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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: December 10, 2015

REPLY TO ATTN OF: KEP-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-611)

TO: Jennifer Knoellinger Natural Resource Specialist – TFBV-CHEMAWA
Carlos Mora Natural Resource Specialist – TFBV-ALVEY

Proposed Action: Vegetation management along the Santiam-Alvey No. 1 and No. 2 corridor

Pollution Prevention and Abatement Project No.: 3279 & 3280

Location: Marion, Linn, and Lane counties, Oregon

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor and access roads of the 230-kilovolt (kV) Santiam-Alvey No. 1 and No. 2 transmission line corridor from the Santiam Substation to Alvey Substation. Other lines that are present within the corridor are the Santiam-Albany No. 1 from Santiam Substation to 12/5, the Santiam-Toledo No. 1 from Santiam Substation to 6/2, the Albany-Lebanon No. 1 from structure 17/2 to Lebanon Substation, and the Mt. Vernon Tap to Lookout Point-Alvey #2 from structure 1/1 to Mt. Vernon Substation. The right-of-way (ROW) corridor in the proposed project area varies from 250 to 450 feet in width and crosses approximately 65 miles of terrain through commercial forestry, agricultural, and rural residential lands, as well as lands managed by the Bureau of Land Management (Salem & Eugene Districts) and Lane County Parks (Buford Park/Mt. Pisgah).

Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated.

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

A combination of selective and nonselective vegetation control methods would be used to perform the work. All methods including selective cutting, mowing, and herbicide treatments are

consistent with the methods approved in BPA's Transmission System Vegetation Management Program EIS. 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. Approximately 1041 acres of ROW, and 24 miles of access road would be initially treated in fall/winter of 2015. A follow-up treatment of re-sprouting target vegetation would be conducted in the spring/summer of 2016. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove up to 140 trees in, or adjacent to, the ROW. Other tree clearing activities would include side-limbing 935 trees. Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All onsite debris would be scattered 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, May 2000) and Record of Decision (August 23, 2000). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. As conservation and avoidance measures, 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. 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 preserved 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. For location information, see the Vegetation Control Prescription.

Threatened and Endangered Species: 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. 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). Based on the ESA review conducted, BPA made a determination that the project would have "No Effect" for all ESA listed species 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 NOAA Fisheries' jurisdiction, with the implementation of the conservation measures in Water Resources section above.

Essential Fish Habitat: A review of the NOAA Fisheries database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources would be followed for EFH. A determination of "No Effect" was made for EFH 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 would be stopped in the vicinity and the BPA Environmental Specialist, and the BPA Archeologist would be contacted.

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

Monitoring: The entire project would be inspected during the work period. A follow-up treatment would occur 3-4 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. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

Benjamin Tilley
Natural Resource Specialist

CONCUR: _____ DATE: 12/10/2015
Stacy Mason
NEPA Compliance Officer

References:
Vegetation Management Prescription and Checklist
Effects Determination