

# memorandum

DATE: December 4, 2018

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-706)

TO: Jacob Marti  
Natural Resource Specialist – TFBV- The Dalles

**Proposed Action:** Vegetation Management along the North Bonneville-Midway No. 1 Corridor

**Pollution Prevention and Abatement Project No.:** 4027

**Location:** Skamania County, Washington

**Proposed by:** BPA

**Description of the Proposal:** BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor and access roads along the 230 kV North Bonneville – Midway No. 1 (from Structure 5/2 to Structure 24/3). An additional line that is present within the North Bonneville – Midway No. 1 corridor is the 115 kV Underwood Tap to Bonneville PH1-Alcoa Nos. 1 & 2. The right-of-way (ROW) corridor in the McNary – Ross No. 1 project area measures 500 feet in width and crosses approximately 20 miles of terrain through rural residential, agricultural, private and the Columbia River Gorge Scenic Area.

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. Coordination with the Columbia River Gorge National Scenic Area occurred on November 15, 2018.

To comply with Western Electricity Coordinating Council (WECC) 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 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 Vegetation Management EIS, to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. The proposed project would begin in fall of 2018 and be completed by winter of 2019. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove up to 10 trees in or adjacent to the ROW. Other tree-clearing activities would include side-limbing of up to 30 trees. Debris would be disposed of using onsite chip, lop, and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

**Analysis:** A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285, May 2000) and Record of Decision (August 23, 2000). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription.

**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 will grow into the minimum approach distances of the conductor at maximum sag; other trees would be left in place or topped to preserved 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. For location information, see the Vegetation Control Prescription.

**Threatened and Endangered Species:** 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 ESA-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 project would have "No Effect" for all ESA-listed species under USFWS' jurisdiction. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). A determination of "No Effect" was made for all ESA-listed species under NMFS' jurisdiction, with the implementation of the conservation measures in the Water Resources section above.

**Essential Fish Habitat:** A review of the NMFS database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources would be followed for EFH. Based on these project conservation measures, it was determined that the project would not adversely affect EFH.

**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:** Native grasses are present on the entire ROW and are expected to naturally seed into the areas that would have lightly-disturbed soil predominantly located on the ROW roads.

**Monitoring:** The entire project would be inspected during the work period, which is from November 2018 to December 2019. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard of inspection results 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/ Michelle Colletti

Michelle Colletti

Physical Scientist, EPR-4

CONCUR:

/s/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer

Date: December 4, 2018

References:

Vegetation Management Prescription and Checklist  
Effects Determination