## **Bonneville Power Administration**

# memorandum

DATE: July 19, 2002

REPLY TO

ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS

(DOE/EIS-0285/SA-93) - Longview District Substations

TO: Orion Albro

Olympia Regional Manager

**Proposed Action:** Vegetation Management for the following electric yards located in the Longview District:

Allston Columbia County, OR Cowlitz County, WA Cardwell Wahkiakum County, WA Cathlamet Clatsop County, OR Clatsop Cowlitz County, WA Cowlitz Clatsop County, OR Driscoll Wahkiakum County, WA **Grays River** Pacific County, WA Holcomb Lexington Cowlitz County, WA Longview (All) Cowlitz County, WA Naselle Pacific County, WA Pacific County, WA Raymond Warren Columbia County, OR Clatsop County, OR Wauna

**Proposed by:** Bonneville Power Administration (BPA).

<u>Description of the Proposal</u>: BPA proposes total vegetation management (bareground) in the electrical substations, and, noxious weed management and maintenance of landscaping within the property boundaries of the listed facilities. These facilities are all located within the Longview District of the Olympia Region.

<u>Description of the Proposal</u>: BPA proposes to manage vegetation inside and around electrical substations and associated facilities. Vegetation management within the substations will include bareground management by herbicides of all areas within the fenced perimeter of the facility including a bareground zone of up to 3 meters (10 feet) outside of the fenced area. The management of vegetation outside the substation and associated facilities will include: 1) bare ground management of perimeter roads and parking areas; 2) control of noxious weeds throughout property boundaries; 3) mowing, fertilizing, and weed control of landscaped lawn and mulched areas; 4) weed control in ornamental shrub areas; and 5) areas requiring only mechanical control to manage unwanted/danger trees, grasses, and shrubs.

<u>Analysis</u>: The attached checklist shows the resources that were found during this analysis and what mitigation measures are required to protect those resources. In addition, each facility is supported by a file containing drawings, aerial photographs, topographic maps, and the mitigation measures to be applied. Applicable findings are discussed below.

## **Planning Steps:**

## 1. Identify facility and the vegetation management need.

See proposed action.

### 2. Identify surrounding land use and landowners/managers and any mitigation.

All of the facilities are fee-owned by BPA. One substation, Warren, may be managed for agricultural leases on lands adjacent to facilities under this proposal but within fee-owned property boundaries. Mitigation: The lessee will be contacted prior to treatment to identify agricultural use and appropriate treatment methods.

### 3. Identify natural resources.

T&E species (Marbled Murrelet), wetlands, drinking water resources and water resources have been identified near some of the facilities as shown in Table 3.1 of the attached checklist. Mitigation measures, consistent with the FEIS, are listed for these sites in Section 3 of the attached checklist.

## 4. Determine vegetation control and debris disposal methods.

For switchyards and up to ten feet outside of fenced areas, the goal is total vegetation management. Facilities requiring landscaping are designed to be low maintenance and are consistent with Integrated Pest Management procedures, such as native, low-growing, types, mulches, rock covers, etc. All of the vegetation management techniques are designed to be permanent.

### 5. Determine revegetation methods, if necessary.

Not applicable, except as mentioned above when landscaping requires replacement.

### 6. Determine monitoring needs.

Monitoring is two-fold. Monitoring for evaluation of BPA/contractor treatment practices to ensure vegetation management practices will be handled through contract specifications. Environmental monitoring to ensure environmentally sound application practices will be determined in the future as outlined in the BPA/NMFS/USFWS Biological Assessment.

## 7. Prepare appropriate environmental documentation.

<u>Findings:</u> 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. This Supplement Analysis also finds the proposed actions will have no effect on T&E species (Marbled Murrelet) as per mitigation measures outlined in Section 3.3 of the attached checklist. Therefore, no further NEPA or ESA documentation is required.

