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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: February 28, 2005

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-244) John Day - Marion: Project #: **V-E-05/03**

TO: Mark Newbill
Natural Resource Specialist – TFE/CHEMAWA

Proposed Action: Vegetation Management along the John Day – Marion Transmission Line Corridor from structure 75/3 to 101/1. Other transmission lines present within these corridors are the Ashe – Marion & Buckley-Marion (Double circuit lines)

Location: The project line is located in Clackamas County Oregon, and is located in BPA's Eugene Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove tall growing and noxious vegetation from the right of way and access roads that can potentially interfere with the operation, maintenance, and reliability of the transmission lines. Unwanted, tall growing, and noxious vegetation and reclaim trees will be removed and/or controlled inside the ROW using selective and nonselective methods that may include hand cutting and mowing. Vegetation management work will occur between structures 75/3 and 101/1 of the John Day - Marion transmission line. In addition, 11.7 miles of access road will be managed. The total project area consists of approximately 930 acres. It is estimated that approximately 682 acres of the project area will be cut (73%).

Analysis: A Vegetation Management Checklist was completed for this project in accordance with the requirements identified in the Bonneville Power Administrations Transmission System Vegetation Management Program FEIS (DOE/EIS-0285).

The subject corridor traverses Mount Hood National Forest in Clackamas County Oregon.

Section 3 of the checklist identifies the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in section 3.1 of the Vegetation Management Checklist. Trees in riparian zones will be selectively cut to include only those that are within 50 feet of the conductor at maximum sag. Trees will be topped where shrubs are not present to provide shade and a silt buffer.

No ground disturbing vegetation management methods will be implemented thus minimizing the risk for soil erosion and sedimentation near the streams. No herbicides will be used during the vegetation management. All non-ESA streams will have a 35 foot buffer and ESA Streams will have a 100foot buffer or be skipped entirely.

Threatened and Endangered Species/Essential Fish Habitat: Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. A species list was reviewed from the United States Fish and Wildlife Service (USFWS) on May 26, 2004, identifying threatened and endangered species and Critical Habitat Units potentially occurring in the project area. In addition a review of species under the jurisdiction of NOAA Fisheries was conducted. A determination of "No Effect" was made for all ESA listed species except for the Northern Spotted Owl within the proposed project area. The proposed vegetation management activities are covered under the Programmatic Biological Assessment (BA) for Activities with the Potential to disturb Northern Spotted Owls and or Bald Eagles in the Willamette Province for FY 2004-2005 prepared by Mt Hood National Forest, Willamette National Forest, Bureau of Land Management, Eugene District, Fish and Wildlife Service, Columbia River Gorge National Scenic Area, Salem District, Bureau of Land Management, Cascades Resource Area, Bureau of Land Management, Willamette National Forest April 2004. The U.S. Fish and Wildlife Service issued a Biological Opinion and concurrence letter (BO). According to the BA, the BPA proposed Vegetation management activities are identified as a may affect not likely to adversely affect, this determination is based on based on timing restrictions, (no disturbance activities will occur within the critical breeding season, March 1 through July 15) and proximity of activities to nest sites (<0.25 mile). Two Northern Spotted Owl nests were identified by the Oregon Natural Heritage database; we are assuming the nests will be occupied during our vegetation management activities. Prior to vegetation management activities within ¼ mile of the Northern Spotted Owl nest sites, BPA will consult further with the Mount Hood Forest service. BPA will comply with the standards and definitions set forth in the BO, additionally no terms and conditions or conservation measures were set forth for BPA's activities.

A determination of "No Effect" was made for Essential Fish Habitat waters that occur in the project area.

Cultural Resources: Clackamas River Ranger Archaeological technician (Susie Rudisill) provided BPA with a list of cultural recourses adjacent to the Right of Way. No ground disturbing aticvities are planned for this project which may affect the cultural resources, however, if a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the BPA Environmental Specialist, and the BPA archeologist will be contacted.

Monitoring: The entire project will be inspected during the work period. Additionally the line will be patrolled annually after treatment to monitor the effectiveness of the treatment and any issues associated with the project.

