

United States Government

Department of Energy

Bonneville Power Administration

memorandum

DATE: October 22, 2001

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-27)

TO: Ben Tilley – TFE/Alvey
Natural Resource Specialist

Proposed Action: Vegetation Management along the Marion-Alvey #1 from structure 14/5 to 64/3 and the Marion-Lane #1 from structure 14/5 to 70/2. Both lines describe the same segment of ROW between structures 14/5 and 45/2.

Location: All ROW are located in Marion, Linn, and Lane Counties, OR, all being in the Eugene Region.

Proposed by: Bonneville Power Administration (BPA), Eugene Region.

Description of the Proposed Action: BPA proposes to clear unwanted vegetation in the rights-of-ways, around tower structures, and associated access roads that may impede the operation and maintenance of the subject transmission line. 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. All work will be executed in accordance with the National Electrical Safety Code and BPA standards

Analysis: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

Planning Steps

1. Identify facility and the vegetation management need.

The work involved will be to clear tall growing vegetation that is currently or will soon pose a hazard to the lines; treat the associated stumps and re-sprouts with herbicides, mow and treat access roads and structure sites. All work will take place in existing rights-of-ways.

Also, all off right-of-way trees that are potentially unstable and will fall within a minimum distance or into the zone where the conductors swing will be removed. The width of the ROW varies from 100 to 517 feet. All work will be accomplished by selective vegetation control methods to assure that there is little potential harm to non-target vegetation and to low-growing plants. The work will provide system reliability.

The overall vegetation management scheme will be to initially control all tall growing species and noxious weeds. Stump herbicide treatments are planned for all species with potential to re-sprout. The access roads and tower sites will be cleared to improve access to the rights-of-way.

Within 2 to 4 years it will be necessary to re-control vegetation (mechanical) along the access roads and tower sites to ensure work access to the rights-of-way.

Future cycles of work will involve the treatments used in the previous phases of work.

2. Identify surrounding land use and landowners/managers.

The subject corridor traverses generally mountainous terrain. The transmission line crosses rural properties, agricultural land, grazing lands, industrial forest lands, BLM (Eugene District), and Lane County Lands.

Prior to work beginning, form letters will be sent out to all known landowners of the right-of-way. These letters will be sent out prior to the job starting. This will allow sufficient time for landowners to provide any overriding concerns, comments, or restrictions that may apply.

3. Identify natural resources.

Water wells, spring, riparian, riparian T&E habitat have been identified. Steep, moderately and level terrains have been identified in the areas of the proposed work. These areas have been tentatively identified during patrols and by using existing data sources. The Project Manager will positively identify the habitats as work progresses along the corridors. No other T&E/wildlife issues, visually sensitive areas, cultural resources or other natural resource issues have been identified along the other work corridor.

- Riparian, water supply wells, and springs. Refer to the attached vegetation checklist for locations. All buffers as outlined in the vegetation FEIS are in effect. Herbicides will not be used within the buffers. Manual vegetation methods may be used to trim trees and taller vegetation.
- Riparian T&E areas. Buffers as outlined in the Vegetation FEIS are in effect for streams and rivers with ESA listed fish. See the attached checklist for actual buffer locations and widths. Herbicides will not be applied within any buffers.
- No culvert work and/or 'in stream' work is to take place without prior consultation with the appropriate government agencies and permits are in place.

See attached ROW vegetation checklist for treatment methods and planned herbicide use in all other non-critical areas.

Prior to the beginning of the work, the contractor will be provided with a set of the project maps, as well as with a list of management prescriptions from the Vegetation Management FEIS.

The herbicides used for vegetation management will be consistent with what is specified in the Vegetation Management FEIS.

4. Determine vegetation control and debris disposal methods.

Initially, mechanical methods will be employed along access roads and around tower sites to control taller vegetation. As a follow up, unwanted vegetation would be removed by employing cut-stump, spot spraying, and follow-up stump treatment with 25% Garlon and 75% crop oil mix. The chemical means would be employed to prevent re-sprouts. Prevention of re-sprouts encourages low-growing plant communities to establish themselves and flourish on the right-of-way. This impact avoidance approach both maximizes the use of limited resources and minimizes environmental impacts. Herbicides will be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions. The herbicide used will be consistent with Vegetation Management FEIS.

All riparian and riparian T & E buffer zones are in effect and will be strictly enforced as outlined in the Vegetation Management FEIS and as shown in the attached vegetation checklist. Treatments on steep, moderate and level slopes will be consistent with the Vegetation Management FEIS and as shown on the attached checklist.

The contractor will receive a list of required mitigation measures (management prescriptions) to follow as well as a set of maps delineating the transmission line and potential sensitive resource areas. The contractor will follow manufacturers' label instructions when applying herbicides.

5. Determine re-vegetation methods, if necessary.

Reseeding /replanting regimes are not determined to be necessary at this time.

6. Determine monitoring needs.

An inspector will monitor the work being performed at the time of the initial work. Follow-up inspections will be preformed during line patrols by the line crew, helicopter reports and by the NRS. Additional required work would be identified at that time.

7. *Prepare appropriate environmental documentation.*

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
Environmental Engineer - KEP

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

DATE: 10/24/01

cc:

K. Nakata – DOE/EH-42
J. Meyer – KEP-4
B. Sherer – KEP-4
J. Sharpe – KEPR-4
P. Key – LC-7
D. Hollen – TF/DOB-1
A. DelaCruz – TFE/Alvey
T. Jones – TFE/Alvey
G. Burbach – TFEF/Alvey
M. Newbill – TFE/Chemawa
Environmental File – KEC
Official File – KEP-4 (EQ-14)

BMSherer:bms:3928:10/22/2001

(KEP-KEP-4-W:\EP\2000 & 2001 FILES\EQ\Eq-14\FEIS-0285-SA-27-Marion-Alvey-Lane.doc)