

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: September 27, 2006

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-318 Southern Coastal Transmission Line Project #: **V-E-06/07**)

TO: Ben Tilley
Natural Resource Specialist – TFE/Alvey

Proposed Action: BPA proposes to conduct vegetation management and access road maintenance activities along the entire Right-of-Way corridor and associated access roads.

Location: The transmission line is located in Coos and Curry Counties, Oregon. The project is in BPA's Eugene Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to clear unwanted vegetation along the transmission line corridor which includes Fairview-Bandon #1; Fairview-Bandon #2; Norway Tap #1; Bandon-Rogue #1; Fairview-Rogue #1; Langlois Tap #1; and Rogue-Gold Beach #1 and #2. In addition, BPA proposes to conduct limited rocking and grading of access roads associated with this corridor

BPA plans 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.) BPA's overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation.

All work will be accomplished by selective vegetation control methods (except for access roads and tower sites) to ensure that there is little potential harm to non-target vegetation and to low-growing plants. The work will provide system reliability. Debris will be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris will be scattered along the ROW.

Analysis: A Vegetation Management Plan was developed for this Corridor that incorporates the elements of the checklist requirements identified in the Bonneville Power Administration's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Management Plan (VMP).

Water Resources: Waterbodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in the Water Resources Section of the VMP. As conservation and avoidance measures, only spot and basal treatment with Garlon 3A (Triclorpyr TEA) will be used within a 100-foot buffer up to the water's edge of any stream containing threatened or endangered species. Trees in riparian zones will be selectively cut. No ground disturbing vegetation management methods will be implemented thus eliminating the risk for soil erosion and sedimentation near the streams.

No drinking water, irrigation wells, or water supplies were identified along the rights of way for this project.

Threatened and Endangered Species: 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 for federally listed, proposed and candidate species potentially occurring within the project boundaries from the United States Fish and Wildlife Service (USFWS) (Reference # 63EEA39D839B7F55882571630076E06F). Based on the ESA review conducted, BPA made a determination that the project may effect, but is not likely to adversely effect the Western Lily (*Lilium occidentale*). BPA entered into informal consultation with the USFWS and subsequently received concurrence on the determination of effects on September 18, 2006 (USFWS Log # 1-15-06-I-0214). The proposed actions are not likely to cause adverse impacts to the lily because harm and/or mortality of individual plants and degradation of lily suitable habitat by project actions will be minimized to the extent possible by the following conservation measures:

- No debris will be piled in suitable habitat. Slash will not restrict or prohibit germination and growth of lily plants.
- No activity will be conducted in lily suitable habitat during the growing period (March 2 to August 30). Plants will be dormant during maintenance activities and thus trampling and herbicide usage will not impact the plants and would generally enhance growing conditions through removal of competitive vegetation.
- Soil disturbance will not occur in lily habitat other than in existing – previously disturbed access routes where lilies do not occur.
- Vehicles will be washed before entering lily habitat along the transmission line corridor and after driving equipment off-road. This measure will reduce spread of noxious weeds.
- Soil compaction will be minimized through the use of light impact rubber-tired vehicles and limiting off-road maintenance (mowing) to selective areas of dense overgrowth.
- The anticipated indirect impacts to the western lily as a result of project activities are positive and long-term. Suppression and spread of non-native vegetation and competitive tall-growing woody vegetation will maintain an early seral stage vegetation regime that is beneficial to the western lily.

BPA also conducted a review of species under the jurisdiction of NOAA Fisheries. A determination of “No Effect” was made for all ESA listed species under NOAA jurisdiction.

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: No cultural resources are known for the project area. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the BPA Environmental Specialist, and the BPA archeologist will be contacted.

Re-Vegetation: Native grasses are present on the entire right-of-way and are expected to naturally seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads.

Monitoring: The entire project will be inspected during the work period. Additionally, monitoring for the follow-up treatment will be conducted once each year.

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. Therefore, no further NEPA documentation is required.

/s/ James R. Meyer (for)
Elaine S. Stratton
Environmental Protection Specialist

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

DATE: 9-27-06

Attachment:
Vegetation Management Plan
Effects Determination
Concurrence Letter