

United States Government  
**memorandum**

Department of Energy  
Bonneville Power Administration

DATE: September 20, 2005

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS  
(DOE/EIS-0285/SA-265-Roundup-La Grande Transmission Line) **Project #: V-P-05/03**

TO: Bill Erickson  
Natural Resource Specialist – TFP/Walla Walla

**Proposed Action:** Vegetation Management along the Roundup-La Grande 230 kV Transmission Line Corridor.

**Location:** The project area is located in Union County, OR being in Walla Walla Region.

**Proposed by:** Bonneville Power Administration (BPA).

**Description of the Proposal:** BPA proposes to clear unwanted vegetation in the right-of-way (ROW), around tower structures and along associated access roads that may impede the operation, safety, maintenance and reliability of the transmission line. Work will be accomplished from structures 31/1+631 to 38/4+650. The width of the ROW easement is 125 feet. This proposal covers approximately 116 acres of land and encompasses the entire right-of-way width of the transmission line segment.

Unwanted, tall growing and noxious vegetation will be removed and/or controlled inside the ROW using selective and nonselective methods that may include hand cutting and mowing. No herbicidal treatment will be used. BPA plans to conduct vegetation control with the goal of removing tall growing vegetation that is currently or will soon be a hazard to the transmission line. BPA's overall goal is to have low-growing plant communities along the right-of-way to control the development of potentially threatening vegetation. All work will be accomplished in a manner using methods to assure that there is little potential harm to non-target vegetation and to low-growing plants. The work will provide system reliability. All work will be in accordance with the National Electrical Safety Code and BPA standards.

**Analysis:** A. Vegetation Management Checklist was completed for sections of the project corridor in accordance with the requirements identified in the Bonneville Power Administrations Transmission System Vegetation Management Program FEIS (DOE/EIS-0285).

The subject corridor traverses US Forest Service lands in Union County. These lands consist of grazing lands and forest lands.

Sections 3 of the checklist, identifies the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in section 3.1 of the Vegetation Management Checklist. In these locations, trees will be topped where shrubs are not present to provide shade and a silt buffer. No mechanical (machine) use will be allowed within 100 feet of streams except for tower sites and access roads. No ground disturbing activities that will cause bare soil or erosion within 400 feet of a stream will be allowed, thus minimizing the risk for soil erosion and sedimentation near the streams.

No herbicides will be used for vegetation management and control along the entire right-of-way, further protecting any water bodies occurring in the project area.

No drinking water wells, irrigation wells or water supplies were identified along the right-of-way.

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. A species list was obtained from the United States Fish and Wildlife Service (USFWS) on August 8, 2004, identifying threatened and endangered species potentially occurring in the project area. A subsequent update of September 15, 2005 showed the addition of a threatened plant, Howell's spectacular thelypody as possibly being within the project area in Union County, Oregon. A determination of no effect was made for all ESA listed species, designated critical habitat and Essential Fish Habitat for the project.

Cultural Resources: A cultural site extending from 36/1 to 36/2+50 was previously identified. The site was protected by laying down geotextile fabric and placing a protective layer of rock. No disturbance to this cultural site will occur. Also, the vegetation management activities for this project are not expected to disturb any unidentified cultural resources. If a site is discovered during the course of vegetation control, work will be stopped and the BPA Environmental Contact and the BPA Archeologist will be contacted.

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) have identified plants that have specific significance to the tribes in the work corridor and are concerned about impacts to these plants from any broadcast and selective applications of herbicides. To avoid impacts, no herbicide treatment will occur.

Re-Vegetation: Re-vegetation needs will be determined onsite. Any areas identified with limited ground cover will be replanted with native plant species. Areas will be replanted or reseeded with low-growing species. This should be done if there are no existing low-growing species or if there is a low potential for natural re-vegetation by low-growing species and a high potential for natural re-vegetation by tall-growing species.

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/ Joseph C. Sharpe for  
Ken Hutchinson  
Environmental Scientist

CONCUR: /s/ Katherine S. Pierce  
Katherine S. Pierce  
NEPA Compliance Officer

DATE: 9/26/2005

Attachments:  
Vegetation Management Checklist  
Effects Determination