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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: June 4, 2003

REPLY TO ATTN OF: KEP/4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-160- Albany-Lebanon1)

TO: Ben Tilley – TFE/Alvey

Proposed Action: Vegetation Management for the Albany-Lebanon #1 115 kV transmission line from Albany Substation to Lebanon Substation.

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

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, access roads, switch platforms, and around tower structures of the subject transmission line 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 Albany-Lebanon #1 transmission line rights-of-way for "on" right-of-way control (including ROW clearing, danger trees, switch platform, and structure clearings) 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 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 rural, residential, urban (Cities of Albany and Lebanon), agricultural, and grazing lands. 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. Letters that are returned will have a personal visit to the new landowner. 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. Sit 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 Wells, Irrigation sources, or springs were identified in the project area.

Threatened and Endangered Species/Essential Fish Habitat (EFH):
Bradshaw's Lomatium was the only threatened and endangered species/essential fish habitat identified in the project area. Avoidance measures will be implemented to maintain a "no effect" determination on the listed species. For a detailed listing see Section 3.3 in the attached checklist.

Visually Sensitive Areas:
Several areas were identified where the project crosses several sensitive areas. 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.

Herbicide application will be for spot/stump treatment of re-sprouting species and conducted using backpack sprayers containing 25% Garlon 4 and 75% web oil mix. 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 of the attached Checklist).

5. Determine revegetation methods, if necessary.

Re-vegetation is not necessary for this project. Reseeding will occur naturally in any areas that are lightly disturbed. 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 (4 times/year) and working patrols (yearly) will also keep the NRS updated on problem areas.

Erosion potential will be monitored during each inspection. Growth rate and return of species along tower sites and access roads will be monitored to predict accessibility in the foreseeable future.

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/ Brett M. Sherer
Brett M. Sherer – KEP/4
Environmental Engineer

CONCUR:*/s/ Robert Beraud for* DATE:06/10/2003
Thomas C. McKinney
NEPA Compliance Officer

Attachment

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
C. Leiter – KEP-4
J. Meyer – KEP-4
P. Key – LC-7
D. Hollen – TF/DOB-1
J. Hilliard Creecy – T-DITT2
T. Jones – TFE/Alvey
M. Newbill – TFE/Chemawa
G. Burbach – TFEF/Alvey
Environmental File – KEC
Official File – KEP-4 (EQ-14)

Bsherer:bs:3928:6/5/2003 (KEP-KEP-4-W:\EP\2002 & 2003 FILES\EQ\EQ-14\FEIS-0285-SA-160 -Albany-Lebanon1.doc)

Vegetation Management Checklist

Prepared by:
Benjamin J. Tilley
Natural Resource Specialist
TFE/Alvey

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
Albany-Lebanon #1	16.84 miles 115 kV	Pole line easement (PLE) to 100’	5 miles of treatment—various spots

Right Of Way:

Right-of-Way – clearing in right-of-way

Transmission Structures – clearing around

Danger Trees

Access Roads - approximate miles: <1 miles (1-3 acres)

1.2 Describe the vegetation needing management.

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

Vegetation Types:

Douglas Fir

True Fir

Hemlock

Alder

Cedar

Wild Cherry

Willow

Residential/Orchard Tree-trimming

Noxious Weeds: Scotch broom, Himalayan blackberry

Density: Low (50 stems or less/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.

Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed. (In places where tall growing vegetation must be left in place, it may not be possible to promote low-growing plants.)

Cut-stump or follow-up herbicide treatments on resprouting-type species will be carried out to ensure that the roots are killed.

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 – Initial entry will entail the activities described above (promoting LGPC). In addition, the first two miles of the corridor crosses dense residential areas. Trees in residential areas will be cut/pruned back to a safe distance from the transmission line. Crews will use bucket trucks, climbing gear, and chippers to reduce and remove debris off-site. Herbicide treatments include: spot stump treatment of resprouting species and low-volume foliar treatment of noxious weeds and around structure sites.

Subsequent entries – The line will be cut in such a way that there should be no concerns of tall-growing species under the lines for the duration of the 5-year cycle. Residential area will require annual work to maintain backyard trees a safe distance from the transmission line.

Future cycles – Every year for urban forestry activities, try to increase cycle of rest of line to 7 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:

Rural

Residential

Agricultural

Grazing Lands

Urban (City of Albany, City of Lebanon)

Counties: Linn County, Oregon

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.

Form letters will be sent out to all known landowners of the right-of-way. These letters will be sent out 3 weeks prior to the job starting. This allows time for sufficient response of landowner's in case there is any overriding concerns, comments, or restrictions that may apply. Any letters that are returned will have a personal visit to the new landowner.

