

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: November 5, 2003

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
DOE/EIS-0285/SA-187-Fidalgo-Lopez No. 2 and 3

TO: Don Atkinson – TFN/Snohomish

Proposed Action: Vegetation Management along the Fidalgo-Lopez No. 2 and 3 transmission lines from structure 5/1 through structure 7/10. Corridor width is 50 feet.

Location: The project area is located on Decatur Island, within San Juan County, Washington.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, access roads and around tower structures along the subject transmission line corridor. Approximately 9.4 acres of the right-of-way, 1.5 miles of access road and 46 structure sites will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Vegetation management is required for unimpeded operation and maintenance of the subject transmission line. See Section 1 of the attached checklist for a complete description of the proposal.

Analysis: Please see the attached checklist for the resources present. Applicable findings and mitigation measures are discussed below.

Planning Steps:

1. Identify facility and the vegetation management need.

Unwanted vegetation, reclaim trees and danger trees will be removed and/or controlled using selective and nonselective methods that will include hand cutting, mowing, and herbicidal treatment. All methods of herbicide treatment will be used (except aerial) dependent on site conditions/restrictions. This proposal covers approximately 9.4 acres of land.

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

The subject corridor traverses private lands used for residential and farming purposes. No other federal and no tribal lands are involved.

Section 2.3 of the attached checklist shows landowners with existing tree and brush agreements. Remaining landowners will be contacted (letters, personal contact, door hangers, etc.) by BPA before and during the project.

3. *Identify natural resources and any mitigation.*

Section 3 of the attached checklist identifies the natural resources present in the area of the proposed work. The following resources found along with applicable mitigation measures:

Riparian Habitat:

Includes all wetlands, streams, and creeks meeting the definition of riparian habitat. No areas were identified. See Section 3.1.

Riparian Habitat Mitigation:

- County or private lands, within 30.5 m (100 ft.) of a stream or open water. Available: all manual, spot and localized herbicide, and biological treatments, except grazing. On slopes less than 20% there will be no disturbance within 35ft. of the stream or wetland. On slopes greater than 20% there will be no disturbance within the buffer.
- Within 50 ft. to edge of surface water only cut-stump and localized chemical treatments using practically non-toxic to slightly toxic formulations of glyphosate, imazapyr, and metsulfuron-methyl (Escort). Moderately toxic to very highly toxic herbicides (to aquatic species) or those herbicides containing a groundwater or surfacewater label advisory will not be used in this zone. Triclopyr (Garlon 4) may be used only more than 100 ft. from streams or water.

Drinking Water Wells:

One spring and two wells were identified. See Section 3.2 of the attached checklist for a complete description and location.

Drinking Water Wells Mitigation:

- No chemical applications within a 100-foot radius of the spring or well.
- No application of a chemical with a groundwater or surfacewater advisory between 100- to 165-foot radius of the spring or well.

Threatened and Endangered Species: No species were identified.

Threatened and Endangered Species Mitigation: Not required.

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

Vegetation will be removed using manual, mechanical, and chemical methods. Debris will be disposed onsite using either chip, lop and scatter, or mulch techniques as described in Section 5 of the attached checklist.

5. *Determine revegetation methods, if necessary.*

Re-vegetation needs will be determined onsite. Any areas identified with limited ground cover will be replanted with native plant species.

6. *Determine monitoring needs.*

The entire project will be inspected during the work period, and, the line will be patrolled annually after treatment to monitor the effectiveness of the treatment measures.

Environmental monitoring to ensure sound application practices will be determined in the future as outlined in the BPA/NMFS/USFWS Biological Assessment currently being prepared.

7. Prepare appropriate environmental documentation.

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. This Supplement Analysis also finds the proposed actions will not affect T&E species since none were identified in the project area. Therefore, no further NEPA or ESA documentation is required.

