

# memorandum

DATE: November 8, 2017

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-676)

TO: Christopher Morse  
Natural Resource Specialist – TFBV-LMT

**Proposed Action:** Vegetation Management along the St. Johns-St. Helens No. 1, St. Helens-Allston No. 1, and Cardwell-Cowlitz No.1 Transmission Line Corridors

**Pollution Prevention and Abatement Project No.:** 3,753

**Location:** Columbia and Multnomah counties, Oregon; and Clark and Cowlitz counties, Washington

**Description of the Proposal:** BPA proposes to clear unwanted vegetation in and adjacent to the transmission line corridors and access roads along the entire lengths of the 115-kilovolt (kV) St. Johns-St. Helens No. 1, St. Helens-Allston No. 1, and Cardwell-Cowlitz No.1 transmission lines. The right-of-way (ROW) corridor in the proposed project area measures from 65 to 100 feet in width and crosses approximately 49 miles of terrain through rural residential, private forest, agricultural, industrial, City of Portland, and City of Rainier lands.

Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated. Any additional measures proposed by landowners or land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

To comply with Western Electricity Coordinating Council standards, BPA proposes to manage vegetation with the goal of removing tall-growing vegetation that is currently or will soon become a hazard to the transmission line (a hazard is defined as one or more branches, tops, and/or whole trees that could fall or grow into the minimum safety zone of the transmission line(s) causing an electrical arc, relay, and/or outage). The overall goal of BPA is to establish low-growing plant communities along the ROW to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods that may include hand cutting, mowing, and herbicidal treatment would be used to perform the work. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Transmission System Vegetation Management Program Final Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000), to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes

with the operation and maintenance of transmission infrastructure. Approximately 457 acres of ROW, 6 structure sites, and 7 miles of access road would be initially treated in winter 2017/2018. In addition, BPA proposes to side-limb up to 504 trees and remove up to 37 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 457 acres of ROW by fall of 2018; however, additional vegetation management may be necessary in subsequent years in discrete areas of noxious weeds, or where BPA personnel discover vegetation that poses a hazard to the transmission line. All debris would be disposed of onsite, along the ROW, using on-site chip, lop and scatter, or mulching techniques.

**Analysis:** A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Final EIS and Record of Decision (ROD) (August 23, 2000). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. As conservation and avoidance measures, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to the water's edge of any stream containing threatened or endangered species. Trees in riparian zones would be selectively cut to include only those that would grow into the minimum approach distances of the conductor at maximum sag; other trees would be left in place or topped to preserve shade. Shrubs that are less than 10-feet-high would not be cut where ground to conductor clearance allows. No ground-disturbing vegetation management methods would be implemented, thus eliminating the risk for soil erosion and sedimentation near the streams. Where private water wells/springs have been identified along the ROW and noted in the Vegetation Control Prescription, no herbicide application would occur within a 50-foot radius of the wellhead/spring (164 feet when using herbicides with ground/surface water advisory).

**Endangered Species Act and Magnuson-Stevens Act:** Pursuant to its obligations under the Endangered Species Act (ESA), BPA has made a determination of whether its proposed project would have any effects on any listed species. A species list was obtained for federally listed, proposed, and candidate species potentially occurring within the project boundaries from the United States Fish and Wildlife Service (USFWS). Based on the ESA review conducted, BPA made a determination that the proposed project would have "No Effect" for all ESA-listed species and designated critical habitat under USFWS' jurisdiction, except the streaked horned lark and Columbian white-tailed deer. BPA made a determination that the proposed project would be "Not Likely to Adversely Affect" the streaked horned lark and Columbian white-tailed deer. The USFWS concurred with this determination in a letter dated October 18, 2017. Impact avoidance and minimization measures, agreed upon between BPA and USFWS during consultation, are noted in the Vegetation Control Prescription.

BPA conducted a review of ESA-listed species and Essential Fish Habitat (as defined by the Magnuson-Stevens Act), under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). The proposed vegetation management activities are within the scope of activities and action area evaluated in the *Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho* (SLOPES PBO) (WCR-2014-1600, September 22, 2016). Streams in the project area with documented presence of ESA-listed fish, designated as critical habitat for one or more species, and/or identified as Essential Fish Habitat (EFH) have been noted in the vegetation control prescription. It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

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

Re-Vegetation: Low-growing vegetation, where present in the ROW, is expected to naturally reseed areas that would have lightly disturbed soil.

Monitoring: The entire project would be inspected during the work period, winter 2017 through fall 2018. A follow-up treatment would occur approximately one year after the initial treatment. Additional monitoring and follow-up treatments would be conducted as necessary. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

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/ Oden Jahn  
Oden W. Jahn  
Environmental Scientist

CONCUR: /s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer

DATE: November 8, 2017

References:  
Vegetation Management Prescription and Checklist  
Effects Determination  
USFWS Letter of Concurrence (consultation code: 01EWF00-2017-I-1587), dated 10/18/2017