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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: September 13, 2004

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-228) **Project #: V-E-04/26**

TO: Benjamin Tilley
Natural Resource Specialist - TFE/ALVEY

Proposed Action: The project activities will be conducted along the Right-of-Way (ROW) of the Reston-Fairview #2 230 kV transmission line corridor between towers 1/1 to 30/4. This corridor includes a portion of Alvey-Fairview #1 230 kV transmission line. The corridor along this section of the proposed project averages 237.5 feet in width and crosses approximately 31 miles of terrain through rural forestlands, farmlands, industrial forestlands, residential lands and BLM lands.

Location: The proposed project is located in Douglas and Coos Counties, Oregon in the BPA Eugene Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, along access roads and around tower structures along the subject transmission line corridor that may impede the operation and maintenance of the identified transmission lines. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation.

Specifically, this vegetation management project will involve the following actions:

- Clearing (mowing, cutting, and spraying) vegetation at tower sites.
- Selective cutting (cutting, lopping and scattering) of vegetation at throughout the ROW.
- Applying low volumes of foliar herbicide along the ROW in the spring of 2005 to control re-sprouting plants and noxious weeds, and re-application every three to four years after initial application to maintain accessibility to access roads and tower sites.

Debris will be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris will be scattered along the ROW. Removal of vegetation on slopes steeper than 20% and spanned canyons will be restricted to tall-growing species that pose a hazard to the transmission line. Identified danger trees will be felled away from the ROW. Trees that visually screen roads from the transmission line will be left where appropriate.

On initial entry, herbicide will be selectively applied using spot/stump treatment of resprouting species and low-volume foliar treatments along access roads, around tower structures, and at noxious weed locations. Garlon 3A herbicide (active ingredient: Triclopyr as triethylamine salt (TEA)) will be the only herbicide used for this project. Backpacks will be used with a 25% Garlon 3A, 75% crop oil mix. Follow-up herbicide treatment uses a 1-2% Garlon 3A / 5% crop oil / 93-94% water mix.

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

The subject corridor traverses rural forestlands, farmlands, industrial forestlands, residential lands and BLM lands.

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: Waterbodies (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 will grow into the minimum approach distances of the conductor at maximum sag. Shrubs will not be cut that are less than 10 feet high where ground to conductor clearance allows. No ground disturbing vegetation management methods will be implemented thus eliminating the risk for soil erosion and sedimentation near the streams. Adjacent to water resources only spot (cut-stump) and localized chemical treatments using practically non-toxic triclopyr (TEA) will be used.

No drinking water, irrigation wells, or water supplies were identified along the rights of way for this project.

Threatened and Endangered Species: 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 obtained from the United States Fish and Wildlife Service (USFWS) on May 26, 2004 as 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 and designated critical habitat for the project.

Essential Fish Habitat: A review of NOAA database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources will be followed for EFH. A determination was made that this project will not adversely affect essential fish habitat.

Cultural Resources: No cultural resources are known for the project area. 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.

Re-Vegetation: Native grasses are present on the entire right-of-way and are expected to seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads.

Monitoring: The entire project will be inspected during the work period. Additionally, monitoring for the follow-up herbicide treatment will be in mid spring of 2005.

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. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/a/ James Meyer for
Shawn L. Barndt
Environmental Scientist

CONCUR: */s/ Thomas C. McKinney* DATE: 9/15/2004
Thomas C. McKinney
NEPA Compliance Officer

Attachment:
Reston-Fairview #2 04 Vegetation Management Checklist
USFWS Species List Reference # 1-7-04-SP-0323
Effects Determination

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
B. Sherer – KEP-4
J. Sharpe – KEPR-4
P. Key – LC-7
J. Hilliard Creecy – T-DITT2
K. Rodd – TF/DOB-1
J. Domschot – TFE/Alvey
A. Sundberg – TFE/Alvey
T. Cupp – TFEP/North Bend
Environmental File – KEC-4
Official File – KEP (EQ-14)

