

United States Government

Department of Energy

Bonneville Power Administration

memorandum

DATE: February 19, 2002

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-40)

TO: William T. Erickson - TFP/Walla Walla
Natural Resource Specialist

Proposed Action: Vegetation Management along the Allston-Keeler 500 kV Transmission Line ROW exclusive to BLM lands between 8/4 through 27/4. The proposed work will be accomplished in the indicated sections of the transmission line corridor with an average corridor width of 150 feet.

Location: The ROW is located in Washington and Columbia County, in the State of Oregon, Olympia Region.

Proposed by: Bonneville Power Administration (BPA).

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 lines and access roads, including Reclaim and Danger Trees. The lands in this SA are administered by BLM. 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. Work is to begin in March 2002. In accordance with a court injunction, no chemical treatment is planned on BLM lands.

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). The Planning steps are described in Attachment 1, Checklist.

- Mechanical treatment will remove danger trees and taller vegetation to encourage low-growing plant communities to establish themselves and flourish on the right-of-way.
- BLM was consulted. The results of the consultation, including mitigation for T&E water resources, are contained in Attachment 2. Attachment 3 shows the resulting prescriptions incorporating BLM concerns.
- The Grande Ronde Tribe was contacted by letter and phone. No concerns were expressed. (Attachment 1, Checklist.)

- Marbled Murrelet and/or Spotted Owl habitat may be present (currently un-surveyed) on adjacent BLM lands. Timing mitigation has been incorporated into the checklist in accordance with the FEIS and ROD. (See Attachment 1, Checklist.)

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. T&E fish and wildlife are not affected with implementation of the attached mitigation measures therefore no formal consultation is required.

/s/ Mark W. Hermeston
Mark W. Hermeston – KEP-4
Physical Scientist (Environmental)

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

DATE: 2/20/02

ATTACHMENT 1 - CHECKLIST

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

Describe Right-of-way.

The subject corridor traverses rural, industrial forestlands on BLM ownership. Vegetation is of moderate density with the average height being less than 14 feet tall. The site has the potential of being treated with basal stem treatments. The managed right-of-way width will is 150 feet.

Corridor Name	Corridor Length & kV	Easement width	AREAS of Treatment
Keeler Allston	43 miles 500 kV	150	9/4+279 to 9/2+63 13/3+532 to 13/3+1605 16/1+949 to 16/3+1205 17/3+129 to 18/1+250 18/2+1266 to 18/3+471 18/5+872 to 19/2+797 19/5+168 to 20/1+397 20/2+223 to 21/3+1297 22/4+695 to 23/4+600 25/1+622 to 25/2+304 26/2+456 to 27/4+790

THIS CHECKLIST DEALS WITH THE BLM LANDS ONLY

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 – up to 15 acres

Reclaim (“C”) Trees

Danger Tree clearing- future

1.2 Describe the vegetation needing management.

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

Vegetation Types:

Douglas Fir-Conifers

Alder

Popular

Wild Cherry

Noxious Weeds - none planned at this time

Blackberries

Poison Oak

Density:

High (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 — Promoting Low-Growing Plant Communities for requirements and checkboxes.

Not Promoting Low Growing Plant Communities Describe Why?

BLM has a legal injunction which prohibits the use of herbicides on their lands. This will require cyclic treatments every 1.5 to 3 years. The cycle will shorten and the cost will increase over time.

These efforts will be implemented

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. [This is done for maintenance of already controlled rights-of-way. This should be done when the saplings are very young.]

1.4 Describe overall management scheme/schedule.

See Handbook - Overall Management Scheme/Schedule.

Subsequent entries – subsequent entries will be needed as follow-up to treat re-growth from 1.5 to 2 years after initial treatment. Danger trees will be cut and removed.

Future cycles – As tall growing species are controlled every 1-3 years. More intense treatments will be needed to ensure the safety of the line. Mowing of heavy brush may be needed. Also review for Danger trees and other hazards will take place. Noxious weeds treatments may be needed.

