

memorandum

DATE: October 2, 2002

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
DOE/EIS-0285/SA-110-Covington-Columbia No. 3

TO: Don Atkinson – TFN/Snohomish

Proposed Action: Vegetation Management along the Covington-Columbia No. 3, 230kV transmission lines from structure 1/1 through structure 12/1. Corridor width varies from 150 feet to 537.5 feet. The project area is located within King County, Washington.

Location: The project area is located within King 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 568.4 acres of the right-of-way 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 568.4 acres of land.

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

The subject corridor traverses BPA fee-owned, private, and city lands used for residential, farming, forestry, and special (watershed) purposes. No other federal and no tribal lands are involved.

The City of Kent's watershed and water intakes were identified from structure 5/6 +725 to structure 6/3 +650. The City has requested that no herbicides be applied within the watershed boundaries.

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. Any input received will be incorporated into the prescription/cut sheets.

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. Many areas were identified. See Section 3.1 for a complete listing.

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 Supply:

A watershed and water intakes used by the City of Kent were identified along Beaver Creek. See Section 3.2 of the attached checklist for a complete description and location.

Drinking Water Supply Mitigation:

- City of Kent Watershed: No chemical applications within the watershed and intake boundaries along the entire transmission right-of-way.

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 W. Hermeston

Mark W. Hermeston
Environmental Scientist (Environmental)
Licensed Hydrogeologist (WA 663)

CONCUR: /s/ James Kehoe for

Thomas C. McKinney
NEPA Compliance Officer

DATE: 10/09/2002

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
L. Alvarez – TFN/Snohomish
S. Davis – TFN/Snohomish
D. Sjoquist – TFN/Snohomish
Environmental File – KEC
Official File – KEP-4 (EQ-14)

Vegetation Management Checklist
Covington - Columbia No. 3
1/1 - 12/1

Prepared By: **Don Atkinson**
Natural Resource Specialist
August 23, 2002

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
Covington - Columbia No. 3	1/1 to 12/1 230kv	150' to 537.5'	Approx. 11 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 572.6 acres. It is estimated that approximately 572.6 acres of the project area will be cut.

Access Road Clearing – Approximately 15 miles of clearing using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. This includes both on right-of-way and off right-of-way roads.

Transmission Structures – Approximately 100 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.

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 miles 30 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.
- 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, will be cut as part of this project. Danger trees may be treated with herbicides to prevent re-prouting.

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

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.

Note: there is no Forest Service land in this project.

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 and to treat noxious weeds as needed. The overall goal is to develop low-growing plant communities within the right-of-way.

Initial entry – Using hand cutting, mechanical mowers or herbicide treatment, BPA will complete brush management activities on the right-of-way, access roads and towers sites. The stumps and stubbles will be chemically treated with herbicides (spot, localized, and broadcast treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines. Noxious weeds such as scotchbroom, blackberries, and tansy may be treated. 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.

BN Rail Road land, private land owners (rural residential, farms, grazing land), City of Kent Water District, and Grass Lake Elementary School.

2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, 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..

*Note-not all areas within the project area will be treated with chemicals, riparian areas, and areas where private landowners who do not want chemicals 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.

Covington - Columbia No. 3 (See attached maps for locations)

Span		Landowner/use	Specific measures to be applied
From	To		
1/6 + 880	1/6 + 1100	Tree & Brush Agreement	Landowner will maintain
2/1 + 790	2/1 + 1030	McGallard – Tree & Brush Agreement	Landowner will maintain
2/2 + 300	2/2 + 450	Sweet - Tree & Brush Agreement	Landowner will maintain
2/2 + 450	2/2 + 760	Bentley - Tree & Brush Agreement	Landowner will maintain
2/3 + 320	2/3 + 740	Lambert - Tree & Brush Agreement	Notify landowner before cutting
2/4 + 530	2/4 + 690	Carlson - Tree & Brush Agreement	Landowner will maintain
3/1 + 280	3/2 + 170	Powell – Tree & Brush Agreement	Landowner will maintain
4/1 + 850	4/2 + 700	No Spray Area	No herbicides will be applied
5/6 + 725	6/3 + 650	No Spray Area City of Kent	No herbicides will be applied
7/3 + 270	7/5 + 1264	Preedy - Tree & Brush Agreement	Landowner will maintain
10/1	10/1 + 650	Tree Farm - Tree & Brush Agreement	Landowner will maintain
10/1 + 1000	10/2 + 580	Francke - Tree & Brush Agreement	Landowner will maintain
10/2 + 580	10/2 + 960	McKee – Tree & Brush Agreement	Landowner will maintain
10/2 + 1200	10/3 + 110	Ediger - Tree & Brush Agreement	Landowner will maintain
10/5 + 60	10/5 + 390	Pohlreich - Tree & Brush Agreement	Landowner will maintain

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.