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, (2) This Supplement analysis also find that the proposed actions are consistent with the Biological Opinion and concurrence letter (BO) issued by the U.S. Fish and Wildlife Service regarding the Programmatic Biological Assessment (BA) for Activities with the Potential to disturb Northern Spotted Owls and or Bald Eagles in the Willamette Province for FY 2004-2005 and there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. This Supplement Analysis also finds the proposed actions will have a may affect not likely to affect on the Northern Spotted owl nest sites covered by the BA, all other threatened or endangered species will not be affected. Therefore, no further NEPA documentation is required.

/s/ John Howington
John Howington
Physical Scientist

CONCUR:*/s/ Thomas C. McKinney* DATE:2/28/2005
Thomas C. McKinney
NEPA Compliance Officer

Attachment:
Vegetation Management Checklist
Effects Determination

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
B. Sherer – KEP-4
J. Sharpe – KEPR-4
H. Adams – LC-7
J. Hilliard Creecy – T-DITT2
M. Johnson – TF/DOB-1
J. Domschot – TFE/ALVEY
A. Sundberg – TFE/ALVEY
K. Barber – TFEK/CHEMAWA
Environmental File – KEC-4
Official File – KEP (EQ-14)

Vegetation Management Checklist

John Day-Marion No.1

Project #: V-E-05/03

Eugene Region
Mark A. Newbill, NRS

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
John Day- Marion Corridor Includes: Ashe – Marion & Buckley-Marion (Double circuit lines) Clackamas Co.	25 miles & 500 kV 25 miles & 500 kV	300 feet	75/3 to 101/1 176/3 to 200/1 (Note: Numbers are different, but the towers are in the same 25 miles of ROW)

The vegetation control method used on the Right-of-Way (ROW) will be hand cutting (cut, lop, and scatter). Where feasible limited machine mowing will be done on access roads or around tower sites (see detail sheet).

The project will include: Access roads and tower sites. Work will not take place on switch platforms, danger trees, and microwave beam paths.

1.2 Describe the vegetation needing management.

Vegetation type: Douglas-fir, Sub-Alpine fir, Noble fir, Western hemlock, Pine, Western Red Cedar, Big Leaf Maple, and Red Alder.

Low - Med. Density (50-250 stems per acre)

Height- small (target species less than 10 feet)

Noxious weeds: 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.

Removing small pine and fir trees allows grass and small shrubs to expand. Grass and forbs fill in bare spots leaving less opportunity for undesirables. Encourage the growth of desirable species such as deer brush or vine maple and they shade out undesirables. In combination this helps promote LGPC.

USFS is the land manager, removing noxious weeds from expanding is consistent with 2002 Farm Bill, Oregon Dept. of Agriculture, and USDA proposed management plan for invasive plants (draft EIS August 2004). Removing small pine, conifer and hardwoods allows the establishment for other small growing plants to get established. Once the low growing plant communities (LGPC) get established, they help reduce the number of invasive weeds and trees while improving forage for wildlife habitat.

1.4 Describe overall management scheme/schedule.

Initial entry – The project is located in the Cascade Mountain Range (legal description 6S8E, 6S7E, 6S6E, 7S6E, and 7S5E). In the first 2 townships, the vegetation types are eastside with pine as the dominant target species. Hand cutting will be used to selectively remove the pine. This control measure is one of maintaining a low growing plant community (LGPC). The existing

trees are small with low-medium density and the planned effort will make the absolute minimum impact to the right-of-way.
In 6S6E and 7S6E, vegetation growth is much faster and conifers abundant. Hand cutting will also be used to remove target species. In addition, machine mowers will be used to control scotch broom along access roads or towers sites. This will be dependant on flat terrain. Otherwise, S. broom removal will be made by hand cutting.
The last section (7S5E), the power line was primarily built over a series of ridges and canyons and as such small spur roads and tower sites will require vegetation control. Hand cutting will be used to accomplish this task.

The project is scheduled to start as soon as snowmelt allows (hopefully May 05) and be completed by July 30, 2005. We intend to complete our work before fire season is an issue. Any unfinished work due to fire season or other restrictions will be completed by September 30, 2005.

Subsequent entries – No follow-up treatments are planned thus no entries will be required until the next vegetative cycle (5 years).

