

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: October 9, 2020

REPLY TO
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-754)

TO: Carlos Mora Flores
Natural Resource Specialist – TFBV-ALVEY

Proposed Action: Vegetation Management along the Reston-Fairview No. 1, Santiam-Toledo No. 1, and Toledo-Wendson No. 1 Transmission Line Corridors

Pollution Prevention and Abatement Project No.: 4274

Location: Benton, Coos, Douglas, Lane, Lincoln, Linn, and Marion counties, Oregon

Description of the Proposal: Bonneville Power Administration (BPA) proposes to clear danger trees and encroaching tree limbs in, and adjacent to, the transmission line corridors and access roads in the BPA Alvey and North Bend districts. Clearance distances were assessed on the following corridors, and Vegetation Control Cut Sheets noting danger trees and trees to be side-limbed were created and compiled:

- the entire length of the 230-kilovolt (kV) Reston-Fairview No. 1, including the 230-kV Alvey-Fairview;
- the 230-kV Santiam-Toledo No. 1, from Structure 28/6 to Toledo Substation, including the entire length of the 115-kV Albany-Burnt Woods; and
- the entire length of the 230-kV Toledo-Wendson No. 1.

The corridors in the proposed project area measure from 100 to 265 feet in width and cross approximately 128 miles of terrain through urban/suburban, rural residential, agricultural, private and commercial forestry, United States Forest Service – Siuslaw National Forest, Oregon Department of State Lands, and United States Bureau of Land Management – Coos Bay District managed lands.

BPA proposes to remove approximately 327 danger trees, and side-limb approximately 1,444 trees that 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 from late fall to late winter of 2020; however, additional vegetation management may be necessary where BPA personnel discover vegetation that poses a hazard to the transmission line.

**Danger Tree (DT) Removal and Side-Limbing Counts by
Transmission Line and Span in the Action Area**

Line	From Structure	To Structure	No. DTs	Side-Limb
Reston-Fairview	3/5	5/1	13	4
	5/3	8/5	17	87
	9/1	18/3	58	60
	18/6	20/3	5	0
	20/5	22/3	2	9
	23/4	25/4	21	16
	26/5	27/3	5	17
Subtotal			121	193
Santiam-Toledo	51/2	55/2	34	98
	62/2	63/4	2	68
Subtotal			36	166
Toledo-Wendson	10/4	13/3	11	76
	16/4	22/1	20	159
	23/3	50/4	139	850
Subtotal			170	1085
Total			327	1444

BPA’s vegetation management contractor would typically utilize one or two pick-up trucks (COVID-19 social distancing measures may affect the number of vehicles used) and a crew of four to five people to access the ROW and perform the work. Once on the ROW, the crew would travel by foot to areas where vegetation is to be managed. Gas-powered tools would likely be used to perform all cutting activities. Side-limbing would be done by qualified individuals climbing the identified trees and cutting branches that could be a hazard. Similarly, tree removal would be done by qualified individuals. Unless otherwise specified by the landowner or land manager, debris would be disposed of using on-site chip, lop and scatter, or mulching techniques.

Letters, 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 land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

Analysis: Vegetation Control Cut Sheets were developed for these corridors that incorporate 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. No herbicides would be used for removing danger trees and limbs. 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 minimizing the risk for soil erosion and sedimentation near the streams.

Endangered Species Act and Magnuson-Stevens Act: BPA's proposed tree removal activities were described in the Endangered Species Act (ESA) consultation with the United States Fish and Wildlife Service (USFWS). A Biological Opinion (BiOp) was issued on October 2, 2020. In accordance with the BiOp, the following *Impact Avoidance and Minimization Measures* would be required:

- When side-limbing, avoid disturbing moss on non-target branches.
- Tree cutting and side-limbing would be conducted from October through February.
- 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, designated as critical habitat for one or more species, and/or identified as Essential Fish Habitat (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: The proposed vegetation management actions would not result in significant 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 Archeologist 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, fall and winter 2020 through winter 2021. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

Findings: This Supplement Analysis finds that: (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-

0285) and ROD, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Oden Jahn
Oden W. Jahn
Environmental Scientist

CONCUR:

/s/ Sarah T. Biegel DATE: October 9, 2020
Sarah T. Biegel
NEPA Compliance Officer

References:

Formal Consultation for Vegetation Management on the Bonneville Power Administration Santiam-Toledo, Reston-Fairview, and Toledo-Wendson (FWS Consultation Number: 01EOW00-2020-F-0559).