

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-842)

**Pollution Prevention and Abatement Project Number 4918**  
**Natural Resource Specialist/Project Manager:** Leonard Rieman, TFBV-SCHULTZ

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 in Klickitat and Yakima Counties, Washington, specifically the Wautoma-Knight No. 1 and N. Bonneville-Midway No. 1 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 150 to 300 feet in width and covers approximately 3.5 miles of terrain through Yakama Nation tribal lands. Specifically, vegetation management actions are proposed in the lines and spans detailed below:

BPA Transmission Line	Spans	
	From	To
Wautoma-Knight No. 1	23/2	24/4
	52/5	53/1
N. Bonneville-Midway No.	78/6	79/2
	80/6	81/2
	84/4	85/5
	94/3	94/5
	109/1	109/3

The Yakama Nation was notified of the planned work and consulted with in regards to environmental and cultural resource minimization measures.

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.

In the Wautoma–Knight No. 1 corridor, work would consist of cutting, lopping, and scattering all incompatible vegetation that can grow within the minimum clearance distance (25 feet of the maximum sag of the conductor). Cutting, lopping, and scattering (CLS) consists of using hand tools (mainly chainsaws). All debris would be left onsite to decompose naturally.

In the North Bonneville–Midway No. 1 corridor work would consist mainly of CLS as well. Specific species to be treated would be oak, as well as sagebrush, willow and tree of heaven that could become incompatible. In addition to the CLS activity, approximately six danger trees would be removed (oak and cottonwood species). The trees are located in spans 78/6 to 79/1 and 94/5 to 94/6. Danger trees would be removed by climbing each tree and then cutting the tree into sections. Each section would be allowed to fall to the ground as long as it could not come within the minimum clearance distance of the line. If it could come within this distance, rigging would be used to lower each section to the ground in order to maintain the minimum clearance distance. Once the tree is at a safe height, the remainder of the tree would be cut conventionally and allowed to fall to the ground. The tree limbs would be removed and the tree cut into sections and allowed to decompose naturally. No tree skidding activities would take place.

Corrective maintenance is planned for spring and summer 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) occur in the project area. As a conservation and avoidance measure and in consultation with the Yakama Tribe, no herbicide use is planned. 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 preserved 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.

### **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).

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). 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 Vegetation Control Cut Sheets. 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.

#### Cultural Resources

The Yakama Nation Tribal Historic Preservation Office was consulted on the proposed undertaking. 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. However, given the location of the project on the Yakama Nation Reservation, some additional measures have been taken to minimize potential impacts including: cultural resources monitoring, no vehicular traffic, no herbicide use, and timing restrictions. 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

No ground disturbance is proposed, so re-vegetation would not be significant. Existing naturalized grasses and woody shrubs are present on the entire ROW and are expected to naturally seed into the areas that are cut, lopped and scattered.

#### Monitoring

The entire project would be inspected during the work period, spring and summer 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/ Aaron Siemers*  
Aaron Siemers, EPR-4  
Physical Scientist

Concur:

*/s/ Katey Grange*  
Katey Grange Date: June 15, 2023  
NEPA Compliance Officer