DOE F 1325.8 e Electronic Form Approved by CGIR - 01/20/95
(8-89)

United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: December 24, 2002

REPLY TO ATTN OF: KEP/CSB-2

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-116 – Allston-Clatsop

TO: Ed Tompkins TFO/LMT

Proposed Action: Vegetation Management along the Allston-Clatsop 230 kV transmission line and along portions of the following adjacent transmission lines: Allston-Astoria 230 kV; Allston-Astoria 115 kv; Driscoll Tap to A-C 230KV; Driscoll-Wauna 230KV; Naselle Tap to L-A 115KV; and Allston-Driscoll 230KV. Corridor width varies from 100 to 237.5 feet.

Location: The project is located in Columbia and Clatsop Counties, Oregon located in the Olympia Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, along access roads and around tower structures along the subject transmission line corridor that may impede the operation and maintenance of the identified transmission lines. All work will be in accordance with the National Electrical Safety Code and BPA standards. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation.

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.

Work will take place along the Allston-Clatsop 230 kV transmission line and along portions of the Allston-Astoria 230 kV; Allston-Astoria 115 kv; Driscoll Tap to A-C 230KV; Driscoll-Wauna 230KV; Naselle Tap to L-A 115KV; and Allston-Driscoll 230KV lines. Using the Allston-Clatsop as a reference, the project extends between towers 2/2 to 43/9.

Tall growing vegetation of the types and densities listed in section 1.2 of the attached checklist are present in the ROW and will soon pose a hazard to the lines. The project will be done in several phases. For the cumulative project, the work involves clearing this tall growing vegetation and treatment of the associated stumps and re-sprouts with herbicides to ensure that the roots are killed. Follow-up herbicide treatment of resprouts will occur after next summer's growing season.

Vegetation on access roads and around tower sites that impede the operation and maintenance of the transmission line will also be cleared and/or treated. ROW roads will be treated with foliar herbicides to control grow-in and scotchbroom emergence every 2 to 3 years. Tall-growing vegetation will be cut and treated every 4 to 5 years.

Approximately 956 acres of cut, lop, and scatter treatment on the ROW, 20 acres of off-ROW access road clearing, and 147 acres of scotch broom treatment will occur in this project.

This SA applies only to the first phase of the project, (the winter phase) which is described here. Endangered species consultation must be completed prior to proceeding with other phases of the work.

The winter phase involves clearing danger trees and spot-treating the associated stumps with herbicide to ensure that the roots are killed. Garlon 4 or 3A will be applied to the stump immediately after cutting. Tree species that will be removed include Douglas fir, pine (sp.), alder, maple, cedar, cottonwood, and wild cherry. Approximately 95% of the trees to be cut are small diameter alder. This project calls for the removal of approximately 60 trees along the corridor. No trees will be cut off the right-of-way in the designated marbled murrelet critical habitat between structures 25/3 and 28/2. No trees with DBH > 32 in. will be cut.

Limited noxious weed control will also be conducted during this phase of the project. ROW roads will be treated with foliar herbicides (Garlon 4 and 3A) over the first five miles of the project to control scotch broom (approximately 9.5 acres will be treated for this first phase). No herbicides will be used in areas within 400´ of fish-bearing streams, and there will be no application of herbicide within 100´ of any body of water. In other areas, scotch broom will be mowed and mulched.

Vegetation will be removed using manual or mechanical methods. Debris will be disposed of using either chip, lop and scatter or mulch techniques. Brush and scotch broom will be chipped or mulched, while larger branches and tree trunks will be lopped. All debris will be scattered along the ROW. There will be no tree removal within 400´ of listed fish-bearing streams. This phase of the work will be completed before March 30, 2003.

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

The subject corridor traverses residential, rural, agricultural, industrial forestland (owned by Evenson Co., Hanson Co., Weyhauser Co., Longview Fiber.) and the Clatsop State Forest.

A letter will be sent by mail, notifying landowners in proximity to the project transmission lines of the upcoming vegetation control activities. Door-to-door contact may also be employed to notify landowners, if warranted.

