

# memorandum

DATE: January 7, 2013

REPLY TO  
ATTN OF: KEP-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-495)

TO: Jacob Marti  
Project Manager – TFBV/DOB-1

**Proposed Action:** Vegetation Management along the John Day-Grizzly #1 Transmission Line Corridor

**Pollution Prevention and Abatement Project #:** 2465

**Location:** Wasco and Jefferson counties, Oregon: Bonneville Power Administration's (BPA) Redmond District

**Proposed by:** BPA

**Description of the Proposed Action:** BPA proposes to remove unwanted vegetation along and adjacent to the transmission line corridor and access roads of the John Day-Grizzly #1 and #2 500-kilovolt (kV) transmission line corridor from structure 35/5 to Grizzly Substation, including the Buckley-Grizzly #1 500-kV transmission line from structure 3/1 to Grizzly Substation. The ROW corridor in the proposed project area measures approximately 300 feet in width and traverses 51 miles of terrain through rural residential, private forest, agricultural, Bureau of Land Management (BLM), and United States Forest Service (USFS) lands. No tribal lands are involved.

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 in January 2013 and be completed by September 2013. The management scheme is repeated on a 6-year cycle.

A combination of selective and nonselective vegetation control methods would be used to perform the work. All methods including selective cutting, and mowing treatments are consistent with the methods approved in the Vegetation Management Program EIS. Debris would be disposed of using onsite chip, lop and scatter, or mowing techniques. All onsite debris would be scattered along the ROW.

**Analysis:** A Vegetation Management Prescription and Checklist was developed for this project that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) (May 2000) and Record of Decision (ROD) (August 23, 2000). 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 noted in the Vegetation Management Prescription. As conservation and avoidance measures, only spot and localized herbicide treatment with Garlon 3A (Triclopyr TEA) will be used within a 100-foot buffer up to the water's edge of any stream containing listed species and/or critical habitat. 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 ground disturbing vegetation management methods would be implemented thus eliminating the risk for soil erosion and sedimentation near the waterways. For location information, see the Vegetation Control Prescription.

**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 was reviewed from the United States Fish and Wildlife Service (USFWS) identifying federally listed, proposed, and candidate species and Critical Habitat Units potentially occurring in the project area. 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 (NOAA) Fisheries. A determination of "No Effect" was made for all ESA listed species under NOAA jurisdiction, with the implementation of the conservation measures in the Water Resources section above.

**Essential Fish Habitat:** A review of the NOAA Fisheries database identified no Essential Fish Habitat (EFH) waterways occurring in the project area. A determination of "No Effect" was made for EFH waters in relation to this project.

**Cultural Resources:** No cultural resources are known to exist within the project area. Vegetation management activities will have limited ground disturbance and are not anticipated to affect cultural resources that may be present. If archaeological material is discovered during the course of vegetation management activities, work would be stopped in the vicinity and the appropriate tribe(s), BPA Environmental Representative and a BPA archaeologist will be notified.

**Monitoring:** The entire project will be inspected daily during the work period, spring 2013 to winter 2013, 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. A diary of inspection results would be used to document formal inspections and will be filed with the contracting officer.

**Re-Vegetation:** 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.

**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

Concur: /s/ Stacy Mason  
Stacy Mason  
NEPA Compliance Officer

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