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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: September 11, 2001

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-26)

TO: Ben Tilley – TFE/Alvey
Natural Resource Specialist

Proposed Action: Vegetation Management on Reedsport-Fairview #1 Transmission Line Structure 1/5 to 39/4.

Location: All ROW are located in Coos and Douglas Counties, OR, all being in the Eugene Region.

Proposed by: Bonneville Power Administration (BPA), Eugene Region.

Description of the Proposed Action: BPA proposes to clear unwanted vegetation in the rights-of-ways and around tower structures that may impede the operation and maintenance of the subject transmission line. 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. All work will be executed in accordance with the National Electrical Safety Code and BPA standards

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 clear tall growing vegetation that is currently or will soon pose a hazard to the lines; treat the associated stumps and re-sprouts with herbicides, mow and treat access roads and structure sites. All work will take place in existing rights-of-ways.

Also, all off right-of-way trees that are potentially unstable and will fall within a minimum distance or into the zone where the conductors swing will be removed. The width of the ROW is 100 feet. All work will be accomplished by selective vegetation control methods to assure that there is little potential harm to non-target vegetation and to low-growing plants. The work will provide system reliability.

The vegetation control is designed to provide a 4-year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all trees using cut, lop and scatter and basal treatment or cut and chip methods as shown on the vegetation control prescription sheets. After completion of this cutting cycle, there is the potential to increase this cycle by another year (5-year cycle), depending on the growth vigor of trees surrounding the line.

Future cycles of work will involve the treatments used in the previous phases of work.

2. Identify surrounding land use and landowners/managers.

The subject corridor traverses generally mountainous terrain. The transmission line crosses both residential and rural properties, agricultural land, industrial forest lands, and Coos County Lands.

Prior to work beginning, 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 will allow sufficient time for landowners to provide any overriding concerns, comments, or restrictions that may apply.

3. Identify natural resources.

Water wells, spring, riparian, riparian T&E, and Coho Salmon habitat have been identified. Steep, moderately and level terrain have been identified in the areas of the proposed work. These areas have been tentatively identified during patrols and by using existing data sources. The Project Manager will positively identify the habitats as work progresses along the corridors. No other T&E/wildlife issues, visually sensitive areas, cultural resources or other natural resource issues have been identified along the other work corridor.

- Riparian and water supply wells. Refer to the attached vegetation checklist for location. All buffers as outlined in the vegetation FEIS are in effect.
- Riparian T&E areas. Buffers as outlined in the Vegetation FEIS are in effect for streams and rivers with ESA listed Coho. Below is a list of crossing where buffers are in effect (for actual buffer locations and widths see the attached checklist).
    - Winchester Creek – Structures 3/4 to 3/5,
    - Clear Creek – Structures 8/3 to 8/4,
    - Eel Creek – Structures 9/1 to 9/2,
    - Tenmile Creek – Structures 10/6 to 10/7,
    - Bear Creek – Structures 14/5 to 14/6,
    - North Slough – Structures 16/1 to 16/2,
    - Palouse Creek – Structures 17/3 to 17/4,
    - Larson Slough – Structures 18/3 + 50’,
    - Mettman Creek – Structures 19/6 to 20/1,
    - Kentuck Creek – Structures 21/2 to 21/3,
    - Willanch Creek – Structures 22/4 to 22/5,
    - Johnson Creek – Structures 22/5 to 23/1,
    - Echo Creek - Structures 24/4 to 24/5,
    - Coos River – Structures 25/4 to 25/5,
    - Lillian Creek – Structures 25/6 to 25/7,
    - Catching Slough – Structures 27/3 to 27/4,
    - Ross Slough – Structures 28/1 to 28/2,
    - Boone Creek – Structures 32/4 to 32/5,
    - Catching Creek – Structures 33/1 to 33/2, and
    - Steele Creek – Structures 37/3 to 37/4.
- No culvert work and/or ‘in stream’ work is to take place without prior consultation with the appropriate government agencies and permits are in place.

See attached ROW vegetation checklist for treatment methods and planned herbicide use in all other non-critical areas.

Prior to the beginning of the work, the contractor will be provided with a set of the project maps, as well as with a list of management prescriptions from the Vegetation Management FEIS.

The herbicides used for vegetation management will be consistent with what is specified in the Vegetation Management FEIS.

