memorandum

DATE: March 29, 2002

REPLY TO ATTN OF: KEP/Z992

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-53)

то: Jim Jellison – TFO/Olympia

Proposed Action: Vegetation Management along the Ross-Vancouver Shipyard Transmission Line ROW. The line is a 115 kV Single Circuit Transmission Line having an easement width of 100 feet.

Location: The ROW is located in Clark County, WA, being in the Olympia Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposed Action: BPA proposes to clear danger trees from varying widths of the indicated transmission line right-of-way that are approaching electrical clearance zones 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 is clearing the danger trees to prevent them from falling or growing into the lines, thereby causing outages.

<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 remove danger trees from BPA's transmission line right-of-way that may affect the integrity and operation of the transmission line. All danger trees marked as potentially unstable and that may fall into the minimum distance or into the safety zone of the power line, as well as trees that could blow into that zone or enter the zone if the conductor swings, will be removed. Hardwood trees in this zone will be stump cut treated after falling to prevent re-sprouting.

The danger trees needing clearing are described in Section 1.2 of the attached checklist and include both conifers and deciduous varieties. The proposed work sites are located primarily in urban areas.

The proposed maintenance activity will be ongoing. Tree removal would occur throughout the year as trees enter the tolerance zone or the landowner chooses not to maintain the trees as required by tree agreements with a goal of a two-year maintenance free cutting cycle. Trees will be cut incrementally until the right-of-way has been re-established 50 feet from the centerline. Maintenance will occur on a two-year cutting cycle thereafter.

2. Identify surrounding land use and landowners/managers.

The work will be conducted on residential and urban lands. The City of Vancouver as well as residential properties along the proposed project have been contacted either personally by letter.

3. Identify natural resources.

No issues dealing with natural resources, T&E Species, wildlife enhancement, visually sensitive areas, cultural resources or areas associated with steep slopes or canyon crossings were identified.

4. Determine vegetation control and debris disposal methods.

The referenced sections of the ROW will be surveyed for danger trees and the trees removed as necessary. Removal shall be by manual and mechanical methods followed by stump treatment with herbicides prior to stump grinding. All equipment used shall be in good operating condition to eliminate oil or fuel spills or excess exhaust. All equipment will have approved spark arrestors. All stumps will be cut flat for later application of herbicides. Both conifers and deciduous trees will be cut per applicable guidelines with herbicides applied as soon as possible after cutting to prevent regrowth.

In some areas, brush will be cleared from the ROW and around transmissions structures and sprayed with herbicide to prevent regrowth.

A licensed contractor would undertake the work with the herbicides applied by licensed applicators following the manufacturer's label instructions and BPA's management prescriptions.

5. Determine revegetation methods, if necessary.

The danger trees will be cleared using chain saws or heavier mechanical equipment if necessary with the woody debris being disposed of either by chipping. Boles will be cut into firewood lengths and hauled off-site when in back yards of residences.

6. Determine monitoring needs.

An inspector will monitor the work being performed.

The ROW will be inspected on a routine basis for follow up actions associated with any additional encroaching danger trees.

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/ Elaine Stratton</u> Elaine Stratton Environmental Scientist - KEP

CONCUR:<u>/s/ Thomas C. McKinney</u> Thomas C. McKinney NEPA Compliance Officer DATE: <u>04/10/02</u>

Attachment

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
Ross-Vancouver Shipyard	5 mi.: 115Kv	100	3

See Handbook — <u>List of Right-of-way Components</u> for checkboxes and the requirements for the components <u>Rights-of-way</u>, <u>Access Roads</u>, <u>Switch Platforms</u>, <u>Danger Trees</u>, and <u>Microwave Beam paths</u>.

Right Of Way: Right-of-Way – clearing in right-of-way Transmission Structures – clearing around Reclaim ("C") Trees **1.2 Describe the vegetation needing management.**

See handbook — List of Vegetation Types, Density, Noxious Weeds for checkboxes and requirements.

Vegetation Types:

Douglas Fir

True Fir

Alder

Maple

Birch

Wild Cherry

Residential/orchard tree trimming

Blackberries

Predominantly cutting conifer and hardwood trees located in the back and front yard of property owner.

1.3 List measures you will take to help promote low-growing plant communities. If promoting lowgrowing plants is not appropriate for this project, explain why.See Handbook — for requirements and checkboxes.

Encourage property owners to plant shrubs rather than trees.

1.4 Describe overall management scheme/schedule. See Handbook - <u>Overall Management Scheme/Schedule</u>.

Initial entry – **Cut** trees that pose an immediate threat to the transmission line conductors and establish a 2-year maintenance free cutting cycle.

