United States Government

memorandum

DATE: April 30, 2001

REPLY TO ATTN OF: KEP-4

- SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-09)
 - то: Elizabeth Johnson TFR/The Dalles Natural Resource Specialist

Proposed Action: Vegetation Management on McNary-Santiam No. 1 & No. 2 Transmission Line Corridor from Structure 137/2-150/1+500

Location: The project area is located on the Warm Springs Reservation, Oregon.

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 McNary-Santiam No. 1 Transmission Line, beginning in the summer of 2000 and ending in July, 2001.

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 Supplemental 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.

<u>/s/ Fred Walasavage</u> Fred Walasavage Environmental Protection Specialist

CONCUR: <u>/s/ Thomas C. McKinney</u> Thomas C. McKinney NEPA Compliance Officer DATE: <u>5/15/2001</u>

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
McNary-Santiam No. 1 (de-energized) & #2.	27 miles in Redmond TLM – Warm Spgs. Res.	300	13

See Handbook — <u>List of Right-of-way Components</u> for checkboxes and the requirements for the components <u>Rights-of-way</u>, and .

- Right-of-Way clearing in right-of-way only within No. 2 line (approx. 150 ft. wide).
 Only trees >10 feet on the de-energized line will be cut to reduce potential problems related to induction.
- **Transmission Structures** clearing around only on No. 2 line.
- □ Access Road clearing approximate miles 13
- 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.

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 — <u>List of Vegetation Types, Density, Noxious Weeds</u> for checkboxes and requirements.

Doug fir, Pine, Wild cherry – Low to Medium

Noxious weeds – Knapweeds & other noxious weeds. Contractor is required to control knapweed & other noxious weeds on land within access roads plus a 5-foot wide shoulder on both sides of access roads. Knapweed will be treated with a foliar application of an approved herbicide and applied according to label requirements. Herbicide and surfactant/adjuvant will be approved by COTR prior to application and from the approved list. All buffers will be maintained according to buffer table in EIS. Additionally, the Wasco County weed board is contracted to survey, control, and manage noxious weeds on row.

- **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.

See Handbook.

Initial entry – Maintenance entry. Project will be cutting & treating with an approved herbicide & surfactant, tall growing vegetation on No.2 line, cleaning around structures and access road. On de-energized line #1, just cutting tall growing >10 due to hazards related to induction.

Subsequent entrys – Same as above every 3-5 years

Future cycles – Same as above. Once established, every five years minor cutting and spot treatment as needed.

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.

Tribal Reservation – Confederated Tribes of Warm Springs

Multiple use activities occur adjacent to row. Tribe has utilized adjacent areas for commercial timber production, wildlife enhancement, and general recreation. PGE has an adjoining 200 ft. wide row corridor starting at BPA's 143/1-200'. The 2 row's travel collectively through Tribal land into the USFS lands - Eugene Region.

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.

Notified the Department of Natural Resource Manager, Bobby Brunoe by official cover letter and copy of proposal. Requested them to review proposal and let me know if there were any environmental concerns or mitigation they wanted me to consider. On 4/18, Dave Smith from the BIA was instructed by Bobby Brunoe to verbally give me the green light to go ahead with my project as he agreed with my herbicide prescription. Dave also suggested I send a letter to Gerald Hendrickson, environmental coordinator to notify him of my intent to proceed. Sent the letter on 4/20. Also spoke with Dan O'Brian regarding merch tree identification and location. He conferred with Bodie Shaw & Dave Smith about the project proposal. It was agreed that if any merch trees were cut, they would be identified on the map and given to him after project was completed.

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

S]	pan	.	
То	From	Landowner/use	Specific measures to be applied
NA	NA	NA	NA

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.

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.

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.

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.

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

Sp	an					Application		
То	From	Waterbody	T&E?	Method	Herbicide	Technique	Buffer	Other
138/3	138/4	Intermittent Stream	Ν	Handcut buffer	None		100 ft.	NA
139/3	139/4	Intermittent Stream	Ν	Handcut buffer	None		100 ft.	NA

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	Other notes/measures
To	From	wen/infigation/of spring	THE DICIUE	Duilei	notes/measures
NA	NA	NA	NA	NA	NA

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			
То	From	T&E Species	Method/mitigation or avoidance measures
146/5	147/5	Potential Lynx Habitat	Abide by Tribal recommendations. See below.
148/3	149/4	Potential Lynx Habitat	Abide by Tribal recommendations. See below.

These portions of the row are above 3000' and consist of Lodgepole Pine stands - potential habitat for lynx. However, the last time I spoke with wildlife personnel from Warm Springs they indicated this area was unlikely lynx habitat. If their response requires mitigation measures to protect this habitat, then I will include mitigation in the contract and abide by their recommendations. As of 4/20, no one from the Tribe indicated my project would be a negative influence on the habitat.

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

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

S	pan		
То	From	Species	Measures
NA	NA	NA	NA

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

See Handbook — Visual Sensitive Areas for requirements.

S	pan	Describe sensitivity	Method/mitigation measures
То	From		
NA	NA	NA	NA

3.6 List areas with cultural resources and the measures to be taken in those areas. See Handbook – **Cultural Resources** for requirements.

S	pan	Describe	
То	From	sensitivity	Method/mitigation measures
137/2/	150/1	Cultural Resources	All work shall cease immediately and the Tribal Cultural Res. Mgr. shall be notified. I anticipate the Tribal response to my proposal will include any traditional use plants and mitigation measures to protect them. Mowing will be done on the access roads and some of the row.

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.

S	pan		
То	From	Describe sensitivity	Method/mitigation measures
NA	NA	NA	NA

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

See Handbook – Spanned Canyons for requirements.

	pan From	Methods, cutting	
NA	NA	NA	

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.

Sp	Dan	
То	From	Methods

137/2	150/1	Except for the 100 ft. buffers along the intermittent streams as described above, the contractor will be required to hand cut and/or basal treat tall growing vegetation with an approved herbicide w/in the energized portion of the row (150'). Tree within the de-energized portion >10' in height will be handcut and
		slash mulched. Slash will be mulched with mowers. Access roads, some vegetation within the row and many structures sites will be mowed.

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.)
- □ **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).

See Handbook — Reseeding/replanting for requirements.

S To	pan From	Reason for Reseed/plant	Type of Seed or Plants	Native?

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

No ground disturbance expected. ROW and access roads are already dry in many areas and operations are not expected to disturb ground surface. However, if surface is disturbed, seeding will be done at conclusion of the project.

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

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.

 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.

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

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

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".

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