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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: May 20, 2014

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement analysis for the BPA Transmission System Vegetation Management Program FEIS(DOE/EIS-285/SA-554)

TO: Michael O'Connell
Natural Resource Specialist – TFBV-CHEMAWA

Proposed Action: Vegetation management along the John Day-Marion No. 1 and Ashe-Marion No. 2 transmission line corridors

Pollution Prevention and Abatement Project No: 2894

Location: Marion County, Oregon; Bonneville Power Administration (BPA) Chemawa District

Proposed by: BPA

Description of the Proposal: BPA proposes to remove select vegetation along and adjacent to the transmission line corridor and access roads summarized by the following table:

Corridor	Tower Range	ROW width	Length of Corridor per County	Access Roads	Structures Treated	Danger Trees Removed
John Day-Marion No. 1 500-kV	75/4 to 128/3	300'	Marion, 26mi	32.2 mi	391	359
Ashe-Marion No. 2 500-kV	224/1 to 227/4	125'	Marion, 4 mi	2.2 mi	20	95

The proposed project area measures 125 to 300 feet in width and is 34.4 miles long, 6.2 miles of which are in the Willamette Valley. The remaining 24 miles are third growth or younger forest. The corridors cross state, rural residential, agricultural lands and federal BLM administered lands. Landowner notification has or will be sent, including letters to the appropriate BLM and state offices.

In order to comply with Western Electricity Coordinating Council (WECC) standards, BPA proposes to remove 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). The overall goal of BPA is to establish low-growing plant communities along the ROW to control the development of potentially threatening vegetation.

BPA would cut or treat vegetation around 411 transmission line structures and on 34.4 miles of access roads. In addition, approximately 454 danger trees along the edge of the three lines would be removed; a removal frequency of 15 trees per lineal mile of right-of-way (ROW).

All vegetation control methods including selective cutting, mowing, and herbicide treatments are consistent with the methods approved in BPA's Transmission System Vegetation Management Program EIS (DOE/EIS-0285, May 2000) and Record of Decision (August 23, 2000). Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All on-site debris would be scattered along the ROW or hauled off site, if necessary.

Analysis: A site-specific Vegetation Control Prescription & Checklist was developed by the BPA NRS for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program EIS and Record of Decision. The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

Water Resources: There are relatively few water bodies (streams, rivers, lakes, wetlands) occurring in the project area and the few that exist are noted in the Vegetation Control Prescription and evaluated in the Effects Determination. There are five listed species of chub or sucker in two of the counties, but they are found only in specific locations, and those locations are not anywhere near the proposed vegetation management activities. To avoid adverse impacts to aquatic species such as steelhead or bull trout, only spot and localized 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. To avoid water temperature changes, trees in riparian zones would be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag; other trees would be left in place or topped to preserve shade. Shrubs that are less than 10-feet-high would not be cut where ground to conductor clearance allows. No ground disturbing vegetation management methods would be implemented thus eliminating the risk for soil erosion and sedimentation near the streams. Private water wells/springs were identified along the ROW. No herbicide application would occur within a 50 foot radius of the wellhead/spring (164 feet when using herbicides with ground/surface water advisory). Locations are identified on the Vegetation Control Prescription.

Threatened and Endangered (T&E) Species: There are no incidences of avian or terrestrial listed T&E species within one mile of the project areas. Pursuant to its obligations under the Endangered Species Act (ESA), BPA has made a determination of whether its proposed project would have any effects on any listed species. Species lists were obtained for federally listed, proposed and candidate species potentially occurring within the project boundaries from the United States Fish and Wildlife Service (USFWS). Based on the ESA review conducted and project conservation measures, BPA determines that the project would have "No Effect" for any of the ESA species under the County general list under USFWS jurisdiction. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries). A determination of "No Effect" was made for all ESA listed species under the jurisdiction of NOAA Fisheries with the implementation of project conservation measures including measures listed in the Water Resources section above.

Additionally, eagle nest proximity to the work areas was assessed, and historical incidences were not within one mile of the project area. There should be no adverse impacts on eagle nesting.

Essential Fish Habitat: A review of the NOAA Fisheries database identified Essential Fish Habitat (EFH) present in the project area. Measures identified for water resources would protect EFH from adverse impact. Based on project conservation measures, it was determined that the project would not adversely affect EFH.

Cultural Resources: Ground disturbing activities are not within the scope of the project. If a site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist and BPA Archeology would be contacted.

Re-Vegetation: Native grasses and low-growing shrubs are present on the ROW and are expected to naturally seed into the areas that would have lightly disturbed soil.

Monitoring: The entire project would be inspected during the work period, spring 2014 to fall 2014. A follow-up treatment would occur 6-12 months after the initial treatment. Additional monitoring for follow-up treatment would be conducted as necessary. A diary of inspection results would be used to document formal inspections and will be filed with the contracting officer.

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/ Andrew B. Chang
Andrew B. Chang
Biological Scientist

CONCUR: */s/ Katherine S. Pierce* DATE: *May 20, 2014*
Katherine S. Pierce
NEPA Compliance Officer

Attachments:
Vegetation Management Prescription
Effects Determination
Vicinity Aerial photo