

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-853)

**Pollution Prevention and Abatement Project Number: 4851**

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Bonneville Power Administration  
Department of Energy



BPA proposes to clear unwanted vegetation in and adjacent to the rights-of-way of high-voltage transmission lines and access roads in Benton, Clackamas, Columbia, Coos, Douglas, Lane, Lincoln, Linn, Marion, Multnomah, and Washington counties, Oregon, and Skamania County, Washington. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for right-of-way corridors and associated access roads along the following transmission line corridors and spans.

District	Corridor	Spans	Proposed Work
Alvey	Cougar-Holden Creek No. 1	Structure 1/5 to 2/5 and 14/5 to 14/6.	Side-limb approx. 28 trees. Remove approx. 20 corridor trees.
Alvey	Holden-Thurston No. 1	Structure 1/4 to 6/5.	Side-limb approx. 99 trees.
Alvey	Green Peter-Lebanon No. 1, including Foster tap to Green Peter-Lebanon No 1	Structure 1/2 to 1/5, 2/2 to 2/3, and 7/2 to 7/4. Foster tap structure 1/7 to 2/3 and 7/2 to 7/4.	Side-limb approx. 132 trees. Remove approx. 70 corridor trees.
Alvey	Santiam-Alvey 1&2 No. 2	Structure 24/3 to 29/4, 36/4 to 46/1 and 51/3 to 51/4.	Side-limb approx. 282 trees. Remove approx. 2 corridor trees.
Alvey	Santiam-Toledo No. 1, including Albany-Burnt Woods No. 1	Structure 34/8 to 66/2 and Albany-Burnt Woods No. 1 from Structure 14/4, and 17/7.	Cut/treat approx. 28 acres. Treat approx. 103 acres with herbicide. Mow approx. 47 acres. Side-limb approx. 587 trees. Remove approx. 35 tree tops. Remove approx. 345 corridor trees. Mow/treat approx. 0.35 miles of access roads

District	Corridor	Spans	Proposed Work
Chemawa	Jones Canyon-Santiam No. 1	Structure 124/3 to 125/1, 130/2 to 134/1, 138/4 to 140/6, 146/1 to 146/2, and 153/3 to 154/1.	Side-limb approx. 20 trees. Remove approx. 25 tree tops. Remove approx. 6 corridor trees. Remove approx. 1 danger tree.
Chemawa	John Day-Marion No. 1, including Buckley-Marion No. 1	Structure 102/3 to 104/1 and 123/2 to 124/2. Buckley-Marion 75/2 to 75/3.	Side-limb approx. 45 trees. Remove approx. 140 corridor trees.
North Bend	Reston-Fairview No. 2, including Alvey-Fairview No. 1	Structure 4/4 to 28/4. Alvey-Fairview 79/4 to 79/5.	Side-limb approx. 373 trees. Remove approx. 13 tree tops. Remove approx. 395 corridor trees.
North Bend	Toledo-Wendson No. 1	Structure 2/1 to 8/5, 10/5 to 16/4, and 50/4 to 51/1.	Side-limb approx. 290 trees. Remove approx. 307 corridor trees.
Ross	Big Eddy-Ostrander No. 1	Structure 46/5 to 47/1, 51/4 to 52/1 and 68/6 to 70/3.	Side-limb approx. 16 trees. Remove approx. 5 tree tops. Remove approx. 395 corridor trees.
Ross	North Bonneville – Troutdale No. 1	Structure 1/4 to 2/4.	Remove approx. 14 danger trees.
Ross	Ostrander-Troutdale No. 1, including Big Eddy-Troutdale No. 1	Structure 12/4 to 19/2. Big Eddy-Troutdale Structure 63/5 to 65/3	Side-limb approx. 165 trees. Remove approx. 8 danger trees.
Ross	Keeler-Allston No. 1,	6/4 to 9/2, 15/1 to 16/4, 23/1 to 23/2, 25/1 to 25/2, 30/5 to 31/1, and 32/1	Remove approx. 17 danger trees.

The corridors run through primarily private lands, but some tracts are managed by the Army Corps of Engineers, United States Forest Service – Mt. Hood and Willamette National Forests, Bureau of Land Management – Northwest Oregon and Coos Bay Districts, Oregon Department of State Lands, and smaller parcels of local government lands. Land use is varied, with urban, suburban, agricultural, forestry, commercial, industrial, and park/recreational uses present along the ROW corridors.

BPA notified and solicited input from the Mt. Hood and Willamette National Forests starting in spring of 2022 and continuing through late fall 2022. BPA also discussed upcoming vegetation management activities at a yearly coordination meeting with each of these National Forests. 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 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.

