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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: FEB 2 6 2009

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-393-Multiple Transmission Line Rights-of-Way)
Project #: PP&A 1222

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

Proposed Action: Vegetation Management along multiple rights-of-way.

Location: The projects are located in Umatilla County, Oregon and Garfield, Benton, Franklin and Walla Walla Counties, Washington in the Tri Cities District as shown in the table below.

County, State	Line	From Tower	To Tower
Umatilla, Oregon	McNary-Roundup	34/5	34/6
Umatilla, Oregon	McNary-Roundup	36/7	36/8
Garfield, Washington	Little Goose-Lower Granite	16/3	16/4
Garfield, Washington	Little Goose-Lower Granite	27/3	28/1
Benton, Washington	Franklin-Badger Canyon #2	15/5	Badger Canyon Sub
Benton, Washington	Badger Canyon-Reata	Badger Canyon Sub	1/4
Franklin, Washington	Franklin-Walla Walla	6/1	6/2
Walla Walla, Washington	Walla Walla-Pendleton	2/7	2/8
Walla Walla, Washington	Franklin-Walla Walla	32/6	32/7
Walla Walla, Washington	Franklin-Walla Walla	33/5	35/2

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: 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. Vegetation that will grow tall will be selectively eliminated before it reaches a height or density to begin competing with low-growing species. Desirable low-growing plants will not be disturbed. Cut-stump or follow-up herbicide treatments on re-sprouting type species will be carried out to ensure that the roots are killed.

The width of the managed ROW easement in the work areas varies from 50 feet to 257.5 feet. All work will be accomplished by selective and non-selective vegetation control methods to assure that there is little potential harm to non-target vegetation and to low-growing plants. All work will be in accordance with the National Electrical Safety Code and BPA standards. The work will provide system reliability.

Analysis: A Vegetation Management Checklist was completed for the project corridor in accordance with the requirements identified in the BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285).
The subject corridors traverse public, private and Federal (Corps of Engineers) land.

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

Water Resources: A portion of the work area is dominated by wetlands and riparian areas and is located in a backwater area of the Snake River behind Little Goose Dam at the Central Ferry Bridge Crossing. Deadman Creek flows into the backwater at this point. Vegetation removal will be accomplished using a rubber tired mower having an extended arm with a brush cutter. Because the equipment will be able to stay out of the riparian area, no ground disturbing vegetation management methods will be implemented, minimizing the risk for soil erosion and sedimentation into the adjacent water bodies. Work will also be conducted near other riparian areas shown on the associated checklist in the manner described above. If necessary, the following herbicide buffers will be implemented for the project. Outside a 100 foot buffer from any T&E listed stream, ponds or wetlands or a 35-foot buffer from any other stream, pond or wetland, Triclopyr BEE (common formulations. Garlon 4 and Tahoe 4E) may be applied. Formulations of Triclopry TEA (common formulations Garlon 3A and Tahoe 3A) may be applied for spot or localized applications up to one yard of the waters edge for T&E listed streams, ponds or wetlands or up to the waters edge of any other water body or sensitive habitat. For any initial or follow up broadcast treatment with Triclopry TEA on sprouting brush, a 35 foot buffer will be maintained from any stream, pond, wetland of sensitive areas. Other approved herbicides and buffers as reference in the project vegetation management checklist may also be used.

No other drinking water wells, irrigation wells or water supplies were identified along the right-of-way. However, if present, work shall be performed as outlined in the checklist.

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) web link on February 6, 2009 identifying threatened and endangered species potentially occurring in the work areas. A determination of "No Effect" was made for all ESA listed species, designated critical habitat and Essential Fish Habitat for the project. Some T&E species are located near some areas of the work, but by following the guidelines in the checklist, this work will also have "No Effect" on any ESA listed species, designated critical habitat or Essential Fish Habitat that may be located in the general vicinity of the work.

Cultural Resources: The vegetation removal will not affect cultural and historic resources. No soil disturbance will occur along the project corridor during this work. If any cultural resources are found during the work, work will cease until a BPA archeologist has been notified and direction given.

Re-Vegetation: It is anticipated that the present native vegetation will quickly resprout and revegetate the affected area, so no reseeding will be necessary.

Monitoring: The entire project will be inspected during the work period. Additionally the line will be routinely patrolled 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.

Ken Hutchinson
Environmental Scientist

CONCUR: Katherine S. Pierce DATE: January 26, 2009
Katherine S. Pierce
NEPA Compliance Officer

References:
Vegetation Checklist
Effects Determination

cc:
K. Pierce– KEC-4
J. Meyer – KEP-4
P. Smith – KEP-4
J. Sharpe – KEPR-4
K. Hutchinson – KEPR/Walla Walla
H. Adams – LC-7
L. Pitzer– TFP/Pasco
G. Wilfong – TFPF/Pasco
Official File – KEP (EQ-14)

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