

United States Government

Department of Energy

Bonneville Power Administration

memorandum

DATE: November 23, 2004

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA 233) Project #: **V-O-05/01**

TO: Ed Tompkins
Natural resource specialist – TFO/Ross

Proposed Action: Vegetation Management along the Hanford Ostrander No. 1, 500 kV Transmission Line Corridor from structures 152/2 to 173/3.

Location: The project line is located in Multnomah County Oregon, from Bonneville Dam to the city of Sandy, Oregon. The project is located in BPA's Olympia 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, danger trees, and reclaim trees will be removed and/or controlled inside the ROW using selective and nonselective methods that may include hand cutting, mowing, and herbicidal treatment. Vegetation management work will occur between structures 152/2 to 173/3 of the Hanford Ostrander No. 1 transmission line. This proposal covers approximately 428 acres of land and encompasses the entire right of way width along the Hanford Ostrander No. 1, 500kV. Line.

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 public and private lands in Multnomah County Oregon consisting of, US Forest service lands, BLM lands, rural forest, and private farmlands. No tribal lands are involved. Coordination has occurred with the Land Management Agencies.

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. The following herbicide buffers will be implemented for the project. Outside a 100' buffer from any stream, ponds, or wetlands Triclopyr BEE (common formulations, Garlon 4 & Tahoe 4E) may be applied. Formulations of Triclopyr TEA (common formulations Garlon 3A & Tahoe 3A) may be applied for spot or localized applications up to the waters edge. For any initial or follow up broadcast treatment with Triclopyr TEA on sprouting stumps or brush a 35' buffer will be maintained from any stream, ponds, wetlands, or sensitive areas.

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

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 received from the United States Fish and Wildlife Service (USFWS) on November 18, 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 and designated critical habitat for the project. A determination of "No Effect" was made for Essential Fish Habitat waters that occur in the project area.

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 appropriate tribe, 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, 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.

/s/ James R. Meyer for

Greg P. Tippetts
Physical Scientist (Environmental)

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

DATE: 11/23/2004

Attachment:
Vegetation Management Checklist

cc:

L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
J. Sharpe – KEPR-4
G. Tippetts – KEPR/Olympia
P. Key – LC-7
J. Hilliard Creecy – T-DITT2
K. Rodd– TF/DOB-1
D. Krauss – TFO/Olympia
D. Swanson – TFOP/LMT
Environmental File – KEC-4
Official File – KEP-4 (EQ-14)

Vegetation Management Checklist

Hanford Ostrander No. 1

Project #: V-O-05/01

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Hanford-Ostrander No. 1	500KV	150 Feet	152/2 to 173/3
Bonneville-N. Bonneville 1,2,3,4	115kV and 230 kV	400 Feet	1/1 to 1/6

Right Of Way:

- Right-of-Way – clearing in right-of-way
- Transmission Structures – clearing around.
- Reclaim C-Trees
- Clearing Access Roads to the ROW

1.2 Describe the vegetation needing management.

Vegetation Types:

- Douglas fir
- Red Alder
- Cottonwood
- Big Leaf Maple
- Western Hemlock
- Willow
- Blackberries
- Scotchbroom

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.

Except in the Bull Run Watershed Area, cut-stump and follow-up foliar herbicide treatments on sprouting-type species will be carried out to ensure that the roots are killed. Vegetation that can grow tall will be selectively eliminated before it reaches a height or density to begin competing with low-growing species. Low-growing species are left untreated if they are not a threat to line integrity.

1.4 Describe overall management scheme/schedule.

Initial entry – All tall growing vegetation, as identified in the control prescription, will be cut, and sprouting stumps chemically treated to prevent re-sprouting. Access roads, right-of-way roads and structure sites are to be cut and treated. A follow-up chemical treatment will occur on all treated areas in the summer of 2005.

Subsequent entries – Every 3-4 years, a maintenance contract will be necessary to treat newly established trees. The use of herbicides on this entry and subsequent cycles should reduce the quantity and cost of work.

Future cycles – Same as above.

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 forestland

Pasture lands, farmland

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.

Olympia will send letters to the property owners about 3 weeks prior to cutting the brush. Door to door contact will be made where it is warranted. Door hangers have been used at properties where special treatments are anticipated. Conversations with property owners on site, emails, and phone calls are all used. Meetings and/or phone calls have occurred with U.S. Forest Service, BLM, and other agencies involved with management of lands within this project area.

