

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-868)

**Pollution Prevention and Abatement Project Number:** 4851, 4860  
**Natural Resource Specialist/Project Manager:** Brian Luis – TFBV-ROSS MHQA, Jennifer Austin – TFBV-CHEMAWA

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to remove approximately 365 trees in and adjacent to transmission line right-of-way corridors in Clackamas and Marion counties, Oregon. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the following spans:

District	Corridor	Spans	Proposed Work
Chemawa	Jones Canyon-Santiam No. 1	Structure 131/2 to 131/3.	Remove approx. 15 corridor trees
Chemawa	John Day-Marion No. 1, including Buckley-Marion No. 1	Structure 79/5 to 80/1, 86/5 to 87/1, 87/2 to 88/1, 88/4 to 89/1, 89/2 to 89/3, 93/2 to 93/3, 94/3 to 94/4, 95/2 to 95/3, 96/4 to 97/1, 97/3 to 97/4, 98/4 to 99/1, 99/4 to 100/1, 100/2 to 100/3, and 100/5 to 101/1.	Remove approx. 326 corridor trees.
Ross	Big Eddy-Ostrander No. 1	Structure 40/4 to 40/5, 42/3 to 42/4, 43/1 to 43/2, 43/3 to 43/4, and 44/2 to 44/3.	Remove approx. 24 danger trees.

All corridor spans are on lands managed by the United States Forest Service – Mt. Hood and Willamette National Forests.

BPA notified and solicited input from the Mt. Hood and Willamette National Forests starting in spring of 2022 and continuing through late fall 2022. BPA also discussed upcoming vegetation management activities at yearly coordination meetings with each of these National Forests. Any additional measures proposed by 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 remove approximately 365 trees within or adjacent to the ROW corridor. These trees are 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. Work would be completed between early December 2023 and Summer 2024. 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

No herbicide use is proposed for the proposed work. 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 within 35-feet of waterbodies or wetlands, or where slopes are greater than 20%, thus minimizing the risk for soil erosion and sedimentation near the streams.

### Endangered Species Act and Magnuson-Stevens Act

Pursuant to its obligations under the ESA, BPA made determinations of whether its proposed project would have any effects on any ESA-listed species. For all spans discussed above, 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, except northern spotted owl.

None of the proposed activities are within a quarter-mile of a known or potential northern spotted owl activity center or nest patch. BPA determined that the proposed removal of approx. 66 trees along the John Day-Marion No. 1 transmission line corridor spans from structures 88/4 to 89/1, 89/2 to 89/3, 93/2 to 93/3, 94/3 to 94/4, 95/2 to 95/3, has the potential to affect northern spotted owl potential suitable habitat. These activities are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) letter of concurrence (LOC) to the USFS and Bureau of Land Management regarding *Routine Land Management Activities within the Willamette Planning Province of Oregon with a Potential to Modify Habitat, which are Not Likely to Adversely Affect Federally Listed Species*, consultation number OIEOFW00-2017-I-0667, dated September 26, 2017. BPA coordinated with the Mt. Hood National Forest who extended ESA coverage to BPA's proposed project. The proposed project is consistent with all applicable *Project Design Criteria* listed in the LOC, and BPA would provide a report to the Mt. Hood National Forest, Clackamas Ranger District Biologist, detailing the total number of trees removed as part of this project.

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). However, none were found in the project area. BPA made a determination that the project would have "No Effect" for all ESA-listed

fish species and designated critical habitat under NMFS' jurisdiction, and the project would not adversely affect EFH.

#### Cultural Resources

All activities were reviewed for their potential to affect historic and/or cultural resources and it was determined that danger tree and corridor tree cutting have the potential to affect historic and/or cultural resources. All activities listed above require the presence of a cultural monitor to ensure no historic and/or cultural resources are impacted. If a site is discovered during the course of project activities, 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, December 2023 and late Summer 2024. 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

NEPA Compliance Officer Date: December 4, 2023

References:

Table of Ross and Salem District CTs and DTs