/s/ Mark W. Hermeston

Mark W. Hermeston Physical Scientist (Environmental) - KEP-4 Licensed Hydrogeologist (WA 663)

CONCUR: /s/ Thomas C. McKinney

DATE:07/25/2002

Thomas C. McKinney NEPA Compliance Officer

#### Attachment

cc:

L. Croff – KEC-4

T. McKinney – KEC-4

P. Key - LC-7

M. Hermeston – KEP-4

J. Meyer – KEP-4

J. Sharpe – KEPR-4

M. Martin – KEPR-Covington

M. Johnson – TF/DOB-1

J. Jellison – TFO/Olympia

D. Krauss – TFO/Olympia

S. Martin – TFO/Olympia

Environmental File – KEC

Official File – KEP-4 (EQ-14)

Mhermeston:mh:4722:7/22/02 (KEP-KEP-4-W:\EP\2002 FILES\EQ\EQ-14\FEIS-0285-SA-93-Long-sa.doc)

## LONGVIEW DISTRICT ELECTRIC YARD AND NON-ELECTRIC FACILITY CHECKLIST

## 1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

### 1.1 Describe facility:

Substation/Facility Name	Maximum Size of Area to be Treated	Nearest 1/4 Section Township/Range or GPS Coordinates	County	State
Allston Cardwell Cathlamet Clatsop Cowlitz Driscoll Grays River Holcomb Lexington Longview (All) Naselle Raymond Warren	54.4 3.84 1.25 19.83 1.72 15.73 2.07 0.9 39.2 27 2.82 20.3 0.92	46.6.27.4802N 123.1.52.3321W 46.2.45.0000N 122.50.36.0000W 46.11.45.1124N 123.22.11.7808W 46.8.33.0877N 123.50.23.7407W 46.6.51.7118N 122.56.8.1840W 46.8.55.9331N 123.24.49.0233W 46.20.4.5346N 123.37.21.5110W 46.35.5.9343N 123.35.42.8713W 46.10.54.1189N 122.54.43.9493W 46.8.22.1898N 122.59.33.4890W 46.22.35.8528N 123.48.15.9201W 46.42.43.9171N 123.44.18.5941W 45.49.10.1793N 123.53.6.6084W	Columbia Cowlitz Wahkiakum Clatsop Cowlitz Clatsop Wahkiakum Pacific Cowlitz Cowlitz Pacific Pacific Columbia	OR WA OR WA OR WA WA WA WA WA
Wauna	4.3	46.9.17.6891N 123.24.35.6114W	Clatsop	OR

## 1.2 Describe vegetation needing management:

Substation (Total vegetation management (TVM) needs no further description.)

Required at all of the facilities listed above.

## Non-Electrical Facility (Describe all landscaping vegetation management.)

Landscaping is required at Allston, Cathlamet, Cowlitz, Longview, Raymond and Wauna in addition to total vegetation management.

## 2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

## 2.1 List the types of landowners and land uses around your facility.

These sites are all fee-owned by BPA and are surrounded by a combination of private, state and federal lands. The surrounding land is used for residential, agricultural, and forested uses.

## 2.2 Determine if there is a need to notify surrounding landowners of vegetation management activities. If so, why and how?

One substation in the Longview District, Warren Substation, may have agricultural leases adjacent to areas needing herbicide treatment. Drift, can be controlled by implementing all label requirements for the reduction of drift. If the agricultural areas need herbicide treatment to control noxious weeds or tall-growing species, the lessee will be contacted though the Regional Realty Specialist, to determine the type of agricultural use, i.e., grazing or crops. Mitigation will be derived from existing label requirements and the needs of BPA and the lessee.

## 2.3 List any specific measures to be taken based on surrounding landowners/use.

See above.

#### 3. IDENTIFY NATURAL RESOURCES

#### 3.1 Water Resources

List or describe any water resources (streams, rivers, lakes, wetlands, undeveloped springs, etc.) near the facility.

Substation/	Water Resources	Aquatic T&E	Direct	Mitigation <sup>1,2,3</sup>
Facility Name	(Within 400 feet)	Species	Pathway	
Allston Cardwell Cathlamet Clatsop Cowlitz Driscoll Grays River Holcomb Lexington Longview (All) Naselle Raymond Warren Wauna	BPA Well None Cathlamet Channel Spring/Shallow Groundwater Shallow Groundwater None Shallow Groundwater Green Creek Tributaries None Drainage Sloughs <sup>4</sup> Johnson Creek/Wetland/Shallow Groundwater BPA Infiltration Gallery/Butte Creek/Shallow Groundwater None None	No N	No No No Yes Yes No Yes Yes No Yes Yes Yes No No	None None None GW/SW GW None GW GW/SW None GW/SW None GW/SW None None

<sup>&</sup>lt;sup>1</sup> If indicated, do not use chemicals with a groundwater (GW) or surfacewater (SW) label advisory.

