

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-863)

**Pollution Prevention and Abatement Project Number: 4941, 4962**  
**Natural Resource Specialist/Project Manager:** Carlos Mora-Flores – TFBV-ALVEY, Jennifer Austin– TFBV-CHEMAWA

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to clear unwanted vegetation in and adjacent to the rights-of-way (ROWs) of high-voltage transmission lines and access roads in Clackamas, Coos, Douglas, Lane, Linn, Multnomah, Polk, Tillamook, Washington, and Yamhill counties, Oregon. 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.

Corridor	Work Order	Transmission Lines and Spans
ALVM_EUGE-ALVY-2	VW-2022-00902	Eugene-Alvey No. 2: Structure 0/1 to 8/1. Eugene-Lane No. 1: Structure 2/1 to 6/7.
ALVM_ALVY-LANE-1	VW-2022-00904	Alvey-Lane No. 1: Structure 1/1 to 14/5. Eugene-Alvey No. 2: Structure 8/1 to 8/2 and 13/1 to 13/8. Hideaway tap to Hawkins-Alvey No. 1: Structure 1/3 to 1/4.
ALVM_ALBA-LEBA-1	VW-2022-00906	Albany-Bureau of Mines No. 1: Structure 1/4 to 1/9. Albany-Lebanon No. 1: Structure 1/5 to 17/2. Santiam-Albany No. 1: Structure 27/2 to 27/5
ALVM_LANE-WEND-2	VW-2022-00907	Eugene-Lane No. 1: Structure 6/4 to 6/5 Lane-Wendson No. 2: Structure 1/1 to 34/1 Lane-Wendson No. 1: Structure 21/2 to 23/4, 27/5 to 33/12. Rainbow Valley Tap to Lane-Wendson No. 1: Structure 1/6 to 3/13.
ALVM_SANT-ALBA-1	VW-2022-00909	Santiam-Albany No. 1: Structure 13/1 to 29/5.
ALVM_ALBA-EUGE-1	VW-2022-00910	Albany-Eugene No. 1: Structure 1/3 to 40/8. Eugene-Alderwood No. 1: Structure 10/5 to 19/4. Halsey Mill North Tap to Albany-Eugene No. 1: Structure 1/5 to 1/6. Harrisburg Tap to Albany-Eugene No. 1: Structure 1/2 to 1/5.
CHHQ_TIMBT-FOTI-1	VW-2022-00915	Timber Tap to Forest Grove-Tillamook No. 1: Structure 1/1 to 11/12.
CHHQ_SALE-GRRD-1	VW-2022-00916	Chemawa-Salem No. 1: Structure 9/4 to 11/2. Grand Ronde-Boyer No. 1: Structure 1/2 to 6/6. Salem-Albany No. 2: Structure 1/5 to 1/10. Salem-Grand Ronde No. 1: Structure 1/5 to 28/8.
CHHQ_PERL-KEEL-1	VW-2022-00917	Pearl-Keeler No. 1: Structure 1/1 to 19/3

Corridor	Work Order	Transmission Lines and Spans
CHHQ_FORG-TILL-1	VW-2022-00918	Carlton-Tillamook No. 1: Structure 40/1 to 41/5. Forest Grove-Tillamook No. 1: Structure 0/1 to 47/7.
CHHQ_CARL-TILL-1	VW-2022-00919	Carlton-Tillamook No. 1: Structure 0/1 to 39/5.
CHHQ_KEEL-FORG-1	VW-2022-00920	Keeler-Forest Grove No. 1: Structure 0/1 to 11/5.
CHHQ_KEEL-OREC-2	VW-2022-00921	Keeler-Oregon City No. 2: Structure 5/3 to 22/13.
CHHQ_BOYR-TILL-1	VW-2022-00922	Boyer-Tillamook No. 1: Structure 0/1 to 33/23.
NBMO_WEND-TAHK-2	VW-2022-00901	Tahkenitch-Gardiner No. 1: Structure 1/3 to 2/4. Tahkenitch-Reedsport No. 1: Structure 1/1 to 4/23. Wendson-Tahkenitch No. 1: Structure 1/3 to 20/7.
NBMO_LANE-WEND-2	VW-2022-00903	Lane-Wendson No. 2: Structure 34/1 to 41/6.
NBMO_REED-FAVW-1	VW-2022-00908	Reedsport-Fairview No. 1: Structure 1/1 to 39/5.

The corridor in the proposed project area measures approximately 455 miles in length and varies between approximately 15 and 270 feet. The corridor runs through primarily private lands, but some tracts are managed by the Bureau of Land Management – Salem, Eugene, and Coos Bay Districts, Oregon Department of State Lands, Oregon Department of Forestry, United States Forest Service – Siuslaw National Forest, United States Fish and Wildlife Service – Baskett Slough National Wildlife Refuge and Tualatin River National Wildlife Refuge, and smaller parcels of local government-managed lands. Land use is varied, with urban, suburban, agricultural, forestry, commercial, industrial, and park/recreational uses present along the ROW corridors

BPA notified and solicited input from the Siuslaw National Forest starting in spring of 2023 and continuing through late fall 2023. BPA also discussed upcoming vegetation management activities at a yearly coordination meetings with this National Forest. No concerns were identified. Letters, on-site meetings, emails, and phone calls would be used to notify all other landowners and managers 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 2,340 acres using selective hand cutting methods followed immediately by an herbicide spot-treatment of hardwood stems, as well as the treatment of up to 3,375 acres using localized herbicide applications. The proposed activities also include the treatment of approximately 1,100 acres of ROW, 125 miles of access roads, and 410 structure sites using mowing techniques and other approved methods. In addition, BPA proposes to remove approximately 1,760 trees in, or adjacent to, the ROW, and to remove limbs from approximately 3,380 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted by fall 2024. 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. The buffer distances described in Table III-3 and III-4 of the FEIS apply to these water resources, unless more stringent buffer zones are required for compliance with Endangered Species Act (ESA), land manager, or local requirements noted in the Vegetation Control Cut Sheets. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the Vegetation Control Cut Sheets, the buffer distances described in Table III-2 of the FEIS apply. 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. The attached Sensitive Species Conservation Measures are required where ESA-listed species are noted as potentially present in the Vegetation Control Cut Sheets or other project documentation.

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

All activities were reviewed for their potential to affect historic and/or cultural resources. The proposed vegetation management actions typically do not result in ground disturbance to the physical environment; however, it was determined that tree cutting activities in select spans along the following corridors would require the presence of a monitor who meets the Secretary of the Interior's standards for a Professional Archaeologist to ensure no historic and/or cultural resources are impacted: CHHQ\_BOYR-TILL-1, CHHQ\_CARL-TILL-1, ALVM\_ALBA-EUGE-1, ALVM\_LANE-WEND-2, NBMO\_LANE-WEND-2, NBMO\_REED-FAVW-1, and NBMO\_WEND-TAHK-2. These locations are noted in the attached table of activities covered by this Supplement Analysis. 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 2023 through fall 2024. 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 FEIS's Proposed Action and no significant new circumstances or information relevant to environmental concerns bearing on the FEIS'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

NEPA Compliance Officer    Date: October 27, 2023

References:

Vegetation Control Cut Sheets

Sensitive Species Conservation Measures

Table of activities covered by this SA