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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: June 6, 2001

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-13)

TO: James Jellison - TFO/Olympia Region – Natural Resource Specialist
Bill Erickson – TFP/Walla Walla Region - Natural Resource Specialist

Proposed Action: Vegetation Management along the Naselle Tarlett #1 and #2 transmission line Right of Way (ROW).

Location: The ROW is located in Pacific County, WA, Olympia 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. Areas will be replanted or reseeded with low-growing vegetation. Desirable low-growing plants will not be disturbed. 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 easment varies from 85 to 200 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.

Access roads will be treated using mowing and herbicide applications.

The vegetation control is designed to provide a 3-8 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all trees using cut, lop and scatter methods. Subsequent work will include the treatment of mowed areas with herbicides in the fall of 2001. See Attachment A for treatment zone methods and planned herbicide use.

Future cycles of work will involve basal treatments or tree cutting. During routine patrols, the ROW will be examined for edge and danger trees with appropriate actions taken.

2. Identify surrounding land use and landowners/managers.

The subject corridor traverses rural, agricutural, grazing lands industrial forest lands, other federal lands (Fish and Wildlife Service) and state, city and county lands of the Long Beach Watershed and the Department of Natural Resources. During routine patrols, tall, encroaching trees and vegetation issues are identified and marked. Notification letters were sent to landowners along the right-of-way. The letters outlined cutting methods and anticipated herbicide use. Personal contact with landowners has occurred. Personal contacts have also occurred with the City of Long Beach due to their watershed issues along the ROW. Prior to any work being preformed, the project manager will make an effort to notify specific landowners when the contractor's crews will be in their area.

3. Identify natural resources.

Many riparian, wetlands and non-herbicide use areas have been identified in the proposed work area. These areas have been tentatively identified during patrols and by using existing data sources. As work progresses the project manager will positively identify these areas. No threatened or endangered salmon issues have been identified in the work area.

Sensitive habitat for the Marbled Murrelet, a federally listed threatened and endangered species has also been identified within the corridor. Refer to attachment B for methods, mitigation or avoidance measures concerning the Marbled Murrelet. Until the consultation with the U.S. Fish & Wildlife has been completed no application of herbicide may be applied to the T&E habitats.

Steep slopes and spanned canyons are present along the subject transmission line ROW. 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 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 mulching, lop and scatter methods and follow-up stump treatment with Garlon 3A and 4, imazapyr and dicamba to prevent resprouts from the cut stumps. In addition to the above herbicides, Escort, and clopyralid can be used for spot foliar and broadcast treatments. 2,4-d amine can be added to the list to control noxious weed 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 manufactures' label instructions and BPA's management prescriptions. All herbicide use will be consistent with the guidance outlined in the Vegetation Management EIS.

Treatments on the steep slopes and spanned canyons will be consistent with that outlined in the Vegetation Management EIS and as shown on Attachment A.

5. Determine revegetation methods, if necessary.

Smooth Brome 70%/Alfalfa 30% non native for sites that need a sod forming grass to reduce re-evasion of trees and alfalfa to consume nutrient load from sludge disposal by the City of Long Beach.

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/ John .W Howington
John W. Howington
Environmental Protection Specialist – KEPR

CONCUR: */s/ Thomas C. McKinney* DATE*: 6/7/2001*
Thomas C. McKinney
NEPA Compliance Officer

Attachment A

Zones	Treatment Alternatives
SS	BPA Fee owned, State DNR, or private lands where a steep slope or visual resources precludes mechanical treatments. Available: all manual and biological treatments; 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.
LVW	LONG BEACH WATERSHED **Sludge Area**: BPA, county, city, or private lands where the ROW is Fairly flat and level and is located in the City of Long Beach watershed. Available: all manual, mechanical, and biological treatments: all herbicide treatments spot, localized, and broadcast treatment including cut-stubble treatment following a mechanical treatment where suitable. The goal is to transform these areas from a heavy brush condition to a grass area for city sludge disposal. The site will be mowed in the summer of 2001, with a follow-up herbicide spot treatments to control re-sprouting species. The site will be seeded to a grass and alfalfa mixture after mowing. Follow up treatments will be required to maintain the grasses as the dominant species on the site. **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.
STC/SKIP	Any areas in the corridor with greater than 38.1 m (125 ft.) vertical distance between the ground surface and transmission lines. Skip areas are areas of lowland estuaries where trees generally cannot grow. **Skip areas need to be checked for tall growing trees to make sure line is safe for operation.** Here, removal is periodically required only of individual trees (single tree cuts) that could encroach into the transmission corridor danger zone. **Herbicides:** None.

Attachment B

Span		T&E Species	Method/mitigation or avoidance measures
To	**From**		
3/2 +40	5/2	Marbled Murrelet	▪ **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) that produce noise above ambient noise levels, within 0.4 km (0.25 mi.) of known marbled murrelet habitat or occupancy (based on marbled murrelet maps).** ▪ **During the late breeding season, from August 6 - September 15, do not carry out maintenance activities using motorized equipment within 0.4 km (0.25 mi.) of marbled murrelet habitat or occupancy within two hours after sunrise or within two hours before sunset.** ▪ **If planning herbicide use in marbled murrelet habitat, further consultation with US Fish & Wildlife is required. (NOT COMPLETED 5/01)**
14/8	15/11	Marbled Murrelet	▪ **#2 line**