

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-816 – Update to SA issued 12/9/2021)

Pollution Prevention and Abatement Project Number: 4772
Natural Resource Specialist/Project Manager: Jennifer Strombom

Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to cut approximately 2,000 danger trees that were burned, partially burned, or de-stabilized as a result of the Beachie Creek and Lionshead wildfires that occurred in late summer 2020. Project activities would take place in Linn and Marion counties, Oregon, specifically within, and adjacent to, several discrete burned areas (known as Areas A, B, D, S1, S2, S3, and S4 as noted in the cut sheet and work plan) near the 230-kilovolt Jones Canyon-Santiam No. 1 and McNary-Santiam No. 1 double-circuit right-of-way (ROW) corridor. The danger trees are located within varied terrain are located generally between structures 109/5 and 127/1 (approximately 18 miles) along the subject corridor and are located on United States Forest Service, Willamette National Forest (WNF) managed lands.

Coordination meetings with WNF staff took place between summer and fall 2021. Measures proposed by the WNF in these meetings and through ongoing communication would be incorporated into the project plan during project implementation.

To comply with Western Electricity Coordinating Council standards, the proposed project would cut danger trees that are potentially at risk of falling into the energized transmission line and causing additional wildfires and electrical outages. Within the action area, trees tall enough to fall into energized transmission line infrastructure; and are dead, expected to die, have significant fire damage, and/or are located within, or adjacent to, areas of significant soil burn severity have been identified and would be targeted to be cut. In addition, danger trees that pose a threat to the line have been identified within unburned portions of the action area would be cut.

BPA proposes to assess all trees within the action area individually at the time that they would be cut. Trees would be assessed by qualified BPA employees and contractors. All danger tree assessments, cutting, and felling would be performed by individuals qualified to cut trees in proximity of transmission lines and would utilize common tools (chainsaws), rigging, wood chippers and work trucks. Heavy equipment (e.g. excavator or other tracked vehicles) would be used where additional control of the falling trees is needed in order to protect workers and infrastructure.

Approximately 2,000 danger trees would be cut between winter 2021/2022 and fall 2022. Debris would be disposed of onsite, along the ROW, using cut, lop, and scatter techniques or by on-site chipping/mulching where requested by the WNF. Excess wood chips would be hauled to an off-site disposal location, if necessary. In some areas, firewood-sized debris would be cut and piled/stacked for

public forest users. Larger trees near the Detroit Ranger Station would be initially cut and felled as part of this action. Any additional debris management beyond cut, lop, and scatter or mulching in these areas would be assessed after cutting and would not occur until after further analysis and planning and coordination with the WNF are conducted.

Analysis

A project plan 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 plan.

Water Resources

Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the project plan. The following measures would be implemented to minimize impacts to water resources:

- Wherever possible, trees would be felled directionally away from streams. Cut trees or debris would not be placed in waterbodies.
- No heavy equipment would be used on slopes greater than 20%.
- No heavy equipment would be used within 60 feet of water courses.
- Erosion and sediment control BMPs, such as seeding and mulching, straw bales and wattles, would be applied to exposed soils that result from project activities.
- Trees would be left in place once they are felled.
- The number of heavy equipment passes across the project area would be minimized to reduce the potential for soil compaction.
- Operations would be ceased if soil rutting occurs greater than one foot.

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 determination that the proposed action would have *no effect* on Fender's blue butterfly and critical habitat, Nelson's checker-mallow, Willamette daisy and critical habitat, Kincaid's lupine and critical habitat, and whitebark pine. BPA determined that the proposed action *may affect*, [but is] *not likely to adversely affect* northern spotted owl and critical habitat. Additionally, it was determined that the proposed action may adversely impact individuals or habitat, but is *not likely to result in jeopardy* of monarch butterfly. BPA initiated informal consultation with the USFWS in November 2021 for the proposed vegetation management activities. The USFWS sent a letter of concurrence (LOC) regarding: *Endangered Species Act Informal Consultation for Danger Tree Management along the Bonneville Power Administration Transmission Line Rights of Way in Linn and Marion Counties, Oregon* (reference number: 01EOFW00-2022-I-0112) to BPA in December 2021. BPA would implement the conservation measures identified in the biological assessment - primarily work timing restrictions in proximity to northern spotted owl habitat.

BPA conducted a review of ESA-listed species, designated critical habitat, 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). However, no waterbodies containing ESA-listed species under NMFS' jurisdiction were found within 100 feet the project area. BPA

made a determination that the project would have *no effect* for all ESA-listed fish species and designated critical habitat under NMFS' jurisdiction, and the project would not adversely affect EFH.

Cultural Resources

The proposed vegetation management actions were reviewed to determine if any previously recorded cultural resources were present. In addition, a cultural resources survey was conducted of high probability areas that had not been previously surveyed. Only areas A and D had not been previously surveyed.

Several previously-recorded resources are present in Area B. However, because the work proposed in Area B would only minimally impact the ground surface, a series of minimization methods would be utilized in Area B to further minimize ground disturbance and any resulting impacts:

- Because the trees would be cut by hand, no heavy equipment would enter known cultural resource boundaries. The only exception is pickup trucks using the existing access roads within site boundaries when necessary.
- Whenever possible trees would be cut to fall toward the perimeters of the known cultural resources.
- Because the trees would be left on site, no dragging/skidding of trees would occur.
- A professionally qualified archaeologist would monitor and advise felling activities (this would be subject to applicable safety restrictions).

Because no cultural resources were identified in any of the other areas, work would be conducted as proposed. However, if a previously unrecorded cultural resource 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 immediately 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. Erosion and sediment control BMPs, such as seeding and mulching, would be applied to exposed soils that result from project activities using heavy equipment.

Monitoring

The entire project would be inspected during the work period, winter 2021/2022 and fall 2022. 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/ Oden Jahn

Oden Jahn
Natural Resource Specialist

Concur:

/s/ Katey Grange

Katey Grange
NEPA Compliance Officer

Date: February 9, 2022

References:

Jones Canyon-Santiam Project Plan