

# memorandum

DATE: February 25, 2016

REPLY TO  
ATTN OF: EP-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-615)

TO: Jennifer Knoellinger  
Natural Resource Specialist – TFBV-CHEMAWA

**Proposed Action:** Vegetation management along the Big Eddy-Chemawa No. 1 and Oregon City #2 corridors

**Pollution Prevention and Abatement Project No.:** 3,288

**Location:** Clackamas and Marion counties, Oregon: Bonneville Power Administration (BPA) Salem District.

**Proposed by:** BPA

**Description of the Proposal:** BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor, and access roads along the 230-kilovolt Big Eddy-Chemawa No. 1 transmission line corridor from tower 93/2 to Chemawa Substation and the entire length of the 115-kilovolt Oregon City-Chemawa #2 transmission line corridor. The Big Eddy-Chemawa No. 1 right-of-way (ROW) corridor in the proposed project area measures 125 feet in width, while the Oregon City-Chemawa #2 right-of-way (ROW) corridor measures 100 feet in width, and both cross approximately 25 miles of terrain through rural residential and agricultural lands.

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 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 that may include hand cutting and herbicidal treatment would be used to perform the work. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Transmission System Vegetation Management Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000), to ensure that the roots are killed preventing new

sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. Approximately 148 acres of ROW, 292 structure sites, and 1 mile of access road would be initially treated in the winter of 2016. In addition, BPA proposes to side-limb up to 175 trees and remove 192 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 229 acres of ROW by fall of 2016; however, additional vegetation management may be necessary in subsequent years in discrete areas of noxious weeds, or where BPA personnel discover vegetation that poses a hazard to the transmission line. All debris would be disposed of onsite, along the ROW, using on-site chip, lop and scatter, or mulching techniques.

**Analysis:** A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's EIS and Record of Decision (ROD) (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.

**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). No ESA-listed Pacific salmon species are found in the project area, thus a determination of "No Effect" was made for all ESA listed species under NOAA Fisheries' jurisdiction.

**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. Based on project conservation measures, it was determined that the project would not adversely affect EFH.

**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, winter 2016. A follow-up treatment would occur approximately one year after the initial treatment. Additional monitoring and follow-up treatments 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.



for Benjamin J. Tilley  
Natural Resource Specialist



CONCUR: Stacy Mason  
NEPA Compliance Officer

DATE: February 25, 2016

References:  
Vegetation Management Prescription and Checklist  
Effects Determination