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. Also, access road clearing will be conducted. 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. This goal will not be attained in the near future due to the inability to use herbicides to control re-sprouting hardwood species. All tall growing tree species over 1 foot tall will be controlled

The width of the ROW easement is 150 feet. All work will be accomplished by selective hand cutting and non-selective (mowing) vegetation control methods. The work may provide system reliability in the short term.

Initial entry –

Brush management on the ROW work will be to clear tall growing vegetation that is currently or will soon pose a hazard to the lines; by controlling tall growing vegetation before it reaches a height or density. Desirable low-growing plants will not be disturbed on the right-of-way by using selective control methods, and by keeping trucks and equipment on designated access roads and trails. All work will take place in existing rights-of-ways. Slash and debris will be loped and scattered.

Danger Trees are currently being marked and identified.

The herbicide injunction has not been settled at this time. No herbicide methods are proposed for BLM lands.

Access roads and Tower sites will be treated using selective and non-selective methods that include, hand cutting and mowing.

Subsequent entry

In the near future, Danger trees that are off of right-of-way and are potentially unstable and will fall within a minimum distance or into the zone where the conductor swing will be cut. Trees that are an imminent hazard (emergency) will be removed when identified. The danger tree process requires a survey of the trees by a specialized BPA crew that identifies hazard trees along the ROW, marks them, appraises the trees, and negotiates with the landowner on the details of falling the tree. The tree remains the property of the landowners. Danger Trees on BLM lands may be marked and removed using a full back line strategy

The vegetation management program will be designed to provide a 1.5 to 3 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all tall growing trees using a combination of manual and mechanical treatments as outlined in the initial treatment

Future cycles -

Future cycles of work will involve tree cutting and mowing. During routine patrols, the ROW will be examined for edge and danger trees with appropriate actions taken

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.

All BLM land

BLM Salem District Office, Tillamook Resource Area

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.

The Tillamook Resource office of the BLM has also been consulted.

Contacts BLM Katrina Symonds 503 815-1141

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.

Requirements

- **When facilities cross state or local agency lands, notify, and cooperate with those entities (such as State Parks or county lands) prior to vegetation control activities, as appropriate.**

BPA is in consultation with BLM

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.

The following landowners have responsibility for vegetation maintenance. (Identify spans where BPA doesn't cut due to landowner agreements — Christmas tree farm, orchard, etc.)

N/A

If landowners have houses or facilities within 200 feet of the Right-of-way, the contractor will contact them in person or leave a door hanger at the facility within two days before treatment.

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

Landowners and adjacent landowners are users. BLM lands are open to the public.

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.

Contacted Grande Ronde Tribe. By letter and Phone. No issues were expressed.

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.

Water Resources for requirements for working near water resources including buffer zones.

LOCATION			(1)	(2)	(3)	CODE	
STR. NO.	FROM	TO	WIDTH	LENGTH	ACRES		
7/1	1050	1300	150.0	250	0.9	T&E	Rock Creek Lake Van Raden
9/1	0	1059	150.0	1059	3.6	ZB	INTERMITTENT WATER AT +500
11/3	875	1650	150.0	775	2.7	T&E	
13/3	352	1605	150.0	1253	4.3	ZB	INTERMITTENT WATER AT DRAWS
12/4	575	1220	150.0	645	2.2	T&E	T&E
14/1	825	1125	150.0	300	1.0	T&E	T&E
17/1	0	500				T&E	T&E
17/1	500	1100	150.0	600	2.1	T&E	RIPARIAN T&E
17/1	1100	1447	150			T&E	
17/2	0	796	150.0	796	2.7	T&E	INTERMITTENT WATER AT DRAWS T&E
17/3	0	129	150			T&E	T&E
17/3	129	650	150.0	521	1.8	ZB	BLM 17/3+129 TO 18/1+250
17/3	650	900	150.0	250	0.9	BB	RIPARIAN

