

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-888)

**Pollution Prevention and Abatement Project Number 5084**  
**Natural Resource Specialist/Project Manager: Jason Hunt (BPA) - TFBV-Olympia-1**

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

The Bonneville Power Administration (BPA) proposes to clear unwanted vegetation in and adjacent to the rights-of-way of high-voltage transmission lines and access roads in Wahkiam, Pacific, Lewis, Thurston, Mason, Kitsap, Jefferson, and Callam counties, Washington. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the rights-of-way (ROW) corridors and associated access roads along the Driscoll-Naselle No. 1, Holcomb-Naselle No. 1, Naselle-Tarlett Nos. 1 and 2, Raymond-Henkle St No.1, Raymond-Wilapa River No. 1, Fairmount-Port Angelese No. 1, Olympia-Shelton Nos. 1 to 4, Satsop-Shelton No. 1, Shelton-Kitsap No. 4, Shelton-Fairmount Nos. 1 to 4, Shelton-South Bremerton No. 1, Chehalis-Mayfield No. 1, Mossyrock-Chehalis No. 1, and Raver-Paul No. 1. Portions of these ROWs were analyzed in this Supplement Analysis and are identified in the table below (Table 1).

<b>Corridor</b>	<b>Transmission Line</b>	<b>Spans</b>
<b>CHMH_DRIS-NASE-1</b>	Driscoll-Naselle No 1	5/2 - NASE
<b>CHMH_DRIS-NASE-1</b>	Holcomb-Naselle No 1	21/8 - NASE
<b>CHMH_DRIS-NASE-1</b>	Naselle-Tarlett No 1	1/2 - 1/3
<b>CHMH_NASE-LOBE-1</b>	Naselle-Tarlett No 1	1/3 - 1/5, 1/11 - 4/1, 4/5 - 4/6, 4/8 - 9/5, 9/8 - 11/3, 12/1 - 13/1, 13/5 - 13/6, 14/6 - 16/5, 16/9 -17/1, 17/2 - LOBE
<b>CHMH_NASE-LOBE-1</b>	Naselle-Tarlett No 2	13/5 - 14/3, 14/7 - 15/10, 18/2 - 18/3, 18/4 - 18/6, 18/7 - LOBE
<b>CHMH_RAYM-WILR-1</b>	Raymond-Henkle St. No 1	RAYM - 2/4
<b>CHMH_RAYM-WILR-1</b>	Raymond-Willapa River No 1	RAYM - WILR

<b>OLMH_FAMT-POAN-1</b>	Fairmount-Port Angeles No 1	FAMT - 8/1, 8/2 - POAN
<b>OLMH_OLYM-SHEL-4</b>	Olympia-Shelton No 1-4	6/1 - 12/2, 13/1-SHEL
<b>OLMH_OLYM-SHEL-4</b>	Satsop-Shelton No 1	22/2 - SHEL
<b>OLMH_SHEL-KTSA-4</b>	Shelton-Kitsap No 4	SHEL - KTSA
<b>OLMH_SHEL-KTSA-4</b>	Shelton - Fairmount No 1-4	SHEL - 2/3
<b>OLMH_SHEL-KTSA-4</b>	Shelton-South Bremerton No 1	SHEL - 32/5
<b>CHMH_MOSY-CHEH-1</b>	Chehalis-Mayfield No 1	1/4 - MASY
<b>CHMH_MOSY-CHEH-1</b>	Mossyrock-Chehalis No 1	7/2 - 27/8
<b>CHMH_RAVE-PAUL-1</b>	Raver-Paul No 1	48/2 - 68/3

**Table 1: Corridor spans proposed for treatment**

The corridors in the proposed project area range in width from approximately 100 to 500 feet and extending a total length of roughly 420 miles. The corridors run through primarily private lands, but some tracts are managed by the State of Washington and Washington Department of Natural Resources (WA DNR). Land use is varied; with urban, suburban, rural-residential, agricultural, forestry, commercial and industrial uses present along the ROW corridors.

Letters, on-site meetings, emails, and phone calls were 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). 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.

The proposed activities include the treatment of up to 7,560 acres using selective hand-cutting methods followed immediately by an herbicide spot-treatment of hardwood stems, as well as the treatment of up to 7,905 acres using localized herbicide applications. The proposed activities also include the treatment of approximately 7 miles of access roads, and 402 structure sites using mowing techniques and other approved methods. In addition, BPA proposes to remove limbs from approximately 57 trees in, or adjacent to, the ROW. Approximately 18 corridor trees and 21 danger trees would be removed, and 18 hours of chipping would occur. The initial treatment period would be from October 2024 through September 2025. 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 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 Columbian white-tailed deer, North American wolverine, marbled murrelet, marbled murrelet critical habitat, Northern spotted owl, streak horned lark, western snowy plover, yellow-billed cuckoo, Northwestern pond turtle, bull trout, bull trout critical habitat, Dolly Varden, monarch butterfly, and Kincaid's lupine ESA-listed species and designated critical habitat under USFWS' jurisdiction except Yelm pocket gopher. The proposed vegetation management activities are within the scope of activities and action area evaluated in BPA's biological assessment that determined that vegetation management activities along the Raver-Paul Vegetation

Management Project would be not likely to adversely affect Yelm pocket gopher. The USFWS sent a letter of concurrence (LOC) (01EWF00-2021-I-1335) to BPA in July 2021. The following conservation measures would be implemented:

- All vegetation removal would be restricted to aboveground, leaving root systems intact.
- 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.
- Herbicides would be mixed according to label instruction and applied by an individual certified through BPA's pesticide applicator certification plan (BPA 2000).

The attached Olympia FY25 Vegetation Management Review includes sensitive species conservation measures that are required where the Vegetation Control Cut Sheets note that ESA-listed/sensitive species or their habitat are potentially present.

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 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 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 2024 through Fall 2025. 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' Proposed Action and no substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the EIS' Proposed Action or its impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9. Therefore, no further NEPA analysis or documentation is required.

/s/ Brenna Blankenship

Brenna Blankenship  
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Concur:

/s/ Katey Grange

Katey Grange  
NEPA Compliance Officer    Date: October 21, 2024

**References:**

Vegetation Control Cut Sheets  
Olympia FY25 VGMT Resource Review  
Effects Determination