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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: February 19, 2003

REPLY TO ATTN OF: KEP/4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-127- Eugene-Alvey#2

TO: Benjamin Tilley – TFE/Alvey

Proposed Action: Vegetation Management for the Eugene-Alvey 115 kV transmission line from structure 7/1 through structure 12/2m, and along portions of the following adjacent transmission lines: Hawkins-Alvey 115KV and Alvey-Lane 115KV.

Location: The project is located in the BPA Eugene Region in Lane County, Oregon.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, access roads, and around tower structures of 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.

Analysis: Please see the attached checklist for the resources present. Applicable findings and mitigation measures are discussed below.

Planning Steps:

1. ***Identify facility and the vegetation management need.***

   Work will take place along the Eugene-Alvey 115 kV transmission line rights-of-way for access road clearing of noxious weeds and tall growing species. The proposed treatment will be performed in designated areas along the ROW's with an easement width ranging from 150 feet to 125 feet. See attached checklist and documents for exact locations of treatment within the corridor.

2. ***Identify surrounding land use and landowners/managers and any mitigation.***

   The project corridor passes through rural and industrial forestlands. Landowners requiring notification or under tree and brush agreements are shown in Section 2.4 of the attached checklist. Any remaining landowners will be contacted (letters, personal contact, door hangers, etc.) by BPA before and during the project. Any input received will be incorporated into the prescription/cut sheets.

3. Identify natural resources and any mitigation.

Section 3 of the attached checklist identifies the natural resources present in the area of the proposed work. The following resources found along with applicable mitigation measures:

Riparian Habitat:
Riparian habitat includes rivers, wetlands, streams, and creeks meeting the definition of riparian habitat. Many areas were identified for this project. Sit specific requirements for work around these resources, including buffers are contained in Section 3.1 of the attached checklist.

Irrigation sources, Wells, and Springs:
Several locations were identified in the project area. Site-specific requirements for working around these resources, including buffers, are contained in Section 3.2 of the attached checklist.

Threatened and Endangered Species/Essential Fish Habitat (EFH):
No species were identified within 0.25 miles of the project area. Therefore, this project will have no effect on T&E species/EFH.

Visually Sensitive Areas:
Several areas were identified. Vegetation management methods and mitigation measures were specifically developed for each area. The measures are summarized in Section 3.5 of the attached checklist.

Cultural Resources: No know cultural resources are present through out the project area. The project does not include any ground disturbance areas. 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.

4. Determine vegetation control and debris disposal methods.

Herbicide application will be for spot/stump treatment of re-sprouting species and conducted using backpack sprayers containing 25% Garlon 4 and 75% crop oil mix. Mechanical removal of vegetation will be accomplished using various methods with debris being scattered to prevent increased fire hazards. Chipping, lop and scatter, and mulching are the three methods that will be used for debris disposal (see Section 4 and 5).

5. Determine revegetation methods, if necessary.

Re-vegetation is not necessary for this project. Reseeding will occur naturally in any areas that are lightly disturbed.

6. Determine monitoring needs.

Monitoring will occur in the form of inspection while work is being done in the area. When convenient, subsequent monitoring will occur by the Foreman 1 and his crew, as well as by the NRS. Helicopter patrols (4 times/year) and working patrols (yearly) will also keep the NRS updated on problem areas.

Erosion potential will be monitored during each inspection. Growth rate and return of species along tower sites and access roads will be monitored to predict accessibility in the foreseeable future.

7. Prepare appropriate environmental documentation.

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. Therefore, no further NEPA documentation is required.

/s/ Brett M. Sherer
Brett M. Sherer – KEP/4
Environmental Engineer

CONCUR:*/s/ Thomas C. McKinney* DATE:02/27/2003
Thomas C. McKinney
NEPA Compliance Officer

Attachment

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
M. Hermeston – KEP-4
J. Sharpe – KEPR-4
S. Barndt – KEPR-4
P. Key – LC-7
D. Hollen – TF/DOB-1
M. Newbill – TFE/Chemawa
T. Jones – TFE/Alvey
G. Burbach – TFEF/Alvey
Environmental File – KEC-4
Official File – KEP-4 (EQ-14)

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Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