Does the substation/facility drainage have a direct pathway to the water body?

See Table above.

<sup>&</sup>lt;sup>2</sup> If indicated, only use chemicals Practically Non-Toxic to Slightly Toxic (TOX) to aquatic species.

All chemicals are selected from BPA's List of Approved Herbicides, ESP E-VGM-004
 No application to any sloughs, when water is present, without Washington Ecology permits.

What measures will you take to limit potential impacts to water resources? As appropriate, list any buffers that will be applied.

In addition to the Table above, the following mitigation measures apply at the following facilities:

**Grays River:** No chemical treatment inside secondary containment lagoon. Glyphosate okay

between liner and fence.

**Naselle:** Do no apply any chemicals when water is present in substation drainage

ditches.

**Raymond:** Do no apply any chemicals when water is present in substation drainage

ditches.

## 3.2 Herbicide Use Near Irrigation Sources and Domestic and Public Drinking Water Supplies

List or describe any irrigation or domestic/public water source.

See Table above.

## Does the substation/facility drainage have a pathway to the water supply?

Allston Substation contains a BPA well. The well is 380 feet deep with a static water level of 204 feet. The well is used for potable and non-potable uses. The well is cased and grouted in accordance with state regulations. Well logs indicate varying layers of clay.

Raymond Substation contains an infiltration gallery that is used for potable and non-potable uses. The gallery is susceptible to groundwater/surfacewater infiltration.

What measures will you take to limit potential impacts to irrigation and drinking water supplies? As appropriate, list any buffers that will be applied.

The well at Allston Substation needs no protection due to well construction and favorable geology that would restrict/prevent downward movement of chemicals.

The infiltration well at Raymond requires protection from chemicals entering the system through surface water infiltration. No herbicide application will be made within a radius of 50 meters (164 feet) for any herbicide having a groundwater/surfacewater label advisory, or, a 15-meter (50 feet) radius for all other approved herbicides that do not have any such label advisories.

## 3.3 Threatened and Endangered Plant or Animal Species

Are there any T&E species in the area that could be affected? List if necessary.

Holcomb Substation is located outside but within 650 feet of Marbled Murrelet Habitat Unit WA-05-h.

What measures will you take to limit potential impacts to each T&E species? As appropriate, list any buffers that will be applied.

Marbled Murrelet

- If a tree needing removal is greater than 80 cm (32 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.
- Herbicides will not be used within the designated habitat.

## 3.4 Steep Slopes/ Unstable Slopes (Soils)

Will herbicide treatment be occurring on any steep slopes?

No.

As appropriate, list any buffers, reseeding and/or ground disturbing restrictions that will be applied.

None.

#### 3.5 Attach drawing showing location of all required buffers.

Drawings showing the locations of all facilities with buffers are attached.

### 4. DETERMINE VEGETATION CONTROL METHODS

## 4.1 Describe overall vegetation management scheme and schedule:

**Initial:** For switchyards, and up to ten feet outside of fenced areas, the goal is TVM. Facilities requiring landscaping are designed to be low maintenance and are consistent with Integrated Pest Management procedures, such as, native, low-growing types, mulches, etc.

**Subsequent:** These facilities and their vegetation management schemes are designed to be permanent.

Future: See above.

#### 5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe debris disposal and revegetation, if any.

Debris disposal will take place on site. Revegetation will be consistent with the permanent nature of the facilities but will incorporate native species where practical.

#### 6. DETERMINE MONITORING NEEDS

6.1 Describe evaluations of BPA/contractor treatment practices to ensure vegetation management measures are working.

Monitoring will be undertaken through contract specifications.

6.2 Is there a need to monitor adjacent areas for potential herbicide movement/contamination? If so, describe monitoring plan. (Unless monitoring for other reasons, this section should be consistent with BPA-systemwide herbicide monitoring plan not yet finalized.)

Monitoring will be established at a later date consistent with the Maintenance BA.

#### 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".

None.

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

No.