

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-850)

**Pollution Prevention and Abatement Project Number 4,877**  
**Natural Resource Specialist/Project Manager: Craig Fackrell – TFBV – BELL-1**

Bonneville Power Administration  
Department of Energy



Proposed Activities: The Bonneville Power Administration (BPA) proposes to clear unwanted vegetation in and adjacent to the Colville-Republic No 1 transmission line right of way (ROW). The work would be conducted in Ferry County, Washington from span 1/3 to 44/13. 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 is 100 ft. wide on average and covers approximately 16 miles of terrain through forested U.S. Forest Service Property, approximately 22 miles of private property, and approximately 6 miles of state lands in Washington.

Letters, on-site meetings, emails, and or phone calls would be used to notify 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.

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, to prevent re-sprouts, and to 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 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 431 acres of cut, lop, and scatter of tall-growing vegetation within the right-of-way corridor would be initially treated in the Winter of 2023 into 2024, along with approximately 116 acres of herbicide treatment. Approximately 19,350 feet of access road maintenance would occur. It is also approximated that two hours of chipping would occur along with the removal of two corridor trees and five danger trees.

Work would be conducted by crews of two to four, using standard equipment such as mowers, chainsaws, and sprayers, utilizing light duty trucks and all-terrain vehicles. Additional vegetation management may be necessary in subsequent years 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 chip, lop, and scatter, or mulching 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 Gallon 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 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. 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 ESA-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: yellow-billed cuckoo, Canada lynx, grizzly bear, bull trout, bull trout critical habitat, and Spalding’s catchfly (*Silene spaldingii*). BPA determined that the proposed project may affect, but is not likely to adversely affect the above listed species. BPA also made a not likely to jeopardize determination for monarch butterfly (candidate for ESA listing). The USFWS concurred with these determinations in a letter dated September 3, 2021 (reference code: FWS/IR9/ES/IFWO/2021-I-1822 ), and in an additional letter on May 4, 2021 (reference code: 01EWF00-2021-I-0878). Conservation measures, agreed upon between BPA and USFWS during consultation, are noted in the USFWS letter of concurrence, the Biological Assessment created for this region, Vegetation Control Cut Sheets, and other work management documents.

Whitebark pine and North American wolverine were listed as threatened species after this initial consultation was completed. After ESA review was conducted for whitebark pine and North American wolverine, BPA made the determination that the project may affect, but is not likely to adversely affect individuals or habitat. The USFWS concurred with these determinations in a letter dated December 20, 2023 (reference code: FWS/R1/2023-0086200). Conservation measures, agreed upon between BPA and USFWS during consultation, are noted in the USFWS letter of concurrence, the Supplemental Biological Assessment created for this region, the cutsheets, and the Spokane whitebark pine conservation measures.

BPA conducted a review of ESA-listed species, designated critical habitat, and Essential Fish Habitat (EFH) (as defined by the Magnuson-Stevens Fishery Conservation and Management 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 proposed vegetation management actions would result in very little ground disturbance and would be limited to previously-disturbed areas (access roads). Based on the information provided, BPA has determined, per 36 CFR 800.3(a)(1), that this undertaking

is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present.

Please be aware that if project changes are required involving BPA funding or action then further review under 36 CFR Part 800 may be necessary. Planning for future actions should take into account the time/process to evaluate potential impacts and consult on these effects. 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 fiscal year 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  
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Concur:

/s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer      Date: January 4, 2024

References:  
Vegetation Control Cut Sheets