

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: February 20, 2003

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-123 Malin-Hilltop)

TO: Elizabeth Johnson – TFR/The Dalles  
Natural Resource Specialist

**Proposed Action:** Vegetation Management on Malin-Hilltop (Structures 20/5-29/1).

**Location:** The project area lies to the southeast of Klamath Falls, OR, and is located in Modoc County, California.

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

**Description of the Proposed Action:** Trees are located under and adjacent to conductors. Should a fire occur, these trees are a hazard to the line and could cause serious damage to the conductors, resulting in significant problems for the transmission grid. BPA plans on controlling these trees by removal. In addition, sagebrush along access roads and within 30 feet of structures will be mowed for fire prevention purposes. Work will be completed between April 1, and June 1, 2003.

**Analysis:** A checklist (see attached) was completed for this project by BPA's Regional Natural Resource Specialist in accordance to the requirements identified in the Bonneville Power Administration's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). Applicable findings and mitigation measures are discussed below.

## **Planning Steps:**

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

Trees are located under and adjacent to conductors. Should a fire occur, these trees are a hazard to the line and could cause serious damage to the conductors, resulting in significant problems for the transmission grid. BPA plans on controlling these trees by removal. In addition, sagebrush along access roads and within 30 feet of structures will be mowed for fire prevention purposes.

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

The proposed project area is located within the Modoc National Forest, Tule Lake Ranger District. Work within this area is subject to their approval.

**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 is a summary of sensitive areas.

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
From	To							
21/1+ 150	21/1+ 250	Intermittent Cr.	No	Handcut	None	NA	35' Both sides – No machinery to operate w/in zone.	Directional fell trees away for mulching slash.
21/2+ 450	21/2+ 550	Intermittent Cr.	No	Handcut	None	NA	35' Both sides – No machinery to operate w/in zone.	Directional fell trees away for mulching slash.
22/4+ 350	22/4+ 450	Intermittent Crs.	No	Handcut	None	NA	35' Both sides – No machinery to operate w/in zone.	Directional fell trees away for mulching slash.

There were no threatened or endangered plant or animal species identified within the project area. This area is considered big game winter range, therefore no activity will occur until after April 1. No cultural resources have been identified within the project area.

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

Vegetation will be removed using manual and/or mechanical methods. No herbicides will be used on this project. Debris will be disposed of using either chip, lop and scatter or mulch techniques as described in Section 5 of the attached checklist.

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

No soil disturbance expected.

**6. Determine monitoring needs.**

Right-of-way will be visited during late summer to determine if target vegetation was cut and treated effectively, whether desired results were achieved and if mitigation measures were appropriately utilized and effective.

**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 or cultural resources. Therefore, no further NEPA or ESA documentation is required.

/s/ Frederick J. Walasavage

Frederick J. Walasavage

Environmental Protection Specialist – KEP

CONCUR: /s/ Thomas C. McKinney

Thomas C. McKinney

NEPA Compliance Officer

DATE: 02/25/2003

Attachment

cc:

L. Croff – KEC-4

T. McKinney – KEC-4

J. Meyer – KEP-4

F. Walasavage – KEP/Celilo

J. Sharpe – KEPR-4

P. Key - LC-7

D. Hollen – TF/DOB-1

R. Fouse – TFR/Redmond

R. Melzer – TFR/Redmond

M. Oakland – TFRF/Redmond

Environmental File – KEC-4

Official File – KEP (EQ-14)

# 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
Malin-Hilltop20/5-29/1	Total - 70 miles/230 kV	100' wide	9

- Right-of-Way – clearing in right-of-way
- Transmission Structures – clearing around
- Access Road clearing - approximate miles – 9 miles

Work to commence April 2003 and completed by May 2003.

### Rights-of-way Requirements:

- § Control all tall-growing species that are now or would be a hazard to the line.
- § Cut stumps are not to be taller than 4 – 6 in.
- § Control all tree and brush species within about 30 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 in. Pull all debris and slash out of the 30-ft. area around transmission structures.

## 1.2 Describe the vegetation needing management.

Individual juniper trees that have been topped due to mitigation requirements stated in the environmental analysis written in 1983. Trees are located under and adjacent to conductors. Should a fire occur, these trees are a hazard to the line and could cause serious damage to the conductors, resulting in significant problems for the transmission grid. Sagebrush along access roads and within 30 feet of structures will be mowed for fire prevention purposes.

## 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.

Promoting Low Growing Plants. Bonneville's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation. In some areas this is not possible.

- Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed.
- 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.