Subsequent entries – Incrementally cut the trees until the edge of the right-of-way or 50' from the centerline has been established.

Future cycles - 2 year cutting cycle.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

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

See Handbook — <u>Landowners/Managers/Uses</u> for requirements, and <u>List of Landowners/Managers/Uses</u> for a checkbox list.

Private property owners and the City of Vancouver.

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 — <u>Methods for Notification and Requesting Information</u> for requirements.

Door to door contact and sending letters to the property owners.

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 — <u>Requirements and Guidance for Various Landowners/Uses</u> for requirements and guidance, also <u>Residential/Commercial</u>, <u>Agricultural</u>, <u>Tribal Reservations</u>, <u>FS-managed lands</u>, <u>BLM – managed lands</u>, <u>Other</u> <u>federal lands</u>, <u>State/ Local Lands</u>.

Span		Landowner/use	Specific measures to be applied
То	From		
4/9+75	4/9	City of Vancouver, Park	Discuss with the city regarding a tree agreement in City Park and Mill Plain Blvd.
5/3+200	Sub+100	Norma Zenier, Tree Agreement	BPA to cut 2 of 3 trees at the property owner's request.
5/6	5/5+250	Helen Palmer, Tree Agreement	Letter is being sent to Helen to bring trees into compliance. I also discussed compliance issues with her.
5/6+300	5/6+250	Bruce Hagensen, Tree Agreement	Letter is being sent to Bruce to bring trees into compliance. I also discussed compliance issues with her.
5/7	5/6+400	John McDonagh, Tree Agreement	Trees are in compliance.
5/7+150	5/7+25	Barbara Roberts, Tree Agreement	Letter is being sent to Barbara to bring trees into compliance. I also discussed compliance issues with her.
5/7+350	5/7+150	City of Vancouver	Discuss with the city regarding a tree agreement.
5/9	5/7+350		

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.

Please note tree agreements are listed above.

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 — <u>Casual Informal Use of Right-of-way</u> for requirements.

N/A

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 — <u>Other Potentially Affected Publics</u> for requirements and suggestions.

N/A

3. IDENTIFY NATURAL RESOURCES

See Handbook — <u>Natural Resources</u>

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 — <u>Water Resources</u> for requirements for working near water resources including buffer zones.

Span		Water body	T&E?	Method	Herbicide	Application	Buffer	Other
То	From					Technique		
4/10+250	4/10+200	Burnt Creek	No	Selective	Garlon 3A	Fill-in	100	

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	Buffer	Other
То	From				notes/measures
		N/A			Fill-in

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 — <u>T&E Plant or Animal Species</u> for requirements and determining presence.

Span		T&E Species	Method/mitigation or avoidance measures
То	From		
		N/A	•

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

See Handbook — <u>Protecting Other Species</u> for requirements.

Span		Species	Measures
То	From		
		N/A	

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

See Handbook — <u>Visual Sensitive Areas</u> for requirements.

Span		Describe sensitivity	Method/mitigation measures
То	From		
		N/A	

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

See Handbook – <u>Cultural Resources</u> for requirements.

Span		Describe sensitivity	Method/mitigation measures
То	From		
		N/A	

I spoke with Mike Lyall, Cowlitz Tribal representative regarding cultural sites on this easement. Mike said, "If there is any evidence of cultural sites, they would like to be contacted". They are not aware of any present sites.

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

See Handbook – <u>Steep/Unstable Slopes</u> for requirements.

Span		Describe sensitivity	Method/mitigation measures
То	From		
		N/A	

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

See Handbook – <u>Spanned Canyons</u> for requirements.

Span To From		Methods, cutting
То	From	
		N/A

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — <u>Methods</u>

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

See Handbook — <u>Manual</u>, <u>Mechanical</u>, <u>Biological</u>, <u>and Herbicides</u> for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
То	From	
		N/A

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.

Cut and chip, cut boles into firewood lengths and haul off site when in a back yard situation.

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3). See Handbook — <u>Reseeding/replanting</u> for requirements.

Span		Reason for Reseed/plant	Type of Seed or Plants	Native?
То	From			
		N/A		

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.

Line crew and NRS annually patrol vegetation and assess vegetation on this easement for safety and reliability of the transmission line conductors.

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

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — <u>Prepare Appropriate Environmental Documentation</u> for requirements. Also prepare Supplement Analysis — <u>Supplement Analysis</u> — 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".

N/A

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

N/A