

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: June 6, 2003

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-162-Libby-Troy)

TO: Joe Johnson
Natural Resource Specialist-TFS/Kalispell

Proposed Action: Vegetation Management for the Libby-Troy section of the Libby-Bonnors Ferry Transmission Line ROW. The line is a 115 kV Single Circuit Transmission Line with 100 foot easement width. Approximately 5 miles of transmission line corridor will be treated using selective vegetation management methods as identified in the attached checklist.

Location: The ROW is located in Lincoln County, Montana being in the Spokane Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to clear unwanted vegetation in the rights-of-ways and around transmission line 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.

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 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 3-4-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 3-4 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 and any mitigation.*

The subject corridor traverses the Kootenai National Forest and Plum Creek Timber Company land. Land uses included general public use of national forest land and commercial timber production of commercial forested land. 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. Both the Forest Service and Plum Creek Timber Company personnel were notified of the upcoming work by direct contact. All issues seem to be resolved at this time.

Between 2/2 and 6/9 only topping and trimming will occur. All other issues seem to be resolved at this time.

3. *Identify natural resources and any mitigation.*

Several sensitive areas have been identified along some sections the ROW occurring on or near USFS lands. These areas include walking trails as well as a scenic area. Any vegetation management occurring within these areas will be minimized when possible.

Several water resources (i.e. creeks, rivers, streams, etc) have been identified between spans 5/2 to 6/9. 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. To avoid disturbance to T&E species and cultural resources, the following mitigation measures will be followed:

Bull Trout and White Sturgeon (Kootenai River Population)

Bull Trout and White Sturgeon are known to inhabit several waterways within the project area as identified by SreamNet and Northwest Sub Basin Geographic Data databases. These waterways traverse spans 5/2 to 6/9. No herbicide applications will be used. Only selective hand cutting methods near these waterways and other potential fish bearing waterways will be applied. The following mitigation measures will be adhered to avoid disturbing any potential fish habitat:

- Low-growing vegetation that provides shade will be protected. A 35-foot buffer will be observed to protect the streams canopy.
- No herbicides will be applied near these waterways and other potential fish bearing waterways. Only cutting and topping will be performed as necessary.
- Cut trees will not be felled into any stream unless directed to do so by the State or Federal fish & wildlife.
- Vehicles are to be kept away from water channels to minimize erosion and sedimentation of waters.

- Standard erosion control practices will be employed, if necessary, to prevent sedimentation of waters.

Plant Species

No species of plant T&E species are present or have been observed.

Cultural Resources

No cultural resources were identified as a result of inquiries with the Tribes. No issues of historical significance were cited. The Tribes cited no potential impacts or concerns regarding the planned vegetation management activities. In addition, no ground disturbing activity will occur.

Issues concerning wildlife, fish, plants and cultural resources have been addressed and work within the project corridor is expected to have “no effect” on any listed species or cultural resources therefore there would be no cumulative effects for any T&E species within the project corridor. If any T&E animal activity is observed, project activity will be suspended until a revised assessment is performed. 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, supplemental information 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 and mechanical selective cutting methods along selected spans of the right-of-way.

Debris will be disposed by:

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.

5. Determine revegetation methods, if necessary.

No revegetation will be conducted at this time due to very low ground disturbance. Any need for re-seeding will be continually assessed as the project work progresses and will be performed if the need arises. In addition, equipment will be power washed to prevent the spread of weeds.

6. Determine monitoring needs.

In addition to evaluating work in progress, follow up monitoring will be every other year to access trees that may violate the safe wire to tree clearance.

7. Prepare appropriate environmental documentation.

No other environmental documentation is needed.

Findings: 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 Scientist – KEPR/Bell-1

CONCUR: /s/ Robert Beraud for

Thomas C. McKinney

NEPA Compliance Officer

DATE: 06/18/2003

Attachment

cc:

L. Croff – KEC-4

T. McKinney – KEC-4

C. Leiter – KEP-4

J. Meyer – KEP-4

M. Rosales – KEPR/Bell-1

P. Key – LC-7

J. Hilliard Creecy – T-DITT2

D. Hollen – TF/DOB-1

J. Lahti – TFS/Bell-1

S. Vickers – TFS/Bell-1

M. McCracken – TFSU/Kalispell

Environmental File – KEC

Official File – KEP-4 (EQ-14)

**Vegetation Management Checklist
(Libby-Troy)**

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

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](#).

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Libby-Troy sec. Of the Libby-Bonners Ferry	45 miles / 115kv	100 feet	Approximately 5 miles

Right Of Way:

Right-of-Way – clearing in right-of-way

Transmission Structures – clearing around

Other – Cut, side trim, and top as necessary

1.2 Describe the vegetation needing management.

See handbook — [List of Vegetation Types](#), [Density](#), [Noxious Weeds](#) for checkboxes and requirements.

Vegetation Types:

Douglas Fir

Larch

Birch

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. See Handbook — for requirements and checkboxes.

Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed. (In places where tall growing vegetation must be left in place, it may not be possible to promote low-growing plants.)

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.

See Handbook - [Overall Management Scheme/Schedule](#).

Initial entry – Cut/remove, side trim, and top as necessary

Subsequent entries – None

Future cycles – Very light cutting/trimming every 3 to 4 years for this section of R/W due to sensitivity of the area.

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:

Forest Service Kootenai National Forest

USFS land next to scenic trail above US Hwy 2

Plum Creek Timber Company

2.2 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.

Direct contact with Kootenai National Forest and Plum Creek Timber Company.

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		
2/2	5/2	Plum Creek / Forest land	Cut, remove, & trim side trees as necessary
5/2	6/4	Kootenai National Forest / Forest land	Cut, remove, side trim, & top trees as necessary
6/4	6/9	Plum Creek / Forest land	Cut, remove, side trim, & top trees as necessary

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.

None

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.

Has walking trail close to R/W on USFS

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.

USFS Scenic area

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
To	From						
5/2	6/9	Creeks below line crossing scenic trail	Bull Trout White sturgeon	Selective hand cutting only	None	N/A	N/A

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
To	From		
5/2	6/4	Springs in area	NONE

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.

T&E Species	Method/mitigation or avoidance measures
Bull Trout White Sturgeon	<ul style="list-style-type: none"> § Low-growing vegetation that provides shade along waterways will be protected. A 35-foot buffer will be observed to protect the streams canopy. § No herbicides will be applied near these waterways and other potential fish bearing waterways. Only cutting and topping will be performed as necessary. § Cut trees will not be felled into any stream unless directed to do so by the state or federal fish & wildlife. § Vehicles will be kept away from water channels to minimize erosion and sedimentation of waters. § Standard erosion control practices will be employed, if necessary, to prevent sedimentation of waters.

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

See Handbook — [Protecting Other Species](#) for requirements.

See 3.3

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		
5/2	6/9	Walking Trail	Hand cut, trim, and top trees as necessary, walk in only.

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		
5/2	6/9	None Known	No ground disturbing activity Tribe was consulted where line crosses river. USFS was consulted for the project area about any possible Cultural Resources

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		
5/1	5/3	Slope	Hand cut, trim, and top trees as necessary, walk in only.
6/3	6/9	Slope	Hand cut, trim, and top trees as necessary, walk in only.

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

See Handbook – [Spanned Canyons](#) for requirements.

None

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, and Herbicides](#) for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
To	From	
5/2	6/9	Manual mulching of any on ground debris

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:

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.

None needed.

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.

N/A

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.

On ground check every other year for trees that might violate the safe wire to tree clearance

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

None

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”.

Standard cutting, trimming, and topping with chain saw mulching.

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

No