Future cycles – 5-year vegetation control cycles will be followed to provide adequate clearance on these 500 KV lines as well as secure the vegetation effort as one of "maintaining" with minimum impact to the ROW.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

US Forest Service, MT. HOOD, Estacada Ranger District

2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.

The Estacada Ranger District will be notified by phone. A winter planning meeting will be set and EIS checklist will be provided to them for review.

2.3 List the specific land owner/land use measures — determined from the handbook or through your consultations with the entities — that will be applied.

None Known

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 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.

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.

None

3. IDENTIFY 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.

Span		Waterbody	T&E	Method	Herbicide	Application Technique	Buffer	Other
To	From							
78/4	78/3	Unnamed Creek 4342+11	No	HCO	None	DNA	35 ft	
78/4	78/3	Unnamed Creek 4342+83	No	HCO	None	DNA	35 ft	
79/3	79/2	Unnamed Creek 4384+75	No	HCO	None	DNA	35 ft	
80/4	80/3	Unnamed Creek 4443+00	No	HCO	None	DNA	35 ft	
82/3	82/2	Unnamed Creek 4545+03	No	HCO	N/A	DNA	35 ft	
84/1	83/4	Clackamas river 138+70 139+54	Yes	HCO	N/A	DNA	200 ft	
87/1	86/5	Unnamed Creek 4731+25	No	HCO	N/A	DNA	35 ft	
87/1	86/5	Unnamed Creek 4741+75	No	HCO	N/A	DNA	35 ft	
87/3	87/2	Unnamed Cks 4761+60 4768+10 4772+20	No	HCO	N/A	DNA	35 ft	
88/5	88/4	Unnamed Ck 4820+24	No	HCO	N/A	DNA	35 ft	
89/1	88/5	Unnamed Creek 4828+93	No	HCO	N/A	DNA	35 ft	

89/3+ 750’	89/3	Spring	No	HCO	N/A	DNA	Skip	Canyon
90/3	90/2	Unnamed creek 4909+72	No	HCO	N/A	DNA	35 ft	
91/4	91/3	Collawash River 4964+46 4965+37	Yes	HCO	N/A	DNA	200 ft	
92/2	92/1	Unnamed Ck 4999+79	No	HCO	N/A	DNA	35 ft	
92/4	92/2	Unnamed Creek 5011+05	No	HCO	N/A	DNA	35 ft	
92/4+ 800	92/4	Spring	No	HCO	N/A	DNA	Skip	Canyon
93/2	93/1	Unnamed Creek 5044+65 5049+56	No	HCO	N/A	DNA	35 ft	
93/3	93/2	Unnamed creek 5052+96	No	HCO	N/A	DNA	35 ft	
93/2+ 1200	93/2	Sand Creek 5064+09	No	HCO	N/A	DNA	35 ft	
93/4	93/3	Pink creek 5079 +60	No	HCO	N/A	DNA	35 ft	
94/1	93/4	Unnamed Ck 5097+14 5099+14	No	HCO	N/A	DNA	35 ft	
94/2	94/1	Unnamed Creek 5102+39 5104+61	No	HCO	N/A	DNA	35 ft	
94/4	94/3	Unnamed Ck 5122+85	No	HCO	N/A	DNA	35 ft	
94/4+ 550	94/4	Spring	No	HCO	N/A	DNA	Skip	Canyon
95/1	94/4	Dutch Creek 5142+15	No	HCO	N/A	DNA	35 ft	
95/3	95/2	Thunder Creek 5184+47	Yes	HCO	N/A	DNA	100 ft	
96/1	95/4	Unnamed Ck 5212+69	No	HCO	N/A	DNA	35 ft	
96/3	96/2	Unnamed Ck 5233+62	No	HCO	N/A	DNA	35 ft	
97/1	96/4	Unnamed Ck 5257+31	No	HCO	N/A	DNA	35 ft	

97/4	97/3	Unnamed CK 5292+85	No	HCO	N/A	DNA	35 ft	
97/4	97/3	Blister Creek 5299+20	No	HCO	N/A	DNA	35 ft	
98/1+ 600	98/1	Spring	No	HCO	N/A	DNA	Skip	Canyon
98/4	98/3	Unnamed Creek 5340+44	No	HCO	N/A	DNA	35 ft	
99/1	98/4	Unnamed Creek 5348+15 5356+28 5360+57	No	HCO	N/A	DNA	35 ft	
99/2	99/1	Unnamed Creek 5361+88 5372+13 5374+30	No	HCO	N/A	DNA	35 ft	
100/1	99/4	Unnamed Creek 5400+65	No	HCO	N/A	DNA	35 ft	
100/2	100/1	Unnamed Creek 5421+54	No	HCO	N/A	DNA	35 ft	

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).