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
From	To		
153/2	173/1	Rural areas, wooded areas.	Cut, Lop, Scatter tall-growing veg. Clearing structures, access roads, ROW roads.
173/2	173/3	Rural residential.	Cut & chip. Spread or pile chips.
158/1+0	167/3+2175	US Forest Service – Bull Run Watershed Area	No herbicides will be used in this watershed.
168/2+0	168/3+800	Bureau of Land Management	Limited use of herbicides according to specific BLM list of allowed chemicals.

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.

Mt. Hood National Forest Plan for the Bull Run Management Area prohibits use of herbicides. Bureau of Land Management allows the use of four herbicide formulations in western Oregon for management of noxious weeds (See BLM attachment at the end of this document). These are Picloram (Tordon 22K), Glyphosate (Roundup products, Accord, etc), Dicamba + 2,4-D (Vanquish, Weedmaster, Veteran), and 2,4-D (Many).

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		Water body	T&E	Method	Herbicide	Application Technique	Buffer
From	To						
152/2	153/1	Columbia River	Yes	Cut, Lop, Scatter tall-growing veg.	Garlon 3A	Chemically treat cut stumps immediately after cutting.	Spot treat with Garlon 3A waters edge to 35 feet
154/1	156/2	Tanner Creek & tributaries	Yes	Cut, Lop, Scatter tall-growing veg. Keep slash out of creeks.	Garlon 3A	Chemically treat cut stumps immediately after cutting.	Spot treat with Garlon 3A waters edge to 35 feet
164/2+0	165/4+912	Various unnamed creeks.	No	Cut, Lop, Scatter tall-growing veg. Keep slash out of creeks.	None. Bull Run Watershed		
168/4+-0	168/4+1450	No name creeks.	No	Cut, Lop, Scatter tall-growing veg.	Garlon 3A	Chemically treat cut stumps immediately after cutting.	Spot treat with Garlon 3A waters edge to 35 feet
171/4+55	171/4+90	No name creek	No	Cut, Lop, Scatter tall-growing veg.	Garlon 3A	Chemically treat cut stumps immediately after cutting.	Spot treat with Garlon 3A waters edge to 35 feet

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).

None

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
From	To		
152/2	153/1	Spring, Summer, & Fall Run Chinook Salmon. Columbia River	Selective cutting of trees in riparian zone and/or cutting trees tops that are within 50' of the conductor at max sag. Shrubs will not be cut that are less than 10' height where the ground to conductor clearance is less than 50' at max sag. Herbicide treatments within 100' up to 1 Yard of waters edge with only practically non toxic (to Aquatic species) chemicals (Garlon 3A / Tahoe 3A or Arsenal). No chemical treatment within one yard of the waters edge. Top trees when shrubs are not present to provide shade and a silt buffer.
152/2	153/1	Summer & Winter run Steelhead Columbia River	Same as listed above.
154/1	156/2	Winter Run Steelhead Tanner Creek	Same as listed above.
152/2	167/4	Northern Spotted Owls & Northern Spotted Owl Critical Habitat	The work will occur outside the critical timing restriction for the Northern Spotted owl Breeding season from March 1 st to September 30 th . No sightings of individuals are show to be in the transmission line ROW

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

Span		Species	Measures
From	To		
152/2	173/3	Anadramous fish and other aquatic species.	Selective cutting of trees in riparian zone and/or cutting trees tops that are within 50' of the conductor at max sag. Shrubs will not be cut that are less than 10' height where the ground to conductor clearance is less than 50' at max sag. Herbicide treatments within 100' up to 1 Yard of waters edge with only practically non toxic (to Aquatic species) chemicals (Garlon 3A / Tahoe 3A or Arsenal). No chemical treatment within one yard of the waters edge. Top trees when shrubs are not present to provide shade and a silt buffer.

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

Span		Describe sensitivity	Method/mitigation measures
From	To		
152/2	154/1	Columbia River Gorge National Scenic Area	The project will occur on the previously disturbed Transmission line ROW and involves removal of small brush and trees under the lines only. Effects to the scenic area will be indiscernible from the existing ROW.

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

No known sites

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

Describe sensitivity	Method/mitigation measures
N/A	All natural vegetation that is not tall-growing will be left undisturbed for erosion control. Less than 5 percent of all vegetation ground cover will be treated in this activity.

