DOE F 1325.8e Electronic Form Approved by Forms Mgmt. 04/19/2006
(08-89)

United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: October 30, 2019

REPLY TO ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-726)

Nicholas Johnson
Natural Resource Specialist – TFBV-Ross MHQA

Proposed Action: Vegetation Management along the Bonneville Powerhouse-Alcoa 1&2 No. 1 corridor, Bonneville Powerhouse-Alcoa 1&2 No. 2 corridor, Sifton-Ross No. 1 corridor, Bonneville Powerhouse-North Camas No. 1 corridor, McNary-Ross No. 1 corridor, Rivergate-Keeler 1&2 No. 1 corridor, St. Johns-Keeler No. 2 corridor, St. Johns-St. Helens No. 1 corridor, Ross-Rivergate No. 1 corridor, Ross-Alcoa No. 3 corridor, Ross-St. Johns No. 1 corridor, and the Ross-Carborundum No. 1 corridor.

Pollution Prevention and Abatement Project No.: 4276

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

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor, and access roads along the Bonneville Powerhouse-Alcoa 1&2 No. 1 corridor from structure 39/2 to 41/6, Bonneville Powerhouse-Alcoa 1&2 No. 2 corridor from structure 1/4 to 40/1, Sifton-Ross No. 1 corridor from structure 1/5 to 1/6, Bonneville Powerhouse-North Camas No. 1 corridor from structure 1/6 to 1/7, McNary-Ross No. 1 corridor from structure 166/5 to 176/5, Rivergate-Keeler 1&2 No. 1 corridor from structure 1/1 to 9/2, St. Johns-Keeler No. 2 corridor from structure 3/4 to 10/5, St. Johns-St. Helens No. 1 corridor from structure 1/11 to 1/12, Ross-Rivergate No. 1 corridor from structure 1/2 to 1/4 and from structure 8/1 to 8/2, Ross-Alcoa No. 3 corridor from structure 1/4 to 4/8, Ross-St. Johns No. 1 corridor from structure 1/5 to 7/7, and the Ross-Carborundum No. 1 corridor from structure 5/2 to 5/17.

The right-of-way (ROW) corridor in the proposed project area measures 125 to 825 feet in width and crosses approximately 85 miles of terrain through residential, rural residential, small-scale agricultural, private timber, as well as county, state, and federal land. Letters notifying property owners of the proposed upcoming work have been mailed.

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. Approximately 500 acres of ROW, 40 structure sites, and 4 miles of access roads would be initially treated between November 2019 and April 2020. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 650 acres of ROW between May 2020 and September 2020. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove approximately 67 trees along the edge of the ROW and approximately 9 trees within the ROW. Other tree-clearing activities would include side-limbing approximately 110 trees. Debris would be disposed of using on-site 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 & 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 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 and Essential Fish Habitat: Pursuant to its obligations under the Endangered Species Act (ESA), BPA 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 project would have "No Effect" for all ESA-listed species and critical habitat under USFWS' jurisdiction.

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: The proposed vegetation management actions do not result in ground disturbance to the physical environment, so the action is not one that typically has the potential to affect historic and/or cultural resources. 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: Existing naturalized grasses and woody shrubs 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 October 2019 to September 2020. A follow-up treatment would occur 3-4 months after the initial treatment. 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/ *Jonnel Deacon*
Jonnel Deacon
Environmental Scientist

CONCUR:

/s/ *Katey Grange* DATE: *October 30, 2019*
Katey Grange
NEPA Compliance Officer

References:
Vegetation Management Prescription and Checklist
Effects Determination