

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: May 4, 2006

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-296- Keeler-Allston No. 1, 1/1 to 43/5). **Project #: V-O-06/11**

TO: Ed Tompkins
Natural Resource Specialist – TFO/LMT

Proposed Action: Vegetation Management along the Keeler-Allston No. 1.

Location: The project is located in BPA's Olympia Region between towers 1/1 to 43/5 along the Keeler-Allston No. 1 500kV transmission line corridor located in Multnomah, Washington and Columbia Counties, Oregon. This proposal covers the right-of-way width of 150 feet along 43 miles of right-of-way.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove tall growing and noxious vegetation from the right of way and access roads that can potentially interfere with the operation, maintenance, and reliability of the transmission lines. Unwanted tall growing and noxious vegetation, danger trees and reclaim trees will be removed and/or controlled inside the ROW using manual, mechanical and herbicide treatments.

All work will be in accordance with the National Electrical Safety Code and BPA standards. The work will provide system reliability.

Analysis: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

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

Section 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. As conservation and avoidance measures, only spot and basal treatment with Garlon 3A (Triclopyr TEA) will be used within a 100 foot buffer up to the water's edge of any stream containing threatened or endangered species. Danger trees

in riparian zones will be selectively cut to include only those that are within 50 feet of the conductor at maximum sag. Trees will be topped where shrubs are not present to provide shade and a silt buffer. Shrubs will not be cut that are less than 10 feet high where ground to conductor clearance is more than 50 feet. No ground disturbing vegetation management methods will be implemented thus minimizing the risk for soil erosion and sedimentation near the streams.

Threatened and Endangered (T&E) Species and Habitats:

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 reviewed from the United States Fish and Wildlife Service (USFWS) on April 28, 2006, to identify threatened and endangered species and Critical Habitat Units that might exist in the project area. This review also covered species under the jurisdiction of NOAA Fisheries.

Threatened and Endangered Species: No T&E species were identified that might be adversely affected by activity on the Keeler-Allston line.

Essential Fish Habitat: A review of the NOAA database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources will be followed for EFH. A determination of "No Effect" was made for Essential Fish Habitat waters that occur in the project area.

Cultural Resources: Vegetation management activities are not anticipated to affect cultural resources. If archaeological material is discovered during the course of vegetation management activities, all work will be halted and the BPA environmental and archaeological representatives will be notified.

Monitoring: The right-of-way identified in the checklist will be inspected after completion of the work to determine if all hazard trees have been removed from these areas. Re-seeding using a native seed mix will occur as necessary to stabilize travel surfaces. Follow-up monitoring for vegetation control will occur in the fall of 2006 and the summer of 2007.

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/ Andrew B. Chang
 Andrew B. Chang
 Biological Scientist - Environmental

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

DATE: 05/05/06

Attachment:
 Vegetation Management Checklist
 Effects Determination