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**.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Eugene-Alvey #2	14 miles 115 kV	150'(combined w/ H-A #1)	5 miles
Hawkins-Alvey #1	9 miles 115 kV	150'(combined w/ E-A #2)	5 miles
Alvey-Lane #1	14 miles 230 kV	125'	5 miles

Right Of Way:
Right-of-Way – clearing in right-of-way
Transmission Structures – clearing around
Access Road clearing - approximate miles – 5 miles (15 acres)

1.2 Describe the vegetation needing management.

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

Vegetation Types:
Douglas Fir
True Fir
Hemlock
Spruce
Alder
Cedar
Wild Cherry
Noxious Weeds - Scotch broom, gorse, tansy ragwort, Himalayan blackberry
Density: Medium (50 – 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 — for requirements and checkboxes.

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 - **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 5-year cycle. A follow-up herbicide treatment will occur 3 – 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 5-year cycle. After completion of this cutting cycle, there is the potential to increase this cycle by another year (6-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.

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

Landowners/Managers/Uses:
Rural
Industrial Forest lands

2.2 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.

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/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.**.

Span		Landowner/use	Specific measures to be applied
To	From		
7\1	7\2 + 515'	Orchard Trees	May remain—not to exceed 18' in height
9\5	9\7	Riding arena—pasture	Remove and chip only what is necessary
10\1 + 147'	10\2 + 600'	Christmas trees	May remain—not to exceed 18' in height
11\5	11\6 + 143'	Pasture	No Herbicides

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.

Refer to table above.

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.

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.
See handbook — **Other Potentially Affected Publics** for requirements and suggestions.

Refer to table above.

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

Span		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
7\4 + 403'		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35'	
8\2 + 292'		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35'	
8\3 + 118'		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35'	
8\5 + 325'		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35'	
8\6 + 197'	8\6 + 550'	Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35'	2 X-ings

8\7 + 380’		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	
9\7 + 714’	9\7 + 749’	Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	2 X-ings
10\1 + 50’		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	
10\6 + 617’	10\6 + 652’	Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	2 X-ings
11\3 + 377’		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	
11\5 + 637’		Unnamed creek	No	No work to be done	N/A	N/A	N/A	
11\7 + 647’		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	
12\1 + 459’	12\1 + 563’	Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	2 X-ings
12\3 + 212’		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	
12\6 + 660’		Unnamed creek	No	CLS	Garlon 4	Spot Stump & LV foliar	35’	

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.

Span		Well/irrigation/or spring	Herbicide	Buffer
To	**From**			
10\1 – 60’		Storm sewer	Garlon 4	50’ radius
10\2 + 242’		Storm sewer	Garlon 4	50’ 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.

See Handbook — **T&E Plant or Animal Species** for requirements and determining presence.

Method/mitigation or avoidance measures
No T & E species or habitat within .25 miles of ROW

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

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

Measures
Encouragement of grasses will help to improve forage potential for large game along access roads.
Shade-providing plants near water bodies will be trimmed to help provide clear access along the roads and improve forage diversity without compromising shade potential of the crossing.

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		
9\4	9\5	Willamette St. crossing	All debris visible from roadway will be chipped and removed.
9\8	10\1	Fox Hollow Rd. & Donald St. crossing	All debris visible from roadway will be chipped and removed. Landscaping will be shaped and debris removed.
11\1	11\2	Dillard Rd. crossing	All debris visible from roadway will be chipped and removed.

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

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

Method/mitigation measures
No known cultural resources present. No ground-disturbing activity will occur. If evidence is found of cultural resources (artifacts, features, burial sites), work will cease immediately and the appropriate authorities will be contacted.

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.

Method/mitigation measures
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.

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

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

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**, **and Herbicides** for requirements for each of the methods.

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 4 / 75% crop oil mix. ----Refer to attached detail sheet for span by span analysis

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.

Cut, lop and scatter to the extent to prevent increased fire hazard.
Chipping will be done where visually sensitive areas exist as well as per landowner request.

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.

Reason for Reseed/plant
Native, naturalized, and non-native 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

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.

Monitor brush control as it is happening on a daily basis. Monitoring will also occur every few months as the situation lends itself. Working patrol will determine when subsequent entry for access road and tower site clearing will be needed (performed in the winter). Helicopter patrol will help determine when tall-growing species need attention. Ground patrols by the NRS will occur every few months.

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

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.

None