

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-861- update to SA issued 10/20/2023)

**Pollution Prevention and Abatement Project Number 4922**  
**Natural Resource Specialist/Project Manager: Brian Luis – TFBV-ROSS MHQA**

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to clear unwanted vegetation in and adjacent to the rights-of-way of high-voltage transmission lines and access roads in Skamania, Cowlitz, and Clark Counties in Washington and Multnomah, Washington and Columbia Counties in Oregon. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads along the following transmission line corridors and spans. Portions of these rights-of-way analyzed in this Supplement Analysis are identified in the table below.

<b>Corridor</b>	<b>Transmission Line</b>	<b>Spans</b>
BOPH-ALCO-2_B	Bonneville PH 1-Alcoa 1&2 No 2	27/6-28/1
BOPH-ALCO-2_C	Bonneville PH 1-Alcoa 1&2 No 1	41/6-41/7
LONG-COWL-1	Longview-Cowlitz No. 1	0/1-4/8
MCNY-ROSS-1	McNary-Ross No. 1	167/1-176/4
RIVG-KEEL-1	Ross-Rivergate No. 1	7/6-8/2
RIVG-KEEL-1	St Johns-Keeler No. 2	1/1-10/5
RIVG-KEEL-1	Rivergate-Keeler 1&2 No. 1	1/1-9/2
ROSS-LEXI-1	Ross-Lexington No. 1	0/1-41/4
ROSS-STJO-1	Ross-St Johns No 1	1/6-7/7
STHL-ALSN-1	St Helens-Allston No 1	1/2-25/6
STJO-STHL-1	St Johns-St Helens No 1	3/1-22/4
WAUT-OSTD-1	Knight-Ostrander No. 1	61/2-82/4

The corridor in the proposed project area measures approximately 360 miles in length and transverses a variety of land uses, including urban, suburban, rural residential, range land, private timber lands, and agricultural as well as land managed by the cities of Rainier and Portland in Oregon, the Northwest Oregon Bureau of Land Management district, Region 6 of the United States Forest Service (USFS), and the States of Oregon and Washington.

The BLM district and the USFS were notified of the planned work. The USFS provided acknowledgement and did not provide any additional comments. Letters, on-site meetings, emails, and 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, 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). 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 1,110 acres of herbicide would be applied and approximately 23 miles of access road maintenance would occur. Seventy-three structure sites would also be treated. The initial treatment period would be from October 2023, through September 2024. In addition, BPA proposes to remove approximately 80 corridor trees and limbs from approximately 75 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted. 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 these corridors 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 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 listed species.

BPA determined that the proposed vegetation management work along the McNary-Ross No. 1 transmission line from 167/1-176/4 are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) letter of concurrence (LOC) regarding: BPA Southern Washington Periodic Vegetation Management, consultation number 2023-0081437, sent to BPA in August 2023.

For all transmission lines not covered in the above consultation, a species list was obtained for federally-listed, proposed, and candidate species potentially occurring within the project boundaries from the 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. The attached Sensitive Species Conservation Measures are required where ESA-listed species are noted in the Vegetation Control Cut Sheets.

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 proposed vegetation management action is not one that typically has the potential to affect historic and/or cultural resources, except for the danger tree and corridor tree work. Danger tree and corridor tree work proposed within segments crossing USFS and BLM parcels on the Knight-Ostrander No 1 transmission line will need a cultural monitor under existing agreements with the USFS and BLM. In addition, cultural monitors will need to be present on the St Helens-Allston No 1 transmission line to cut danger trees located between 6/3-6/4, 11/6-11/7, and between 19/3-19/4. 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 2023 through fall 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*

Zoe Wellschlager  
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Concur:

*/s/ Katey Grange*

Katey Grange  
NEPA Compliance Officer    Date: November 3, 2023

References:

Vegetation Control Cut Sheets  
Sensitive Species Conservation Measures