

# memorandum

DATE: March 15, 2002

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-50)

to: Elizabeth Johnson – TFR/The Dalles  
Natural Resource Specialist

**Proposed Action:** Vegetation Management on Grizzly-Summerlake (Structures 102/1-104/2) and Grizzly-Captain Jack (Structures 103/1-140/4) Transmission Line Corridors.

**Location:** The project area lies east and northeast Klamath Falls, OR, and is located in Lake and Klamath Counties, Redmond Region.

**Proposed by:** Bonneville Power Administration.

**Description of the Proposed Action:** BPA proposes to clear unwanted vegetation from the rights of way and access roads for BPA's Grizzly-Summerlake, Grizzly-Captain Jack Transmission Lines, beginning April 2002, and ending July 2002.

**Analysis:** A Checklist (see attached) was completed for this project in accordance to the requirements identified in the Bonneville Power Administrations Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). The Checklist evaluated the following areas:

- *Description of right-of-way and vegetation management needed*
- *Vegetation to be controlled*
- *Surrounding land use and landowner*
- *Natural Resource*
- *Vegetation control methods*
- *Debris disposal.*
- *Monitoring*
- *Appropriate environmental documentation*

In preparation of this Supplement Analysis, the Checklist was reviewed. Specific information regarding the areas as identified above are described the attached checklist.

**Finding:** This Supplement Analysis finds that: (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD; and (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Frederick J. Walasavage

Frederick J. Walasavage  
Environmental Protection Specialist – KEP

CONCUR: /s/ Thomas C. McKinney      DATE: 3/15/02  
Thomas C. McKinney  
NEPA Compliance Officer

Attachment

cc:

L. Croff – KEC  
T. McKinney - KEC  
M. Hermeston – KEP  
J. Meyer - KEP  
F. Walasavage – KEP/Celilo  
P. Key - LN-7  
M. Johnson – TF/DOB-1  
R. Fouse – TFR/Redmond  
R. Melzer – TFR/Redmond  
M. Oakland – TFRF/Redmond  
Environmental File - KEC  
Official File – KEP (EQ-14)

## 1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

### 1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Big Eddy-Ostrander	39 miles/500kV. Other 3 lines are 230 kV.	425 and variable widths	12

See Handbook — List of Right-of-way Components for checkboxes and the requirements for the components Rights-of-way, and,

- Right-of-Way** – clearing in right-of-way
- Transmission Structures** – clearing around
- Access Road clearing** - approximate miles – 12

**Work shall commence April 2001 and completed by May 2001.**

#### Rights-of-way Requirements

- **Control all tall-growing species that are now or would be a hazard to the line.**
- **Cut stumps are not to be taller than 4 – 6 in.**
- **Control all tree and brush species within about 30 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 in.**
- **Pull all debris and slash out of the 30-ft. area around transmission structures.**
- **For wood pole fire protection, keep a vegetation-free (bare ground) area within 10 feet of the pole.**

#### Access roads Requirements

- **Control all vegetation except grasses, to enable safe driving.**
- **The access road is to be 14 to 25 ft. wide with a 15-ft.- high clearance. Limbs should not hang down into the access road.**
- **Cut stumps are not to be taller than 2 – 4 in. in the roadbed.**
- **Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.**
- **Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.**
- **Pull all debris back from the access road as prescribed.**

### 1.2 Describe the vegetation needing management.

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

Doug fir, wild cherry, alder, maple, & willows – low to medium

Noxious weeds – Scotch Broom. Contractor is required to control scotch broom on non-USFS lands within access roads plus a 5-foot wide shoulder on both sides of access roads. Scotch broom will be treated with a foliar application of an approved herbicide and applied according to label requirements. Herbicide and surfactant/adjutant will be approved by COTR prior to application and from the approved list. All buffers will be maintained according to buffer table in EIS. Scotch broom will not be controlled by herbicide on USFS lands except by Hood River County Weed Board group. Control methods will be biological.

**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 Plants for requirements and checkboxes.

Project includes promoting low-growing plant communities and those actions below will be use to promote low-growing plants.

- Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed.** (In places where tall growing vegetation must be left in place, it may not be possible to promote low-growing plants.)
- Cut-stump or follow-up herbicide treatments on resprouting-type species will be carried out to ensure that the roots are killed.**
- Vegetation that will grow tall will be selectively eliminated *before* it reaches a height or density to begin competing with low-growing species.**
- Desirable low-growing plants will not be disturbed. Only selective vegetation control methods that have little potential to harm non-target vegetation will be used.**

**1.4 Describe overall management scheme/schedule.**

See Handbook.

