

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: August 15, 2002

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-100)

TO: Joe Johnson
Natural Resource Specialist
TFS/Kalispell

Proposed Action: Vegetation Management along the Libby-Conkelly, 1/2 to 26/4 Transmission Line ROW. The line is a 230kV Double Circuit Transmission Line having an easement width of 125 feet to 250 feet. The proposed work will be accomplished in the indicated sections of the transmission line corridor.

Location: The ROW is located in both Lincoln and Flathead County, MT, being in the Spokane 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 line. All work will be in accordance with the National Electrical Safety Code and BPA standards. 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.

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 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 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.

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. 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. Desirable low-growing plants will not be disturbed. The work will provide system reliability.

The vegetation control is designed to provide a 10-year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all tall growing brush utilizing machine and hand cutting methods as outlined in the attached checklist.

Future cycles - As tall growing species are controlled, a 10-year entry treatment will be needed. Also a review of Danger trees and other hazards will take place at that time.

2. *Identify surrounding land use and landowners/managers.*

The subject corridor traverses USFS, State and large timber company 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. Landowners were notified of the upcoming work by telephone. All issues seem to be resolved at this time.

3. *Identify natural resources.*

Several water resources (i.e. creeks) have been identified between spans 4/4 to 5/1, 9/1 to 9/2, 16/3 to 16/4, 17/1 to 18/2, 22/2 to 22/3, and 23/2 to 23/3 and 26/3 to 26/4. Threatened and Endangered (T&E) wildlife/plant issues, visually sensitive areas, cultural resources or other natural resource issues have been identified and addressed along the work corridor.

A Biological Assessment (BA) and a Cultural Resource Survey for the fiber optic project along the Noxon-Kalispell corridor was prepared last year. The Libby-Conkelly line was included in the BA as well as the cultural resource survey since it was part of the fiber optic project. The following T & E species were identified as potentially being in the project area:

Bald Eagle

Bald Eagles primarily occur in the area during the winter season. No loss of bald eagle habitat or prey items is anticipated. There would be no vegetation management activities during the wintering bald eagle season. There are no known nests within ¼ mile of the project area.

Gray Wolf

No loss of wolf habitat or prey items is anticipated. According to the U.S. Fish and Wildlife Service (2001) wolf packs that may use the power line corridors in this area are resilient to disturbance. There are no known wolf denning sites in the project area and the project would occur outside of the denning season.

Grizzly Bear

The treatment areas are outside the Grizzly Bear management units. No loss of grizzly bear habitat or prey items is anticipated. There are no known grizzly bear denning sites in the project area.

Canada Lynx

Canada lynx are rarely found in open fields or meadows, such as those associated with transmission lines, therefore impacts directly related to vegetation management activities are considered unlikely. No loss of Canada lynx habitat or prey items is anticipated. There are no known lynx denning sites in the project area.

Bull Trout

Bull Trout are known to inhabit Wolf Creek and Fisher Creek as identified by the Montana Fish, Wildlife and Parks database. These creeks traverse spans 17/1 to 18/2 and 26/3 to 26/4, respectively. A 35-foot buffer is to be maintained along these waterways and other potential fish bearing waterways during all vegetation management activities to avoid disturbing any potential fish habitat. Vehicles are to be kept away from water channels to minimize erosion and sedimentation of waters. Standard erosion control practices would be employed if necessary to prevent sedimentation of waters.

Ute Ladies Tresses

This plant species is located in wetland areas that range from 4,350 feet to 4,800 feet in elevation. If vegetation management is necessary in proximity to any wetland areas within this elevation range, consultations with the USFS should be conducted prior to performing any vegetation management work.

Cultural Resources

No cultural resources were identified as a result of the background research and three field surveys that were conducted. Any vegetation management work performed is expected to have “no effect” on cultural resources.

Issues concerning wildlife, fish, plants and cultural resources have been addressed and work within the project corridor is not expected to affect any listed species or impact cultural resources. If archaeological material is discovered during the course of vegetation management activities, all work will be halted and a professional archaeologist will be notified.

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 EIS.

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 selective cutting methods along selected spans of the right-of-way.

Debris will be disposed by:

Chip – Mechanical brush disposal unit cuts brush into chips 4 inches or less in diameter and spread over the 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 axe 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.

Mulched – Mulching is a debris treatment that falls between chipping and lop and scatter. The debris is cut into 1 to 2 foot 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.

NOTE: Mulching will be the preferred method for debris disposal.

5. Determine revegetation methods, if necessary.

No revegetation will be conducted at this time due to very low ground disturbance, equipment to be power washed to prevent the spread of weeds.

6. Determine monitoring needs.

No follow-up monitoring will occur.

