memorandum

DATE: September 26, 2017

Bonneville Power Administration

REPLY TO ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-668 Big Eddy-Ostrander No. 1)

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

Proposed Action: Vegetation Management along the Big Eddy-Ostrander No. 1 Corridor

Location: Wasco County and Hood River County, Oregon

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor, and access roads of the 500 kV Big Eddy-Ostrander No. 1 transmission line from Big Eddy Substation to Structure 39/3. Other lines that are present within the corridor are the 230 kV Big Eddy-Troutdale No. 1, 230 kV Big Eddy-McLaughlin No. 1 and No. 2, and 230 kV Big Eddy-Chemawa No. 1. The right-of-way (ROW) corridor in the proposed project area measures from 500 to 1,000 feet in width and crosses approximately 39 miles of terrain through rural residential, private forest, agricultural, the Mount Hood National Forest, public, and private 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. Coordination with the Forest Service occurred in May of 2017.

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 rights-of-way (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 Vegetation Management EIS, to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. The proposed project would begin in fall of 2017 and be completed by fall of 2018. To prevent trees from coming into contact with the energized

conductors, BPA proposes to remove up to 27 trees in, or adjacent to, the ROW. Debris would be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

<u>Analysis</u>: 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.

<u>Water Resources</u>: 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 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. For location information, see the Vegetation Control Prescription.

<u>Threatened and Endangered Species</u>: 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 (NMFS). A determination of "No Effect" was made for all ESA-listed species under NMFS' jurisdiction, with the implementation of the conservation measures in the Water Resources section above.

<u>Essential Fish Habitat</u>: A review of the NMFS 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 Essential Fish Habitat waters that occur in the project area.

<u>Cultural Resources</u>: 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.

<u>Re-Vegetation</u>: 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.

<u>Monitoring</u>: The entire project would be inspected during the work period from fall 2017 to fall 2018. Additional monitoring for follow-up treatment would be conducted as necessary.

A vendor scorecard 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/ <u>Michelle Colletti</u> Michelle Colletti Physical Scientist – EPR-4

DATE: <u>September 26, 2017</u>

CONCUR: /s/ <u>Sarah T. Biegel</u> Sarah T. Biegel NEPA Compliance Officer

References: Vegetation Management Prescription and Checklist Effects Determination