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 attached *Endangered Species Act- Effects Determination for the Proposed Allston-Clatsop Transmission Line Danger Tree and Vegetation Control Project* summarizes the resources identified and the determination of no effect on the identified resources for this phase of the project.

Steep Slopes

The work corridor also crosses steep slopes. Mitigations include selective methods as described in Section 3.7 of the attached checklist. These mitigation measures are consistent with the EIS.

4. Determine vegetation control and debris disposal methods.

Vegetation will be removed using manual or mechanical methods. Herbicide applications include spot, localized and foliar techniques. Debris will be disposed of using either chip, lop and scatter or mulch techniques as described in Section 5.1 of the attached checklist.

5. Determine re-vegetation methods, if necessary.

Re-vegetation activities are not planned for this project.

6. Determine monitoring needs.

The lines will be patrolled annually after treatment to monitor the effectiveness of the treatment measures.

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. Therefore, no further NEPA documentation is required.

/s/ Elaine Stratton
Elaine Stratton
Environmental Protection Specialist

CONCUR:*/s/ Thomas C. McKinney* DATE:01/06/2003
Thomas C. McKinney
NEPA Compliance Officer

Attachment

cc:
L. Croff – KEC-4
M. Mayer – KEC-4
N. Weintraub – KEC-4
T. McKinney – KEC-4
M. Hermeston – KEP-4
J. Meyer – KEP-4
E. Stratton – KEP/CSB-2
J. Sharpe – KEPR-4
P. Key – LC-7
D. Hollen – TF/DOB-1
D. Kraus – TFO/Olympia
S. Martin – TFO/Olympia
D. Swanson – TFOP/Ross
Environmental File – KEC
Official File – KEP-4 (EQ-14)

Vegetation Management Checklist

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
Allston-Clatsop Allston-Astoria	44 Miles, 230KV	Varies from 100 feet to 237.5 feet	44

Right Of Way:
Right-of-Way – clearing in right-of-way
Transmission Structures – clearing around
Access Road clearing -
Wood Poles - fire protection clearing
Reclaim ("C") Trees
Danger Tree clearing

1.2 Describe the vegetation needing management.

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

Vegetation Types:
Douglas Fir
Pine
Alder
Maple
Cedar
Cottonwood
Wild Cherry
Noxious Weeds - Scotch broom
Blackberries

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.

All tall-growing species will be cut and treated with herbicide, except in sensitive locations. Most low-growing species will be left uncut, except where ground-to-conductor clearance warrants cutting it. A follow-up treatment of herbicide will be performed after the summer growing season.

1.4 Describe overall management scheme/schedule.

See Handbook - **Overall Management Scheme/Schedule**.

Initial entry – Cut all tall-growing vegetation, and treat stumps of hardwood species with herbicide. Approximately 956 acres of cut, lop, and scatter treatment on the ROW, 20 acres of off-ROW access road clearing, and 147 acres of scotch broom treatment will occur inn this project.

Subsequent entries – Follow-up treatment of resprouts with herbicide after next summer's growing season.

Future cycles – ROW roads will be treated with foliar herbicides to control grow-in and scotchbroom emergence every 2 to 3 years. Tall-growing vegetation will be cut and treated every 4 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.

Landowners/Managers/Uses:
Residential
Rural
Agricultural
Industrial Forest lands – Evenson Co., Hanson Co., Weyhauser Co., Longview Fiber.
State/City/County Lands Clatsop State Forest

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.

Door hangers, phone calls, house calls, landowner mailing list.

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.**.

Residential/Commercial:

The following landowners have responsibility for vegetation maintenance.

Span		Landowner	Agreement ID number (?)
To	From		
26/1+1050	25/4+670	Oregon Dept. of Forestry	Case No. 910739 Christmas Tree Agreement

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.

N/A

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.

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 — **Other Potentially Affected Publics** for requirements and suggestions.

N/A

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.

