

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-910)

**Pollution Prevention and Abatement Project Number** 4851, 4853, 4860, 4922,4941, 4962  
**Natural Resource Specialist/Project Manager:** Carlos Mora-Flores – TFBV-ALVEY, Brian Luis – TFBV-ROSS  
MHQA, Jennifer Austin – TFBV-CHEMAWA

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to remove approximately 1,500 trees and prune approximately 450 trees in and adjacent to transmission line right-of-way corridors in Clackamas, Columbia, Coos, Douglas, Lane, Lincoln, Marion, Multnomah, Polk, Tillamook, Wasco, Washington, Yamhill counties, Oregon. Vegetation management needs were assessed, and Tree Cut Lists were created for the following corridors:

District	Corridor	Proposed Work
Eugene	Reston Fairview No. 2	Remove approx. 13 danger trees Remove approx. 120 corridor trees
Eugene	Toledo-Wendson No.	Remove approx. 18 danger trees Remove approx. 899 corridor trees
Eugene	Wendson-Tahkenitch No 2	Remove approx. 96 corridor trees
Eugene	Lane-Wendson No. 1 and No.2	Remove approx. 282 corridor trees
Eugene	Reedsport-Fairview No. 1	Remove approx. 32 corridor trees
Salem	Boyer-Tillamook No. 1	Remove approx. 1 corridor tree Side-limb approx. 13 trees
Salem	Carlton-Tillamook No.1	Remove approx. 4 danger trees Remove approx. 21 corridor trees Side-limb approx. 329 trees
Salem	Forest Grove-Tillamook No.1	Remove approx. 19 danger trees Remove approx. 3 corridor trees Side-limb approx. 55 trees
Longview	Knight-Ostrander No. 1	Remove approx. 5 danger trees Remove approx. 1 corridor tree
Longview	Big Eddy-Troutdale No. 1	Remove approx. 1 danger tree Side-limb approx. 40 trees
Longview	Ostrander-Troutdale No. 1	Side-limb approx. 17 trees
Longview	Keeler-Allston No. 1	Remove approx. 3 danger trees

BPA notified and solicited input from the Mt. Hood, Siuslaw, and Willamette National Forests starting in spring of 2022 and continuing through late fall 2023. BPA also discussed upcoming vegetation management activities at yearly coordination meetings with each of these National Forests. Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Any additional measures proposed by landowners or land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

BPA also contacted the Bureau of Land Management (BLM) NW Oregon and Coos Bay Districts, Oregon Department of Forestry and other private landowners to coordinate or secure rights to remove these trees. The trees would be cut by conventional methods. Once on the ground, trees would be cut into smaller pieces. All debris would be disposed of onsite, using on-site chip, lop and scatter, or mulching techniques. The work is anticipated to take place from January through November 2025.

### Analysis

Tree Cut Lists were 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 Tree Cut Lists and other project documents.

### Water Resources

No herbicides would be used, and no ground-disturbing vegetation management methods would be implemented; therefore, there would be no impact to water resources.

### 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 be consistent with scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BiOp) and letter of concurrence (LOC) regarding *Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025*. All terms and conditions and conservation measures identified in this consultation would be implemented and included on the cut sheets.

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. The Tree Cut List indicates specific areas where presence of a cultural monitor is required 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 Archaeologist and BPA Environmental Specialist would be contacted.

### Re-Vegetation

Existing naturalized grasses and woody shrubs are present in the project area and are expected to naturally seed into the areas that would have lightly-disturbed soil.

### Monitoring

The entire project would be inspected during the work period - January through November 2025. 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' Proposed Action and no substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the EIS' Proposed Action or its impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9.<sup>1</sup> Therefore, no further NEPA analysis or documentation is required.

/s/ Oden Jahn

Oden Jahn, EPR-4

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey Grange

NEPA Compliance Officer

Date: January 15, 2025

Attachments:

Tree Cut Lists for Eugene, Salem, and Longview

Sensitive Species Conditions

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<sup>1</sup> BPA is aware of the November 12, 2024, decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality regulations implementing NEPA are not judicially enforceable or binding on this agency action, BPA has nonetheless elected to follow those regulations at 40 Code Federal Regulations (C.F.R.) §§ 1500– 1508, in addition to the US Department of Energy's NEPA implementing procedures at 10 C.F.R. Part § 1021, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*