

memorandum

DATE: February 9, 2018

REPLY TO
ATTN OF: EPR/Olympia

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285/SA 682)

TO: Chris Morse
Natural Resource Specialist – TFBV-ROSS MHQA

Proposed Action: Vegetation management along the Paul-Allston transmission lines corridor.

Pollution Prevention and Abatement Project No.: 3870

Location: Columbia County Oregon, in Bonneville Power Administration's (BPA) Longview Maintenance District.

Proposed by: BPA

Description of the Proposal: BPA proposes to control vegetation along the transmission lines span of the Paul-Allston transmission line corridor on Lord Island. The right-of-way (ROW) corridor measures 900 feet in width and encompasses 56 acres. The underlying land is owned and managed by the Oregon dept. of state lands.

The project area consists of the property within and adjacent to the ROW easement boundary of the Paul-Allston transmission lines corridor. Several segments of other transmission lines listed on the following table are located within the right of way corridor.

Transmission Line	Segment	Transmission Line	Segment
Paul-Allston No 2	47/1 to 47/2	Longview-Allston No 3	3/1 to 3/2
Longview-Allston No 1	3/1 to 3/2	Longview-Allston No 4	3/1 to 3/2
Longview-Allston No 2	3/1 to 3/2	Napavine-Allston No 1	37/1 to 37/2

In order to comply with Western Electricity Coordinating Council standards and to help provide system reliability, 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 vegetation control methods will be used to perform the work. Management methods including selective cutting of identified trees and herbicide treatments, are consistent with the methods approved in the Vegetation Management Program, Transmission System Vegetation Management Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000 and Record of Decision (ROD) (August 23, 2000). Herbicides would be selectively applied by spot stump treatment using chemicals consistent with the EIS.

To prevent trees from coming into contact with the energized conductors, BPA proposes to remove 113 trees in, or adjacent to, the ROW. Other tree clearing activities would include side-limbing 40-50 trees along the edge of the ROW. Debris would be left in place and or disposed of using on-site chip, lop and scatter techniques.

Analysis: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (DOE/EIS-0285, May 2000) and ROD. A Vegetation Management Control Prescription and Checklist were completed for this project in accordance with the requirements identified in BPA's Transmission System Vegetation Management Program FEIS and ROD. The subject corridor traverses public land in Columbia County Oregon managed by the Oregon dept. of state lands (DSL). BPA staff has been in contact with DSL in regard to the planning and implementation of the project. No tribal lands are involved. 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 is located on Lord Island, Oregon within the Columbia River. All trees requiring management under this project are considered to be in the riparian zone. Trees would be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag. No ground disturbing vegetation management methods would be implemented thus eliminating the risk for soil erosion and sedimentation. No in-water work would be conducted with the proposed project. Where herbicide applications are prescribed, only spot treatment with Garlon 3A (Triclopyr TEA) would be used.

Wildlife, Migratory Birds: Several of the trees identified for removal are within a great blue heron rookery and three trees have nests in them. BPA intends to remove the trees/nests during the time of year when they are un-occupied under the authority of the migratory bird special purpose permit-electric. The permit, number: MB31739C-0 was issued to BPA on April, 4th 2017 from the United States Fish and Wildlife service and authorizes take of migratory species.

Threatened and Endangered Species/Essential Fish Habitat: Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. A species list from the United States Fish and Wildlife Service (USFWS) for the proposed project area was reviewed on February 1st 2018. The lists identify Threatened and Endangered species and critical habitat units potentially occurring in the project area. In addition, a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration (NOAA) Fisheries was conducted. A determination of "No Effect" was made for all ESA listed species and designated critical habitat for the project. A determination of "Not likely to adversely affect" was made for Essential Fish Habitat waters that occur in the project area.

Cultural Resources: No ground disturbing activities are planned for this project that could potentially affect unknown cultural resources. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the appropriate tribe, the BPA Environmental Specialist and the BPA archeologist will be contacted.

Monitoring: The entire project will be inspected during the work period. Additionally, the line will be patrolled annually after treatment to monitor the effectiveness of the treatment and any issues associated with the project.

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.

/s/ Philip Smith for
Greg P. Tippetts
Physical Scientist (Environmental)

CONCUR: /s/ Stacy L. Mason DATE: February 9, 2018
Stacy L. Mason
NEPA Compliance Officer

Attachments:
Vegetation Control Prescription & Checklist
Effects Determination for Threatened and Endangered Species and Essential Fish Habitat