

# memorandum

DATE: December 30, 2011

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-455 Bandon-Rogue No. 1) PP&A Project #2178

TO: Stephen Duncan  
Forester – TERS-3

**Proposed Action:** Vegetation management activities along the entire right-of-way (ROW) corridors

**Location:** Coos and Curry counties, Oregon, in the Eugene District

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposal:** The project activities would be conducted along the 115-kV Bandon-Rogue No. 1 transmission line corridor from Bandon Substation to Rogue Substation. The 230-kV Fairview-Rogue is also present within the corridor. The ROW corridor in the proposed project area measures from 100 to 400 feet in width and crosses approximately 46 miles of terrain through fee-owned, rural residential, agricultural, public and private lands.

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 overall goal of BPA is to establish low-growing plant communities along the ROW to control the development of potentially threatening vegetation.

Selective cutting will be the primary method used to control tall-growing vegetation for this project and is consistent with the methods approved in BPA's Transmission System Vegetation Management Program EIS. Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All on-site debris would be scattered along the ROW.

**Analysis:** A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285, May 2000) 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 Vegetation Control Prescription & Checklist.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. Trees in riparian zones would be selectively cut to include only those that will grow into the minimum approach distances of the conductor at maximum sag. Within 50 feet of creeks, tall-growing conifers equal to or greater than 18-inches in diameter at breast height (DBH) would be topped, so long as the resulting snag would be greater than 20 feet tall. All shrubs and all herbaceous material that will not grow into the minimum approach distances of the conductor at maximum sag, excluding noxious weeds, would be left in place. Within 50 feet of creeks, trees that cannot be topped would be felled toward the creek, unless specified otherwise by the landowner. No ground disturbing vegetation management methods would be implemented thus eliminating the risk for

soil erosion and sedimentation near the streams. For location information, see the Vegetation Control Prescription.

Threatened and Endangered Species: Pursuant to its obligations under the Endangered Species Act (ESA), BPA has 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 under USFWS jurisdiction. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries). A determination of “No Effect” was made for all ESA listed species under NOAA Fisheries’ jurisdiction, with the implementation of the conservation measures in Water Resources section above.

Essential Fish Habitat: A review of the NOAA Fisheries database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources would be followed for EFH. A determination of “No Effect” was made for EFH waters that occur in the project area.

Cultural Resources: No cultural resources are known for the project area. 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 archeologist would be contacted.

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.

Monitoring: The entire project would be inspected during the work period of December 2011 to March 2012. Additional monitoring for follow-up treatment would be conducted as necessary. A diary of inspection results would be used to document formal inspections and will be filed with the contracting officer.

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. Therefore, no further NEPA documentation is required.

/s/Oden W. Jahn

Oden W. Jahn  
Environmental Scientist

CONCUR: /s/Rick Yarde  
Rick Yarde  
Acting NEPA Compliance Officer

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References:

Vegetation Management Prescription and Checklist  
Effects Determination