LOCATION			(1)	(2)	(3)	CODE	
STR. NO.	FROM	TO	WIDTH	LENGTH	ACRES		
20/2	223	830	150	607	2.1	T&E	BLM 20/2+223 TO 21/3+1279 R-T&E ZONE East Fork Dairy Ck
20/2	1250	1750	150.0	500	1.7	T&E	R-T&E ZONE
22/4	695	1350	150.0	655	2.3	T&E	T&E BLM 22/4+695 TO 23/4+600
23/3	900	1800	150.0	900	3.1	ZB	INTERMITTENT WATER AT DRAWS
23/4	0	600	150.0	600	2.1	ZB	END BLM - INTERMITTENT WATER AT DRAWS
24/2	1350	1450	150.0	100	0.3	T&E	R-T&E ZONE +100
27/3	450	1450		1000	0.0	STC	T&E STREAM STC AREA Kenusky Ck

BLM has identified sensitive streams (18) both on and off of the BLM system. BPA will apply the appropriate mitigations at these sites

1. Rock Creek 7/1 Cutthroat T&E
2. Jackson Creek 9/2 Cutthroat Spanned Canyon
3. E. Fork McKay 10/3 Steelhead Spanned Canyon
4. Creek 11/2 Steelhead Spanned Canyon
5. Creek 11/3 Cutthroat Spanned Canyon
6. Creek 11/4 Cutthroat Spanned Canyon
7. Creek 12/4 Steelhead Spanned Canyon/T&E
8. Creek 13/1 Cutthroat Spanned Canyon
9. Creek 14/1 Cutthroat T&E
10. Creek 14/4 Cutthroat Spanned Canyon
11. Creek 17/1-17/3 Cutthroat adjacent to the ROW T&E
12. Creek 20/2 Steelhead Spanned Canyon T&E
13. Creek 20/3 Cutthroat Spanned Canyon
14. Creek 22/4 Cutthroat T&E
15. Creek 24/2 Coho Spanned Canyon
16. Creek 25/1 Coho Spanned Canyon
17. Creek 26/6 Cutthroat Spanned Canyon
18. Kenusky 27/3 Coho Spanned Canyon

SALMON T&E STREAMS (BLM LANDS) Code T&E on cut sheet

BLM lands within 122 m (400 ft.) of a listed stream. Available: manual, mechanical, and biological treatments. No mechanical within 100 feet of streams except for tower sites and access roads.

No Herbicide Treatments at this time on BLM Lands. (11/01)

Manual: Hand tools and chainsaws

Mechanical: None within 100 feet of stream. Except for Access Roads and Tower sites. On the Right-of-way, no ground disturbing activities within 400 feet from the stream.

STREAMS AND WETLAND BLM Lands Code “BB on Cut sheet

State Forest or private lands, within 30.5 m (100 ft.) of a stream. Available: all manual and biological treatments

Manual: Hand tools and chainsaws

Mechanical: None, within 25 feet of streams or wetlands. Even on Access Roads and Tower sites

No Herbicide Treatments at this time on BLM Lands. (11/01)

Table F-2: BLM Buffer Zones (Western Oregon)

Method	Buffer Width
No Ground-disturbing Mechanical (Tractor operations may be limited to periods of minimum soil moisture levels)	Within 7.6 m or 25 ft. of streams

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.

T&E Plant or Animal Species for requirements and determining presence.

None Listed in Data Base except for T & E Steams which are addressed in the previous section.

Span		T&E Species	Method/mitigation or avoidance measures
To	From		
26/6+456 25/1+622	27/4+790 25/2+304	Marbled Murrelet	<ul style="list-style-type: none"> ▪ If a tree needing removal is greater than 80 cm (32 in.) in diameter at breast height and has suitable nest tree characteristics, initiate formal consultation with the USFWS. ▪ During core breeding season, from April 1- August 5, do not carry out maintenance activities (e.g., chainsaw work) that produce noise above ambient noise levels, within 0.4 km (0.25 mi.) of known marbled murrelet habitat or occupancy (based on marbled murrelet maps). ▪ During the late breeding season, from August 6 - September 15, do not carry out maintenance activities using motorized equipment within 0.4 km (0.25 mi.) of marbled murrelet habitat or occupancy within two hours after sunrise or within two hours before sunset. <p>If planning herbicide use in marbled murrelet habitat, further consultation with US Fish & Wildlife is required. (NOT COMPLETED 1/02)</p>
26/6+456 25/1+622	27/4 +790 25/2 +304	Spotted owl	<ul style="list-style-type: none"> ▪ Where opportunity exists, <i>suspend vegetation management activities within 0.4 km (0.25 mi.) of spotted owl critical habitat between March 1 and June 30, unless the owls are shown not to be nesting. For Future entries,</i> ▪ Examine any large danger trees (11" diameter at breast height) that need to be removed in spotted-owl habitat for evidence of owls. If a tree has evidence of owl nesting activity, conduct formal consultation with the USFWS. ▪ <i>In case of an emergency danger tree removal—a tree suddenly becoming an imminent threat to the line, posing a danger to life and property—immediately examine the felled tree for evidence of owl nesting. If such evidence is found, start emergency consultation with the USFWS, or, if the situation occurs during off-duty hours, conduct after-the-fact emergency consultation the next business day.</i>