/s/ Mark A. Martin

Mark A. Martin

Environmental Protection Specialist

CONCUR: /s/ Thomas C. McKinney

Thomas C. McKinney

NEPA Compliance Officer

DATE: 11/05/2003

Attachment

cc:

L. Croff – KEC-4

T. McKinney – KEC-4

J. Meyer – KEP-4

J. Sharpe – KEPR-4

M. Martin – KEPR/Covington

P. Key – LC-7

J. Hilliard Creecy – T-DITT2

K. Rodd – TF/DOB-1

L. Alvarez – TFN/Snohomish

A. DelaCruz – TFN/Snohomish

Environmental File – KEC-4

Official File – KEP-4 (EQ-14)

Vegetation Management Checklist

Fidalgo – Lopez No. 2&3

5/1 to 7/10 mile

Prepared By: **Katherine Rodd**
Natural Resource Specialist
October 6, 2003

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
Fidalgo – Lopez No. 2&3	5/1 to 7/10 34.5kv & 69kv	50'	Approx. 1.5 miles

Right Of Way:

Right-Of-Way – Clearing trees and brush within the right-of-way and treating with herbicides. The right-of-way will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Herbicide treatments will include spot treatment (stump treatment, basal treatment, and/or spot foliar), or localized treatments (including broadcast application and cut stubble treatments). The total project area consists of approximately 9.4 acres. It is estimated that approximately 9.4 acres of the project area will be cut.

Access Road Clearing – Approximately 1.5 miles of clearing using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Note, when the access roads traverse a riparian area they will not be treated with herbicides.

Transmission Structures – Approximately 46 tower sites will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. The herbicide treatments include spot (cut stump or basal treatment), localized and broadcast applications including cut stubble treatments. Structures located within riparian areas will not be treated with herbicides.

Clearing Requirements:

Control all tree and brush species within about 30 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 inches.

Pull all debris and slash out of the 30-ft. area around transmission structures.

Access Road Clearing Requirements: - (there are approximately 1.5 miles of machine and hand cutting)

Control all vegetation except grasses and forbs, to enable safe driving.

The access road is to be 14 to 25 ft. wide with a 15-ft.- high clearance. Limbs should not hang down into the access road.

Cut stumps are not to be taller than 2 – 4 inches in the roadbed.

Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.

Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.

Pull all debris back from the access road as prescribed.

Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.

Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.

Pull all debris back from the access road as prescribed.

Reclaim (“C”) Trees – C trees will be cut as part of this project.

Danger Trees (off right-of-way): – All off-right-of-way trees (danger trees) that are marked as potentially unstable, or trees that are identified during the project, that would fall within the minimum approach distance (MAD) or into the safety zone of the power line, may be cut as part of this project. Danger trees may be treated with herbicides to prevent resprouting.

1.2 Describe the vegetation needing management.

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

Vegetation Types:

Western Red Cedar

Douglas fir

Grand fir

Hemlock

Alder

Willows – mid span or where ground to conductor clearance is low

Cottonwoods

Wild Cherry

Scotchbroom – along access roads and around structures or mid span where ground to conductor clearance is low

Blackberries - along access roads and around structures or mid span where ground to conductor clearance is low

Density: The density is variable through the project and ranges from Low (50 stems or less per acre) to as High (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.

Vegetation that will grow tall will be selectively eliminated *before* it reaches a height or density to begin competing with low-growing species. 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.

Cut-stump or follow-up spot herbicide treatments on species that re-sprout will be carried out to ensure that the roots are killed (follow-up treatment may take place during the next growing season). Herbicides will not be applied using high volume methods to ensure that non-target species are not treated.

1.4 Describe overall management scheme/schedule.

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

Description of the Proposed Action: The project consists of clearing unwanted vegetation within the right-of-way, around structures, and along access roads 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. It is the goal of this project to remove the tall growing vegetation that is currently or will soon be a hazard to the transmission line. The overall goal is to develop low-growing plant communities within the right-of-way.

Right-Of-Way – The total project area consists of approximately 9.4 acres. It is estimated that approximately 9.4 acres of the project area will be cut.

Access Road Clearing – Approximately 1.5 miles of access roads will be cleared.

Transmission Structures – Approximately 46 tower sites will be treated.

Danger Trees (off right-of-way) – All off-right-of-way trees (danger trees) that are marked as potentially unstable, or trees that are identified during the project, that would fall within the minimum approach distance (MAD) or into the safety zone of the power line, will be cut as part of this project. As site conditions allow danger trees may be treated with herbicides to prevent re-sprouting.

