

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: November 9, 2001

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-31)

TO: James Jellison - TFO/Olympia
Natural Resource Specialist

Proposed Action: Vegetation Management along the Fairmount – Port Angeles line 1 & 2 from structure 1/1 to 27/8 both lines describe the same segment of ROW.

Location: The ROW is located in Jefferson and Clallam County, WA, located within BPA's 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 lines and access roads, including Reclaim and Danger Trees. 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. Brush cutting will begin in November 2001 work on the Danger Tree will begin January 2002. Follow-up chemical treatment is planned to begin in the late spring of 2002.

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). The Planning steps are described in the attached checklist. See checklist.

- Vegetation herbicide treatments on sprouting-types of species ensure that the roots are killed. Prevention of resprouts encourages low-growing plant communities to establish themselves and flourish on the right-of-way.
- Mike McHenry (Lower Ellwa Tribe) was contacted to identify cultural sites on the Port Angeles-Sappho transmission line (adjacent to the Fairmount–Port Angeles line). Mike stated that the cultural sites are along the Straits of Juan De Fuca and are not located inland near BPA's transmission lines.
- Treatments on steep, moderate and level slopes will be consistent with the Vegetation Management FEIS and as shown on the attached checklist.

- Riparian T&E areas:
100'-200' buffers for the Esu listed Bull Trout and Salmon streams and rivers are in effect as outlined in the Vegetation Management FEIS. See attached checklist. Work will not occur during the seasonal restrictions for the Spotted Owl and Marbled Murrelet.
- Water resources (streams, rivers, and water wells) will be protected with 100-foot buffers combined with the spot application of Garlon 4 and Accord (herbicides are consistent with Vegetation Management FEIS; Practacly non-toxic with low potential for surface runoff).
- No 'in stream' work is to take place without prior consultation with the appropriate government agencies and permits are in place.
- Herbicides will be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions.
- Reseeding /replanting regimes have not been planned at this time. Low growing aggressive vegetation within the Right Of Way can naturally dominate with the elimination of tall growing vegetation.

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 or Marbled Murrelet habitat is removed.

For /s/ Joseph Sharpe _____
John Howington
Physical Scientist – KEPR-4

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

DATE: *11/13/01* _____

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 and Acreage of Treatment
Fairmount-Port Angeles No. 1 & 2	27 miles, 230Kv	225	27 miles , 724.6 acres

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

Transmission Structures – clearing around

Access Road clearing - approximate miles – **Fill-in**

Wood Poles - fire protection clearing

Reclaim (“C”) Trees

Danger Tree clearing

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

Low Density (50 stems or less per acre)

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 — **Promoting Low-Growing Plant Communities** 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 trees and brush to be cut and chemically treated to prevent grow-into trees into the lines on the corridor. Access, right-of-way roads and structure sites are to be cut and treated. The danger trees will be cut that is adjacent to the Fairmount-Port Angeles No. 1 & 2 lines. Danger and “C” trees contract work is to begin January 1, 2002 and the brush cutting will begin November. Follow-up chemical treatment to begin in the late spring of 2002.

Subsequent entries – Every 3-4 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
- DNR
- USFS-Quilcene R.S.

Describe method for notifying right-of-way landowners and requesting information (i.e., doorhanger, 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 will send letters to the property owners 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/landuse 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		
12/6	12/6 427'AH	Keith Emerson	LU#80102
12/7	13/4 90'AH	Thomas Finnerty	LU#91117 (Rescinded)
13/4 250' AH	13/5 200'AH	Edward Mildenberger'	LU#81132
13/5 AH 200'	13/6 AH 70'	Louis Williams	LU#80098

Span		Landowner/use	Specific measures to be applied
To	From		
18/6 AH250'	18/9'	Robert Provenzano	LU#59600
19/1 AH350	19/4 AH250'	Duane Cole	LU#79013
19/6 AH450'	19/8	Dalton Garing	
20/3 AH500'	20/4	Miner	LU#82159 Application. In process
25/6 AH300'	25/6 AH 350'		Application in process

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 tree agreements 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.

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 contacted Mike McHenry. Lower Ellwa Tribe regarding cultural sites when identifying sites on the Port Angeles-Sappho transmission line. Mike said, that the cultural sites are not located inland near BPA's transmission lines.

