

memorandum

DATE: December 29, 2016

REPLY TO
ATTN OF: EPR/Olympia

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285/SA 647)

TO: Chris Morse
Natural Resource Specialist – TFBV-LMT

Proposed Action: Vegetation management along the McNary-Ross No.1, Ross-St. Johns No.1, and Rivergate-Keeler No. 1 transmission lines corridors.

Pollution Prevention and Abatement Project Numbers: 3542, 3543, and 3544

Location: Clark County, Washington, and Multnomah and Washington Counties, Oregon in Bonneville Power Administration’s (BPA) Ross Maintenance District.

Proposed by: BPA

Description of the Proposal: BPA proposes to control vegetation along the transmission line corridors and access roads leading to the easements of various transmission lines in BPA’s Ross Maintenance District (see table below). Several segments of other transmission lines listed on the following table are partially located within the right of way corridors. The project extends from approximately 10 miles East of Ross substation along the McNary-Ross No. 1 transmission line corridor to Ross Substation located in Vancouver, WA. The project continues along the Ross St. Johns No.1 transmission line from Ross substation to St. Johns substation located in Portland Oregon. The project then continues along the Rivergate-Keeler No.1 transmission line from St. Johns Substation to Keeler Substation located in Hillsboro Oregon. The right-of-way (ROW) corridor width ranges from 300 to 100 feet wide and encompasses 759.3 acres over approximately 39 miles of terrain. Also included is 9,670 feet of transmission line access roads with an average width of 12-14 feet.

Transmission Line	Segment	Transmission Line	Segment
McNary-Ross No. 1	166/5 to 176/5	Ross-Alcoa 2&4 No. 4	ROSS to ALCO
Bonneville PH 1-Alcoa 1&2 No. 2	27/6 to 38/1	Ross-Carborundum No. 1	ROSS to CARB
North Camas-Sifton No. 1	6/6 to SIFT	Rivergate-Keeler1&2 No.1	RIVG to KEEL
Sifton-Ross No. 1	SIFT to 9/4	St. Johns-Keeler No.2	RIVG to KEEL
Ross-St. Johns No. 1	ROSS to STJO	Rivergate-Keeler 1&2 No.2	1/5 to 2/3
Ross-Rivergate No. 1	ROSS to RIVG	St. Johns-St. Helens No.1	STJO to 3/5
Ross-Alcoa 2&4 No. 2	ROSS to ALCO	St. Johns Stub No. 1	1/1 to 1/9
Ross-Alcoa No. 3	ROSS to ALCO		

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 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 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 and methods consistent with the EIS.

Approximately 759.3 acres of ROW and 9,670 feet of access roads would be initially treated starting in December 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 conditions. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove 89 trees in, or adjacent to, the ROW. Other tree clearing activities would include side-limbing 272 trees along the edge of the ROW. Debris would be disposed of using on-site 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 corridors traverse public and private lands in Clark County Washington and Multnomah and Washington Counties Oregon. Land parcels transected by the corridors consist of agricultural, private rural and urban residential, industrial, and City of Portland owned (Forest Park) 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 (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 under USFWS' jurisdiction.

BPA conducted a review of ESA-listed species and Essential Fish Habitat (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 prescription. 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: 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/ Philip Smith for
Greg P. Tippetts
Physical Scientist (Environmental)

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

DATE: December 29, 2016

Attachments:
Vegetation Control Prescription & Checklist
Effects Determination for Threatened and Endangered Species and Essential Fish Habitat