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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: May 15, 2001

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-11)

TO: Donald F. Atkinson - TFN/Snohomish
Natural Resource Specialist

Proposed Action: Vegetation Management along the Covington-Maple Valley No. 2 Transmission Line ROW. The line is a 345kV Single Circuit Transmission Line having an easement width of 150 feet. The proposed work will be accomplished in selected sections along the entire transmission line corridor.

Location: The ROW is located in King County, WA, being in the Snohomish 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. Also, access road clearing will be conducted. 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 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 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.

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. The work will provide system reliability.

Access roads will be treated using mowing and herbicide applications.

The vegetation control is designed to provide a 5-15 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all trees using cut, lop and scatter methods. Chipping will be done where needed. Subsequent work will include cut stump applications using Garlon 3A and 4. See Attachment A for treatment zone methods and planned herbicide use.

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 residential, rural, grazing lands, and urban areas. 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. The landowner is notified using door hangers, phone calls and one on one meetings. If the landowner chooses not to remove the tree, BPA will remove the tree.

Notification will be given prior to the beginning of any work.

3. Identify natural resources.

Some riparian and riparian T&E streams have been identified in the areas of the proposed work. Also, some wells and wetlands have been identified in the proposed work area. These areas have been tentatively identified during patrols and by using existing data sources. They 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 corridor. See Attachment A for treatment zone methods and planned herbicide use in these 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 EIS.

The transmission line corridor may traverse the City of Renton's Sole Source Aquifer Protection Area. The City of Renton's Aquifer Protection Officer will be notified prior to the application of any herbicides in the protection area.

The herbicides used for vegetation management will be consistent with what is specified in 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 cut, lop and scatter methods, chipping and mulching where needed and

follow-up stump treatment with Garlon 3A and 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 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 Vegetation Management EIS.

Treatments on the spanned canyons will consist of single tree cutting and will be consistent with that outlined in the Vegetation Management EIS and as shown on Attachment A.

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.

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. 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.

/s/ Mark A. Martin
Mark A. Martin
Environmental Scientist - KEPR

CONCUR: */s/ Thomas C. McKinney* DATE: *5/15/01*
Thomas C. McKinney
NEPA Compliance Officer