

United States Government

Department of Energy

Bonneville Power Administration

# memorandum

DATE: November 27, 2001

REPLY TO  
ATTN OF: KEP/Z992

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-33)

TO: Bill Erickson - TFP/Walla Walla  
Jim Jellison - TFO/Olympia

**Proposed Action:** Vegetation Management along the St Helens-Allston 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 Columbia County, OR, 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.

**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 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 includes both conifers and deciduous varieties. The proposed work sites are located in rural, agricultural, and 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. This maintenance cycle will occur over the next 4-5 years to remove the danger trees.

### *2. Identify surrounding land use and landowners/managers.*

The work will be conducted on agricultural, rural and urban lands. The City of Rainer, Columbia County OR, and Columbia County School have been contacted in addition to the Oregon Department of Forestry.

Landowners are contacted as follows:

During routine ROW surveillance trips, danger trees are identified and marked, usually with red ribbon or metal numbered tags. Once the danger trees have been identified and marked, affected landowners are contacted, either personally, by letter or by e-mail to alert them of the situation. They will be asked to maintain the tree(s) at their own expense and given a period of time to comply. Multiple contacts will be given prior to an adverse removal. If the trees pose a hazard, they will be removed. BPA will offer to remove the tree (s) at no cost to the landowner with items such as clean-up, wood removal and stump removal being negotiable.

### *3. Identify natural resources.*

Several small creeks are located in the proposed work area including Goble Creek between 13/8 and 13/7, a small creek between 12/5 and 12/4 and Tide Creek between 10/2 and 10/1. Once a danger tree is removed and prior to stump removal, if that option is chosen, the tree stump is treated with an herbicide to prevent regrowth once the stump is ground. No herbicide treatments, except for cut-stump treatments using the practically non-toxic or slightly toxic formulations of Glyphosate, imazapyr, and Triclopyr (Garlon 3A) will be used within 30.5 m (100 ft.) of these streams.

In addition, the project will cross Milton Creek (a T&E stream) between 3/3 and 3/4. In this area no herbicides will be used within 100 feet from the waters edge. From 100 to 400 feet away, Escort, Clopyralid, Imazapyr, the Rodeo® formulation of Glyphosate and Triclopyr (Garlon 3A) can be used. Highly toxic and very highly toxic (to fish) herbicides will not be used in this zone.

One of the Landowners on the project reported that a Bald Eagle nest exists near 11/7-12/1. On 11/8/01, the Bonneville Helicopter flew the area stated above. After many passes over the area - no nests were identified. A video was taken for documentation. A consultation with Malcolm Hiatt of the Oregon Department of Forestry indicated that there were no known roosting areas in the vicinity. At this time, no mitigations requirements are recommended.

If Bald Eagles were an issue in the future these mitigations would apply:

**Wintering bald eagles:** No work within 100 meters (328 feet) of any known wintering bald eagle roosts from Nov. 1 through March 15 unless clearance surveys are done daily to determine that no bald eagles are present within 100 meters of activities. If roosting trees are to be removed, a formal consultation with USFWS will be pursued.

**Nesting bald eagles:** No work within 0.25 miles if out of line-of-sight of nesting tree, or 0.5 miles if in line-of-sight of nesting tree from January 1 to August 31, unless clearance surveys show that there is no nesting occurring. May be able to cut sooner if consult with USFWS and can show that young have fledged.

No other issues dealing with 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 re-growth.

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 or by lop and scatter techniques. The woody debris would be turned into chips or mulch depending on conditions present at the time.

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.

/s/ James Meyer for \_\_\_\_\_  
Elaine Stratton  
Environmental Scientist - KEP

CONCUR: /s/ Thomas C. McKinney \_\_\_\_\_  
Thomas C. McKinney  
NEPA Compliance Officer

DATE: 11/28/01 \_\_\_\_\_

Attachment

cc:

L. Croff – KEC-4  
T. McKinney – KEC-4  
M. Hermeston – KEP-4  
J. Meyer – KEP-4  
E. Stratton – KEP-Z992  
J. Sharpe – KEPR-4  
P. Key – LC-7  
D. Hollen – TF/DOB-1  
D. Krauss – TFO/Olympia  
S. Martin – TFO/Olympia  
D. Swanson – TFOP/Ross  
Environmental File – KEC  
Official File – KEP-4 (EQ-14)