Herbicides will not be used on the project

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.

Span		**T&E Species**	**Method/mitigation or avoidance measures**
To	**From**		
79/5 84/1 101/1	78/4 83/3 95/4	Northern Spotted Owl Critical Habitat	No work activities shall occur within the nest buffer areas from 3/1-7/15 or until further consultation with the Forest Service.
80/4+420 ft 100/3+600ft	80/3+720 ft 100/2+800ft	Northern Spotted Owl Nesting site buffer	For Future entries, 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. If a dead, injured, or sick endangered or

			threatened species specimen is located, initial notification must be made to the nearest Service Law Enforcement Office, located at 9025 SW Hillman Court, Suite 3134, Wilsonville, OR 97070; phone: 503-682-6131. 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.

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

Small shrubs and vine maple will be left for bird habitat

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

The power line crosses USFS roads, County, and State Highways. Trees will be topped or left untouched if adequate clearance exists (greater than 30 feet). All woody debris will be chipped back 50 feet from the roads. Locations of road crossings are listed below.

Span		Describe sensitivity	Method/mitigation measures
To	**From**		
76/3	76/4	Oregon Skyline Road	Skip Area – no topping required.
80/3	80/4	USFS Rd # S663	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings.
82/2	82/3	USFS Rd #S601H	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings.
82/4	82/5	USFS RD # 635D	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings.
83/4	84/1	Clackamas River Rd OR HWY 46	Skip Area – no topping required.
85/2	85/3	USFS Rd # S652	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings
88/5	89/1	USFS Rd # S635	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings
90/4	91/1	USFS Rd # S635	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings

91/3	91/4	Collawash River Rd HWY 63	Skip Area – no topping required
91/4	92/1	USFS Rd S63	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings
93/1	93/2	USFS RD # S651	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings
94/3	94/4	USFS RD # S740	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings
96/3	96/4	USFS RD # S709	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings
99/3	99/4	USFS RD # S709	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings
100/5	101/1	USFS RD # S709	Top / trim trees as needed. Chip and clean-up debris 50 feet from each of these road crossings

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

Clackamas River Ranger Archaeological technician (Susie Rudisill) provided BPA with a list of cultural recourses adjacent to the Right of Way.

Span		Describe	Method/mitigation measures
To	**From**	**sensitivity**	
84/1	83/4	Lithic scatter	This area will be skipped. 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.
78/3	78/4	Lithic scatter	

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.

A vast majority of the project has steep slopes (86 mile through 101). This is especially true where towers have been built on landings. The conductors entering and exiting those towers sag fairly close to the ground due to the extended span lengths. Therefore, vegetation must be cut 100 –200 feet either side of those towers. The only possible way is hike down those slopes and manual cut this brush.

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

During the last vegetation cycle many large trees encroaching the catenary's (conductor) were removed from every canyon span. We have no plans to remove any more trees from canyons at this time or even the next 2 subsequent cycles. We have maintained a least a 50' foot clearance with past efforts.

4. DETERMINE VEGETATION CONTROL METHODS

4.1 List Methods that will be used in areas not previously addressed in steps above.

Attached is a contract detail sheet with specific span- by- span prescription and analysis as to what will be accomplished (see attachment).

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

Throughout the right-of-way, the prescription method identifies hand cutting (chainsaw) per standard cut, lop, and scatter technique will be used. Chipping will be used in road crossing areas. Machine mowing used on access roads and tower sites mulches and grinds woody debris into small pieces.

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

None planned, open sunlight due to remove of target species enhances 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

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 final site visit to evaluate control.
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

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