The proposed activities are listed in the table above. A follow-up treatment of re-sprouting target vegetation would be conducted by spring 2024. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle 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 chipping/mulching, or cut, lop, and scatter 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. The buffer distances described in Table III-3 and III-4 of the FEIS apply to these water resources, unless more stringent buffer zones are required for compliance with Endangered Species Act (ESA), land manager, or local requirements noted in the Vegetation Control Cut Sheets. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the Vegetation Control Cut Sheets, the buffer distances described in Table III-2 of the FEIS apply. 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 ESA, BPA made determinations of whether its proposed project would have any effects on any ESA-listed species.

BPA determined that the proposed tree removal activities along the North Bonneville-Troutdale No.1 transmission line corridor, between structures 1/4 and 2/4, are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) letter of concurrence (LOC) regarding: BPA Southern Washington Periodic Vegetation Management, consultation number 2023-0081437, sent to BPA in August 2023. In accordance with the LOC, the following *Conservation Measures* are required:

- All vegetation management activities within 65 yards of suitable and highly suitable NW Forest Plan modeled northern spotted owl habitat (2022 NWFP Model) would be conducted outside of the critical nesting period (March 1 – July 15).
- BPA would provide an annual report to the USFWS Westside Forest and Alpine Zone Team that details the specific individual tree removal. The report would include tree data such as location, species, diameter (DBH), and reason for removal.

BPA determined that the proposed tree removal activities along the Santiam-Toledo No. 1 (between 51/2 and Toledo Substation), Reston-Fairview No. 1 (all spans listed above), and Toledo-Wendson No.1 (all spans listed above) transmission line corridors are within the scope of activities and action area evaluated in the USFWS biological opinion (BiOp) regarding: Formal Consultation for Vegetation Management on the Bonneville Power Administration Santiam-Toledo, Reston-Fairview, and Toledo-Wendson (FWS Consultation Number: 01EOFW00-2020-F-0559), sent to BPA in October 2020. In accordance with the BiOp, the following *Conservation Measures* are required:

- No tree removal activities would be conducted in Marble Murrelet Critical Habitat.
- When side-limbing, avoid disturbing moss on non-target branches.
- Tree cutting and side-limbing would be conducted between October 1 – February 28.
- All garbage (especially food products) must be contained or removed daily from the vicinity of the proposed project.

BPA determined that the proposed tree removal activities along the Santiam-Toledo No. 1 transmission line corridor from Structure 38/3 to 42/7, and the Albany-Burnt Woods transmission line from Structure 14/4 to 17/7 between are within the scope of activities and action area evaluated in the USFWS 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, Fender's blue butterfly critical habitat, 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. Coordination with USFWS staff regarding the proposed work took place between June 29 and September 18, 2023, and a Vegetation Management Plan consistent with the PROJECTS BiOp was developed and approved by USFWS. The following *Conservation Measures* are required:

- A USFWS Biologist must be present for activities in Fender's blue butterfly (FBB), Kincaid's lupine (KILU), and Taylor's checkerspot butterfly (TCB) habitat and their critical habitats.
- Vegetation management would be performed between late August/early September and mid-April.
- Mowing would be performed with a skid-steer with mowing deck. Sharp turns would be avoided.
- In areas of known ESA species, CH, and other sensitive areas, mowing would be done in late summer/early fall.
- Where herbicide is indicated, Triclopyr TEA (Garlon 3A) would be used in the spring (prior to mid-April).
- Only spot spray treatment methods would be used in occupied FBB, KILU, and TCB habitat areas. No broadcast treatment in these areas.
- Additional herbicide applications may be necessary in late summer/early fall.
- Weeds targeted would be knapweed, poison oak, scotch broom, and thistle.
- Danger trees and tree limbs would be cut, lopped and scattered on-site.

- Unless otherwise requested by landowners, all debris would be disposed of onsite, along the ROW (outside of occupied FBB, KILU, and TCB habitat areas), using on-site chip, lop and scatter, or mulching techniques.

For all other Phase 3 spans not discussed above, a species list was obtained for federally-listed, proposed, and candidate species potentially occurring within the project boundaries from the 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. The attached Sensitive Species Conservation Measures are required where ESA-listed species are noted in the Vegetation Control Cut Sheets.

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 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. The attached Sensitive Species Conservation Measures for Anadromous Salmon and Steelhead are required where ESA fish are noted in the Vegetation Control Cut Sheets.

#### Cultural Resources

The proposed vegetation management actions do 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 Archaeologist 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 2023 through spring 2024. 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/ Oden Jahn

Oden Jahn, EPI-4

Natural Resource Specialist (Environmental Compliance)

Concur:

/s/ Katey Grange

Katey Grange Date: September 22, 2023

NEPA Compliance Officer

References:

Sensitive Species Conservation Measures

Table of activities covered by this SA

2023 Vegetation Management Plan for the BPA Santiam – Toledo Transmission Line Right-of-Way