Sbarndt: tmb: 4722:9/13/2004 (KEP-KEPR-4-W:\EP\2004 FILES\EQ\EQ-14-Supplement Analasys\FEIS-0285-SA-228-Reston-Fairview.doc)

Vegetation Management Checklist

Alvey-Fairview #1 230 kV line
(Reston-Fairview section)
Reston-Fairview #2 230 kV line

Project #: V-E-04/26

Prepared by:
Benjamin Tilley
Natural Resource Specialist
TFE/Alvey

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Alvey-Fairview #1 (Reston-Fairview section)	31 miles 230 kV	100' – 150'	31 miles (entire corridor)
Reston-Fairview #2	31 miles 230 kV	125'- 175'	31 miles (entire corridor)

Right Of Way:

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

Transmission Structures – clearing around

Access Road clearing - approximate miles – 30 miles (90 acres)

Switch Platforms

Danger Tree clearing

1.2 Describe the vegetation needing management.

Douglas Fir, True Firs
Hemlock
Spruce
Alder, Maple
Mrytlewood (California Laurel)
Cedar
Madrone
Wild Cherry
Ash
Noxious Weeds - scotch broom, gorse, tansy, Himalayan blackberry, and thistle (various spp.)
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. 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.

Initial entry – Initial entry will entail the activities described above (Promoting LGPC).

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 4-year cycle. A follow-up herbicide treatment will occur 6 – 12 months following the initial entry to eliminate resprouting noxious weeds and tall-growing species along access roads and tower sites.

Future cycles - This line is on a 4-year cycle due to its location on 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.

Landowners/Managers/Uses:
Rural
Residential
Agricultural
Grazing lands
Industrial Forest lands
BLM: Roseburg District, Coos District
Counties: Douglas & Coos

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.

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

Span		Landowner/use	Specific measures to be applied
To	From		
5\9 – 134'	5\9 + 46'	BLM—Roseburg District (28S, 8W, 15)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
7\6 – 54'	8\4 + 731'	BLM—Roseburg District (28S, 8W, 17)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
8\7	10\6 + 212'	BLM—Roseburg/Coos District (28S, 8W, 07; 28S, 9W, 13)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
11\6 – 105'	12\3 + 571'	BLM—Coos District (28S, 9W, 15)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
13\3 + 705'	14\2 + 959'	BLM—Coos District (28S, 9W, 17)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
15\3 + 200'	15\5 + 475'	BLM—Coos District (28S, 9W, 07)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
17\1 + 60'	17\2 + 415'	BLM—Coos District (28S, 10W, 11)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
19\2 – 165'	20\3 + 210'	BLM—Coos District (28S, 10W, 09)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
20\7 – 130'	22\2 + 260'	BLM—Coos District (28S, 10W, 07 & 08)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
23\9 + 181'	24\10 + 383'	BLM—Coos District (28S, 11W, 11)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.

25\3 + 114’	26\4 – 135’	BLM—Coos District (28S, 11W, 03)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
27\1	27\2 + 373’	BLM—Coos District (27S, 11W, 33)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
28\7 – 52’	28\7 + 690’	BLM—Coos District (27S, 11W, 29)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.
30\1 + 175’	30\4 + 258’	BLM—Coos District (27S, 11W, 19)	Cut, lop, scatter debris-generated on-ROW to reduce fire hazard.

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.

Responses from form letters sent out to landowners will be applied to the vegetation prescription, where feasible.

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.

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.

Refer to table above.

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							
3\5	3\6	Rock Creek	Yes	CLS	None	N/A	N/A	No work to be done in ck. Canyon
4\5 4\8 6\1 6\3 6\4	4\6 5\1 6\2 6\4 6\5	Unnamed creeks	No	CLS	None	N/A	N/A	No work to be done in creek canyons
6\7	6\8	Tenmile Creek	Yes	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
6\4	7\1 (RF#2)	Wilson Creek	No	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
7\2 8\3	7\3 8\4	Unnamed creeks	No	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood

