

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-851)

**Pollution Prevention and Abatement Project Number: 4853**  
**Natural Resource Specialist/Project Manager: Carlos Mora-Flores – TFBV-ALVEY**

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to clear unwanted vegetation in and adjacent to the Toledo-Wendson high-voltage transmission line right-of-way corridor in Lane and Lincoln counties, Oregon. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the following spans: Structure 12/2 to 12/3 and Structure 17/2 to 50/4.

The corridor in the proposed project area measures approximately 66 miles in length and varies between approximately 125 and 375 feet. The corridor runs through United States Forest Service (USFS) Lands managed by the Siuslaw National Forest.

BPA notified and solicited input from the Siuslaw National Forest starting in Spring of 2022 and continuing through late Fall 2022. BPA also discussed upcoming vegetation management activities at a yearly coordination meeting with the Siuslaw National Forest. 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 remove approximately 550 trees, and side-limb approximately 1,780 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 October 2023 and late February 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

The location, scope, and scale of BPA's proposed tree removal activities are consistent with those described in a previous Endangered Species Act (ESA) consultation with the United States Fish and Wildlife Service (USFWS). Because no tree removals would take place within Marbled Murrelet Critical Habitat, the level of effects of proposed activities would be consistent with those analyzed in the Biological Opinion (BiOp) that was issued on October 2, 2020. In accordance with the BiOp, the following *Conservation Measures* are required:

- When side-limbing, avoid disturbing moss on non-target branches.
- Tree cutting and side-limbing would be conducted between October 1 – February 28.
- All garbage (especially food products) must be contained or removed daily from the vicinity of the proposed project.

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, with 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

BPA initiated consultation and made a determination of no historic properties affected on July 5, 2023. Correspondence was sent to the Oregon SHPO; Coquille Indian Tribe; Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians; and the Confederated Tribes of Siletz Indians. On July 28, Oregon SHPO noted that they had received the determination of effect. No other response was received. Since 30 days had passed, BPA concluded the Section 106 process with a determination of no historic properties affected with the stipulation that cultural resources monitoring be conducted during the tree cutting.

#### 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 Winter 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 Date: September 15, 2023

NEPA Compliance Officer

References:

Table of Toledo-Wendson CTs and SLs

Formal Consultation for Vegetation Management on the Bonneville Power Administration Santiam-Toledo, Reston-Fairview, and Toledo-Wendson (FWS Consultation Number: 01EOFW00-2020-F-0559).