

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-817)

**Pollution Prevention and Abatement Project Number 4728**

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Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way of high-voltage transmission lines and access roads in King and Snohomish counties, WA, specifically the Snohomish-Bothell 1, SnoKing Tap to Echo Lake-Monroe 1, Mt. Si-Tanner 1, Monroe-Novelty Hill 1, Murray-Custer 1, Snohomish-Bothell 2, Snohomish-Murray 1, Snohomish-Beverly Park 4, Echo Lake-Monroe 1, Monroe-Custer 1, and Chief Joseph-Snohomish 3 transmission lines. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads along these transmission assets.

The corridor in the proposed project area measures approximately 100-500 feet wide and 150 miles long of terrain through rural residential as well as a small area of Washington Department of Natural Resources managed land.

Letters, on-site meetings, emails, and phone calls would be used to notify landowners (including Washington Department of Natural Resources) 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.

To comply with Western Electricity Coordinating Council 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 right-of-way (ROW) to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods would be used to perform the work, and may include hand cutting, mowing, herbicidal treatment, or a combination of those methods. To ensure that the roots are killed, prevent re-sprouts, and selectively manage vegetation that interferes with the operation and maintenance of transmission infrastructure, herbicides would be selectively applied using spot treatment (stump treatment) or localized treatments (basal treatment and/or low-volume foliar treatment). Broadcast applications of liquid herbicide would be used if, and where, appropriate. For worker safety and fire prevention, broad-spectrum (non-selective) residual herbicide

would be applied and immediately adjacent to switch platforms and selected transmission structures (primarily wood poles). 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.

Approximately 2,000 acres of ROW, 50 structure sites, and 10 miles of access road would be initially treated in winter 2022 through fall of 2023. In addition, BPA proposes to remove approximately 180 trees in, or adjacent to, the ROW, and to remove limbs from approximately 160 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted by fall of 2023. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle in discrete areas of noxious weeds, or where BPA personnel discover vegetation that poses a hazard to the transmission line. All debris would be disposed of onsite, along the ROW, using on-site chipping/mulching, or "cut, lop, and scatter" techniques.

### **Analysis**

A Vegetation Control Cut Sheet 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 Vegetation Control Cut Sheets.

#### **Water Resources**

Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Cut Sheets. 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. Trees in riparian zones would be selectively cut to include only those that would grow into the minimum approach distances of the conductor at maximum sag; other trees would be left in place or topped to preserve shade. Shrubs that are less than 10-feet-high would not be cut where ground to conductor clearance allows. No ground-disturbing vegetation management methods would be implemented, thus eliminating the risk for soil erosion and sedimentation near the streams. Where private water wells/springs or agricultural irrigation sources have been identified along the ROW and noted in the Vegetation Control Cut Sheets, 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. 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 as critical habitat for one or more species, and/or identified as Essential Fish Habitat (EFH) have been noted in the vegetation control prescription. 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.

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, except Oregon spotted frog (OSF). BPA made a determination that the proposed project would be “Likely to Adversely Affect” OSF. The USFWS concurred with this determination in a Biological Opinion dated 5/4/2018. USFWS confirmed on 6/8/2021 that no changes to the Biological Opinion were needed and that the proposed routine vegetation management could continue under the Biological Opinion. Impact avoidance and minimization measures, agreed upon between BPA and USFWS during consultation, are noted in the Vegetation Control Prescription and include:

- BPA would not mow or use mechanized equipment *in standing water* in OSF suitable habitat in identified potential habitat. BPA, therefore, could mow these areas any time of year when the ground is dry. “Standing water” is defined as water of any depth that is connected to wetlands, creeks, etc. This does not include isolated puddles and potholes. “OSF suitable habitat” is defined as ephemeral or permanent bodies of freshwater including natural or manmade ponds, springs, lakes, slow-moving streams, wetlands, pools, canals, or ditches. OSF suitable habitat occurs outside of the designated critical habitat boundaries. “OSF potential habitat” is a buffer around mapped aquatic features that indicates that suitable habitat could be present and occupied by OSF. OSF potential habitat was provided to BPA by USFWS in a shapefile, and is meant to inform those carrying out the proposed action that they should be looking for suitable habitat. OSF potential habitat occurs outside of the designated critical habitat boundaries.
- Vehicles, other than ATVs and UTVs, used to access the project area, would stay on established access roads and routes of travel.
- Spot and localized treatments (stump treatment, basal treatment, and/or low-volume foliar) would be used to minimize application to non-target plants.
- BPA-approved herbicides, Triclopyr TEA and BEE (Garlon 3A and Garlon 4, respectively), would be used within project areas with potential sensitive terrestrial species. Only Triclopyr TEA (Garlon 3A) would be used between the water’s edge and 100 feet of wetlands and waterbodies providing suitable OSF habitat (35 feet for non-sensitive wetlands and waterbodies). Herbicide application to standing water is prohibited.
- Herbicides would be mixed according to label instruction and applied by an individual certified through BPA’s pesticide applicator certification plan (BPA, 2000).
- All equipment that would be used off of existing roads and routes of travel would be cleaned prior to entering ROW to reduce the potential spread or introduction of noxious weeds or other exotic species.
- Except for inspections, all work occurring in standing water in potential habitat for OSF would occur between July 1 and October 15.
- If encroaching hazardous vegetation needing management is discovered within permanent waters that are known or assumed to provide habitat to OSF, the hazardous vegetation must be removed outside of the dry season (July 1 and October 15). BPA would contact USFWS to discuss methods and mitigations that would be implemented to remove the hazard.
- Except for inspections, no work would occur during or immediately after a major precipitation event (>0.50 inches).