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		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
1/2	1/1 + 200	Snow Creek	Yes	Hand/Sel	Garlon 3A/Accord	Spot appl.	100'	Trees fallen away from creek
1/10+ 200	1/10	Unnamed Creek	No	Hand/Sel.	Garlon 3A/Accord	Spot appl.	100'	Trees fallen away from creek.
2/1	2/1+100	Salmon Creek	Yes	Hand/Sel.	Garlon 3A/Accord	Spot appl.	100'	Trees fallen en away from creek
2/4+450	2/4 +200	Salmon Creek	Skip	N/A	N/A	N/A	N/A	N/A

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
2/8+700	2/8+500	Wetlands.	No	Hand/Sel.	Garlon 3A/ Accord	Spot Appl.	100'	Trees fallen away from creek.
5/3+450	5/3+250	Unnamed Creek	No	Hand/Sel.	Garlon 3A/ Accord	Spot Appl.	100'	Trees fallen away from creek.
8/3+675	8/3+475	Unnamed Creek	No	Hand/Sel.	Garlon 3A/ Accord	Spot Appl.	100'	Trees fallen away from creek.
8/5+200	8/5	Dean Creek	No	Hand/Sel.	Garlon 3A/ Accord	Spot Appl.	100'	Trees fallen away from creek.
10/9+200	10/9	Johnson Creek	Yes	Hand/Sel.	Garlon 3A/ Accord	Spot Appl	100'	Trees fallen away from creek.
14/4+100	14/4	Irrig. Ditch	No	Hand/Sel.	Garlon 3A/ Accord	Spot Appl	100'	Trees fallen away from creek.
14/4+550	14/4+100	Dungeness River	Yes	Hand/Sel	Garlon 3A/ Accord	Spot Appl	100'	Trees fallen away from creek.
15/4+400	15/4+200	Bear Cr	Yes		G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
17/2+715	16/8+536	Wetland	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
18/2+500	18/2+300	Wetland.	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
19/6+600	19/6+250	Pederson Creek	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
21/1+300	21/1+200	Seibert Creek	Skip	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
21/8+550	21/8+450	Pond	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
22/6+400	22/9+200	Unnamed Creek	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
23/1+700	23/1+500	Bagley Creek	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
25/2+600	25/2+400	East Fork Less Creek	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
25/7+350	25/7	Unnamed Creek	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
26/4+475	26/4	Unnamed Creek	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
26/5+550	26/5+350	Ennis Cr	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
27/1+525	27/1	Wetlands.	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.
27/4+400	27/4+200	White Creek	No	Hand/Sel	G 3A/ Acd	Spot Appl	100'	Trees fallen away from creek.

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				
10/8+450'	10/8+450'	Well/Pump House	Garlon 3A/ Accord	100'	450' AH Lt Well/PumpHouse
11/5+475	11/5+475	Well	Garlon 3A/ Accord	100'	475' AH Lt edge of R/W
13/4+500	13/4+500	Well/Pump House	Garlon 3A/ Accord	100'	500' AH Lt Well/PumpHouse

Span		Well/irrigation/ or spring	Herbicide	Buffer	Other notes/measures
To	From				
24/4	24/4	Well	Garlon 3A/accord	100'	Between towers Well/PumpHouse

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		
½	1/1	Salmon/Bull Trout	Selective cutting within riparian zone, no herbicide w/in 100' of stream bank. 100-200' AH Accord/Garlon 3A is selectively used on cut stumps.
2/1+945	2/1+100	Salmon/Bull Trout	Selective cutting within riparian zone, no herbicide w/in 100' of stream bank. 100-200' AH Accord/Garlon 3A is selectively used on cut stumps
2/4+450	2/4+200	Salmon/Bull Trout	Skip
5/9	5/3	Spotted Owl	No cutting during the seasonal restriction from March 1 to July 15.
8/6	6/8	Marble Murrelet	No cutting during the seasonal restriction from April 1 to August 5.
10/6	8/9	Marble Murrelet	
14/4+500	14/4+100	Salmon/Bull Trout	Selective cutting within riparian zone, no herbicide w/in 100' of stream bank. 100-200' AH Accord/Garlon 3A is selectively used on cut stumps
15/4+400	15/4+300	Salmon/Bull Trout	Selective cutting within riparian zone, no herbicide w/in 100' of stream bank. 100-200' AH Accord/Garlon 3A is selectively used on cut stumps
24/5+1775	24/5+550	Salmon/Bull Trout	Skip

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		
5/9+150	5/8+330	Survey & Management	The USFS has determined that surveys are not required due to right-of-way management objectives and individual trees being treated.

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		
24/5+1775	24/5+550	Four Seasons Park for Motorcycles	Selectively cut trees whose tops are within 50 of the conductor at max sag. The debris is lopped.

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		
			Avoidance of all known cultural sites.

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		
6/8	6/2	Steep Slope	Hand cut veg. and selective applic. of the herbicide.

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

See Handbook – Spanned Canyons for requirements.

Span		Methods, cutting
To	From	
6/8+2000	6/8+300	Skip
24/5+1775	24/5+550	Skip

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
To	From	
1/1	27/8	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..

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 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.)

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 inspectors 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 the Fairmount-Port Angeles transmission lines are 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