatment or cut and chip methods as shown on the vegetation control prescription sheets.

Future cycles of work will involve the treatments used in the previous phases of work.

2. Identify surrounding land use and landowners/managers.

The subject corridor traverses generally mountainous terrain. The transmission line crosses both residential and rural properties, grazing land, industrial forsest land, and the Olympia National Forest and Department of Natural Resource lands. During routine patrols, tall encroaching trees and vegetation issues are identified and marked. If a danger or reclaim tree is identified as a potential threat to the integrity of the transmission line, appropriate action to remove the tree is taken. There are no landowner agreements.

3. Identify natural resources.

Water wells, spring, riparian, riparian T&E, potential Marbled Murrelet and Northern Spotted Owl habitat have been identified. Steep, moderately and level terrian have been identified in the areas of the proposed work. These areas have been tentatively identified during patrols and by using existing data sources. The Project Manager will positively identify the habitats as work progresses along the corridors. No other T&E/wildlife issues, visually sensitive areas, cultural resources or other natural resource issues have been identified along the other work corridor.

- Riparian and water supply wells. Refer to the attached vegetation checklist for location. All buffers as outlined in the vegetation FEIS are in effect.

- Riparian T&E areas:
    - Elwa River. All buffers as outlined in the Vegetation FEIS are in effect.

- Marbled Murrelet Critical Habitat areas from structures 4/7 to 5/7, 6/4 to 7/3, 8/3 to 9/3, 11/8 to 13/4, 16/2 to 18/2, 26/2 to 26/3, 28/3 to 33/6 and 37/3 to 38/1. Marbled Murrelet habitat has been identified to be within ¼ mile of the above listed spans. The below measures are appropriate for manual and mechanical tree removal and noise disturbance from all vegetation control activites. Herbicide use will require further consultation.
    - If a tree needing removal is greater than 80 cm (32 in.) in diameter at breast height and has suitable nest tree characteristics, initiate formal consultation with the USFWS.
    - During core breeding season, from April 1 – August 5, do not carry out maintenance activities, (e.g. chainsaw work) which produce noise above ambient levels within 0.25 miles of known marbled murrelet habitat or occupanacy.
    - During the late breeding season, from August 6 – September 15, do not carry out maintenance activities using motorized equipment within 0.25 miles of a marbled murrelet habitat or occupancy within two hours after sunrise and within two hours before sunset.

- Spotted Owl Critical Habitat between structures 25/5 to 37/4. Northern Spotted Owl habitat has been identified to be within ¼ mile of the above listed spans. The below measures are appropriate for manual and mechanical tree removal and noise disturbance from all vegetation control activites. Herbicide use will require further consultation.

    - Where opportunity exists, suspsend vegetation management activities within 0.25 miles of spotted owl critical habitat between March 1 and June 30, unless the owls are shown not to be nesting.
    - Examine any large trees (greater 11 in.) in diameter at breast height that need to be removed for evidence of spotted owls. If tree has evidence of owl nesting activity, conduct formal consultation with the USFWS.

- *In case of an emergency danger tree removal immediately examine the felled tree for evidence of owl nesting. If evidence is found, start emergency consultation with the USFWS, or, if the situation occurs during off-duty hours, conduct after-the-fact emergency consultation the next business day.*

- No culvert work and/or 'in stream' work is to take place without prior consultation with the appropriate government agencies and permits are in place.

See attached ROW vegetation checklist for treatment methods and planned herbicide use in all other non-critical areas.

Prior to the beginning of the work, the contractor will be provided with a set of the project maps, as well as with a list of management prescriptions from the Vegetation Management FEIS.

The herbicides used for vegetation management will be consistent with what is specified in the Vegetation Management FEIS.

4. Determine vegetation control and debris disposal methods.

Unwanted vegetation would be removed by employing cut-stump and follow-up stump treatment with Accord, Garlon 4. The chemical means would be employed to prevent resprouts from the cut stumps. 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 will be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions. The herbicide used will be consistent with Vegetation Management FEIS.