5/6 + 725 to 6/3 + 650 No Spray City of Kent

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.

Grass Lake Elementary School

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.

Covington - Columbia No. 3 (See attached maps for locations)

Span		Waterbody	T&E?	Treatment Zone	Herbicide	Application Technique	Buffer
From	To						
1/2 + 580	1/2 + 780	Spring	No	Riparian	See Below	See below	See below
1/6 + 110	1/6 + 320	Well	No	Riparian	See Below	See below	See below
3/2 + 610	3/2 + 770	Pond	No	Riparian	See below	See below	See below
3/4 + 500	3/4 + 750	Rock Creek	No	Riparian	See below	See below	See below
6/2 + 280	6/2 + 1230	Beaver Creek	No	Riparian	See below	See below	See below
6/3 + 200	6/3 + 740	Beaver Creek	No	Riparian	See below	See below	See below
7/1 + 600	7/2 + 50	Well	No	Riparian	See below	See below	See below
7/2 + 950	7/2 + 1160	Creek	No	Riparian	See below	See below	See below
Riparian	<p>RIPARIAN: 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.</p> <p>HERBICIDES: Within 50 ft. of a stream, only cut-stump and localized treatments using practically toxic or Slightly toxic formulations of glyphosate, imazapyr, and Escort can be used up to the waters edge. Highly Toxic and very highly toxic (to fish) herbicides will not be used in this zone. Triclopyr (Garlon 4) may be used only more than 100 ft. from streams or water. See Table 111-1: Buffer width to Minimize Impacts on non-target Resources. (Transmission Vegetation Management EIS)</p>						

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

Covington - Columbia No. 3 (See attached maps for locations)

Span		Wells, Irrigation or Springs	Treatment Zone	Buffer
From	To			
1/2 + 580	1/2 + 780	Spring	Non Herbicide Area	100 ft. radius around spring
1/6 + 110	1/6 + 320	Well	Non Herbicide Area	100 ft. radius around well head
5/6 + 725	6/3 + 650	City of Kent Water Intake and Watershed	Non Herbicide Area	No chemical application within cited spans
7/1 + 600	7/2 + 50	Well	Non Herbicide Area	100 ft. radius around well head
NON- HERB	NON-HERBICIDE AREAS Water sources, springs, wells and other sensitive lands within 100 feet of sensitive Riparian areas or water sources. Hand Cutting Methods only, no Herbicides allowed. WELLS: No herbicides allowed within 100 feet of wellhead. Use only herbicides that do not have ground or surface water advisories between 100 and 165 feet of wellhead. Approved herbicides include: glyphosate, imazapyr, triclopyr, Escort,			

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. Also, any areas in the corridor with ground to conductor clearances greater than 38.1 m (125 ft.) vertical distance will be select tree cut. This will help provide shade for salmon and other fish.

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. If, as a result of the letters sent to the tribes, any are identified we will take the necessary steps to protect the 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. See attached maps for exact locations.

Covington - Columbia No. 3

Span		Describe sensitivity	Method/mitigation measures
From	To		
1/2	1/5 + 980	Steep slope	See below
1/6 + 910	1/6 + 1200	Steep slope	See below
3/4 + 420	3/4 + 640	Steep slope	See below
3/4 + 820	3/4 + 1340	Steep slope	See below
4/3 + 1460	4/3 + 1630	Steep slope	See below
5/6 + 1210	6/2 + 460	Steep slope	See below
6/3 + 690	6/4 + 180	Steep slope	See below
7/2 + 980	8/5 + 310	Steep slope	See below
Resource	Treatment Alternatives		
SS	<p>BPA Fee owned State DNR, or private lands where a steep slope or visual resources precludes mechanical treatments except on access roads and around structures. Available: all manual and biological treatments. All herbicide treatments including cut-stubble treatment following a mechanical treatment on access roads and structure sites.</p> <p>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. See Table 111-1: Buffer width to Minimize Impacts on non-target Resources. (Transmission Vegetation Management EIS)</p>		

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

See Handbook – Spanned Canyons for requirements.

None mapped.

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.

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 re-sprouting. 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).

SEE CUT SHEET FOR CONTROL METHODS

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, Lope, and Scatter.

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 reseeding 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