Supplement Analysis

for the

Transmission System Vegetation Management Program EIS (DOE/EA/EIS-0285/SA-876)

Pollution Prevention and Abatement Project Number: 5012
Natural Resource Specialist/Project Manager: Christopher Morse

Bonneville Power Administration
Department of Energy



Proposed Activities

Bonneville Power Administration (BPA) proposes to spray unwanted vegetation in and adjacent to the right-of-way (ROW) of high-voltage transmission lines and access roads in Clackamas and Hood River counties in Oregon. Specifically, BPA plans to conduct herbicide spraying activity in and adjacent to the Big Eddy-Chemawa corridor from 39/4 to 51/2. This treatment would start in 2024.

The corridors in the proposed project area range from approximately 250 – 400 ft. wide and cover approximately 12 miles of terrain through several land uses, including rural residential, private forest land, as well as land managed by the Bureau of Land Management (BLM) including the Northwest Oregon District, and the US Forest Service (USFS) including the Mount Hood National Forest.

BPA notified and solicited input from the Mt. Hood National Forest and the BLM. The Mt. Hood National Forest and the BLM expressed that there were no concerns with the proposed project. Letters, on-site meetings, emails, and phone calls would be used to notify private and public landowners approximately three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated. Any additional measures proposed by landowners or land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

Herbicides would be selectively applied using spot treatment (stump treatment) or localized treatments (basal treatment and/or low-volume foliar treatment). All herbicides and adjuvants would be chosen from a list of approved chemicals in BPA's Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 2000) and subsequent supplement analyses to the FEIS. The proposed activities include the treatment of up to 1,184 acres using localized herbicide applications. A follow-up treatment of re-sprouting target vegetation would be conducted as needed in subsequent years in discrete areas of noxious weeds.

Analysis

A noxious weed management statement of work was developed for this corridor that incorporated the requirements identified in BPA's Transmission System Vegetation Management Program FEIS 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 Weed Board Environmental Restrictions document.

Water Resources

Water bodies (streams, rivers, wetlands) occurring in the project area are noted in the Weed Board Environmental Restrictions document. 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. No ground-disturbing vegetation management methods would be implemented, thus eliminating the risk for soil erosion and sedimentation near the streams. Minikahda Creek was identified as a water source for a local rural residential community in spans 47/2 to 47/3. No pesticides would be sprayed in the span containing the water source. If an additional agricultural or drinking water source is found, no herbicide application would occur within a 50-foot radius of the wellhead, spring, or irrigation source (164 feet when using herbicides with ground/surface water advisory).

Endangered Species Act and Magnuson-Stevens Act

Pursuant to its obligations under the Endangered Species Act (ESA), BPA 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 and designated critical habitat under USFWS' jurisdiction.

BPA conducted a review of ESA-listed species, designated critical habitat, and Essential Fish Habitat (EFH) (as defined by the Magnuson-Stevens Act), under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). The proposed vegetation management activities are within the scope of activities and action area evaluated in the Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho (SLOPES PBO) (WCR-2014-1600, September 22, 2016). Streams in the project area with documented presence of ESA-listed fish, designated critical habitat for one or more species, and/or identified as EFH have been noted in the Weed Board Environmental Restrictions document. It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

<u>Cultural Resources</u>

The proposed vegetation management actions do not result in ground disturbance to the physical environment. The vegetation management actions were determined to not be actions that would typically have the potential to affect historic and/or cultural resources. 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 Archaeologist would be contacted.

Re-Vegetation

Existing naturalized grasses and woody shrubs are present on the entire ROW and are expected to naturally seed into the areas that would have lightly-disturbed soil predominantly located on the ROW roads.

Monitoring

The entire project would be inspected during the work period of Spring 2024 through Fall 2024. A follow-up treatment may occur after the initial treatment. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

Findings

BPA finds that the types of actions and the potential impacts related to the proposed activities have been examined, reviewed, and consulted upon and are similar to those analyzed in the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD. There are no substantial changes in the EIS's Proposed Action and no significant new circumstances or information relevant to environmental concerns bearing on the EIS's Proposed Action or its impacts within the meaning of 10 CFR § 1021.314(c)(1) and 40 CFR §1502.9(d). Therefore, no further NEPA analysis or documentation is required.

/s/ Zoe Wellschlager Zoe Wellschlager Physical Scientist

Concur:

/s/ <u>Sarah T. Biegel</u> Sarah T. Biegel

NEPA Compliance Officer Date: May 6, 2024