Maintenance will include treatments to manage the target vegetation. Maintenance activities in the ROW could occur every year for the first Maintenance Cycle. Normally, the vegetation would be treated every 3 to 4 years. Three general control methods are being considered. They can be used individually or in combination to control vegetation including noxious weeds. The project prescription cut sheet documents exactly which treatment is proposed on a site-specific location.

Manual methods

Mechanical methods

Chemical methods

Manual Control Methods – are the control/management of vegetation by pulling or cutting with hand tools including the following techniques:

Pulling - Physically pulling vegetation from the soil.

Cutting - using shears, clippers, chainsaws, brush saws and axes to sever the above ground vegetation (including topping, pruning and side -trimming). The most common cutting prescription is “cut lop and scatter”. This is defined as cutting the vegetation from the stump, lopping or cutting the limbs from it to ensure contact with the ground, and hand scattering the cut limbs to avoid concentrations of debris.

Girdling – cutting a ring completely around the trunk of the tree, sufficiently deep into the cambium layer to kill the tree, but leave it standing.

Mechanical Control Methods – are the control/management of vegetation by cutting it with mowing type equipment, mounted on rubber-tired or track-type tractors, including the following types of equipment:

Mowers with rotary heads or rotating drums mounted on rubber tired or track-type tractors (track hoe).

Feller Bunchers, track-mounted machines that grab the trees, cut them at the base, remove branches, cut to length, and then move them to a desired location. The feller buncher could be used during the removal of C-Trees (large trees within the right-of-way) or Danger Trees off the right of way.

Chemical Methods - include spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (including broadcast application and cut stubble treatments with Garlon 4 or 3A to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines. If we are unable to treat the stumps during the project, we will wait until the next growing season and do a localized foliar treatment. In areas where the trees are less than 6ft. tall and the density is light we may do a localized basal treatment.

Critical Design Elements

Streams and Wetlands

Buffer zones have been established for all aquatic resources as follows:

For T&E streams a 400-foot (on each side of stream) no herbicide buffer.

For non T&E streams a 100-foot (on each side) no herbicide buffer.

For wetlands and ponds a 100-foot (on each side) no herbicide buffer.

For other water resource buffers (springs, well and irrigation) see section 3.2

On slopes less than 20% there will be no disturbance within 35ft. of the stream or wetland.

On slopes greater than 20% there will be no disturbance within the identified buffer.

Threatened and Endangered Species Areas:

Aquatic Species

For T&E fish streams a 400-foot (on each side of stream) no herbicide buffer.

No mechanical treatments within the buffer except along access roads and around structures

Steep Slopes and Spanned Canyons

Do not use ground disturbing mechanical equipment on slopes over 20%.

Perform mechanical clearing when the ground is dry enough to sustain heavy equipment.

Areas with the potential for erosion may be re-seeded with low-growing vegetation or grasses if there is limited vegetation for re-establishment of the site.

Any areas in the corridor with greater than 38.1 m (125 ft.) vertical distance between the ground surface and transmission lines will have selective tree removal. Individual trees that could encroach into the conductor danger zone will be identified and selected for removal in each management entry

Specific Measures to be implemented during the project:

When chainsaws are used, conifers will be cut below the lowest live limb to eliminate continued growth of the lateral branches.

Control all tree and brush species within about 30 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 inches.

Pull all debris and slash out of the 30-ft. area around transmission structures.

Access Road Clearing Requirements: - (there are approximately 10 miles of machine and hand cutting)

Control all vegetation except grasses, to enable safe driving.

The access road is to be 14 to 25 ft. wide with a 15-ft.- high clearance. Limbs should not hang down into the access road.

Cut stumps are not to be taller than 2 – 4 inches in the roadbed.

Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.

Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.

Pull all debris back from the access road as prescribed. Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.

Areas may be re-seeded with low-growing vegetation or grasses if there is limited vegetation for re-establishment of the site.

As flush to the trunk as possible when trees are rooted outside of the Areas where vegetation densities are high, or that have high densities of scotch broom and /or blackberries will be mowed using a track mounted mowing head.

Trim limbs back access road.

