

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-834)

Pollution Prevention and Abatement Project Number: 4852
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Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way (ROW) of high-voltage transmission lines and access roads along the following corridors: LaPine-Chiloquin No 1 (from Lapine Substation to Structure 2/2, 3/1 to 5/7, 13/5 to 13/8, 14/5 to 39/5), and LaPine-Fort Rock No. 1 (from Structure 4/5 to 26/5). Vegetation management needs were assessed for these ROW corridors and associated access roads, and Vegetation Control Cut Sheets were created.

The corridors in the proposed project area are located in Deschutes, Klamath, and Lake counties, Oregon and measure approximately 50 miles in length and vary in width between approximately 75 and 150 feet. The ROW corridors primarily run through public lands managed by the United States Forest Service – Deschutes and Fremont-Winema National Forests; however, several miles of ROW are on lands managed by the State of Oregon Department of Forestry and the United States Bureau of Land Management – Prineville District. Land use is primarily forestry; however, other undeveloped lands are present along the ROW corridors.

BPA notified and solicited input from the Deschutes and Fremont-Winema National Forests starting in summer 2022 and continuing through late fall 2022. BPA also discussed upcoming vegetation management activities at a yearly coordination meeting, other project-specific meetings, and ongoing email communications with both of these National Forests. Although BPA received USFS input on the submitted pesticide use proposal, no additional input was received concerning the proposed activities. Any additional measures proposed 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 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 265 acres using selective handcutting methods followed immediately by an herbicide spot-treatment of hardwood stems. The proposed activities also include the treatment of approximately 400 acres of ROW, 4 miles of access roads, and 275 structure sites using mowing techniques and other approved methods starting in spring 2023. In addition, BPA proposes to remove approximately 57 trees in, or adjacent to, the ROW. A follow-up treatment of resprouting 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 these corridors 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) and 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 or other sensitive aquatic species (35 feet for non-sensitive water resources). 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.

In previous coordination with the Deschutes and Fremont-Winema National Forests, the pumice grape-fern (*botrychium pumicola*) was identified as a sensitive plant species present in the subject corridors. Pumice grape-fern, also known as pumice moonwort, is a USFS "Sensitive" Special Status Species, an

Oregon State “Threatened” species, but is “Not Listed” as a Federal ESA-listed species. Pumice grape-fern is a small fern endemic to Northern California and the Crater Lake area in Southern Oregon (Deschutes, Klamath, and Lake counties), and can be found in areas of dry, sparsely-vegetated, fine to course pumice soils at elevations between approximately 4,000 to 9,000 feet above sea level. Known locations of pumice grape-fern were noted in the Vegetation Control Cut Sheets. Pumice grape-fern is not a species that would interfere with the operation of the transmission lines, and would not be targeted for treatment. Treatment methods were adjusted to have minimal impacts to known populations, including performing vegetation management activities when the pumice grape-fern would be in senescence and less susceptible to unintentional damage.

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). No federally-listed anadromous fish species or critical habitat is present within the project area. Additionally, no Essential Fish Habitat (EFH) (as defined by the Magnuson-Stevens Act) is present in the project area. Thus, it was determined that the proposed project would have “No Effect” on ESA-listed species and designated critical habitat under NMFS’ jurisdiction, and would have “No Adverse Effect” on EFH.

Cultural Resources

Two proposed vegetation management actions were reviewed to determine their potential to cause effects to cultural resources. Where a proposed vegetation management action would not result in ground disturbance to the physical environment, it was determined that the action is not one that typically has the potential to affect historic and/or cultural resources. Where a proposed action had potential to affect historic properties, BPA initiated consultation with the Oregon State Historic Preservation Office (SHPO) and Tribes. BPA conducted a review and determined that the proposed undertaking would result in no historic properties affected. The SHPO concurred with BPA’s determination of effect and no comments were received from the Tribes.

Because no cultural resources were identified in any of the work areas, work would be conducted as proposed. However, if a previously unrecorded cultural resource 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 immediately 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, spring 2023 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/ Sarah T. Biegel

Sarah T. Biegel Date: December 14, 2022

NEPA Compliance Officer

References:

Vegetation Control Cut Sheets