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**		
Albany Sub	1\20	Various LUAG's for residential infrastructure	Each landowner will be contacted personally before any work takes place. All agreements will be respected.
2\8–300'	2\8	Trees used for road screen	Trees are to remain but not to exceed 18' in height. Will trim if necessary.
3\1	3\3+175'	Fruit Orchard	Trees are to remain but not to exceed 18' in height. Will trim if necessary.
15\2	15\6	Wetland Mitigation Bank	Only TGS that are a threat to the transmission line will be managed.

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.

Refer to table above.

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.

Refer to table above.

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.

Refer to table above.

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?	Method	Herbicide	Application Technique	Buffer
To	From						
2\8+\-100’		PSSA (wetland)	No	No work in this area	None	N/A	N/A
2\8–70’		Unnamed creek	No	No work in this area	None	N/A	N/A
3\4+112’	3\4+172’	Oak Creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’
3\5+585’	3\5+675’	Oak Creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’
3\7+315’	3\7+395’	Oak Creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’
7\3+403’		Unnamed creek (dry)	No	No work in this area	None	N/A	N/A
7\4	7\4+100’	Oak Creek	No	No work in this area	None	N/A	N/A
7\4+425’		Oak Creek	No	No work in this area	None	N/A	N/A
13\3–250’		PFOAd (wetland)	No	No work in this area	None	N/A	N/A
13\3+150’		Oak Creek	No	No work in this area	None	N/A	N/A
13\5+393’	13\5+440’	Oak Creek	No	No work to be done	N/A	N/A	N/A
15\3+403’		Oak Creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’
15\6+211’	15\6+226’	Oak Creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’

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.

N/A

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 To	T&E Species	Method/mitigation or avoidance measures
16\3 – 100’	Bradshaw’s Lomatium	No work to be done in immediate or adjacent areas.

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

Encouragement of grasses will help to improve forage potential for large game along access roads.

Shade-providing plants near water bodies will be trimmed to help provide clear access along the roads and improve forage diversity without compromising shade potential of the crossing.

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

Span		Describe sensitivity	Method/mitigation measures
To	From		
1\18	1\19	Liberty St.—Residential road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
1\19	1\20	Fir Oaks Dr.—Residential road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
2\7	2\8	34th Ave.—Residential road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
3\6	3\7	Lochner Rd.—Rural road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
4\5	4\6	Intersection of Ellingson rd. & Columbus St.—Rural road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
5\6	5\7	Interstate 5—Federal freeway road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
13\8	14\1	10th St.—Residential road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
14\1	14\2	Vaughn Rd.—Rural road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.

14\7	14\8	S. Main Rd.—Residential road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
15\1	15\2	Hillview Dr.—Residential road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
15\6	15\7	Rock Hill Dr.—Residential road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
16\8	16\9	Sodaville Rd.—Rural road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.
17\7	17\8	State Hwy. 20—State highway road crossing	Top/shape all vegetation that is a threat to the line. Chip and remove all debris off-site.

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

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

Removal of vegetation on steep slopes restricted to tall-growing species that are a hazard to the transmission line.

3.8 List areas of spanned canyons and the type of cutting needed.
See Handbook – **Spanned Canyons** for requirements.

Removal of vegetation in spanned canyons restricted to tall-growing species that are a hazard to the transmission 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.

Methods, including herbicide active ingredient, trade name, application technique

Select Cut= cut, lop and scatter to extent necessary to prevent fire hazard. Low Cut= Remove all vegetation at ground level, CLS to prevent fire. Chip Acres= select cut and chip all debris generated. Remove off-site in residential areas.

Access Road Acres= select/low cut method on access roads. Side-limb=remove limbs/tops of large trees. Shape trees for satisfactory appearance.

Tower Sites= low cut method 30-50’ radius around tower site Herbicide application—spot/stump treatment of resprouting species. Backpacks will be used with a 25% Garlon 4 / 75% crop oil mix. ----Refer to attached detail sheet for span-by-span analysis

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.

Cut, lop and scatter to the extent to prevent increased fire hazard.

Chipping will be done where visually sensitive areas exist as well as per landowner request.

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.

Native, naturalized, and non-native grasses are present on the entire ROW that will naturally reseed into the areas that have been lightly disturbed by vegetation management activities.

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.

Monitor brush control as it is happening on a daily basis. Monitoring will also occur every few months as the situation lends itself. Working patrol will determine when subsequent entry for access road and tower site clearing will be needed (performed in the winter). Helicopter patrol will help determine when tall-growing species need attention. Ground patrols by the NRS will occur every few months.

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

Survey vegetation growth of native and weed species in sensitive areas. Monitor for erosion potential during every inspection. Monitor growth rate and return of species along tower sites and access roads to predict accessibility in the foreseeable future.

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 needed.