

# memorandum

DATE: July 28, 2016

REPLY TO  
ATTN OF: EP-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285/SA 633)

TO: Christopher Morse  
Natural Resource Specialist – TFBV-Chemawa

**Proposed Action:** Vegetation management along the McNary-Ross transmission line corridor

**Pollution Prevention and Abatement Project No.:** 3482

**Location:** Clark and Skamania Counties, in Bonneville Power Administration's (BPA) Longview Maintenance District

**Description of the Proposal:** BPA proposes to control vegetation along the transmission lines and access roads of the McNary-Ross transmission line corridor. The project extends from structure 144/1 (located in Skamania County, Washington) to structure 166/5 (located in Clark County, Washington). The right-of-way (ROW) corridor measures from 175 to 300 feet in width and encompasses 644 acres over approximately 22 miles of terrain. Also included are 2 miles of transmission line access roads with an average width of 12-14 feet.

The project area consists of the properties within and adjacent to the ROW easement boundary of the McNary-Ross transmission lines corridor. Several segments of other transmission are partially located within the right of way corridor. They include the North Bonneville-Troutdale #2 and the North Bonneville-Ross #2 from structures 8/4 to 20/1.

In order to comply with Western Electricity Coordinating Council standards and to help provide system reliability, 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 for 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 will be used to perform the work. All methods, including selective cutting, mowing, and herbicide treatments, are consistent with the methods approved in the Vegetation Management Program, Transmission System Vegetation Management Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000 and Record of Decision (ROD) (August 23, 2000). 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) using chemicals consistent with the EIS.

Approximately 644 acres of ROW and 2 miles of access roads would be initially treated starting in July 2016. A follow-up treatment of re-sprouting target vegetation would be conducted approximately 6-12 months after the initial treatment, and will be scheduled considering weather and timing restrictions for listed species in the project area. To prevent trees from coming into

contact with the energized conductors, BPA proposes to remove 75 trees in, or adjacent to, the ROW. Debris would be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

**Analysis:** This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (DOE/EIS-0285, May 2000) and ROD. A Vegetation Management Control Prescription and Checklist were completed for this project in accordance with the requirements identified in BPA's Transmission System Vegetation Management Program FEIS and ROD. The subject corridor traverses public and private lands in Clark and Skamania counties, Washington. Land parcels transected by the corridor consist of, private residential, agricultural, private industrial timber, and Washington State DNR properties. No tribal lands are involved. The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) occurring in the project area noted in the Vegetation Control Prescription. 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. No in-stream work would be conducted with the proposed project.

Where herbicide applications are prescribed, 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 water resource (stream, pond, and wetland) where threatened or endangered species have the potential to occur. For non-T&E water resources, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 35-foot buffer up to the water's edge.

**Threatened and Endangered Species/Essential Fish Habitat:** Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. Species lists from the United States Fish and Wildlife Service (USFWS) for the proposed project area were reviewed on July 25<sup>th</sup>, 2016. The lists identify Threatened and Endangered species and critical habitat units potentially occurring in the project area. In addition, a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration (NOAA) Fisheries was conducted. A determination of "No Effect" was made for all ESA listed species and designated critical habitat for the project. A determination of "Not likely to adversely affect" was made for Essential Fish Habitat waters that occur in the project area.

**Cultural Resources:** No cultural resources are known to occur within the project area; additionally no ground disturbing activities are planned for this project that could potentially affect unknown cultural resources. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the appropriate tribe, the BPA Environmental Specialist and the BPA archeologist will be contacted.

**Monitoring:** The entire project will be inspected during the work period. Additionally, the line will be patrolled annually after treatment to monitor the effectiveness of the treatment and any issues associated with the project.

**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. This Supplement Analysis also finds the proposed

actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ Phil Smith, for  
Benjamin J. Tilley  
Natural Resource Specialist

CONCUR: /s/ Stacy L. Mason  
Stacy L. Mason  
NEPA Compliance Officer

DATE: July 28, 2016

Attachments:

Vegetation Control Prescription & Checklist

Effects Determination for Threatened and Endangered Species and Essential Fish Habitat