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/ Michael A. Rosales

Michael A. Rosales

Environmental Protection Specialist - KEPR

CONCUR: /s/ Thomas C. McKinney

Thomas C. McKinney

NEPA Compliance Officer

DATE: 08/19/2002

Attachments

cc:

L. Croff- -KEC-4

T. McKinney – KEC-4

K. Nakata – DOE/EH-42

M. Hermeston – KEP-4

J. Meyer – KEP-4

M. Rosales – KEPR/Bell-1

J. Sharpe – KEPR-4

P. Key – LC-7

M. Johnson – TF/DOB-1

J. Lahti – TFS/Bell-1

D. Hawkins – TFS/Kalispell

M. McCracken – TFSU/Kalispell

Environmental File – KEC (EQ-14)

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
Libby-Conkelly	65 miles/230kv	125' to 250'	25 miles

1.2 Describe the vegetation needing management.

Vegetation Types:

Douglas Fir

Pine

Poplar

Cottonwood

Density:

Medium (50 – 250 stems/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.

Vegetation that will grow tall will be selectively eliminated *before* it reaches a height or density to begin competing with low-growing species.

Desirable low-growing plants will not be disturbed. Only selective vegetation control methods that have little potential to harm non-target vegetation will be used.

1.4 Describe overall management scheme/schedule.

Initial entry – Tall growing vegetation will be cut this summer

Subsequent entries – No follow up will be needed

Future cycles – 10+ years

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

USFS, State, and large timber companies

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.

Landowners will be notified by telephone

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.

Span		Landowner/use	Specific measures to be applied
To	From		
½	1/3	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
1/3	2/3	State of MT	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
2/3	3/5	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
3/5	4/4	Kootenai National Forest	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
4/4	5/3	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary – Creek between 4/4 and 5/1, will leave as much cover as possible.
5/3	12/2	Kootenai National Forest	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary – Creek between 9/1 and 9/2, will leave as much cover as possible.
12/2	13/2	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
13/2	14/2	Kootenai National Forest	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
14/2	16/4	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary – Creek between 16/3 and 16/4, will leave as much cover as possible
16/4	17/1	State of MT	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
17/1	18/2	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
18/2	19/2	State of MT	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary

19/2	20/4	Kootenai National Forest	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
20/4	21/3	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
21/3	22/3	Kootenai National Forest	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary
22/3	26/3	Plum Creek	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary – Creeks between 22/3 - 22/4, and 23/2 – 23/3, will leave as much cover as possible
26/3	26/4	Big Meadows Grazing Assoc.	Machine/Hand Cut all tall growing brush, chip and/or machine mulch as necessary

2.3 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.

None in this area

2.4 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.

None known

2.5 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.

None known

3. IDENTIFY 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.

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
4/4	5/1	Creek	No	Cutting	None	None	35'	
9/1	9/2	Creek	No	Cutting	None	None	35'	
16/3	16/4	Creek	No	Cutting	None	None	35'	
17/1	18/2	Stream	Yes	Cutting	None	None	35"	Bull trout

22/2	22/3	Creek	No	Cutting	None	None	35'	
23/2	23/3	Creek	No	Cutting	None	None	35'	
26/3	26/4	Stream	Yes	Cutting	None	None	35''	Bull trout

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).

No herbicides will be applied

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.

A Biological Assessment (see attached) was conducted for the Noxon-Kalispell corridor. This corridor also includes the Libby-Conkelly line. The following is a list of T&E species potentially present in the project area and the avoidance measures to the insure T&E species are not impacted by work related activities.

T&E Species	Method/mitigation or avoidance measures
Bald Eagle	No known eagle nests are present in the project area.
Gray Wolf	No known wolf denning sites in the project area.
Grizzly Bear	No known bear denning sites in the project area.
Canada Lynx	No known lynx denning sites in the project area.
Bull Trout	Use standard buffer of 35 feet from all water bodies.
Ute Ladies' Tresses	Avoid disturbing wetland habitats where plant species may be present.

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.

Measures
See attached Biological Assessment for further discussion.

3.5 List any visually sensitive areas and the measures to be taken at these areas.

Method/mitigation measures
See Section 2.3

3.6 List areas with cultural resources and the measures to be taken in those areas.

A cultural survey was completed in 2001 for the fiber project along the Noxon-Kalispell corridor. This corridor also includes the Libby – Conkelly line. The cultural survey determined that there were no cultural resources present along the Noxon-Kalispell corridor. Any vegetation management work performed will have no effect on cultural resources. If archaeological material is discovered, work will be halted and an archaeologist notified.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.

Method/mitigation measures
No machine cutting will be permitted on slopes greater than 20%. Only selected trees will be taken on steep slopes. Most of r/w has less than 5-10% slopes

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

Methods, cutting
No vegetation will be cut where ground clearance is greater than 90' from the wire. Some trees may have to be removed for fiber insulation.

4. DETERMINE VEGETATION CONTROL METHODS

4.1 List Methods that will be used in areas not previously addressed in steps above.

Methods
Machine cutting/mulching where possible, hand cutting where machine cutting/mulching cannot be used

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

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.)

NOTE: Mulching will be the preferred method for debris disposal.

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

No reseeding/replanting will be necessary due to little or no ground disturbance.

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

No reseeding/replanting will be necessary.

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

No reseeding/replanting will be necessary.

6. DETERMINE MONITORING NEEDS

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

None needed

6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.

N/A

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

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”.

No other known potential impacts.

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

No known additional documentation needed.