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

See Handbook — Protecting Other Species for requirements.

By following the Mitigations outlined no effect is determined as supported by the BPA Vegetation EIS.

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

See Handbook — Visual Sensitive Areas for requirements.

Right of way in area since 1966

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

See Handbook – Cultural Resources for requirements.

None listed or ID

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.

LOCATION			(1) WIDTH	(2) LENGTH	(3) ACRES	
STR. NO.	FROM	TO				
19/1	0	1014	150.0	1014	3.5	SSB
19/2	0	150	150.0	150	0.5	SSB
20/3	0	150	150.0	150	0.5	SSB
20/3	750	1750	150.0	1000	3.4	SSB
22/4	1350	1452	150.0	102	0.4	SSB
25/1	1200	1617	150	417	1.4	SSB
25/2	0	150	150.0	150	0.5	SSB
26/6	950	1399	150.0	449	1.5	SSB
27/3	0	450	150	450	1.5	SSB
27/3	1450	1800	150.0	350	1.2	SSB
27/4	0	200	150.0	200	0.7	SSB

STEEP SLOPE ON BLM CODE SSB on Cut Sheet

BLM-administered lands including Late Successional Reserve (LSR), where a steep slope precludes the use of mechanical treatments. Available: all manual and biological treatments; Mechanical treatments are limited to roads and structure sites.

No Herbicide Treatments at this time on BLM Lands. (11/01)

Manual: Hand tools and chainsaws

Mechanical: Can be used on roads and towers, No Ground disturbing activities on steep slopes.

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

See Handbook – Spanned Canyons for requirements.

7/1	550	1050	500	STC	Rock Creek	T&E
8/4	297	575	278	STC	BLM 8/4+279 TO 9/2+68 Rock Creek	
9/2	350	1100	750	STC	Jackson Creek	T&E
10/3	350	850	500	STC	E. Fork McKay	T&E
11/2	625	1050	425	STC		T&E
11/3	600	875	275	STC		T&E
12/4	250	575	325	STC		T&E
13/1	750	1000	250	STC		T&E
14/4	100	1000	900	STC		T&E
20/2	830	1250	420	STC		T&E
20/3	150	750	600	STC		T&E
24/2	375	1350	975	STC	East Fork Nehelum	T&E
25/1	550	622	72	STC		T&E
25/1	622	1200	578	STC	BLM 25/1+622 TO 25/2+304	T&E
25/2	150	304	154	STC	END BLM	
26/6	456	950	494	STC	BLM 26/6+456 TO 27/4+790	T&E
27/3	450	1450	1000	STC	T&E STREAM STC AREA Kenusky cr	
27/4	200	790	590	STC	END BLM	

STEEP CANYONS CODE “STC” ON CUT SHEET

Any areas in the corridor with greater than 38.1 m (125 ft.) vertical distance between the ground surface and transmission lines. Here, removal is periodically required only of individual trees (single tree cuts) that could encroach into the transmission corridor danger zone.

In areas adjacent to STC zones the following treatment will be required. In the area were the conductor clearance is from 70 feet to 125 feet tall growing trees will be controlled in the following manner.

