

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-883)

Pollution Prevention and Abatement Project Number: 5055
Natural Resource Specialist/Project Manager: Carlos Mora-Flores – TFBV-ALVEY

Bonneville Power Administration
Department of Energy



BPA proposes to conduct right-of-way (ROW) mowing near Wren in Benton County, Oregon. Vegetation management needs were assessed, and a vegetation management plan was created for the treatment area along the Santiam-Toledo No. 1 transmission line ROW corridor approximately structure 39/1 to 39/5 and 41/3 to 41/8. The corridors in the proposed project area measure from 95 to 265 feet in width and cover approximately 17 acres.

The corridors run through primarily private agriculture and rural residential lands. The project area is habitat for ESA-listed species and designated critical habitat and conservation easements and landowner agreements among the landowners, Benton County, and United States Fish and Wildlife Service (USFWS) are in place.

BPA, Benton County, and USFWS visited the site on May 22, 2024, to discuss the proposed project and other management concerns. Additional 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 USFWS through ongoing communication would be incorporated into the vegetation management plan during project implementation.

The proposed activities include mowing of up to 17 acres using a skid-steer and mowing deck in coordination with USFWS staff. Mowing would take place between September 1 and approximately October 15 to avoid rutting and compacting saturated soils. Sharp turns would be avoided and minimized. Cuttings would be left in place as mulch. No herbicides would be used.

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 Management Plan.

Water Resources

There are no water bodies (streams, rivers, lakes, wetlands) occurring in the project area.

Endangered Species Act and Magnuson-Stevens Act

BPA determined that the proposed mowing activities along the Santiam-Toledo No. 1 transmission line corridor from approximately structure 39/1 to 39/5 and 41/3 to 41/8 are within the scope of activities and action area evaluated in the USFWS' Programmatic Restoration Opinion for Joint Ecosystem Conservation by the Services (PROJECTS) program (FWS reference: 01EOFW00-2014-F-0222, May 2015).

It has been determined that, by complying with the project design criteria and management standards listed within the above-mentioned Programmatic Biological Opinion, potential effects to Fender's blue butterfly, Fender's blue butterfly critical habitat, Kincaid's lupine, Kincaid's lupine critical habitat, Taylor's checkerspot butterfly, and Taylor's checkerspot butterfly critical habitat would be consistent with those evaluated and addressed in the above-mentioned Programmatic Biological Opinion. Coordination with USFWS staff regarding the proposed work took place on May 22, 2024, and through additional emails and phone calls, and a Vegetation Management Plan consistent with the PROJECTS BiOp was developed and approved by USFWS. The following *Conservation Measures* are required:

- A USFWS Biologist must be present for activities in Fender's blue butterfly (FBB), Kincaid's lupine (KILU), and Taylor's checkerspot butterfly (TCB) habitat and their designated critical habitats.
- Vegetation management would be performed between September 1 and approximately mid-October.
- Mowing would be performed with a skid-steer with mowing deck. Sharp turns would be avoided.
- Unless otherwise requested by landowners, all debris would be disposed of onsite, along the ROW (outside of occupied FBB, KILU, and TCB habitat areas), using on-site chip, lop and scatter, or mulching techniques.

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" on ESA-listed fish species and designated critical habitat under NMFS's jurisdiction, and the project would not adversely affect EFH.

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 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.

Monitoring

The entire project would be inspected during the work period, Fall 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/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer Date: August 28, 2024

References:

Checklist and 2024 Vegetation Management Plan for the BPA Santiam – Toledo Transmission Line Right-of-Way