

memorandum

DATE: July 19, 2012

REPLY TO
ATTN OF: KEP-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-473-Hills Creek-Lookout Point #1, Lookout Point-Alvey #1 and #2, and Dexter Tap Transmission Line Corridors)
Project No. PP&A # 2300

TO: Carlos Mora
Natural Resource Specialist – TFBV/Alvey

Proposed Action: Vegetation management and danger tree removal along the Hills Creek-Lookout Point #1 115-kV, the Lookout Point-Alvey #1 and #2 115-kV, and the Dexter Tap 115-kV transmission line corridor rights-of-way (ROW) from Hills Creek Substation to Alvey Substation.

Location: Lane County, Oregon, within the Alvey District.

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action: BPA proposes to remove tall-growing and noxious vegetation from the entire length (43 miles) and width (100-150 feet) of the ROW, structure sites, and access roads that can potentially interfere with the operation, maintenance, and reliability of the transmission lines. Danger trees have also been identified and will be removed at selected locations throughout these corridors.

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 work supports system reliability. The overall goal of BPA is to establish low-growing plant communities along the ROW to control the development of potentially threatening vegetation. The proposed project would begin as early as July 2012 and be completed by October 2012. A follow-up treatment may occur 6-12 months after the initial treatment. Vegetation management activities will repeat in similar fashion every four years on this corridor.

All vegetation management activities will be performed in accordance with the BPA Master Agreement Statement of Work for Vegetation Control on BPA Transmission Line Rights-Of-Way and in accordance with the specific details identified in the vegetation control prescription and checklist.

Target vegetation and reclaim trees will be removed and/or controlled inside the ROW using selective and nonselective methods that may include hand cutting, mowing, and herbicide treatments. Danger trees adjacent to the ROW will also be removed and/or controlled. Low-

growing vegetation will be protected along the ROW with the exception of brush at the base of transmission structures, tower sites, and within and along access roads. Debris disposal will be a combination of lop and scatter, mechanical chipping, and mulching.

The proposed action will allow safe and timely access to the transmission lines, which will help reduce outage times and maintain reliable power in the region. All work will be done in accordance with the National Electric Safety Code and BPA standards.

Analysis: A Vegetation Management Prescription and Checklist was completed for this project in accordance with the requirements identified by BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) (May 2000) and Record of Decision (ROD) (August 23, 2000). A previously completed SA was also considered: *DOE/EIS-0285/SA-180-September 16, 2003*.

Lands along the project corridors traverse private lands in Lane County, Oregon. Land along the corridor consists of private timber, residential, and agricultural lands, as well as United States Forest Service (Middle Fork Ranger district). No tribal lands are involved.

Section 3 of the checklist and the prescription identify the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures:

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in the Vegetation Management Prescription. No ground-disturbing management methods will be implemented, thus minimizing the risk for soil erosion and sedimentation near water bodies. Trees and brush in riparian zones will be selectively cut to include only those that are within 50 feet of the transmission conductor at maximum sag. Trees will be topped where shrubs are not present to provide shade and a silt buffer. No broadcast herbicide treatments are prescribed for this project. Cut stump herbicide application is prescribed for the initial treatment of the project. Follow-up spot and localized foliar treatments will occur on invasive species 6-12 months following initial treatments. As a conservation measure, only formulations of Triclopyr TEA (common formulations of Garlon 3A & Tahoe 3A) may be applied within a 100-foot buffer from all waterways for spot or localized applications up to one yard of the water's edge. Specific buffers are listed in the vegetation prescription for any Threatened and Endangered (T&E) listed water bodies. Irrigation and drinking water wells, listed in the prescription, or other domestic water supplies located on the ROW will have a 165-foot radius buffer excluding all herbicide use.

Threatened and Endangered Species/Essential Fish Habitat (EFH): Pursuant to its obligations under the Endangered Species Act (ESA), BPA has made a determination of whether its proposed project will have any effects on any listed species. A species list was reviewed from the United States Fish and Wildlife Service (USFWS) website on April 16, 2012, identifying T&E 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. By implementing conservation and avoidance measures detailed in the Effects Determination for this project, a determination of "No Effect" was made for all ESA-listed species and designated critical habitats that occur in the project area.

Essential Fish Habitat: A review of the NOAA database identified Pacific salmon EFH occurring in the project area. Measures identified for water resources will be followed for EFH. A determination of “No Effect” was made for EFH that occurs in the project area.

Cultural Resources: No known cultural and/or historic sites are known to occur within the ROW. There will be no ground-disturbing vegetation management methods implemented during this project. It has been determined that this project will not affect any cultural or historic resources. If a site or archaeological material is discovered during the course of vegetation management activities, all work will be stopped in the vicinity and the appropriate tribe(s), the BPA Environmental Specialist, and the BPA archaeologist will 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 ROW roads. Re-seeding using a native seed mix will occur as necessary to stabilize traveled surfaces. Germination success will be monitored during the next growing season and follow-up seeding will be performed as needed.

Monitoring: The entire project will be inspected daily during the work period to ensure all target vegetation has been managed. Follow-up monitoring for vegetation control will combine line maintenance patrols and next season’s site reviews to determine any follow-up actions that would be required. Additionally, the line will be patrolled annually by ground after the initial treatment to monitor the long-term effectiveness of the treatments.

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/ Stuart Hugill, for:
Benjamin Tilley
Natural Resource Specialist – KEP-Alvey

Concur: /s/ Katherine S. Pierce
Katherine S. Pierce
NEPA Compliance Officer

DATE: July 19, 2012

Attachment(s)
Vegetation Management Checklist
Effects Determination for T&E Species