

memorandum

DATE: November 5, 2019

REPLY TO
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-728)

TO: Jacob Marti
Natural Resource Specialist – TFBV- The Dalles

Proposed Action: Vegetation Management along the Big Eddy-Spring Creek No. 1 Corridor, the Big Eddy-Demoss No. 1 Corridor, Demoss-Fossil No. 1 Corridor, Harvalum-Big Eddy No. 1 Corridor, Rock Creek-John Day No. 1 Corridor, and Round Up-La Grande No. 1 Corridor.

Pollution Prevention and Abatement Project No.: 4270

Location: Gilliam, Sherman, Umatilla, Union, Wasco, and Wheeler counties, Oregon and Klickitat County, Washington

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridors and access roads. Approximately 1,323 acres of Right-of-Way (ROW), 304 structure sites, and 63 miles of access road would be treated in fiscal year 2020. The corridors include the following transmission line segments:

- Big Eddy-Spring Creek No. 1, miles 10/3-37/1
- Big Eddy-Demoss No. 1, miles 1/7-24/16
- Spearfish Tap to Chenoweth-Goldendale No. 1, miles 0/1-4/1
- Demoss-Fossil No. 1, miles 0/1-48/1
- Harvalum-Big Eddy No. 1, miles 15/3-24/1
- Rock Creek-John Day No. 1, miles 0/1-10/5
- McNary-Ross No. 1, e miles 68/6-74/5
- Horse Heaven-Harvalum, miles 51/5-58/1
- McNary-John Day No. 2, miles 68/6-74/5
- Wautoma-Rock Creek No. 1, miles 64/1-65/5
- McNary-John Day No. 1, mile 75/2-76/3
- McNary Powerhouse-McNary No. 6, mile 1/1-1/2
- Round Up-La Grande No. 1, mile 1/1-45/1

The corridors in the proposed project measure from 125 to 700 feet in width and cross approximately 169 miles of terrain through agricultural and range lands on private, Washington Department of Natural Resources, Oregon Department of State Lands, Confederated Tribes of the Umatilla Indian Reservation, United States Forest Service, or Bureau of Land Management lands.

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.

To comply with Western Electricity Coordinating Council (WECC) 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 ROW to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods that may include hand cutting and herbicidal treatment would be used to perform the work. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Vegetation Management EIS, to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. The proposed project would be completed in fiscal year 2020. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove up to 42 trees in or adjacent to the ROW. Other tree clearing activities would include side-limbing of up to 38 trees. Debris would be disposed of using onsite chip, lop, and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

Analysis: A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285, May 2000) 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 Prescription.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. 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 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, thus eliminating the risk for soil erosion and sedimentation near the streams. For location information, see the Vegetation Control Prescription.

Threatened and Endangered Species: Pursuant to its obligations under the Endangered Species Act (ESA), BPA has made a determination of whether its proposed project would have any effects on any ESA-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 determination that the project would have "No Effect" for all ESA-listed species under USFWS' jurisdiction. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). A determination of "No Effect" was made for all ESA-listed species under NMFS' jurisdiction, with the implementation of the conservation measures in the Water Resources section above.

Essential Fish Habitat: A review of the NMFS database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources would be followed for EFH. Based on project conservation measures, it was determined that the project would not adversely affect EFH.

Cultural Resources: No cultural resources are known for the project area. 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: Native 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 roads.

Monitoring: The entire project would be inspected during the work period of year 2020. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard of inspection results would be used to document formal inspections and will 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/ Laura Roberts
Laura Roberts
Biological Scientist, EPI-4

CONCUR:

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

Date: November 5, 2019

References:

Vegetation Management Prescription and Checklist
Effects Determination