1. All conifers over 14 feet tall will be controlled. Conifers over 25 feet tall will be cut for clearance.
2. Hardwood trees over 30 feet tall will be cut for clearance and treated.
3. Hardwood trees less than 30 feet tall will be left untreated.

No Herbicide Treatments at this time on BLM Lands. (11/01)

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.

No Environmental Constraints BLM Code “ZB” on Cut sheet

BLM-administered land, including Late Successional Reserve (LSR)¹, with no other environmental constraints.
Available: all manual, mechanical, and biological.

No Herbicide Treatments at this time on BLM Lands. (11/01)

Manual: Hand tools and chainsaws

Mechanical: Can be used on roads and towers, all areas suitable for mechanical treatment. No Ground disturbing activities on slopes over 20%

LOCATION			(1)	(2)	(3)	ROAD	IVM	ZONE	STR	BLM		Remarks
STR. NO.	FROM	TO	WIDTH	LENGTH	ACRES	ACRES	ACRES		#	ACRES		
8/4	0	297	150.0	297	1.0	1		ZB	1.0	1.0	BLM	
8/4	297	575		278	0.0			STC			BLM	BLM 8/4+279 TO 9/2+68
8/4	575	1103	150	528	1.8	1.8		ZB		1.8	BLM	
8/5	0	753	150.0	753	2.6	2.6		ZB	1.0	2.6	BLM	
9/1	0	1059	150.0	1059	3.6	3.6		ZB	1.0	3.6	BLM	INTERMITTENT WATER AT +500
9/2	0	69	150.0	69	0.2	.2		ZB	1.0	0.2	BLM	
16/1	949	1214	150.0	265	0.9	.9		ZB		0.9		BLM
16/2	0	605	150.0	605	2.1	2.1		ZB	1.0	2.1		BLM
16/3	0	1205	150.0	1205	4.1	4.1		ZB	1.0	4.1		BLM
17/1	0	500	150.0	500	1.7		1.7	T&E	1.0			
17/1	500	1100	150.0	600	2.1		2.1	T&E				RIPARIAN
17/1	1100	1447	150.0	347	1.2		1.2	T&E				
17/2	0	796	150.0	796	2.7		2.7	T&E	1.0			INTERMITTENT WATER AT DRAWS
17/3	0	129	150.0	129	0.4		0.4	T&E	1.0			
17/3	129	650	150.0	521	1.8	1.8		ZB		1.8	BLM	BLM 17/3+129 TO 18/1+250
17/3	650	900	150.0	250	0.9	.9		BB		0.9	BLM	RIPARIAN
17/3	900	1543	150.0	643	2.2	2.2		ZB		2.2	BLM	
18/1	0	250	150.0	250	0.9	.9		ZB	1.0	0.9	BLM	
18/2	1266	1726	150.0	460	1.6	1.6		ZB		1.6		BLM
18/3	0	471	150.0	471	1.6	1.6		ZB		1.6		BLM
18/5	872	1331	150.0	459	1.6		1.6	ZB		1.6		BLM 18/5+872 TO 19/2+797

¹ Late-Successional Reserves (LSR) are identified with an objective to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth forest-related species.

