

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-825)

**Pollution Prevention and Abatement Project Number: 4852**  
**Natural Resource Specialist/Project Manager: Jacob Marti – TFBV-THE DALLES**

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way (ROW) of high-voltage transmission lines and access roads in along the following corridors: LaPine-Chiloquin No 1 (from Structure 2/2 to 3/1, 5/7 to 13/5, 13/8 to 14/5, and 39/5 to 47/5), LaPine-Fort Rock No. 1 (from Structure 26/5 to 47/8), Brasada-Harney No. 1, and Redmond-Pilot Butte No. 1. Vegetation management needs were assessed for these ROW corridors and associated access roads, and Vegetation Control Cut Sheets were created.

The corridors in the proposed project area are located in Crook, Deschutes, Harney, Klamath, and Lake counties, Oregon and measures approximately 176 miles in length and varies between approximately 75 and 215 feet. The corridor runs primarily through public lands managed by the Bureau of Land Management – Prineville District, and Oregon Department of State Lands; however, some tracts are on private lands. Land use is varied, with urban, rural residential, agricultural, forestry, grazing, and undeveloped lands present along the ROW corridors.

Letters were used to notify landowners and land managers on September 1, 2022. On-site meetings, emails, phone calls, or 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). For worker safety and fire prevention, broad-spectrum (non-selective) residual

herbicide would be applied, and only applied 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 1,228 acres of ROW, 71 miles of access roads, and 1,269 structure sites would be initially treated starting in fall 2022. A follow-up treatment of re-sprouting target vegetation would be conducted by fall 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 or other sensitive aquatic species. 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. 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 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). No federally-listed anadromous fish species or critical habitat is present within the project area. Additionally, no EFH (as defined by the Magnuson-Stevens Act) is present in the project area. Thus, it was determined that the proposed project would have "No Effect" on ESA-listed species and designated critical habitat under NMFS' jurisdiction, and would have "No Adverse Effect" on EFH.

### 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, fall 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/ Oden Jahn

Oden Jahn, EPI-4

Natural Resource Specialist (Environmental Compliance)

Concur:

/s/ Katey Grange Date: September 26, 2022

Katey Grange

NEPA Compliance Officer

References:

Vegetation Control Cut Sheets

becc:

O. Jahn – EPI-4

J. Johnson – EPI-4

A. Nagra – LN-7

M. Burgan – TFBV-BELL-1

Official File – EP (EQ-13-SA)

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