memorandum

DATE: April 18, 2001

REPLY TO ATTN OF: KEP-4

- SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-07)
 - TO: Bill Erickson TFP/Walla Walla Natural Resource Specialist

<u>Proposed Action</u>: Vegetation Management on section of three ROWs. The ROWs include selected sections of the McNary Powerhouse, the present and proposed new sections of the McNary-Roundup and the McNary Switchyard South Transmission lines.

Location: All ROW are located east Umatilla, OR., all being in the Walla Walla Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposed Action: BPA proposes to clear unwanted vegetation in the rights-ofways and around tower structures that may impede the operation and maintenance of the subject transmission lines. All work will be in accordance with the National Electrical Safety Code and BPA standards. See Section 1.1 of the attached checklist for pertinent information on each section of referenced transmission line. BPA would 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 to promote low-growing plant communities in the right-of-way and to clear vegetation from new rightsof-way corridors.

<u>Analysis</u>: 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 herbicide to ensure that the roots are killed preventing new sprouts and selectively eliminate 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, along new rights-of-way access road corridors, around steel transmission structures and around wooden poles and switching platforms. 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, issues associated with the work that will occur along the new Capline section of the McNary-Roundup transmission line corridor have identified and an EIS is being developed to address those issues.

The subject transmission lines range from 115kV to 500kV and are made up of accompanying access roads, steel and wooden transmission line structures and associated switching platforms. The minimum clearance ranges from 15 feet for 115kV lines to 30 feet for 500kV lines. Vegetation control occurring in the action is designed to provide a 5-15 year maintenance free interval. The vegetation needing control are mainly deciduous trees as indicated in Section 1.2 of the attached checklist.

The overall vegetation management scheme will be to initially clear and remove all trees using manual and mowing methods and then re-seed disturbed areas with adapted grasses if needed. Subsequent work will include selective herbicide treatment using spot treatments, cut stump applications and localized applications. Future cycles of work will involve the treatments used in the subsequent phase of work.

2. Identify surrounding land use and landowners/managers.

The subject corridors traverse residential, rural, agricultural and Federal lands. They are either all fee owned, all easement or a combination of the two. During routine patrols, tall, encroaching trees and vegetation issues are identified and marked. Since the area is sparsely populated, the appropriate landowner is easily identified and personal contact occurs. The appropriate landowner is then contacted for follow-up action.

The U.S. Army Corps of Engineers (COE) manages Federal lands along the transmission line corridor. The majority of this land is located downstream of McNary Dam. The transmission lines there cross over wildlife parks and wooded areas managed by the agency. There are tall tree issues associated with the 230kV lines. The COE is under agreement #930383 to maintain the trees in that area. Discussions have taken place with the agency and a strategy for removal, treatment and replacement has been identified.

If work is to be performed, the project manager will notify specific landowners when the contractor's crews will be in their area.

3. Identify natural resources.

Associated wildlife issues may arise in areas of COE responsibility, but those issues are being addressed as part of the work agreement between the agency and BPA.

Circle irrigation systems are prevalent in the areas along the other transmission line corridors. The irrigation systems are served by water wells. Isolated wetlands have also been identified along the various transmission line corridors and have been mostly formed as a result of the collection and ponding of irrigation waters. These areas have been tentatively identified, but will be positively identified by the Project Manager 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 corridors.

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

The transmission lines also cross mainly arid lands. Small ditches may be present. Vegetation Management activities will be conducted only in those areas that have vegetation causing direct impedance to the proper operation of the transmission line.

The herbicides used for vegetation management will be consistent with what is specified in the VEG EIS. Section 3.1 of the attached checklist specifies herbicides, methods, application techniques and buffers used for particular instances of application.

4. Determine vegetation control and debris disposal methods.

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

The only herbicide label for use on wetlands would be used on near wetlands. Herbicides: labeled for wetlands include, 2,4-d, tryclopyr, glyphosate, imazapyr, and Escort.

In areas adjacent to water, Rodeo, Accord, Garlon 3A, and Imazapyr are practically non-toxic to freshwater fish, and can be applied up to the waters edge using spot or localized application techniques.

A 35 foot buffer from water is required for Garlon 4

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.

The corridor sites are composed mostly of sandy soils with an annual average rainfall of 6 to 9 inches. This should be sufficient to support the plant growth.

Disturbed areas will be re-seeded. The optimum native grass mix would be: 40% Needle and Thread; 20% Bluebunch Wheatgrass; 30% Thickspike Wheatgrass; and 10% Indian Ricegrass. The mixture would be seeded and a pure live seed rate of 30# per acre. Any of these grasses can be seeded at 30#/acres (un-mixed) as a second alternative to sites on the right-of-way.

Follow-up investigations and re-seeding if necessary will occur in early spring and late fall periods.

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 routine regular patrols. 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.

<u>/s/ Ken Hutchinson</u> Ken Hutchinson Environmental Scientist - KEPR

CONCUR: <u>/s/ Thomas C. McKinney</u> Thomas C. McKinney NEPA Compliance Officer DATE: <u>4/23/01</u>