All riparian and riparian T & E buffer zones are in effect and will be strictly enforced as outlined in the Vegetation Management FEIS and as shown on attachment A and the attached vegetation checklist. Treatments on steep, moderate and level slopes will be consistent with the Vegetation Management FEIS and as shown on the attached checklist.

Work schedules as outline in the Vegetation Management FEIS is to be followed to accommodate the core and late breeding season of the Marbled Murrelet and Spotted Owl.

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 potential sensitive resource areas. The contractor will follow manufacturers' label instructions when applying herbicides.

5. Determine revegetation methods, if necessary.

Reseeding /replanting regimes have not been planned at this time.

6. Determine monitoring needs.

An inspector will monitor the work being performed at the time of the initial work. Follow-up inspections will be preformed during line patrols by the line crew and within one year by the NRS. Additional required work would be identified at that time.

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, unless Potential Spotted Owl Habitat is removed.

/s/ Mark A. Martin
Mark A. Martin
Physical Scientist – KEPR/Covington

CONCUR: */s/ Thomas C. McKinney* DATE: *9/5/2001*
Thomas C. McKinney
NEPA Compliance Officer

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

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(KEP-KEPR/COVINGTON-W:\EP\2000 & 2001 FILES\EQ\Eq-14\FEIS-0285-SA-28-PortAngeles-Sappo1_42.doc)

Attachment A

Zones	Treatment Alternatives
Riparian	**RIPARIAN**: 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. No mechanical treatments. **Herbicides**: Within 100 ft. of a stream, only cut-stump and localized treatments using practically toxic or Slightly toxic formulations of glyphosate, imazapyr, and Escort can be used up to the waters edge. Highly Toxic and very highly toxic (to fish) herbicides will not be used in this zone. Triclopyr (Garlon 4) may be used only more than 200 ft. from streams or water.
Riparian T&E	**RIPARIAN SALMON**: BPA, county, or private lands, within 122 m (400 ft.) of a listed salmon stream. Available: all manual, spot and localized herbicide, and biological treatments, except grazing. No mechanical treatments. **Herbicides**: No herbicides within 200 feet from the water edge.. From 100 to 400 feet away for stream or water, Escort, clopyralid, imazapyr, practically toxic or Slightly toxic formulations of glyphosate, and triclopyr (Garlon 3A) can be used. Highly Toxic and very Highly toxic (to fish) herbicides will not be used in this zone. Glyphosate, and triclopyr (Garlon 3A) can be used. Highly Toxic and very Highly toxic (to fish) herbicides will not be used in this zone.
STC	Any areas in the corridor with greater than 38.1 m (125 ft.) vertical distance between the ground surface and transmission lines. Here, removal is periodically required only of individual trees (single tree cuts) that could encroach into the transmission corridor danger zone. **Herbicides:** None.

Zones	Treatment Alternatives
SS	BPA Fee owned US Forest, State DNR, or private lands where a steep slope or visual resources precludes mechanical treatments. Available: all manual, mechanical treatments using track mowers on slopes up to 60%, mowing equipment such as the Spyder (trade name) can be used on slopes up to 90% - 100% and biological treatments, all access roads and structure sites may also be mowed. All herbicide treatments except for cut-stubble treatment following a mechanical treatment. **Herbicides:** glyphosate, triclopyr (Garlon 3A and 4), imazapyr, dicamba may be prescribed for cut-stump, stem-injection, and basal-stem treatments. In addition to the above herbicides, Escort, and clopyralid can be used spot foliar and broadcast treatments. 2,4-d amine can be added to the list to control noxious weed species.
LT	LEVEL TERRAIN: BPA, county, or private lands where the ROW is Fairly flat and level. There are minimal environmental and treatment restrictions. Available: all manual, mechanical (when conditions make it feasible), and biological treatments: all herbicide treatments spot, localized, and broadcast treatment including cut-stubble treatment following a mechanical treatment where suitable. **Herbicides:** glyphosate, triclopyr (Garlon 3A and 4), imazapyr, dicamba may be prescribed for cut-stump, stem-injection, and basal-stem treatments. In addition to the above herbicides, Escort, and clopyralid can be used spot foliar and Broadcast treatments. 2,4-d amine can be added to the list to control Noxious weed species.