

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-815)

Pollution Prevention and Abatement Project Number 4,708
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Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to the Bonneville Powerhouse – Hood River No. 1 transmission lines and access roads in Multnomah and Hood River counties, Oregon. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads along these transmission assets.

The corridor in the proposed project area measures approximately 150 ft. wide and is approximately 24 miles long through lands managed by the U.S. Forest Service (USFS), the State of Oregon, and private lands. The land runs through the Columbia Gorge National Scenic Area (CRGNSA), managed by the USFS. Land use consists of conservation lands, recreation such as camping and hiking, agriculture, and residential dwellings.

The USFS CRGNSA office was notified of the proposed project in August of 2021. Cut sheets and danger tree locations were shared. Additional discussion and coordination on Endangered Species Act and Forest Sensitive Species compliance and impact mitigation occurred in the fall of 2021. Letters, on-site meetings, emails, and phone calls would be used to notify other 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 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.

Approximately 330 acres of cut, lop, and scatter of tall-growing trees and shrubs as well as 330 acres of herbicide application within the cleared transmission corridor would be initially treated in fall of 2021 and 2022. BPA also proposes to cut approximately 180 danger trees (trees immediately outside the right-of-way corridor that pose unique risk of falling into the line) and plans to trim and cut trees in the City of Hood River that could encroach upon the transmission line. Approximately 9 miles of access road vegetation management is planned, as well as clearing vegetation and selectively applying herbicide at approximately 170 structure sites. Additional vegetation management may be necessary in subsequent years 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 chip, lop, and scatter, or mulching 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. As conservation and avoidance measures, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to the water's edge of any stream containing threatened or endangered species. 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 preserve 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, thus eliminating the risk for soil erosion and sedimentation near the streams. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the Vegetation Control Cut Sheets, 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 no effect determination for bull trout. BPA made a "Not likely to result in jeopardy of proposed species" for the candidate species monarch butterfly. ESA consultation is not required for that determination under the ESA. BPA made a "May affect, not likely to adversely affect" for northern spotted owl and a "No effect" for northern spotted owl critical habitat. BPA discussed the proposed actions with the Fish and Wildlife Office of the USFS CRGNSA as well as the

Oregon USFWS office. BPA, USFWS, and the USFS agreed that BPA will utilize USFS' ESA-coverage documented in the 2017 Willamette Planning Province Biological Assessment for Routine Land Management Activities for potential effects to northern spotted owl from project activities (USFWS consultation code OIEOFWOO-2017-I-0667). Danger tree removal would be conducted outside of the northern spotted owl critical breeding period (March 1st – July 15th).

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 as 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 developed an area of potential effect (APE) for the project, and in an October 13, 2021, letter to the Confederated Tribes and Bands of the Yakama Nation, the Oregon State Historic Preservation Office, the Nez Perce Tribe, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes of the Grande Ronde Community of Oregon, and the Cowlitz Indian Tribe made a determination of *no historic properties affected*. No consulted party responded to BPA regarding the determination during the statutory 30-day comment period. 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.

Visual Resources

The project is located within the Columbia River Gorge National Scenic Area. Vegetation management actions within and immediately adjacent to existing easements do not require special coordination with the USFS CRGNSA office. The proposed work is consistent with the existing visual quality of the transmission right-of-way, which is managed periodically to remove tall-growing trees and trees that pose a special risk to the energized conductor. Proposed danger tree removal, while not insignificant, would not significantly alter the visual profile of the existing transmission corridor or the Scenic Area in general.

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 of 2021 through winter, spring, and summer of 2022. 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'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/ Aaron Siemers
Aaron Siemers, EPR-4
Physical Scientist

Concur:

/s/ Sarah Biegel
Sarah T. Biegel
NEPA Compliance Officer

Date: December 8, 2021

References:

- 1) Vegetation Control Cut Sheets
- 2) The Dalles District FY '22 Veg. Mgmt. Bundle; Bonneville-Hood River No. 1 Periodic Veg. Mgmt. Endangered Species Act Effects Determination Memo