

memorandum

DATE: March 12, 2020

REPLY TO
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-739)

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

Proposed Action: Vegetation Management along the Santiam-Toledo No. 1 Transmission Line Corridor

Pollution Prevention and Abatement Project No.: 4274

Location: Benton County, Oregon

Description of the Proposal: Bonneville Power Administration (BPA) proposes to clear unwanted vegetation in and adjacent to the transmission line corridors and access roads in the BPA Alvey district. Vegetation management needs were assessed, then a Vegetation Control Cut Sheet was created for the 230-kilovolt (kV) Santiam-Toledo No. 1, from Structure 32/4 to 32/6, 38/3 to 42/7, and 44/5 to 45/5. The right-of-way (ROW) corridor is shared with the 115-kV Albany-Burnt Woods from Structure 7/4 to 7/6, 13/2 to 17/7, and 19/3 to 20/3.

The corridors in the proposed project area measure from 95 to 265 feet in width and cross approximately eight miles of terrain through urban/suburban, rural residential, agricultural, private and commercial forestry 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. 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 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. 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 Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 2000), to ensure that the roots are killed - preventing new sprouts - and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure.

Approximately 86 acres of ROW, and 1 mile of access road would be initially treated in spring of 2020. In addition, BPA proposes to remove up to 135 trees in, or adjacent to, the ROW, and side-limb approximately 100 trees. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 106 acres of ROW by fall and winter of 2020/2021; however, 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. Unless otherwise requested by landowners, 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 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 Sheet.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Cut Sheet. 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 will 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. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the Vegetation Control Cut Sheet, 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 has 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 determination that the project would have "No Effect" for all ESA-listed species and designated critical habitat under USFWS' jurisdiction, except Fender's blue butterfly, Kincaid's lupine, Kincaid's lupine critical habitat, Taylor's checkerspot butterfly, and Taylor's checkerspot butterfly critical habitat.

Proposed vegetation management activities within known and potential Fender's blue butterfly, Kincaid's lupine, and Taylor's checkerspot butterfly habitat; and Kincaid's lupine and Taylor's checkerspot butterfly critical habitat have a goal of promoting and maintaining a low-growing

vegetation community. Further, the proposed vegetation management activities would be compatible with protection of these species and habitat, and the proposed removal of tall-growing species, weeds, and undesirable vegetation may be beneficial to these species and habitat. BPA coordinated with USFWS staff to develop a Vegetation Management Plan and conservation measures for project activities in the project area. It was determined that the proposed activities would be within the scope of activities and action area evaluated in the USFWS's *Programmatic Restoration Opinion for Joint Ecosystem Conservation by the Services (PROJECTS) program* (FWS reference: 01EOFW00-2014-F-0222, May 2015). It has been determined that, by complying with the project design criteria and management standards listed within the above-mentioned Programmatic Biological Opinion, potential effects to Fender's blue butterfly, Kincaid's lupine, Kincaid's lupine critical habitat, Taylor's checkerspot butterfly, and Taylor's checkerspot butterfly critical habitat would be consistent with those evaluated and addressed in the above-mentioned Programmatic Biological Opinion.

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 Sheet. 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 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, spring 2020 through fall and winter 2020/2021. 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 W. Jahn
Environmental Scientist

CONCUR: /s/ Katey Grange
Katey Grange
NEPA Compliance Officer

DATE: March 12, 2020

References:
Vegetation Control Cut Sheet
Effects Determination