**Initial entry – This project is a maintenance entry. On non-USFS lands, only tall growing conifer and hardwood will be basal treated and scotch broom foliar sprayed. This area has been cut in the last 2 years. On USFS lands, only cutting with chain saws will be allowed. The USFS requires BPA to cut to a 40' ground to conductor height in the riparian areas to maintain shade for sensitive fish habitat and temperature.**

**Subsequent entry's – Every two years, the USFS lands will need to be manually cut as the area is wet and alder tends to proliferate. Non-USFS lands will need spot treatment every 3 years.**

**Future cycles - Same as subsequent entry.**

**2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS**

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

See Handbook — **List of Landowners/Managers/Uses** for a checkbox list.

Hood River County & Longview Fibre – Industrial Forest lands

USFS – MT. Hood National Forest. Landownership is checkerboard from 31/2 to 39/3 between Longview Fibre and USFS. USFS land use is timber management and riparian.

**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.**

See Handbook — **Methods for Notification and Requesting Information** for requirements.

Hood River County – Letter dated 3/22/01

Longview Fibre – discussed the project with Steve Hansen, Longview manager. Steve verbally gave me approval to cut and treat the row that traverses Longview's land.

USFS – Letter to Kim Titus dated 3/22/01

Confederated Tribes of Warm Springs – Letter to Dept. of Natural Res. 3/22/01

**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.**

See handbook — Requirements and Guidance for Various Landowners/Uses for requirements and guidance, also Agricultural, Residential/Commercial, Tribal Reservations, FS-managed lands, BLM –managed lands, Other federal lands, State/ Local Lands.

Span		Landowner/use	Specific measures to be applied
To	From		
31/2	39/3	USFS	Within riparian areas as described by the USFS, cut tall growing w/in 40' of the ground & lines only.

**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.

None

**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

**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.

Confederated Tribes of Warm Springs – Letter to Dept. of Natural Res. 3/22/01

Letter requested information regarding traditional use plants.

### 3. IDENTIFY NATURAL RESOURCES

**3.1 List any water resources (streams, rivers, lakes, and wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.**

See Handbook — **Water Resources** for requirements for working near water resources including buffer zones.

Span		Waterbody	T&E ?	Method	Herbicide	Application Technique	Buffer
To	From						
27/3	27/4	Intermittent stream	N	Cut/Spray	Rodeo	Spot Spray	Between 100' and water's edge. Longview Fibre lands
28/2	28/3	Intermittent streams	N	Cut Individual trees if w/in 40' of lines	None		Water's Edge - .>125 feet
28/3	28/4	Perennial stream (Tony Cr.)	Y	Cut Individual trees if w/in 40' of lines	None		Water's Edge - .>125 ft.
29/3	29/4	Perennial stream	N	Cut Individual trees if w/in 40' of lines	None		Water's Edge - .>125 feet
29/5	30/1	Perennial stream	N	Cut Individual trees if w/in 40' of lines	None		Water's Edge - .>125 feet
31/2	31/3	Perennial stream	N	Cut Individual trees if w/in 40' of lines	None		USFS Riparian Buffer Requirements
32/2	32/3	Intermittent & perennial streams	N	Cut Individual trees if w/in 40' of lines	None		USFS Riparian Buffer Requirements
33/1	33/2	Intermittent stream	N	Cut			USFS Riparian Buffer Requirements
33/2	34/3	Intermittent & perennial streams & wetlands	N	Cut tall growing w/in 40' of the ground & lines only	None		USFS Riparian Buffer Requirements

34/3	35/4	Intermittent & perennial streams & wetlands	N	Cut/spray tall growing	Rodeo	Spot Spray	Between 100' and water's edge. Longview Fibre lands.
35/4	36/3	Intermittent & perennial streams (Ladd Cr.) & wetlands	Y	Cut tall growing w/in 40' of the ground & lines only	None		USFS Riparian Buffer Requirements
36/4	38/3	Intermittent & perennial streams (McGee & Elk Cr.) & wetlands	Y	Cut tall growing w/in 40' of the ground & lines only	Rodeo	Spot Spray	Between 100' and water's edge. Longview Fibre lands
38/3	39/3	Intermittent & perennial streams (Eagle Cr.) & wetlands	Y	Cut tall growing w/in 40' of the ground & lines only	None		USFS Riparian Buffer Requirements

**3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners may be able to provide this info if requested).**

See Handbook — **Herbicide Use Near Irrigation, Wells or Springs** for buffers and herbicide restrictions.

Span		Well/irrigation/or spring	Herbicide	Buffer	Other notes/measures
To	From				
		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.**

See Handbook — **Determining Threatened or Endangered Plant or Animal Species** for requirements and determining presence.