## 1.4 Describe overall management scheme/schedule.

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

Initial entry – This project is a maintenance entry. On USFS lands, vegetation will be cut with chain saws & mowers.

Subsequent entries – Every 8-10 yrs., vegetation will need to be manually/mechanically cut.

Future cycles - Same as subsequent entry.

## 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.

- Forest Service – Modoc National Forest, HQ & Tule Lake Ranger District – Necessary to receive approval from USFS to cut the remaining junipers on this segment of line.

### 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.

Submit checklist & supplemental analysis for approval. Request any additional mitigation requirements and include in contract.

### 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](#).

The environmental analysis for the construction of the Malin-Warner transmission line stated:

1. “Clearing will be limited to structure sites, danger trees, access roads, & fire hazard trees...”
2. “Top junipers when the trees would survive.”
3. According to Chapter 4, Forest Plan (3/01), incidental removal of vegetation and down woody material for activities such as administering special use permits; maintaining recreation developments; constructing, reconstructing, and maintaining roads, trails, and rights of way; expanding resorts based on approved development plans; and removing trees that present imminent safety hazards may deviate from vegetation management standards and guidelines. Exceptions to vegetation management standards and guidelines may also include restoration activities, such as regenerating aspen, managing sugar pine, and regenerating giant sequoia.

### 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.

No tree & brush permits located within this segment of line.

**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.

Hunters & recreational day users may casually use of the right-of-way but this project will likely have no effect on vegetation control.

**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.

Modoc Tribe - Notification letter will be sent.

**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.

**General requirements:**

- § In riparian areas, use selective control methods and take care not to affect non-target vegetation.
- § Leave vegetation intact, where possible.
- § Any discharge of material (displaced soils, and in certain circumstances, vegetation debris) within a water of the U.S. may be subject to U.S. Army Corps of Engineers regulations under the Clean Water Act.
- § Do not permit debris from tree falling, cutting, or disposal to fall into or be placed in any watercourse, spring, pond, lake, or reservoir, unless there is approval from the appropriate authorities for stream habitat projects.
- § For all methods using machinery or vehicles (i.e. chainsaws, trucks, graders) keep the equipment in good operating condition to eliminate oil or fuel spills.
- § Do not wash equipment or vehicles at a stream.

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
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21/2 +450	21/2 +550	Intermittent Cr.	No	Handout	None	NA	35' Both sides – No machinery to operate w/in zone.	Directional fell trees away for mulching slash.
22/4 +350	22/4 +450	Intermittent Crs.	No	Handout	None	NA	35' Both sides – No machinery to operate w/in zone.	Directional fell trees away for mulching slash.

**3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners may be able to provide this info if requested).**

See Handbook — [Herbicide Use Near Irrigation, Wells or Springs](#) for buffers and herbicide restrictions.

No herbicide application prescribed.

**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 identified.

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

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

Big game winter range exists. No operational activity will occur until after April 1.

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

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

None identified.

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

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

None identified.

### **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

Topography within this segment of line is relatively flat with very little slope.

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

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

No spanned canyons within this portion of line.

## **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.

Hand cutting and mowing are the only methods prescribed.

#### **General:**

- § When crews are working during the fire season (defined by the fire protection district with jurisdiction in the area), each crew shall have the proper fire-suppression tools and materials, as required by the responsible fire control agency.
- § Cut junipers below the lowest live limb to eliminate the continued growth of lateral branches.
- § For safety, cut all brush stumps flat where possible. (Angular cuts leave a sharp point that could cause injuries if fallen upon.)
- § For cutting trees close to "live" power lines, use only qualified personnel.

#### **Mechanical Requirements**

- § Do not use ground-disturbing mechanical equipment to clear on slopes over 20%.
- § Perform soil-disturbing or heavy mechanical clearing when the ground is sufficiently dry to sustain heavy equipment and excessive rutting will not occur.
- § Use measures to control the spread of noxious weeds.
- § Do not use ground-disturbing mechanical methods in areas with T&E plant species unless determined appropriate through consultations.
- § Do not use ground-disturbing mechanical methods in areas with cultural resources unless determined appropriate through consultations.
- § Do not use ground-disturbing mechanical methods in riparian areas.



## 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.

Mulch tops & limbs to reduce slash loading with mower. Leave bole of tree in place for wildlife purposes.

### 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.

No soil disturbance expected.

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

See 5.2

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

None identified

## 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.

Right-of-way will be visited during late summer to determine if target vegetation was cut and treated effectively, whether desired results were achieved and if mitigation measures were appropriately utilized and effective.

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

None identified.