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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: January 6, 2015

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the BPA Transmission System Vegetation Management Program FEIS(DOE/EIS-285/SA-573)

TO: Jacob Marti
Natural Resource Specialist – TFBV-The Dalles

Proposed Action: Vegetation management on portions of the Grizzly-Captain Jack, Jones Canyon-Santiam, and Brasada-Harney transmission lines

Pollution Prevention and Abatement Project No: 3055

Location: Deschutes, Harney, Klamath, Lake, and Wasco counties, Oregon; Bonneville Power Administration (BPA) Redmond District

Proposed by: BPA

Description of the Proposal: BPA proposes to remove select vegetation along and adjacent to the transmission line right-of-way (ROW) corridors and access roads summarized below:

Transmission Line Corridor	Tower Range	ROW width	ROW length and County	Access Roads	Towers Treated	Danger Trees
Grizzly-Captain Jack 500-kV	104/3 to Capt. Jack Sub (175/3)	150'-200'	Klamath- 20 mi Lake- 50-mi	5.2 mi	324	2
Jones Canyon-Santiam 230-kV	71/3 to 102/3	125' – 300'	Wasco – 31 mi	1.5 mi	282	15
Brasada-Harney 115-kV	56/3 to Harney Sub (113/9)	100'	Deschutes - 14 mi Lake – 3 mi Harney – 41 mi	29 mi	432	0

The proposed project corridors range from 100- to 300-feet wide and total about 160 miles in length. The ROW corridors cross through a combination of arid inland sagebrush and juniper, and dry ponderosa forest. The project corridors traverse county, rural residential, agricultural, Confederated Tribes of Warm Springs Reservation, and federal BLM and USFS administered lands. Landowner notification has or will be sent, including letters to the appropriate tribal, BLM, and USFS district 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 along select portions of a total of approximately 160 miles of transmission line ROW. In addition, a minimum of 17 danger trees along the edge of the corridors would be removed.

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 Environmental Impact Statement (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 FEIS and ROD. The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

Water Resources: The project corridors cross very few waterbodies (streams, rivers, lakes, wetlands). Potentially sensitive crossings are noted in the Vegetation Control Prescriptions and evaluated in the Effects Determination. To avoid adverse impacts to aquatic species such as 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 excavation or ground clearing vegetation management methods would be implemented, minimizing the risk for soil erosion and sedimentation near the streams.

Threatened and Endangered Species: There are no known incidences of avian or terrestrial listed T&E species within 5-miles of the project corridors. The project corridor spans three rivers and streams with the potential of T&E fish species present. 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.

Essential Fish Habitat: A review of the NOAA Fisheries database did not identify any Essential Fish Habitat (EFH) present in the project area. However, measures identified for water resources would protect EFH from adverse impact if it was present. Based on review and 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 lead and a BPA archaeologist would be notified immediately.

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 2015 to fall 2015. 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/ Makary Hutson
Makary A. Hutson
Biological/Environmental Scientist

CONCUR: */s/ Katherine S. Pierce* DATE: *January 6, 2015*
Katherine S. Pierce
NEPA Compliance Officer

References:
Vegetation Management Prescription
Effects Determination