

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-837)

Pollution Prevention and Abatement Project Number 4,841
Natural Resource Specialist/Project Manager: Cozette DeTray – TFBV – BELL-1

Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation and 69 danger trees in and adjacent to the right-of-way (ROW) of high-voltage transmission lines and access roads along the sections of the Roundup-La Grande No.1 corridor on Forest Service managed land and Tribal lands. The sections on the Roundup-La Grande No.1 corridor that would be treated under this supplement analysis include: line mile/structure number 0/1 to 16/11; 18/1 to 18/5; and 30/10 to 37/6.

The corridor sections in the proposed project area are located in Umatilla and Union Counties, Oregon. The transmission corridor measure between approximately 100 and 250 feet in width and in total, approximately 25 miles of corridor would be treated. Land use is primarily agricultural or forestry land. A small amount of urban work is planned for in La Grande as well.

Approximately 7 miles of the Roundup-La Grande No.1 transmission line corridor runs through Umatilla National Forest. On June 7th, 2022, BPA notified the US Forest Service of the planned work in and adjacent to the ROW of the power line that runs through the La Grande Ranger District.

Approximately 17 miles of the Roundup-La Grande No.1 transmission line corridor runs through the lands within or near the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) reservation. Ten danger trees are located in or immediately adjacent to the tribal lands where work would be carried out on tribal lands. Approximately 56 trees are located on private land. The CTUIR was notified of the planned danger tree work on March 3rd, 2022. Any 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 ROW to control the development of potentially threatening vegetation. Danger trees are those trees with a 50 percent or greater probability of structural failure within five years due to physical damage or environmental conditions. This project would utilize conventional tree cutting methods to cut trees. Prescriptions for retention or removal of cut trees are dependent on the area and volume in which they

occur. All debris would be disposed of onsite, along the ROW, using cut, lop and scatter techniques and in accordance with underlying landowner agreements.

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). Broadcast applications of liquid herbicide would be used if, and where, appropriate. 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. As described in the supplement analysis 821 (SA-821), aminocyclopyrachlor would not be applied on lands managed by the US Forest Service.

Approximately 194 structure sites and 2.5 miles of access road would be initially treated in 2023. Approximately 81 acres of ROW would be treated with herbicide and approximately 38 acres of areas with immature trees and other tall-growing brush would be cut. Approximately 69 danger trees would be removed. In addition, BPA proposes to remove limbs from approximately 40 trees in, or adjacent to, the ROW. Urban tree work would also be conducted by trained crews to remove risks to the transmission line in La Grande. A follow-up treatment of re-sprouting target vegetation may be conducted. 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, designated critical habitat, 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

On March 3rd, 2022, BPA engaged in consultation with the CTUIR and the Oregon State Historic Preservation Office (SHPO) for work proposed on and near the CTUIR reservation. BPA developed an area of potential effects (APE) for the project and sent determination letters stating that the undertaking would have no adverse effect to historic properties to the CTUIR and the SHPO. The CTUIR Tribal Historic Preservation Officer concurred on March 4th, 2022. SHPO concurred on November 15th, 2022. Additional danger trees were identified and a second round of consultations with SHPO and CTUIR occurred on October 18th, 2022. CTUIR responded in concurrence on December 12th, 2022 and asked that a cultural resource monitor be provided during danger tree work. SHPO did not respond within 30 days and BPA finalized the Section 106 process.

The US Forest Service was the lead federal agency for their lands and finalized their Section 106 review on May 10th, 2022 using their programmatic agreement.

If a site is discovered during the course of vegetation control work, 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 April 2023, through December 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/ Zoe Wellschlager
Zoe Wellschlager, EPR-4
Physical Scientist

Concur:

/s/ Katey Grange
Katey Grange Date: April 13, 2023
NEPA Compliance Officer

References:
Vegetation Control Cut Sheets