8\4 10\6 11\3 11\6 11\7 12\1 12\3 12\4 13\2 13\3 14\1 14\2 15\1	8\5 10\7 11\6 11\7 12\1 12\2 12\4 13\1 13\3 14\1 14\2 14\3 15\4							stumps and noxious weeds
15\2	15\3	Unnamed swamp	No	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
15\6	16\1	Camas Ck.	No	CLS	None	N/A	N/A	No work to be done in ck. Canyon
9\6 10\4 10\9 16\2 16\6 17\1 17\5 18\7 19\1	9\7 10\5 11\1 16\3 17\1 17\2 17\8 18\8 19\2	East Fork Coquille River	Yes	CLS	None	N/A	N/A	No work to be done in ck. Canyon
20\4	20\5	Unnamed creeks	No	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
20\9 21\1 21\2 21\3 22\1 22\2 22\3	21\1 21\2 21\3 22\1 22\2 22\3 22\4	Unnamed creeks	No	CLS	None	N/A	N/A	No work to be done in creek canyons.
22\4	23\1	East Fork Coquille River	Yes	CLS	None	N/A	N/A	
23\1 23\2	23\2 23\3	Unnamed creeks	No	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood

23\3 23\4 23\6	23\4 23\5 23\7							stumps and noxious weeds
23\8	23\9	Steel Creek	Yes	CLS	None	N/A	N/A	No work to be done in creek canyon.
24\4	24\5	Hantz Creek	Yes	CLS	None	N/A	N/A	No work to be done in creek canyon.
24\7	24\8	Unnamed creeks	No	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
26\4	26\5	Cherry Creek	Yes	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
27\5	27\6	Middle Creek	Yes	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
29\5	29\7 + 100’	Unnamed creeks	No	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds
30\6	30\7	North Fork Coquille River	Yes	CLS	Garlon 3A	Spot stump	35 feet	Treat hardwood stumps and noxious weeds

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).

Span		**Well/irrigation/or spring**	**Herbicide**	**Buffer**
To	**From**			
14\3 + 750’	14\3 + 872’	Spring	Garlon 3A	167’ radius

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**		
19\3	19\4	Bald Eagle (1991)	No evidence of eagle or eagle nesting on ROW. Currently a disposal site for pipeline construction overburden. Work will be performed outside of breeding seasons.
2\10	3\1	Spotted Owl (1991)	Located .5 miles off-ROW across county road. ROW work will have no effect.
18\3	18\4	Spotted Owl (1991)	Located .3 miles off-ROW. ROW work will have no effect.
19\2 – 130'	22\2	Marbled Murrelet Critical Habitat Unit # OR-06-b	Work will commence outside of breeding season (October through December).
6\7	7\6	Marbled Murrelet Critical Habitat Unit # OR-06-d	Southern boundary of CHU located almost .5 miles north of ROW. ROW work will have no effect on habitat unit.
9\7 – 780'	22\4	Northern Spotted Owl Critical Habitat Unit # 119	Work will commence outside of breeding season (October through December).
7\8	8\4	Northern Spotted Owl Critical Habitat Unit # 120	Work will commence outside of breeding season (October through December).
		Anadromous fish runs	Refer to Section 3.1

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

None at this time

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

Visually sensitive areas will have all debris generated chipped and removed off-site. Modified trimming techniques may be applied per landowner request.

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

No known cultural resources present. The project does not include any ground disturbing activities. 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.

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

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.

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

4. DETERMINE VEGETATION CONTROL METHODS

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

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 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 3A / 75% crop oil mix. Follow-up herbicide treatment uses a 1-2% Garlon 3A / 5% crop oil / 93-94% water mix.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

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

Debris Disposal:

Chip (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

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.)

** In the case of heavy debris accumulation (i.e. piles of felled trees) that is not feasible to manage by any means listed above, land owner/land manager may remove debris off-site to prevent increased fire hazard and/or to recover costs incurred for doing so.

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

Native, non-native and naturalized 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

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 TLM Foreman 1 and his crew as well as by the Natural Resource Specialist at convenient times. Helicopter reports (4x/yr.) and working patrol (yearly) will keep the NRS updated on hot spots.

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

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