4. Determine vegetation control and debris disposal methods.

Initially, mechanical methods will be employed along access roads and around tower sites to control taller vegetation. As a follow up, unwanted vegetation would be removed by employing cut-stump, spot spraying, and follow-up stump treatment with 25% Garlon and 75% crop oil mix. The chemical means would be employed to prevent re-sprouts. Prevention of re-sprouts encourages low-growing plant communities to establish themselves and flourish on the right-of-way. This impact avoidance approach both maximizes the use of limited resources and minimizes environmental impacts. Herbicides will be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions. The herbicide used will be consistent with Vegetation Management FEIS.

All riparian and riparian T & E buffer zones are in effect and will be strictly enforced as outlined in the Vegetation Management FEIS and as shown on Attachment A and the attached vegetation checklist. Treatments on steep, moderate and level slopes will be consistent with the Vegetation Management FEIS and as shown on the attached checklist.

The contractor will receive a list of required mitigation measures (management prescriptions) to follow as well as a set of maps delineating the transmission line and potential sensitive resource areas. The contractor will follow manufacturers' label instructions when applying herbicides.

5. Determine re-vegetation methods, if necessary.

Reseeding /replanting regimes are not determined to be necessary at this time.

6. Determine monitoring needs.

An inspector will monitor the work being performed at the time of the initial work. Follow-up inspections will be preformed during line patrols by the line crew, helicopter reports and by the NRS. Additional required work would be identified at that time.

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/ Brett M. Sherer
Brett M. Sherer
Environmental Engineer - KEP

CONCUR: */s/ Thomas C. McKinney* DATE: *9/13/01*
Thomas C. McKinney
NEPA Compliance Officer

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Reedsport-Fairview	41 miles 115 kV	100'	41 miles

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**.

Right Of Way:
Right-of-Way – clearing in right-of-way
Transmission Structures – clearing around
Access Road clearing - approximate miles – 36 acres
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
True Fir
Hemlock
Pine
Spruce
Alder
Maple
Oak
Popular
Cedar
Madrone
Wild Cherry
Residential/orchard tree-trimming
Noxious Weeds - Tansy ragwort, thistle (various spp.), Him. Blackberries, scotchbroom, gorse Blackberries

Density:
Medium (50 – 250 stems/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 activities described above.

Subsequent entries – Subsequent entries will probably not be necessary due to the sparse vegetation surrounding most of the access roads. Much logging has happened since the last cutting cycle and, therefore, very little vegetation exists on most of the access roads. 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 4-year cycle.

Future cycles – This line is on a 4-year cycle due to it's location near the south Oregon Coast. After completion of this cutting cycle, there is the potential to increase this cycle by another year (5-year cycle), depending on the growth vigor of trees surrounding the line.

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.

Residential
Rural
Agricultural
Industrial Forest Lands
State/City/County Lands—Coos County

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.

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		
			Refer to detail sheet

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 detail sheet

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 detail sheet

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 I am aware of.

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	Other
To	From							
		Refer to detail sheet						

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.

Span		Well/irrigation/or spring	Herbicide	Buffer	Other notes/measures
To	From				
		Refer to detail sheet			

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		
Fill-in		Coho Salmon listed in waterways of the 6-8 mile	No herbicides will be used in this area within 100' of the waterways with endangered species.

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

Span		Species	Measures
To	From		
		NONE	

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		
			Refer to detail sheet for listing of visually sensitive areas. Chipping and removal of debris required.

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

Span		Describe sensitivity	Method/mitigation measures
To	From		
		None I am aware of.	

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.

Span		Describe sensitivity	Method/mitigation measures
To	From		
			Refer to detail sheet

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

Span		Methods, cutting
To	From	
		Refer to detail sheet

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**, **Herbicides** for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
To	From	
		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 Access Road Acres= select/low cut method on access roads Side-limb=remove limbs/tops of large trees 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 of avoiding increase fire hazards.

Chipping will be done on debris where visually sensitive areas exist and 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.

Span		Reason for Reseed/plant	Type of Seed or Plants	Native?
To	From			
		None		

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

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

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.

Monitoring will occur in the form of inspection while the work is being done. Subsequent monitoring will occur by the Foreman 1 and his crew as well as by the Natural Resource Specialist at convenient times. Helicopter reports and working patrol will keep the NRS updated on hot spots.

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

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".

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