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

N/A

4. DETERMINE VEGETATION CONTROL METHODS

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

Span		Methods, including herbicide active ingredient, trade name, application technique
From	To	
152/2 167/4	157/5 173/3	For non-sensitive areas, cut-stump/basal treatment uses 25% Garlon 4 (triclopyr) and 75% water/ forest crop oil. Summer foliar application on re-sprouts uses 3% Garlon 4 and 97% water, and dye. For areas near water, Garlon 3A is substituted for Garlon 4. For non-sensitive areas (spans) cut stump/basal treatment with 25% Garlon 4/Tahoe 4E and 75% Forest Crop Oil (FCO). A 50/50 % mixture of Garlon 3A/Tahoe 3A and/or 5% of Arsenal and water for stump treatment will be used in the non-T&E listed creek riparian zones and within the 100' buffer up to one yard of the high water mark of a T&E listed creek. A late spring and early summer follow-up foliar treatment with Garlon 3A/Tahoe 3A and Escort on all hardwood species except the use of Arsenal on Big Leaf Maple, Wild Cherries and Cottonwood sprouting stumps and/or brush in non-T&E/EFH buffers. Initially, foliar treat Scotch broom as well as a follow up treatment in the spring-summer
168/2	168/3	For BLM land, use any of the four approved herbicides, in 2.4 above, according to labels for scotchbroom.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

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

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 usually cut to 10-15 foot lengths. The cut branches and trunks are then scattered on the ground to a depth of 2-3 feet, 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).

N/A

Native grasses and shrubs 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. BPA expects 2-3 vehicles of the brush contractor and 1 contract inspector's vehicle will be present on the site.

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 of the effectiveness of the cutting and initial herbicide treatment will begin in the spring and early summer. Monitoring the follow-up herbicide treatment will be in the mid to late summer.

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

Annually patrol the transmission line by the line crew and the Natural Resource Specialist will periodically monitor the right-of-way for effective mitigation measures.

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”.

All proposed brush cutting and chemical treatment activities on this corridor is noted in the EIS.

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

No



Herbicide Use in Oregon

- In 1984 the U.S. District Court of the District of Oregon enjoined the Forest Service and Bureau of Land Management from the use of herbicides in Oregon. The Forest Service filed the proper documents and had the injunction dissolved in 1989. The injunction remains effective against BLM, except that the court modified the injunction in 1987 to allow BLM to use four herbicides to control noxious weeds.
- The BLM is currently undertaking a nation-wide environmental impact statement (EIS) to consolidate, update and evaluate vegetation treatments and methods of treatments on BLM public lands in the western states, including Alaska. It is not intended to address specific agency management decisions developed under local land use plans.
- This EIS will consolidate, update and evaluate vegetation treatments and methods of treatment. It will update and replace analyses contained in four existing vegetation treatment EISs the agency completed from 1986 to 1992. It will also analyze vegetation treatments on BLM-administered lands in Alaska that were not included in the earlier EISs.
- The EIS is not intended to address specific agency management decisions developed under local land use plans. It will identify and analyze alternatives for treating more than 6 million acres of public land a year by using prescribed and managed natural fire, Integrated Weed Management, and hazardous fuels reduction as part of the National Fire Management Plan and the Department of the Interior's Cohesive Strategy. Treatment methods could include, but are not limited to, mechanical, chemical, biological, cultural (such as goats or other animals, hand-pulling, etc.), and prescribed fire/fuels reduction.
- The nation-wide vegetation EIS, once complete, will effectively direct Oregon/Washington BLM with regard to future use of herbicides.
- The BLM has conducted two literature reviews for the past 10 years to determine if any new significant information has been found that would change any of the recommendations in the current two EISs. The literature review showed minor changes in the application of herbicides but nothing new to warrant a new FEIS or change the current proposal to lift the injunction to use other herbicides.
- Currently, BLM administered lands in Oregon currently can only use four chemicals with approved formulations and only on classified noxious weeds from county, state, and federal weeds lists. The BLM is not permitted to use any herbicides on other undesirable vegetation.
- Lifting the injunction would allow these assessments to go into effect in Oregon, thus permitting a well-rounded integrated vegetative management approach. Current BLM Resource Management Plans in western and eastern Oregon assume herbicides, at least in limited amounts, would be available.

- More effective integrated noxious weed control permits a broader array of herbicides that are more effective, environmentally friendly, and often more economical. Management and recovery of native plant species in recreational areas, facilities yard maintenance, and rights-of-ways/easements permits an integrated vegetation management approach that could include the use of herbicides.
- The BLM would be able to coordinate more effectively with other interagency and intergovernmental groups, private landowners, and other western states in restoration, habitat management, and vegetation control projects. Finally, lifting the injunction would permit the implementation of the land use plans that assumed limited amounts of herbicide were available.