Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-831)

Pollution Prevention and Abatement Project Number: 4851, 4853, 4860
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Bonneville Power Administration
Department of Energy

Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to the rights-of-way of high-voltage transmission lines and access roads in Benton, Clackamas, Columbia, Coos, Douglas, Hood River, Jackson, Lane, Lincoln, Linn, Marion, Multnomah, and Washington counties, Oregon, and Clark, Cowlitz, and Skamania counties, Washington. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for right-of-way corridors and associated access roads along the following transmission line corridors and spans. Portions of these rights-of-way analyzed in this Supplement Analysis are identified in the table below.

District	Corridor	Spans
Alvey	Cougar-Holden Creek No. 1	Structure 7/4 to Holden Creek Sub.
Alvey	Holden-Thurston No. 1	All
Alvey	Thurston-McKenzie No. 1	All
Alvey	Green Peter-Lebanon No. 1, including Foster tap to Green Peter-Lebanon No 1	All
Alvey	Santiam-Alvey No. 2	All
Alvey	Santiam-Toledo No. 1, including Albany-Burnt Woods No. 1	Structure 28/6 to 38/3, and 42/7 to 66/2 and Albany-Burnt Woods No. 1 from Albany Sub. to Structure 13/2 and 17/6 to Burnt Woods Sub.
Alvey	Mt Avenue Tap to Ashland-Oak Knoll	All
Chemawa	Jones Canyon-Santiam No. 1, including Big Cliff-Detroit PH 1&2 No. 1 and No. 2	Structure 132/1 to Santiam Sub., and Big Cliff-Detroit PH 1&2 No. 1 and No. 2 from Big Cliff PH to Structure 3/5.
Chemawa	John Day-Marion No. 1	Structure 101/2 to Marion Sub.
Chemawa	Keeler-Oregon City No. 2	Structure 4/9 to Oregon City Sub.

District	Corridor	Spans
Chemawa	Pearl-Marion No. 1	All
Chemawa	Ostrander-Pearl No. 1	86/4 to 89/2
Chemawa	Santiam-Toledo No. 1	Structure 6/2 to 28/6
North Bend	Reston-Fairview No. 2	All
North Bend	Toledo-Wendson No. 1	Toledo Sub. to Structure 12/2, Structure 13/2 to 17/2, and Structure 50/4 to Wendson Sub.
Ross	Big Eddy-Ostrander No. 1	Structure 45/2 to Ostrander Sub.
Ross	McNary-Ross No. 1	Structure 144/2 to 167/1.
Ross	North Bonneville-Ross No. 1, including Sifton-Lacamas No. 1	Structure 20/1 to Ross Sub., and all spans of the Sifton-Lacamas No. 1 line
Ross	North Bonneville –Troutdale No. 1, including North Bonneville-Troutdale No. 2	Structure 9/3 to Troutdale, and North Bonneville-Troutdale No. 2 from Structure 7/4 to 8/4
Ross	Ostrander-Troutdale No. 1, including Big Eddy-Troutdale No. 1	Structure 5/2 to 20/2 and 24/3 to Troutdale Sub., and Big Eddy-Troutdale No. 1 from Structure 61/4 to 73/3, and 77/2 to Troutdale Sub.
Ross	Keeler-Allston No. 1, including Paul-Allston No. 1	All spans of Keeler-Allston No. 1, Paul-Allston No. 1 from Structure 45/2 to Allston Sub., All spans of Trojan-Allston No. 1 and No. 2, and St. Helens-Allston No. 1 from Structure 23/6 to Allston Sub.

The corridor in the proposed project area measures approximately 500 miles in length and varies between approximately 100 and 1,000 feet in width. The corridor runs through primarily private lands, but some tracts are managed by the Army Corps of Engineers, Bureau of Land Management – Northwest Oregon District, Oregon Department of State Lands, the City of Rainier Watershed, and smaller parcels of local government lands. Land use is varied, with urban, suburban, agricultural, forestry, commercial, industrial, and park/recreational uses present along the ROW corridors.

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 right-of-way (ROW) to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods would be used to perform the work, and may include hand cutting, mowing, herbicidal treatment, or a combination of those methods. To ensure that the roots are killed, prevent re-sprouts, and selectively manage vegetation that interferes with the operation and maintenance of transmission infrastructure, herbicides would be selectively applied using spot treatment (stump treatment) or localized treatments (basal treatment and/or low-volume foliar treatment). For worker safety and fire prevention, broad-spectrum (non-selective) residual herbicide would be applied, and only applied immediately adjacent to switch platforms and selected transmission structures (primarily wood poles). All herbicides and adjuvants would be chosen from a list of approved chemicals in BPA's Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 2000) and subsequent supplement analyses to the FEIS.

The proposed activities include the treatment of up to 7,730 acres using selective hand cutting methods followed immediately by an herbicide spot-treatment of hardwood stems, as well as the treatment of up to 8,487 acres using localized herbicide applications. The proposed activities also include the treatment of approximately 977 acres of ROW, 206 miles of access roads, and 210 structure sites using mowing techniques and other approved methods. In addition, BPA proposes to remove approximately 1,388 trees in, or adjacent to, the ROW, and to remove limbs from approximately 1,222 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted by fall 2023. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle 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 chipping/mulching, or cut, lop, and scatter techniques.

Analysis

A Vegetation Control Cut Sheet was developed for this corridor that incorporated the requirements identified in BPA's Transmission System Vegetation Management Program FEIS 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 Cut Sheets.

Water Resources

Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Cut Sheets. 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. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the Vegetation Control Cut Sheets, no herbicide application would occur within a 50-foot radius of the wellhead, spring, or irrigation source (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 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 designated critical habitat under USFWS' jurisdiction.

BPA conducted a review of ESA-listed species and Essential Fish Habitat (EFH) (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 critical habitat for one or more species, and/or identified as EFH have been noted in the Vegetation Control Cut Sheets. 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 Archaeologist 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, fall 2022 through fall 2023. A follow-up treatment may occur after the initial treatment. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

Findings

BPA finds that the types of actions and the potential impacts related to the proposed activities have been examined, reviewed, and consulted upon and are similar to those analyzed in the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD. There are no substantial

changes in the EIS's Proposed Action and no significant new circumstances or information relevant to environmental concerns bearing on the EIS's Proposed Action or its impacts within the meaning of 10 CFR § 1021.314(c)(1) and 40 CFR §1502.9(d). Therefore, no further NEPA analysis or documentation is required.

/s/ Oden Jahn
Oden Jahn, EPI-4
Natural Resource Specialist (Environmental Compliance)

Concur:

/s/ *Katey Grange*
Katey Grange Date: *November 2, 2022*
NEPA Compliance Officer

References:
Vegetation Control Cut Sheets