

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-911)

Pollution Prevention and Abatement Project Number 5116
Natural Resource Specialist/Project Manager: Jacob Marti – TFBV-THE DALLES

Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear approximately 66 danger trees along the Bonneville PH 1-Hood River No 1 right-of-way (ROW) corridor in Hood River County, Oregon. Vegetation management needs were assessed, and a Vegetation Control Cut Sheet was created for the ROW corridor and associated access roads along the transmission corridor from structure 3/1 to 19/8.

The Bonneville PH 1-Hood River No 1 transmission line corridor runs through the Columbia River Gorge National Scenic Area (CRGNSA), managed by the USFS. BPA notified the USFS of the planned work and the USFS provided acknowledgment and did not provide additional comments.

Approximately 6 miles of the Bonneville PH 1-Hood River No 1 transmission line corridor runs through state parks and natural areas, managed by the Oregon Department of State Lands. The OR Dept of State Lands was notified of the planned work in September 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 right-of-way (ROW) to control the development of potentially threatening vegetation.

The trees would be cut by conventional methods. Once on the ground, trees would be cut into smaller pieces. All debris would be disposed of onsite, using on-site chip, lop and scatter, or mulching techniques. The work is anticipated to take place during winter 2025 to fall 2025.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

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 Sheet.

Water Resources

Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Cut Sheet. 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.

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" for gray wolf and bull trout. BPA made a determination of "May effect, not likely to adversely affect" for northern spotted owl. BPA made a determination of "May adversely affect individuals and habitat, not likely to result in jeopardy of the species" for monarch butterfly and northwestern pond turtle. There is no designated critical habitat in the project area. 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) Biological Opinion (BiOp) regarding: *Bonneville Power Administration Routine Inspections and Right-of-Way Maintenance in Western Oregon*, Ecosphere Project Code 2023-0041665-S7, dated January 14, 2025. All terms and conditions and conservation measures identified in this consultation would be implemented and included on the cut sheet.

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 Sheet. 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, winter 2025 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 § 1502.9.¹ 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: March 14, 2025

References:

Vegetation Control Cut Sheet
Sensitive Species Conservation Measures

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this SA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*"