

memorandum

DATE: August 22, 2011

REPLY TO
ATTN OF: KEP-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA448 Pearl-Marion No. 1 Transmission Line Corridor)
Project No. PP&A # 2049

to: Clayton Tinsley
Project Manager – TFBV/Chemawa

Proposed Action: Vegetation management along the Pearl-Marion #1 500-kV transmission line corridor rights-of-way (ROW) from Pearl Substation to Marion Substation. The corridor includes 4.5 miles of the Ostrander-Pearl #1 and 3 miles of the Big Eddy-Chemawa #1 transmission line ROW. The corridor ranges from 150 to 562 feet in width and traverses approximately 44 miles of terrain.

Location: The project is located in Clackamas and Marion counties, Oregon, in Bonneville Power Administration's (BPA) Salem District. The project activities will be conducted on the rights-of-way and access roads on the Pearl-Marion #1 transmission line corridors.

Proposed by: BPA

Description of the Proposed Action: BPA proposes to remove tall-growing and noxious vegetation from the entire length (44 miles) and width of the ROW (150-562 feet), structure sites, and access roads that can potentially interfere with the operation, maintenance, and reliability of the transmission lines. Specific targets include: Douglas fir, oak, ash, hemlock, red alder, big leaf maple, wild cherry and cottonwood trees, as well as scotch broom and Himalayan blackberry weeds present in the ROW. 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. 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. Initial treatment will begin in February 2011 and continue through September 2011. Continuing vegetation management treatments will occur on a 5-year cycle.

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 the BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) (May 2000) and Record of Decision (ROD) (August 23, 2000).

Lands along the project corridors traverse private lands in Clackamas and Marion counties, Oregon. Land along the corridor consists of rural residential, private farmland, and land owned by the City of Wilsonville. 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. Outside the buffers for T&E listed water bodies, Triclopyr BEE (common formulations of Garlon 4 & Tahoe 4E) may be applied. 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.

T&E 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) on August 19, 2011, 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. A determination of "No Effect" was also made for Essential Fish Habitat waters that occur in the project area.

Cultural Resources: There are no known cultural resources occurring at or adjacent to the project area. 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.

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/ Joseph C. Sharpe, for:

Benjamin Tilley
Natural Resource Specialist

Concur: */s/ Katherine S. Pierce*

Katherine S. Pierce
NEPA Compliance Officer

DATE: *August 22, 2011*

Attachments:

Vegetation Management Checklist
Effects Determination for T&E Species