Span		T&E Species	Method/mitigation or avoidance measures
To	From		

28/3	28/4	ESA Listed Fish (Tony Creek)	Only individual trees w/in 40' of conductor will be cut. No cutting or herbicide treatment w/in 400' of stream is likely. Conductor height is >125'. Likely not to affect sensitive habitat or ESA listed fish.
36/2	36/3	ESA Listed Fish (Ladd Creek)	According to USFS requirements, on target vegetation w/in 40' of the conductor & w/in 300 ft. slope distance of either side of stream channel will be cut. No herbicides. Minimal # of trees to be cut in this area w/this mtce application. Likely not to affect sensitive habitat or ESA listed fish.
37/1	37/2	ESA Listed Fish (McGee and Elk Creeks)	Target vegetation w/in 40' of the conductor & w/in 300 ft. slope distance of either side of stream channel will be cut. Spot treatment with Rodeo on cut stumps w/in the 300 ft. buffer. Minimal # of trees to be cut in this area w/this mtce application. Likely not to affect sensitive habitat or ESA listed fish.
38/3	38/4	ESA Listed Fish (Elk Creek)	According to USFS requirements, on target vegetation w/in 40' of the conductor & w/in 300 ft. slope distance of either side of stream channel will be cut. No herbicides. Minimal # of trees to be cut in this area w/this mtce application. Likely not to affect sensitive habitat or ESA listed fish.
39/1	39/2	ESA Listed Fish (Eagle Creek)	According to USFS requirements, on target vegetation w/in 40' of the conductor & w/in 300 ft. slope distance of either side of stream channel will be cut. No herbicides. Minimal # of trees to be cut in this area w/this mtce application. Likely not to affect sensitive habitat or ESA listed fish.

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

See Handbook — **Protecting Other Species** for requirements.

Span		Species	Measures
To	From		
		None	

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

See Handbook — **Visual Sensitive Areas** for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
		See section 3.1	

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

See Handbook – **Cultural Resources** for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
		None	

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

See Handbook – **Steep/Unstable Slopes** for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
Fill-in		Fill-in	Fill-in

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

See Handbook – **Spanned Canyons** for requirements.

Span		Methods, cutting
To	From	
28/2	28/3	Cut only individual trees within 40' of conductors. No Herbicides.
28/3	28/4	Cut only individual trees within 40' of conductors. No Herbicides.
29/3	29/4	Cut only individual trees within 40' of conductors. No Herbicides.
29/5	30/1	Cut only individual trees within 40' of conductors. No Herbicides.
31/1	31/2	Cut only individual trees within 40' of conductors. No Herbicides.
31/2	31/3	Cut only individual trees within 40' of conductors. No Herbicides.

## 4. DETERMINE VEGETATION CONTROL METHODS

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

See Handbook — **Manual, Mechanical, Biological, Herbicides–spot, Herbicides-localized, Herbicides-broadcast, and Herbicides- aerial** for requirements for each of the methods.

Span		Methods
To	From	

27/3	31/2 +350	<b>Except for spanned canyons or w/in water resources as described above,</b> Contractor will use a mixture of 30% Garlon 4 and 70% Forest Crop Oil or other approved herbicide to basal treat target vegetation. Garlon will be used no closer than 100 feet to any intermittent or perennial stream or wetland. Rodeo will be used w/in the 100-foot wide stream buffer on cut stump treatments in approved locations.
34/3 – 830	35/4- 500	<b>Except for spanned canyons or w/in water resources as described above,</b> Contractor will use a mixture of 30% Garlon 4 and 70% Forest Crop Oil or other approved herbicide to basal treat target vegetation. Garlon will be used no closer than 100 feet to any intermittent or perennial stream or wetland. Rodeo will be used w/in the 100-foot wide stream buffer on cut stump treatments in approved locations.
36/4- 200	38/3 +400	<b>Except for spanned canyons or w/in water resources as described above,</b> Contractor will use a mixture of 30% Garlon 4 and 70% Forest Crop Oil or other approved herbicide to basal treat target vegetation. Garlon will be used no closer than 100 feet to any intermittent or perennial stream or wetland. Rodeo will be used w/in the 100-foot wide stream buffer on cut stump treatments in approved locations.

## 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.

**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.)

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

See Handbook — **Reseeding/replanting** for requirements.

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

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

Not using ground-disturbing equipment.

### 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

See handbook — **Monitoring** for requirements.

- Right-of-way will be visited during late summer to determine if target vegetation was cut and treated effectively, whether desired results were achieved for riparian as well as non-riparian areas and if mitigation measures were appropriately utilized and effective. ROW mgmt plan will be developed from this review and implemented next cutting cycle.

### 6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

Annually field verify results of previous veg. mgmt schemes and look for new alternatives for treatment, etc.

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

N/A

## 7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — **Prepare Appropriate Environmental Documentation** for requirements.

### 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.

A Supplemental Analysis will be completed.