Pull all debris back from the access road as prescribed

Initial entry – Using hand cutting or mechanical mowers, BPA will complete brush management activities on the right-of-way, access roads and towers sites, chemically treat stumps and stubbles with herbicides (spot and localized treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines. Areas may be replanted or re-seeded with low-growing vegetation or grasses if there is limited vegetation for re-establishment of the site. Cut, lop and scatter, and stump treatment (where possible to prevent re-sprouting) are the preferred methods on State and Private lands. Areas where densities are high, or that have a lot of Scotch Broom and /or blackberries will be mowed using a track mounted mowing head. Access roads and structure sites will also be mowed and chemically treated.

Subsequent entries – Follow-up/re-treatment, within the right-of-way, around structure sites, and along access roads, is planned within the next growing season. This will be done with herbicides in areas that were not treated due to adverse weather conditions, there was not a good kill, or that were not treated in the initial entry.

Future cycles – This area is being managed on a 3 to 5 year maintenance free cycle for brush and danger trees. During routine patrol, the right-of-way will be examined for tall growing trees on the right-of-way and danger trees (DT's) off the right-of-way. The overall vegetation management scheme will be to cut and treat all encumbering vegetation on the right-of-way using a combination of manual, mechanical and herbicide treatments as outlined in the initial treatment every 3 to 5 years.

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.

Private landowners

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.

Letters or personal contact by BPA and/or the contractor along with door hangers. This will be done before and during the project. The Prescription/Cut Sheets will be modified as needed based on any input received during the project.

2.3 List the specific land owner/land use 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](#).

None known. Note – not all areas within the project area will be treated with herbicides. Areas where the landowners do not want herbicides used, will not be treated.

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 Known.

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.

None Known.

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.

None Known.

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.

None mapped.

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 restriction

None mapped.

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.

None mapped.

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

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

None mapped.

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

See Handbook — [Visual Sensitive Areas](#) for requirements.

None known within the project area.

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

See Handbook — [Cultural Resources](#) for requirements.

None known within the right-of-way.

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. See attached maps for exact locations.

None mapped.

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

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

None known within the project area.

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

MANUAL: Manual control methods include the following: cutting with shears, clippers, or chainsaws; and girdling by cutting a ring around the tree. When chainsaws are used cut conifers below the lowest live limb to eliminate continued growth of the lateral branches and cut all stumps flat where possible.

MECHANICAL: Mechanical methods include the use of brush mowers and feller bunchers. Ground-disturbing mechanical equipment will not be used on slopes over 20% or in riparian areas (Refer to 3.1). Work will be done when the ground is sufficiently dry enough to sustain heavy equipment and minimize excessive rutting.

HERBICIDES: The herbicide treatments prescribed for the project area are spot stump treatment, localized basal treatment, and localized foliar treatment. Where possible the deciduous stumps will be treated to prevent resprouting. If we are unable to treat the stumps during the project, we will wait until the next growing season and do a localized foliar treatment. In areas where the trees are less than 6ft. tall and the density is light we may do a localized basal treatment.

PROPOSED HERBICIDES: Glyphosate, triclopyr (Garlon 3A and 4), imazapyr, and 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 for spot foliar and Broadcast treatments. 2,4-d amine may be added to the list to control Noxious weed species. See Tables 111-1: Buffer width to Minimize Impacts on non-target Resources, and 5-7: Herbicide Ecological Toxicities and Characteristics. (Transmission Vegetation Management EIS).

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.

Mulching/Mowing – This will be done on access roads and around structure sites.

Lope and Scatter – These areas are identified in the VEGETATION CONTROL PRESCRIPTION as Cut, Lop, and Scatter.

Some areas may require that the brush be chipped. These areas are identified in the VEGETATION CONTROL PRESCRIPTION as cut and treat as needed, and will depend on the requirements of the landowners.

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.

Not planned at this time. However, if soil disturbance occurs during the project the area will be reseeded.

5.3 If not using native seed/plants, describe why.

Native seed will be considered in all mixes. Introduced species may be more competitive against invading tree species and protecting against erosion.

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

Not planned at this time. However, if reseeded is necessary it will take place in the fall just before the fall rains.

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.

The project area will be inspected during treatment. In addition, it will be reviewed during routine patrols by the line crew and within one year by the NRS.

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

Will review during line patrol by the line crew and within one year by the NRS.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — [Prepare Appropriate Environmental Documentation](#) for requirements.

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”.

Effects are expected to be the same or less than the description provided in the EIS.

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

No