LOCATION			(1)	(2)	(3)	ROAD	IVM	ZONE	STR	BLM		Remarks
STR. NO.	FROM	TO	WIDTH	LENGTH	ACRES	ACRES	ACRES		#	ACRES		
19/1	0	1014	150.0	1014	3.5	3.6		SSB		3.5		BLM
19/2	0	150	150.0	150	0.5	.5		SSB		0.5		BLM
19/2	150	797		647	0.0			STC				BLM
19/5	168	1688	150.0	1520	5.2	5.2		ZB		5.2		BLM 19/5+168 TO 20/1+397
20/1	0	397	150.0	397	1.4	1.4		ZB		1.4		END BLM
20/2	223	830	150	607	2.1	2.1		T&E		2.1		BLM 20/2+223 TO 21/3+1279
20/2	830	1250		420	0.0			STC				R-T&E ZONE
20/2	1250	1750	150.0	500	1.7	1.7		T&E		1.7		BLM
20/3	0	150	150.0	150	0.5	.5		SSB	1.0	0.5		R-T&E ZONE BLM
20/3	150	750		600	0.0			STC				BLM
20/3	750	1750	150.0	1000	3.4	3.4		SSB		3.4		BLM
21/1	0	828	150.0	828	2.9			ZB	1.0	2.9		BLM
21/2	0	230	150.0	230	0.8	2.9		ZB	1.0	0.8		BLM
21/2	230	950		720	0.0			STC				BLM
21/2	950	1325	150.0	375	1.3	1.3		BB		1.3		BLM
21/3	0	1297	150.0	1297	4.5	4.5		ZB	1.0	4.5		END BLM
22/4	695	1350	150.0	655	2.3	2.3		T&E		2.3	BLM	T&E BLM 22/4+695 TO 23/4+600
22/4	1350	1452	150.0	102	0.4	.4		SSB		0.4	BLM	
23/1	0	1249	150.0	1249	4.3	4.3		ZB	1.0	4.3	BLM	
23/2	0	875	150.0	875	3.0	3		ZB	1.0	3.0	BLM	
23/3	0	200	150.0	200	0.7	.7		ZB	1.0	0.7	BLM	
23/3	200	900		700	0.0			STC			BLM	
23/3	900	1800	150.0	900	3.1	3.1		ZB		3.1	BLM	INTERMITTENT WATER AT DRAWS
23/4	0	600	150.0	600	2.1	2.1		ZB	1.0	2.1	BLM	
25/1	550	622		72	0.0			STC				T&E
25/1	622	1200		578	0.0			STC			T&E	BLM 25/1+622 TO 25/2+304
25/1	1200	1617	150	417	1.4	1.4		SSB		1.4		BLM
25/2	0	150	150.0	150	0.5	.5		SSB	1.0	0.5		BLM
25/2	150	304		154	0.0			STC				END BLM
26/6	456	950		494	0.0			STC				BLM 26/6+456 TO 27/4+790
26/6	950	1399	150.0	449	1.5	1.5		SSB		1.5		BLM
27/1	0	682	150.0	682	2.3	2.3		ZB	1.0	2.3		BLM
27/2	0	1050	150.0	1050	3.6	3.6		ZB	1.0	3.6		BLM
27/3	0	450	150	450	1.5	1.5		SSB	1.0	1.5		BLM

LOCATION			(1)	(2)	(3)	ROAD	IVM	ZONE	STR	BLM		Remarks
STR. NO.	FROM	TO	WIDTH	LENGTH	ACRES	ACRES	ACRES		#	ACRES		
27/3	450	1450		1000	0.0			STC				T&E STREAM STC AREA
27/3	1450	1800	150.0	350	1.2	1.2		SSB		1.2		BLM
27/4	0	200	150.0	200	0.7	.7		SSB	1.0	0.7		BLM
27/4	200	790		590	0.0			STC				END BLM

APPLICATION METHOD DESCRIPTIONS

Manual control methods include the following: pulling weeds; cutting with shears, clippers, chainsaws, brush saws, or axes; and girdling by cutting a ring around the trunk of the tree.

Mechanical methods include the use of chopper/shredders, walking brush controllers, mowers, feller-buncher machines, roller-choppers, and blading.

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:

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.)

Mulch

(Mulching is a debris treatment that falls between chipping and lop-and-scatter. The debris is cut into 1-to-2-ft. lengths, scattered on the right-of-way and left to decompose. This method is used when terrain and conditions do not allow the use of mechanical chipping equipment.)

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.

If Re-Seeding is needed Mixtures of the following grasses would be beneficial

Native

California Brome (Bromus carinatus)	y
Sheep fescue (Festuca ovina)	y
Blue wildrye (Elymus glaucus)	y
Canada bluegrass (Poa compressa)	y
Smooth Brome	n
Perennial Ryegrass	n
Big Bluegrass	y
Clovers	n
Alfalfa	n
Sickle-keeled lupine 5 oz./100# seed	y
And/or Lupinus bicolor 5 oz./100# seed	y
America vetch (Vicia Americana)	y

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

Native will be considered in all mixes. Introduced species are more competitive against invading tall tree species

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

Seeding should be completed when there is enough moisture to allow for 2 months of growth. Seeding can be completed any time of the year except for the hot summer months.

