

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: April 4, 2003

REPLY TO  
ATTN OF: KEP/4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-142- KeelerOregon City #2)

TO: Mark Newbill  
Natural Resource Specialist– TFE/Chemawa

**Proposed Action:** Vegetation Management for the Keeler-Oregon City #2 115 kV transmission line from Keeler Substation to Oregon City Substation. Includes 5 miles of the St. Johns-Oregon City #2 69 kV transmission line.

**Location:** The project is located in the BPA Eugene Region, Washington County, Oregon.

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

**Description of the Proposal:** BPA proposes to remove unwanted vegetation via hand cutting along the right-of-way, access roads, switch platforms, microwave beam paths, and around tower structures of the subject transmission line corridor that may impede the operation and maintenance of the identified transmission lines. 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 Keeler-Oregon City #2 115 kV transmission line rights-of-way for "on" right-of-way control and access road clearing of noxious weeds and tall growing species. The proposed treatment will be performed in designated areas along the ROW's with an easement width of 100 feet. See attached checklist and documents for exact locations of treatment within the corridor.

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

The project corridor passes through a variety of land ownerships and land uses including; light industrial/commercial, urban residential, city parks, City of Beaverton, commercial Holly tree farms, and City of Tualatin. Landowners requiring notification or under tree and brush agreements are shown in Section 2.4 of the attached checklist.

Any 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:**

Riparian habitat includes rivers, wetlands, streams, and creeks meeting the definition of riparian habitat. Many areas were identified for this project. Site specific requirements for work around these resources, including buffers are contained in Section 3.1 of the attached checklist.

**Irrigation sources, Wells, and Springs:**

No known irrigation sources, wells, or spring were identified in the project area.

**Threatened and Endangered Species/Essential Fish Habitat (EFH):**

No threatened or endanger species/EFH were identified in the project area.

**Visually Sensitive Areas:**

Several areas were identified where the project crosses roadways. Vegetation management methods and mitigation measures were specifically developed for each area. The measures are summarized in Section 3.5 of the attached checklist.

**Cultural Resources:**

No known cultural resources are present through out the project area. The project does not include any ground disturbance areas. In the event that project activities unearth or discover any cultural/historic or prehistoric materials, work will cease immediately; and will not resume until a professional archaeologist has evaluated the site.

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

Mechanical removal of vegetation will be accomplished using various methods with debris being scattered to prevent increased fire hazards. Chipping, lop and scatter, and mulching are the three methods that will be used for debris disposal (see Section 4 and 5).

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

Re-vegetation is not necessary for this project. In mowing areas, the mowers will cut slightly above grade. This prevents erosion and stimulates native grass.

**6. *Determine monitoring needs.***

Monitoring will occur in the form of inspection while work is being done in the area. When convenient, subsequent monitoring will occur by the Natural Resource Specialist and TLM crew. Helicopter patrols (3 times/year) and working patrols (yearly) will also keep the NRS updated on problem areas.

**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/ Shawn L. Barndt  
Shawn L. Barndt – KEPR/4  
Environmental Physical Scientist

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

DATE:04/17/2003

Attachment

cc:

L. Croff – KEC-4  
T. McKinney – KEC-4  
B. Sherer – KEP-4  
C. Leiter – KEP-4  
J. Meyer – KEP-4  
P. Key – LC-7  
D. Hollen – TF/DOB-1  
B. Tilley – TFE/Alvey  
T. Jones – TFE/Alvey  
K. Barber – TFEK/Chemawa  
Environmental File – KEC-4  
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
Keeler-Oregon City #2 (Includes St. Johns- Oregon City #2)	17 miles and 115 Kv 5 miles and 69 kv	100 feet  100 feet	5/2 –11/1 & 20/1-22/12 1/1 –5/1 managed by Ross 11/1-20/1 managed by PGE per lease agreement

The vegetation control method used on the Right-of-Way (ROW) will be hand cutting. Topping, side-liming, and pruning trees off ROW trees will be used in urban areas.

The project will include Switch platforms, Danger Trees, or microwave beam paths

## 1.2 Describe the vegetation needing management.

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

Vegetation type: Douglas-fir, Wild Cherry, Cedar, Cottonwood, Big leaf Maple, Ash, Red Alder, Pine and many varieties of Fruit and Ornamental trees

Low Density (0-50 stems per acre)

Noxious weeds: Blackberries, Tansy Ragwort and Scotch Broom.

## 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.

Removing small fir trees and hardwoods allows grass and small shrubs to expand. Many areas are in private residence (backyard) or City parks and LGPC is not the goal.

## 1.4 Describe overall management scheme/schedule.

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

**Initial entry** – Cut and or prune trees back a safe distance from the line. Summer treatment after growth and dry weather conditions. Crews will use bucket trucks or climb trees and chip all debris. This is an urban Forestry operation. No chemicals will be used do to the high urban population and Residential nature of the line.

**Subsequent entries** – Return every year or every two years to trim trees as needed to maintain safe distance from tree to conductor.

