

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: OCT 27 2009

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-405-Keeler-Allston No. 1, 1/1 to 43/5). **PP&A Project #: 1404**

to: Ed Tompkins
Natural Resource Specialist – TFBV-LMT

Proposed Action: Perform vegetation management along the entire 43 mile Keeler-Allston No. 1, 500-kV transmission line corridor

Location: The project line is located in Columbia County, Washington and Multnomah County, Oregon, and is located in Bonneville Power Administration's Olympia Region. This proposal covers the right-of-way (ROW) width of 150 feet along 43 miles of transmission line.

Proposed by: BPA

Description of the Proposal: BPA proposes to remove tall growing and noxious vegetation from the ROW 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 reclaimed trees would be removed and/or controlled inside the ROW using manual, mechanical and herbicide treatments. All work would be in accordance with the National Electrical Safety Code and BPA standards. The work would provide system reliability.

The overall long-term goal is to develop low-growing plant communities within the ROW. Limited noxious weed control would also be conducted along the ROW.

Analysis: A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA'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 Control Prescription & Checklist.

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) would 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 would be selectively cut to include only those

that are within 50 feet of the conductor at maximum sag. Trees would be topped where shrubs are not present to provide shade and a silt buffer. Shrubs would 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 would 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 would have any effects on any listed species. A species list was reviewed from the United States Fish and Wildlife Service (USFWS) on October 19, 2009 to identify T&E species and critical habitat units that might exist in the project area. This review also covered species under the jurisdiction of National Oceanic Atmospheric Administration (NOAA) Fisheries.

T&E Species: Populations of Winter steelhead and Coho salmon listed as “threatened” are present in waters along the proposed project ROW. Measures identified for water resources would be followed to avoid impacting listed fish species.

Nelson’s checker-mallow is a federally listed, threatened plant species and occurs within the ROW of the proposed project. With the use of best management practices (BMPs) listed below, which are consistent with the most current guidance from USFWS, BPA has determined the proposed project would be a “No Effect” on Nelson’s checker-mallow.

Best Management Practices:

- 1) All vegetation management would be done on foot only; no heavy machinery would be operated.
- 2) Trees that are felled would be cut, lopped and scattered.
- 3) Herbicidal treatments would be limited to stump treatment only. Broadcast application would not be used.
- 4) Vegetation management would conclude prior to March 2010 in order to avoid the growing season.

No other listed species were found to occur in the area. A determination of “No Effect” was made for listed T&E species that occur in the project area.

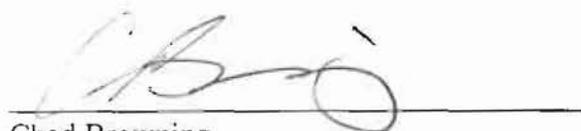
Critical Habitat: While critical habitat is present within Columbia County, Oregon, critical habitat does not occur within the proposed ROW access road maintenance.

Essential Fish Habitat: A review of the NOAA database identified Essential Fish Habitat (EFH) occurring in the project area for Chinook and Coho salmon. Measures identified for water resources would be followed to avoid impacting EFH. A determination of “No Effect” was made for EFH 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 would be halted and BPA’s environmental and archaeological representatives would be notified.

Monitoring: The ROW identified in the checklist would be inspected after completion of the work to determine if all hazard trees have been removed from these areas. Reseeding using a native seed mix would occur as necessary to stabilize travel surfaces. Follow-up monitoring for vegetation control would occur in the summer of 2010.

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 Record of Decision, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. This Supplemental Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.



Chad Browning
Biological Scientist (Environmental)

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

DATE: October 27, 2009

Attachment:
Vegetation Management Checklist
Effects Determination

cc:

K. Pierce – KEC-4

J. Sharpe – KEPR-4

G. Tippetts – KEPR/Olympia

Official File – (EQ-14)

Chrowning:cb:3928:10/26/2009 (KEP-KEPR-4-W:\EP\2010 FILES\EQ-14-Supplemental Analysis\FEIS-0285-SA-405-Keeler-Alston #1.doc)