

# memorandum

DATE: January 4, 2019

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-707)

TO: Christopher Morse  
Natural Resource Specialist – TFBV-ROSS

**Proposed Action:** Vegetation Management along the McNary-Ross Bundle

**Pollution Prevention and Abatement Project No.:** 4093

**Location:** Clark and Skamania counties, Washington, and Multnomah County, Oregon

**Proposed by:** BPA

**Description of the Proposal:** The Bonneville Power Administration (BPA) is proposing to conduct vegetation maintenance for the McNary-Ross Bundle which consists of three transmission line corridors; a subsection of the McNary-Ross No. 1 Corridor from structure 144/2-176/4, the North Bonneville-Ross No. 1 Corridor, and the North Bonneville-Troutdale No. 1 Corridor. The corridors include all or some portions of the following transmission lines:

- Big Eddy-Troutdale No. 1
- Bonneville PH1-Alcoa 1&2 No. 2
- Bonneville PH1-North Bonneville No. 1
- Bonneville PH1-North Bonneville No. 2
- Bonneville PH1-North Camas No. 1
- Bonneville PH2-North Bonneville No. 3
- Bonneville PH2-North Bonneville No. 4
- McNary-Ross No. 1
- North Bonneville-Ross No. 1
- North Bonneville-Ross No. 2
- North Bonneville-Troutdale No. 1
- North Bonneville-Troutdale No. 2
- North Camas-Oak Park No. 1
- North Camas-Sifton No. 1
- Ostrander-Troutdale No. 1
- Ross-Vancouver Shipyard No. 1
- Sifton Tap to North Bonneville-Ross No. 1
- Sifton Tap to North Bonneville-Ross No. 2
- Sifton-Ast No. 1
- Sifton-Lacamas No. 1
- Sifton-Ross No. 1

The corridors in the proposed project area measure from 175 to 300 feet in width and cross approximately 97 miles of terrain through urban/suburban, rural residential, agricultural, and forested land uses on private, Washington State Department of Natural Resources (State), or United States Forest Service [(USFS), managed by the Columbia Gorge National Scenic Area] 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. Coordination with the USFS occurred in November 2018.

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 Vegetation Management EIS, to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines. Approximately 2,089 acres of ROW and 3.43 miles of access road would be treated in winter 2019. BPA proposes, as well, to side limb up to 270 trees and remove up to 157 trees in, or adjacent to, the ROW. 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 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 would 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 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 of winter 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/ Laura Roberts

Laura Roberts  
Biological Scientist, EPR-4

CONCUR:

/s/ Sarah T. Biegel

Sarah T. Biegel  
NEPA Compliance Officer

DATE: January 4, 2019

References:

Effects Determination