

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: September 11, 2007

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-344-Toledo - Wendson No. 1 Transmission Line Vegetation Management)  
**Project #: PP&A-496**

to: Benjamin Tilley  
Natural Resource Specialist – TFE/Alvey

**Proposed Action:** The project activities will be conducted along the entire Right-of-Way (ROW) of the 230 kV Toledo - Wendson #1 transmission line corridor. The corridor along this section of the proposed project is 125 feet in width and crosses approximately 53 miles of terrain through rural, agricultural, industrial forestlands, Bureau of Land Management (BLM) (Salem District), USDA Forest Service (Siuslaw National Forest, and Central Coast Range District-Oregon Dunes National Recreational Area) (ODNRA).

The project activities being employed are the same vegetation management prescriptions within the same project area, and the environmental conditions as what was documented in DOE/EIS-0285/SA-209-Toledo - Wendson (April 26, 2004).

**Location:** The proposed project is located in Lincoln and Lane Counties, Oregon in the Bonneville Power Administration (BPA) Eugene Region.

**Proposed by:** BPA

**Description of the Proposal:** BPA is proposing to conduct vegetation control activities along its Toledo - Wendson transmission line corridor to remove Douglas fir, true fir, hemlock, spruce, alder, maple, willows, wild cherry, madrone, pine and western red cedar present in the ROW. This will allow low-growing plant communities to get established, reducing the number of invasive weeds. The noxious weeds to be controlled are Scotchbroom, Tansy ragwort, Gorse, Thistle (several species) and Himalayan blackberry. Site-specific activities are described below:

Vegetation will be removed using manual or mechanical methods. Debris will be disposed of using either chip, lop and scatter or mulching techniques. All debris will be scattered along the ROW.

Herbicides will be selectively applied using stump treatment applications to prevent resprouting. Only Garlon 3A herbicide (active ingredient: Triclopyr) will be used for this project. Backpacks will be used with a 25% Garlon 3A / 75% crop oil mix. Localized low volume spot treatments will use a 1.5% Garlon 3A mix in water with 5% crop oil to create an emulsion. No herbicide will be applied on or adjacent to residential infrastructure or water supply areas.

The project is to be completed **between October and December 2007**. Follow-up spot treatments of resprouts will occur 6 months later using Garlon 3A.

**Analysis:** A Vegetation Management Checklist was completed for the project in accordance with the requirements identified in BPA's Transmission System Vegetation Management Program EIS (DOE/EIS-0285).

Section 3 of the checklist identifies the natural resources present in the areas of the proposed work. The following summarizes natural resources occurring in the project areas along with applicable mitigation measures.

**Water Resources:** Waterbodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in section 3.1 of the Vegetation Management Checklist. Trees in riparian zones will be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag. Shrubs will not be cut that are less than 10 feet high where ground to conductor clearance allows. No ground disturbing vegetation management methods will be implemented, thus eliminating the risk for soil erosion and sedimentation near the streams.

Private water wells/springs were identified along the ROW. No herbicide application will be made within a 50 foot radius of the wellhead/spring. For location information, see section 3.2 of the attached project checklist.

**Threatened and Endangered Species:** Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether the proposed project will have an affect on any listed species. A species list was obtained from the United States Fish and Wildlife Service (USFWS) website in February 2007, for threatened and endangered (T&E) species potentially occurring in the project area. In addition, a review of species under the jurisdiction of NOAA Fisheries was conducted. A determination of "No Effect" was made for all ESA-listed species and designated critical habitat for the project.

**Essential Fish Habitat:** A review of NOAA's database identified no Essential Fish Habitat (EFH) streams occurring in the project area.

**Cultural Resources:** No cultural resources are known for the project area. If a site is discovered during the course of vegetation control, work will be stopped at that location and BPA Environmental Specialist, and BPA archeologist will be contacted.

**Re-Vegetation:** Native grasses are present on the entire ROW, and are expected to seed into the areas that will have lightly disturbed soil predominately located on the ROW roads.

**Monitoring:** The entire project will be inspected during the work period. Additionally, monitoring for the follow-up herbicide treatment will be in 2008.

**Siuslaw National Forest:** An evaluation of the Siuslaw National Forest plant species of concern and sensitive terrestrial species was completed. In accordance with BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD and the USDA Forest Service's "Pacific Northwest Region Invasive Plant Program Preventing and Managing Invasive Plants Record of Decision (ROD)" (October 2005) and "Pacific Northwest Region Invasive Plant Program Preventing and Managing Invasive Plants Final Environmental Impact Statement (FEIS)" (April 2005), BPA was able to conclude that by applying Garlon 3A (TEA) (active ingredient: triclopyr) in selective application techniques only (e.g., spot spraying, wiping, basal bark, cut stump, injection) would reduce the direct effects to non-target plant species and not cause adverse effects to birds, mammals, and amphibians.

**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. This Supplement Analysis also finds the proposed actions will not affect T&E species. Therefore, no further NEPA documentation is required.

Sincerely,



Shawn L. Barndt  
Environmental Scientist

CONCUR:   
Katherine S. Pierce  
NEPA Compliance Officer

DATE: September 11, 2007

Attachments:

Vegetation Management Checklist  
Effects Determination  
FY08 Detail Sheet  
Survey & Manage Report  
Sensitive Plant List  
Appendix A  
Forest Service Land Issues