Winter Phase – no work w/in 400 feet of any T&E Stream
Summer Phase as follows pending consultation

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer
To	From						
8/3+ 1660	8/3+ 1410	Clatskanie River	Yes	Cut, Lop, Scatter	No herbicide within 100 feet of river. Garlon 3A beyond 100 feet	Cut surface application.	100 feet each side of river.
AA9/6+ 330	AA9/6+ 0	Clatskanie River	Yes	Cut, Lop, Scatter	No herbicide within 100 feet of river. Garlon 3A beyond 100 feet.	Cut surface application.	100 feet each side of river.
19/3+ 630	19/3+ 380	Plymouth Creek	Yes	No Treatment	N/A	N/A	N/A
25/4+ 830	25/4+ 580	Gnat Creek	Yes	Cut, Lop, Scatter	No herbicide within 100 feet of river. Garlon 3A beyond 100 feet	Cut surface application.	100 feet each side of river
30/5+ 1950	30/5+ 1720	Little Creek	Yes	Cut, Lop, Scatter	No herbicide within 100 feet of river. Garlon 3A beyond 100 feet	Cut surface application	100 feet each side of river
30/5+ 960	30/5+ 700	Big Creek	Yes	Cut, Lop, Scatter	No herbicide within 100 feet of river. Garlon 3A beyond 100 feet	Cut surface application	100 feet each side of river
33/3+ 400	33/3+ 180	Hillcrest Creek	Yes	Cut, Lop, Scatter	No herbicide within 100 feet of river. Garlon 3A beyond 100 feet	Cut surface application	100 feet each side of river
34/6+ 750	34/6+ 550	Marys Creek	Yes	No Treatment	N/A	N/A	N/A

38/3+ 1600	38/3+ 1200	John Day River	Yes	No Treatment	N/A	N/A	N/A
41/6+ 2150	41/6+0	Youngs River	Yes	No Treatment	N/A	N/A	N/A
AA39/4 +830	AA39/4 +200	John Day River	Yes	No Treatment	N/A	N/A	N/A

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.

No Known wells or springs.

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.

Span		T&E Species	Method/mitigation or avoidance measures
To	From		
27/2	24/3	Marbled Murellet	Any cutting activities will be suspended during nesting period for this species. No herbicide application within habitat unit during nesting season without consultation.
All		Columbia White-tailed Deer	No foliar herbicide application without consultation

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.
See Handbook — **Protecting Other Species** for requirements.

None

3.5 List any visually sensitive areas and the measures to be taken at these areas.
See Handbook — **Visual Sensitive Areas** for requirements.

None

3.6 List areas with cultural resources and the measures to be taken in those areas.
See Handbook – **Cultural Resources** for requirements.

No Known 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 – **Steep/Unstable Slopes** for requirements.

Describe sensitivity	Method/mitigation measures
N/A	No ground-disturbing machinery will be used on steep slopes on this project. Only individual tall-growing species will be cut in all areas treated, leaving almost 100% ground cover of low-growing species such as grasses and shrubs.

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

See Handbook – **Spanned Canyons** for requirements.

Methods, cutting
In canyons greater than 120 feet deep, only trees that have grown within 50 feet of the conductors, and are capable of growing into the lines, will be cut.

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.

Methods, including herbicide active ingredient, trade name, application technique
Foliar spraying will be done with Garlon 3A or Garlon 4 on low-growing species like scotch broom where it is small in size, like on many ROW roads or structure clearing. In cut, lop, and scatter areas, hardwood trees will be stump-treated with Garlon 3A or Garlon 4 immediately after cutting, depending on proximity with creeks. If machine mulching is used, herbicide will be applied after the next growing season on re-sprouts. In all cases, foliar spraying of herbicide will be done after the next growing season to kill tall-growing species that re-sprout.

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.

Debris Disposal:

Chip (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

Lop and Scatter (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

Pile and no burn

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.

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.

All work will be monitored as part of the inspection process for the contract. Contractor will inform the COTR of completed work, and inspections will be done as work gets done.

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

Effectiveness will be determined at the time of the follow-up herbicide treatment at the end of the next growing season. I second inspection by the COTR will determine effectiveness.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — **Prepare Appropriate Environmental Documentation** for requirements. Also prepare Supplement Analysis — **Supplement Analysis** — 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