<u>United States Government</u>

Bonneville Power Administration

DATE: September 11, 2001

REPLY TO ATTN OF: KEP-4

- SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-26)
 - TO: Ben Tilley TFE/Alvey Natural Resource Specialist

Proposed Action: Vegetation Management on Reedsport-Fairview #1 Transmission Line Structure 1/5 to 39/4.

Location: All ROW are located in Coos and Douglas 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 and around tower structures 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

<u>Analysis</u>: 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 is 100 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 vegetation control is designed to provide a 4-year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all trees using cut, lop and scatter and basal treatment or cut and chip methods as shown on the vegetation control prescription sheets. After completion of this cutting cycle, there is the potential to increase this cycle by another year (5-year cycle), depending on the growth vigor of trees surrounding the line.

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 both residential and rural properties, agricultural land, industrial forest lands, and Coos 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 3 weeks 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, and Coho Salmon habitat have been identified. Steep, moderately and level terrain 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 and water supply wells. Refer to the attached vegetation checklist for location. All buffers as outlined in the vegetation FEIS are in effect.
- Riparian T&E areas. Buffers as outlined in the Vegetation FEIS are in effect for streams and rivers with ESA listed Coho. Below is a list of crossing where buffers are in effect (for actual buffer locations and widths see the attached checklist).
 - Winchester Creek Structures 3/4 to 3/5,
 - Clear Creek Structures 8/3 to 8/4,
 - Eel Creek Structures 9/1 to 9/2,
 - Tenmile Creek Structures 10/6 to 10/7,
 - Bear Creek Structures 14/5 to 14/6,
 - North Slough Structures 16/1 to 16/2,
 - Palouse Creek Structures 17/3 to 17/4,
 - Larson Slough Structures 18/3 + 50',
 - Mettman Creek Structures 19/6 to 20/1,
 - Kentuck Creek Structures 21/2 to 21/3,
 - Willanch Creek Structures 22/4 to 22/5,
 - Johnson Creek Structures 22/5 to 23/1,
 - Echo Creek Structures 24/4 to 24/5,
 - Coos River Structures 25/4 to 25/5,
 - Lillian Creek Structures 25/6 to 25/7,
 - Catching Slough Structures 27/3 to 27/4,
 - Ross Slough Structures 28/1 to 28/2,
 - Boone Creek Structures 32/4 to 32/5,
 - Catching Creek Structures 33/1 to 33/2, and
 - Steele Creek Structures 37/3 to 37/4.
- 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 on Attachment A and 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.

<u>/s/ Brett M. Sherer</u> Brett M. Sherer Environmental Engineer - KEP

CONCUR: <u>/s/Thomas C. McKinney</u> Thomas C. McKinney NEPA Compliance Officer DATE: <u>9/13/01</u>

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

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