

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/ EIS-0285/SA-889)

**Pollution Prevention and Abatement Project Number 5085**  
**Natural Resource Specialist/Project Manager:** Cozette DeTray, TFBV-BELL-1

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 Benton County, Washington, specifically the transmission lines listed in table 1 below:

<b>Transmission Line</b>	<b>Spans</b>
Benton-White Bluffs No 1	0/1-8/2
White Bluffs-451B No 1	1/1-1/4, 7/1-7/2
Ashe-Hanford No 1	10/2-11/3
Riverland-Midway No 1	1/1-2/28
Ashe-White Bluffs No 1	3/3-10/3
Benton-451B No 1	1/1-5/5

Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the ROW corridor and associated access roads along these transmission assets.

The corridor in the proposed project area measures approximately 22 miles long and 100 to 300 feet wide and transverses through shrub step and dry grassland habitat. The project area runs through open rangeland and undeveloped property managed by the Department of Energy-Richland (DOE-RL) as part of the Hanford Reach National Monument and the Hanford Site. The DOE-RL was notified of the planned work and provided no additional comment. Letters, on-site meetings, emails, and phone calls would also be used to notify DOE-RL 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. The overall goal of BPA is to establish low-growing plant communities along the 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 255 structure sites would be initially treated in fall of 2024 through fall of 2025. A follow-up treatment of re-sprouting target vegetation would be conducted as needed. 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**

Vegetation Control Cut Sheets were 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**

No water resources are present in the project area.

### **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). Monarch butterfly, a candidate species, and their associated habitat were found in the project area. Umtanum desert buckwheat was not on the species list and is not recorded as being present in the project area; however, since Umtanum desert buckwheat critical habitat is near the project area, mitigation measures have been developed and are required where the species name or abbreviation appears in the vegetation control cutsheets. A list of complete mitigation measures are provided in the sensitive species conservation measures document. An identification guide for Umtanum desert buckwheat is also provided since it is nearby the project area. With the implementation of mitigation measures present in the cutsheets and in the sensitive species conservation measures document, it was determined that the project would have "No Effect" for all state-listed species, ESA-listed species and designated critical habitat under USFWS' and the state of Washington's 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). However, none were found in the project area. BPA made a determination that the project would have "No Effect" for all ESA-listed fish species and designated critical habitat under NMFS' jurisdiction, and the project would not adversely affect 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 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/ Zoe Wellschlager*

Zoe Wellschlager  
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Concur:

*/s/ Katey Grange*

Katey Grange  
NEPA Compliance Officer      Date: October 24, 2024

References:

Vegetation Control Cut Sheets

Sensitive Species Conservation Measures: SA5\_FY24\_Tri\_Cities\_Sens\_Species\_Cons\_Measures

Umtanum Desert Buckwheat Identification Guide