

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-916)

Pollution Prevention and Abatement Project Number 6854
Natural Resource Specialist/Project Manager: Jennifer Austin, TFBV CHEMAWA

Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way (ROW) corridors in the Chemawa Operations & Maintenance District in Linn and Marion counties, Oregon, specifically the deenergized McNary-Santiam No 1 and Lyons UHV Test Line No 1. Analyses of recent wildfires where ignition sources may be associated with electrical utility infrastructure suggest that hazards may be present, even after transmission facilities have been de-energized. If a fire were to occur, it could hamper operation of the energized line located immediately adjacent to the McNary-Santiam No 1 and Lyons UHV Test Line No 1, as well as pose a potential threat to BPA substations and other nearby infrastructure which depending on other conditions in the region could affect life, safety and grid reliability. Vegetation management needs for this project were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads along these transmission assets.

The corridor in the proposed project area measures approximately 300 and 400 feet in width and total approximately 12 miles in length. The corridor runs through private lands, but some tracts are managed by BPA, U.S. Forest Service – Mt. Hood National Forest (MNF) and Willamette National Forest (WNF) and Confederated Tribes of the Warm Springs Reservation. Land use is varied, with rural residential, agricultural, forestry, commercial, and industrial uses present along the ROW corridors.

Approximately 8 miles of the McNary-Santiam No. 1 transmission line corridor runs through USFS-managed lands. The BPA Natural Resource Specialist notified the MNF and WNF via email on 6/6/25, outlining the planned work, and provided acknowledgement and requested mitigation measures for Forest Sensitive Species. Additionally, notifications to the Confederated Tribes of Grande Ronde (CTGR), Confederated Tribes of the Warm Springs (CTWS), Oregon State Historic Preservation Office and the Advisory Council on Historic Preservation were delivered on 6/6/25. Given the narrow scope and expedited timeline of this project, notification for additional private landowners via door hangers would be used at properties. Mitigation measures requested by the MNF, WNF, CTWS, CTGR, Oregon THPO, and 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.

BPA vegetation management contractors will begin work to clear encroaching vegetation from around metal tower structures and de-energized conductor between the 150 and 158 miles of the McNary-Santiam transmission line ROW. BPA proposes to cut, lop, and scatter tall-growing brush and trees within 10 feet of the de-energized conductor, and clear tall-growing brush and trees from within a 50-foot radius around all structures. All work along this 8 mile long segment of the McNary-Santiam ROW would be completed by crews using hand tools (i.e., chainsaws); no heavy equipment or machinery would be needed to clear hazardous vegetation, however, a towed chipper may be used to reduce the size of cut debris and disperse chips to lower fuel loads in the vegetation clearing areas as needed. Altogether, approximately 18 acres would be cleared of hazard vegetation in this portion of the proposed project area.

Approximately 18 acres of ROW, 46 structure sites would be treated summer of 2025. In addition, BPA proposes to top and side limb approximately 142 trees in, or adjacent to, the ROW. Additional vegetation management may be necessary in subsequent years of the vegetation management 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.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA’s customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

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. 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.

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). The proposed vegetation management activities are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service’s (USFWS) 2025 Programmatic Biological Opinion (PBO) for BPA’s Routine Inspections and Right-of-Way Maintenance in Western Oregon. BPA received USFWS determination concurrence via Teams Meeting and correspondence on June 10, 2025 that the scope is consistent with the PBO and would not

result in effects to ESA-listed species nor impair Northern Spotted Owl(NSO) Critical Habitat beyond what was considered in the PBO. One span of McNary-Santiam crosses a waterbody identified as resident bull trout habitat, though it is a translocated experimental population, and would not be effected. There are no streams in the project area with documented presence of ESA-listed anadromous fish.

Cultural Resources

BPA is proposing this project is consistent with the emergency procedure described at 36 CFR § 800.12(b)(2) of the National Historic Preservation Act (NHPA) and the emergency declared by the President in Executive Order 14156 “Declaring a National Energy Emergency”. 13 spans within this emergency project would require a cultural monitor to be present during the work period and are denoted on the vegetation cutsheet. 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, June 2025 through August 2025. 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' Proposed Action and no substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the EIS' Proposed Action or its impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9¹. Therefore, no further NEPA analysis or documentation is required.

/s/ Eric McOmie

Eric McOmie

Natural Resource Specialist (Environmental Compliance)

Concur:

/s/ Katey Grange

Katey Grange

NEPA Compliance Officer

Date: June 16, 2025

References:

Vegetation Control Cut Sheets

Sensitive Species Conservation Measures

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this SA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*