- BPA would work with the USFWS to identify road segments in the right-of-way that are seasonally flooded, suitable for OSF, and where a limitation on road use would effectively reduce the potential for driving over OSF in all life stages. Those identified road segments would not be driven over when flooded unless on-foot access is not sufficient for meeting the need for inspection and maintenance.
- Prior to conducting in-water work in identified drainages for the Black River Watershed containing OSF, clothing or equipment or materials must be disinfected. (See *Disinfection Procedures*, below). These drainages include the following:
  - Woods Creek-Skykomish River
  - Quilceda Creek-Frontal Possession Sound

### Disinfection Procedures

Disinfection procedures must be implemented when entering or leaving the above-identified drainages. Disinfection must be performed regardless of where the clothing or equipment was last used, including adjacent drainages also containing OSF. By “in-water work” refers to when boots or other equipment enter standing water in potential habitat. This requirement does not apply to vehicles that remained on existing roads and routes of travel.

All personnel entering ponds and wetlands are required to follow disinfection techniques for the control of chytrid fungus (*Batrachochytrium dendrobatidis*), ranavirus, and other potentially unknown diseases or parasites. For this specific consultation covering BPA’s Monroe-Custer powerline easement, personnel must disinfect equipment prior to entering a water body in the following Black River watershed drainages. These drainage boundaries may change if new OSF occupied locations are discovered. Disinfection is not necessary between sites if sites are within the same drainage. If moving between drainages, disinfect equipment while at the site of exposure.

- All field equipment must be cleaned of organic matter (dirt, mud, vegetation). Equipment includes all materials that may have contact with the water body, including waders and boots. (A stiff scrub brush is very helpful.)
- All disinfection and rinsing must be done away from all water bodies.
- All field equipment must be disinfected with a 10% liquid chlorine bleach (be sure bleach has a 6% concentration of sodium hypochlorite)\* solution or with an anti-fungal/anti-bacterial solution approved by USFWS. The preferred method is to submerge equipment in a tub or sturdy plastic bag filled with the bleach solution; however, spray application may be used IF all surfaces are generously saturated, including all crevasses such as under wader ankle protectors. Sprayed or dipped equipment must remain wet with bleach solution for at least 3-5 minutes and then be thoroughly rinsed with clean water. (If a scrub brush is used for removing organic material, remember to disinfect it between sites).

The Service will continue to update the BPA with the most effective and efficient protocols as new information and protocols become available.

\* Bleach breaks down rapidly. Do not use an expired bleach bottle or one that has been open for more than one month. Fresh bleach solution should be mixed at the beginning of each field day to retain potency.

*This protocol was adapted from disinfection procedures established in the US National Park Service's 2014 Equipment Decontamination Protocol for Field Staff in Sequoia and Kings Canyon National Parks and the Washington Department of Fish and Wildlife's Oregon spotted frog egg mass survey protocol.*

#### Cultural Resources

The proposed vegetation management actions do not result in ground disturbance to the physical environment, so the action is not one that typically has 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, Winter 2022 through Fall 2023. 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/ Jonnel Deacon*

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Concur:

*/s/ Sarah T. Biegel*

Sarah T. Biegel  
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Date: January 18, 2022

References:

Vegetation Control Cut Sheets  
Biological Opinion References

Bonneville Power Administration (BPA). 2000. Bonneville Power Administration Transmission System Vegetation Management Program Final Environmental Impact Statement-Appendices, DOE/EIS-0285. Available at [https://www.bpa.gov/efw/Analysis/NEPADocuments/Pages/Vegetation\\_Management.aspx](https://www.bpa.gov/efw/Analysis/NEPADocuments/Pages/Vegetation_Management.aspx)