**Future cycles** – Try to achieve a 2-year trimming cycle.

# 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.

Light Industrial / Commercial  
Urban Residential  
City of Beaverton

City Parks  
 Commercial Holly tree farms (permitted T & B)  
 City of Tualatin

**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.

Every landowner is sent a Letter notifying them of the scope and timetable for the Project. Letters will be sent out 2 weeks prior to start date.

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

Span		Landowner/use	Specific measures to be applied
To	From		
7/9	7/10	Comm. Tree Farm	Do not cut Holly trees
9/3	9/8	Nike Corp. 10 ft (T & B Agreement)	Nike manages vegetation on their property
20/3	20/4	Show Horses	Hand cut only, contract owner before any action

**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.

See Above Table

**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.

Span		Waterbody	T&E?	Herbicide	Application Technique	Other
To	From					
6/8	6/9	PFOC, PEMC (wetlands)	No	N/A	Hand cut only	Work in late summer
6/8	6/9	Unnamed Creek	No	N/A	Hand cut /chip	
7/7	7/8	Unnamed Creek	No	N/A	Hand cut /chip	
9/10	9/11	PFOC (wetland)	No	N/A	Hand cut only	Work in late summer
9/10	9/11	Unnamed Creek	No	N/A	Hand cut /Chip	
10/10	10/11	PEM1Y (wetland)	No	N/A	Hand cut only	Work in late summer
20/11	21/2	PSS/EM1Y (wetland)	No	N/A	Hand cut only	Work in late summer
20/11	21/1	Unnamed Creek	No	N/A	Hand cut /chip	

#### 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.

Herbicides will not be used.

#### 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 Known

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

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

Small shrubs will be left for bird habitat

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

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

The line criss-crosses City Streets, County Roads, and US Highways. Trees will be topped or left if adequate clearance exists. All woody debris will be chipped back 50 feet from the blacktop. Locations of road crossings are listed below.

Span		Describe sensitivity	Method/mitigation measures
To	From		
7/2	7/3	W. Union Road	Top or trim trees as needed. Clean-up debris
7/11	7/12	NW Cornell Road	Top or trim trees as needed. Clean-up debris
8/3	8/4	Sunset HWY	Top or trim trees as needed. Clean-up debris
8/7	8/8	Pioneer Street	Top or trim trees as needed. Clean-up debris
9/2	9/3	SW Walker Rd.	Top or trim trees as needed. Clean-up debris
9/10	9/11	SW Jenkins	Top or trim trees as needed. Clean-up debris
10/2	10/3	Railroad	Top or trim trees as needed. Clean-up debris
10/1	10/12	Tualatin Valley HWY	Top or trim trees as needed. Clean-up debris
21/7	21/8	Tonquin	Top or trim trees as needed. Clean-up debris
22/3	22/4	Mulloy Rd	Top or trim trees as needed. Clean-up debris

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

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

None Known

No known cultural resources present. No ground-disturbing activity will occur. If evidence is found of cultural resource (artifacts, features, burial sites), work will cease immediately and appropriate authorities will be contacted.

**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.

The project area is primarily flat (<10 %). In a few remote locations (>10 %), hand cutting will be the only method used.

Describe sensitivity	Method/mitigation measures
Slopes >10 %	Removal limited to tall growing species

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

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

None Known



#### 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.

Span		Methods, including herbicide active ingredient, trade name, application technique <b>No biological or herbicides will be used.</b>
To	From	
5/5 20/1	11/1 22/11	The project area is “Urban”. As such, manual tree trimming / pruning, and topping by climbing or bucket truck is the primary method.
5/2 20/1	5/5 22/11	In limited areas, small mowers can be used to clear S. Broom and blackberries
6/8	6/9	Wetlands areas will be hand cut in late summer dry condition. Woody debris will be pulled out and chipped or finely C,L, & S.
9/10	9/11	Wetlands areas will be hand cut in late summer dry condition. Woody debris will be pulled out and chipped or finely C,L, & S.
10/10	10/11	Wetlands areas will be hand cut in late summer dry condition. Woody debris will be pulled out and chipped or finely C,L, & S.
20/11	21/2	Wetlands areas will be hand cut in late summer dry condition. Woody debris will be pulled out and chipped or finely C, L, & S.

#### 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.

All limbs and woody debris generated from manual cutting will be chipped and hauled away from the site. That includes all street, road, highway, and railway crossings.

##### 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.

None planned, open sunlight and naturally disturbed areas enhance native grasses to flourish. Sufficient native plants already exist. In mowing areas, the mowers cut slightly above grade. This prevents erosion and stimulates existing grass. Seeding is not needed.

##### 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.**

NRS will be on site 1 day per week during the project. After 2 months, NRS will make a site visit to evaluate control and plan follow-up treatments.

TLM makes annual ground patrol. BPA helicopters patrol 3 times a year.

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

If mitigation was put in place, on site visit will be conducted to monitor. Otherwise no mitigation is expected.

## **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”.**

None, Project is consistent with EIS.

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

None