

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-905)

**Pollution Prevention and Abatement Project Number 5028**  
**Natural Resource Specialist/Project Manager: Jacob Marti – TFBV-THE DALLES**

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-ways (ROWs) of high-voltage transmission lines in Wasco and Morrow Counties in Oregon, and Skamania and Klickitat Counties in Washington. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the ROW corridor and associated access roads along these transmission corridors and spans. Portions of these rights-of-way analyzed in this Supplemental Analysis are identified in the table below.

<b>Corridor</b>	<b>Transmission Line</b>	<b>Spans</b>
BEMA_NBON-MIDW-1	Carson Tap to Underwood Tap	1/2-2/7
BEMA_NBON-MIDW-1	North Bonneville-Midway No 1	5/2-24/3
BEMA_CHEN-GOLD-1	Chenoweth-Goldendale No 1	2/3-19/5; 19/7-19/8; 20/2-24/9
BEMA_CSGP-SLAT-1	Coyote Springs-Slatt No 1	5/2-12/3
BEMA_BIGE-QUEN-1	Big Eddy-Quenett Creek No 1	0/1-1/16
BEMA_BIGE-QUEN-1	Big Eddy-Quenett Creek No 2	1/1-7/4

The corridors in the proposed project area measures approximately 56 miles in length and transverses a variety of land uses, including urban, suburban, rural-residential, agricultural, timber lands, commercial, industrial, and undeveloped properties as well as land managed by local governments, the United States Forest Service (USFS), and the Washington Department of Natural Resources (DNR).

Approximately 32 miles of the North Bonneville-Midway No 1 transmission line corridor runs through the Columbia River Gorge National Scenic Area (CRGNSA), managed by the USFS. The USFS was notified of the planned work and provided acknowledgment. No proposed work will proceed on USFS until coordination between USFS and BPA is completed (anticipated early December 2024).

Approximately 5 miles of the Chenoweth-Goldendale No 1 transmission line corridor runs through the Columbia Hills State Park Natural Area, managed by Washington DNR. The WA DNR was notified of the planned work on September 5, 2024, and did not provide comments or concerns. 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 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 542 acres of herbicide would be applied and approximately 16 miles of access road maintenance would occur. 107 structure sites would also be treated. The initial treatment period would be from October 2024 through September 2025. In addition, BPA proposes to remove approximately 69 danger 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 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 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. 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” on gray wolf, North American wolverine, and yellow-billed cuckoo. BPA made a determination of “May effect, not likely to adversely affect” for bull trout, bull trout designated critical habitat, northern spotted owl, and northern spotted owl designated habitat. BPA made a determination of “Not likely to result in jeopardy of the proposed species” for monarch butterfly. The proposed vegetation management activities 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 of 2023, and conservation measures would be implemented including herbicide buffers around ESA-fish streams and other waterways, maintaining vegetation near waterways to the extent practicable, and conducting all proposed activities within suitable northern spotted owl habitat during the late nesting season, post July 15<sup>th</sup>, to minimize disturbance to spotted owls.

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

All activities were reviewed for their potential to affect cultural and/or historic resources. The following spans on the North Bonneville-Midway No 1 transmission line spans require a pre-work cultural survey or the presence of a cultural monitor before any danger trees can be removed: 14/4 to 14/5; 15/2 to 15/3; and 18/5 to 18/6. Other vegetation management actions do not result in ground disturbance to the physical environment, so the actions are not those that typically have 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/ Samantha Rinker*

Samantha Rinker  
Biological Scientist

Concur:

*/s/ Katey Grange*

Katey Grange  
NEPA Compliance Officer      Date: November 12, 2024

References:

Vegetation Control Cut Sheets  
Sensitive Species Conservation Measures