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.

Site will be inspected during treatment. In addition routine patrols by BPA ground and aerial patrols

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

Routine patrols by BPA ground and aerial patrols

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

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

On January 18th, 2002 BPA received the following letter. On January 30, 2002 Bill Erickson discussed the letter with Katrina Symonds. She has reviewed the checklist. Mitigation measures are shown on this checklist and Attachments 2 and 3. With these items addresses BPA can proceed with the project

Attachment 2 – BLM Letter/BPA Response and Mitigation

Dear Mr. Erickson:

In response to your July 18, 2001 letter notifying the BLM (Bureau of Land Management) of your proposal to perform vegetation control on the Keeler-Allston Line, we offer the following comments for your consideration.

1. Fish (see attached map)

- The proposed project crosses three ESU (Evolutionarily Significant Unit) areas for federally listed salmonids, including Oregon Coast coho salmon in the Upper Nehalem Watershed, and Upper Willamette steelhead trout and Upper Willamette chinook salmon in the Dairy/McKay Watershed.
- Of the eighteen stream crossings with recorded fish presence there are eight locations with anadromous fish that are covered by the Endangered Species Act. The other ten locations have Bureau Sensitive cutthroat. The Bureau's policy is to manage for the conservation of bureau sensitive species and their habitat so as not to contribute to the need to list and to recover the species.

BPA-The additional identified T&E streams have been located and marked for mitigation. See Attachment 3 for mitigation measures.

- Oregon BLM is still under a herbicide injunction except for the control of noxious weeds. As such, the herbicide list contained in the Transmission System Vegetation Management Program Final Environmental Impact Statement only applies to the use of herbicides on noxious weeds. As such, herbicides for vegetation control should not be used on BLM lands. If herbicides are used on lands of other ownerships, the downstream distribution of fish should be evaluated and the type of herbicide to be applied should be carefully considered as most herbicides are toxic to fish and are soluble in water.

BPA-No herbicides will be used on this project. Off BLM lands toxicity to fish and buffers area a main consideration. Adjacent lands will be treated in accordance with the Transmission System Vegetation Management Program Final Environmental Impact Statement which provides both toxicity and buffer requirements.

- Increases in stream temperature due to a lack of adequate shade is a concern. If taller vegetation needs to be cut in Riparian Reserves, consider planting native species such as Indian Plum and Elderberry. These species are successful in riparian areas and would provide shade while not growing over 30 feet tall which is your designated height safety zone.

BPA-Only the tall growing species will be cut. Vegetation management for spanned canyons deals with the removal of tall growing species. Low-growing vegetation, 5-10 feet tall will not be disturbed.

- Point #4 on the attached map is a complex of both beaver ponds and small lakes. This area is of high concern as the tributary streams in this location are short, steep, and drain into a rearing area for coho, steelhead and cutthroat. Potential concerns include ground disturbance from the proposed action resulting in sediment delivery or the transport of other contaminants downstream to these ponds.

BPA- The area from 17/1 to 17/3+129 will be treated as a T&E area. Mitigations designed for T&E streams will minimize effects from project. The mitigation measures are shown on Attachment 3.

2. Wildlife

- Suitable un-surveyed spotted owl and/or marbled murrelet habitat may exist within 0.25 miles of the project area in T5 N, R3W, section 33 and T4N, R3W, section 9.

BPA-Sites have been identified and mitigations are in place (See Attachment 1, Checklist.) Only trees that (threaten the line) have less than 30 feet of line to tree clearance will be cut during the exclusion period.

3. Soils and Water

- Project documentation should include discussion of consistency of action with the nine Aquatic Conservation Strategy objectives and anticipated impacts to beneficial uses.

BPA-No soil disturbing activities planned. Project is in accordance with the Vegetation Management Record of Decision (2001)

4. Survey and Manage (see attached table)

- If the proposed action is determined to be " habitat disturbing" for any of the species listed in the attached table under category A or C, pre-disturbance surveys must be completed in accordance with Survey Protocols.

BPA-Site is a powerline Right of way. No habitats are going to be disturbed by this activity.

5. General Comments

- The proposed action would occur within the General Forest Management Area, Connectivity (T4N, R3W, section 21; T3N, R3W, section 13), and Riparian Reserve land use allocations.

BPA-Actions developed through Vegetation EIS will meet Requirements

- T2N, R2W, section 15 is designated as a rural interface area. The proposed action should use design features/mitigation measures to " avoid or minimize impacts to health, life and property, and quality of life." (Salem District Resource Management Plan, p. 39).

BPA-Landowners have been contacted by mail. Contractors will contact landowners who have houses within 200 feet of project.

- The proposed action would occur on lands identified as Visual Resource Management Class III (T2N, R2W, section 15) and Class IV. The proposed action appears to be consistent with the objectives of these visual resource management classes.

BPA- Right of Way clearing has been occurring over the past 35+ years

- There are no known cultural resource sites that would be affected by the proposed action.

If you have any questions, contact Katrina Symons at the above address or telephone (503) 815-1460.

Attachment 3 - Treatment Prescriptions BLM LANDS 5/1 to 29/1

NO ENVIRONMENTAL CONSTRAINTS BLM CODE “ZB” on Cut sheet

BLM-administered land, including Late Successional Reserve (LSR)¹, with no other environmental constraints. Available: all manual, mechanical, and biological.

No Herbicide Treatments at this time on BLM Lands. (11/01)

Manual: Hand tools and chainsaws

Mechanical: Can be used on roads and towers, all areas suitable for mechanical treatment. No Ground disturbing activities on slopes over 20%

STEEP SLOPE ON BLM CODE SSB on Cut Sheet

BLM-administered lands including Late Successional Reserve (LSR), where a steep slope precludes the use of mechanical treatments. Available: all manual and biological treatments; Mechanical treatments are limited to roads and structure sites.

No Herbicide Treatments at this time on BLM Lands. (11/01)

Manual: Hand tools and chainsaws

Mechanical: Can be used on roads and towers, No Ground disturbing activities on steep slopes.

SALMON T&E STREAMS BLM LANDS Code T&E on cut sheet

BLM lands within 122 m (400 ft.) of a listed stream. Available: manual, mechanical, and biological treatments. No mechanical within 100 feet of streams except for tower sites and access roads.

No Herbicide Treatments at this time on BLM Lands. (11/01)

Manual: Hand tools and chainsaws

Mechanical: None within 100 feet of stream. Except for Access Roads and Tower sites. On the Right-of-way, no ground disturbing activities within 400 feet from the stream.

¹ Late-Successional Reserves (LSR) are identified with an objective to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth forest-related species.

STREAMS AND WETLAND BLM Lands Code “BB on Cut sheet

State Forest or private lands, within 30.5 m (100 ft.) of a stream. Available: all manual and biological treatments

Manual: Hand tools and chainsaws

Mechanical: None, within 25 feet of streams or wetlands. Even on Access Roads and Tower sites

No Herbicide Treatments at this time on BLM Lands. (11/01)

Table F-2: BLM Buffer Zones (Western Oregon)

Method	Buffer Width
No Ground-disturbing Mechanical (Tractor operations may be limited to periods of minimum soil moisture levels)	Within 7.6 m or 25 ft. of streams

STEEP CANYONS CODE “STC” on Cut sheet

Any areas in the corridor with greater than 38.1 m (125 ft.) vertical distance between the ground surface and transmission lines. Here, removal is periodically required only of individual trees (single tree cuts) that could encroach into the transmission corridor danger zone.

In areas adjacent to STC zones the following treatment will be required. In the area where the conductor clearance is from 70 feet to 125 feet tall growing trees will be controlled in the following manner.

1. All conifers over 14 feet tall will be controlled. Conifers over 25 feet tall will be cut for clearance.
2. Hardwood trees over 30 feet tall will be cut for clearance and treated.
3. Hardwood trees less than 30 feet tall will be left untreated.

Herbicides: NONE.

No Herbicide Treatments at this time on BLM Lands. (11/01)