

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-912)

Pollution Prevention and Abatement Project Number 5113

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Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way of high-voltage transmission lines, access roads, and a communication site in Crook, Deschutes, Lake, and Klamath, counties, Oregon, specifically along Grizzly-Captain Jack No 1, Pilot Butte-LaPine No 1, Ponderosa-Pilot Butte No 1, LaPine-Chiloquin No 1 and Ponderosa-Corral No 1 transmission lines. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads along these transmission assets. Some spans are not addressed in this SA. Table 1 below outlines which sections of the subject lines are not covered under this SA.

Transmission Line	Start	End
Pilot Butte-La Pine No 1	26/4	26/6
Pilot Butte-La Pine No 1	26/7	27/2
Pilot Butte-La Pine No 1	27/5	27/7
Pilot Butte-La Pine No 1	28/6	28/8
Pilot Butte-La Pine No 1	30/6	30/9
Grizzly-Captain Jack No 1	110/02	110/03
Grizzly-Captain Jack No 1	116/02	116/03
Grizzly-Captain Jack No 1	122/02	122/03
Grizzly-Captain Jack No 1	124/03	124/04
Grizzly-Captain Jack No 1	173/01	173/05
Ponderosa-Pilot Butte No 1	003/05	003/06
Ponderosa-Pilot Butte No 1	8/3	008/04
Ponderosa-Pilot Butte No 1	008/05	008/13
Ponderosa-Pilot Butte No 1	008/15	016/03
Ponderosa-Pilot Butte No 1	016/09	017/01
Ponderosa-Pilot Butte No 1	017/02	017/04

Table 1. Spans are not addressed in this SA.

The corridor in the proposed project area covers approximately 130 miles of terrain in which the corridor ranges from 100 to 350 feet in width. The treatment area crosses a variety of land uses, including suburban, rural residential, range land, private forest land, and agricultural as well as land managed by the City of Bend, Deschutes County, the State of Oregon; the Bureau of Land Management including the Prineville District and the Lakeview District; and the US Forest Service including Fremont-

Winema National Forest (NF) and Deschutes NF. All public land managers were notified of the planned work and provided no additional comment, except for Deschutes NF which provided Project Design Criteria (PDC's). The PDC's contain additional mitigations and criteria for the project and have been added as attachments and would be implemented during work occurring on the Deschutes NF.

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). For worker safety and fire prevention, broad-spectrum (non-selective) residual herbicide may 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 22 miles of access roads and 508 structure sites would initially be treated from March 2025 through March 2026. In addition, BPA proposes to remove approximately 10 danger trees in, or adjacent to, the LaPine-Chiloquin No1 and Pilot Butte-LaPine No1 Transmission line ROW. Around 300 acres of manual cut lop, and scatter treatment would occur as well to control juniper and tall shrubs in or near the ROW. 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.

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). A Conservation Measures attachment was prepared for this project as well, which includes cultural and wildlife mitigations. The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Cut Sheets and Conservation Measures attachment.

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-foot-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). Mitigation measures were created for federally listed species as well as species that have special protections such as eagles. Mitigation measures are documented in the "Conservation Measures" attachment and where the species abbreviation appears in the cutsheets. 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.

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.

The Deschutes National Forest provided additional mitigations that are present in the Conservation Measures attachment and below:

1. Pole numbers 160, 161, 222 (including hazard tree removal actions at this location), 223, and 227, conduct work outside of the nesting season of March 1 – Aug 31. Report raptor (northern

goshawk) occurrence to District wildlife staff who may be able to refine protection needs based on current status and location.

2. If agitated raptors are encountered at the project site, relocate to another site at least ¼ mile away and return to complete work outside of the above-mentioned nesting season. Signs of agitation include circling, flyovers, dive bombing, vocalizations, reluctance to leave an area or continually returning to an area after being flushed.
 - Prior to operations on NFS lands, equipment shall be free from invasive species plant parts and seed, including mud and dirt on the equipment.
 - Any ground disturbing activities outside of a roadbed or other consistent disturbed areas shall be revegetated with a FS approved native seed mix.

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. However, a number of sites will require a cultural monitor to be present while the work is occurring. These locations are noted in the Conservation Measures SA2 attachment. If a site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist, the BPA Archaeologist and the Forest Service archaeologist and operations in the area would be contacted.

The Deschutes National Forest provided additional mitigations in the PDC attachment.

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 winter 2026. 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/ Zoe Wellschlager

Zoe Wellschlager
Physical Scientist

Concur:

/s/ Katey Grange

Katey Grange
NEPA Compliance Officer Date: March 13, 2025

Attachments:

Vegetation Control Cut Sheets
BPA Pilot Butte to La Pine Veg Maintenance PDC
Conservation Measures SA2

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 CX/SA/EA 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.*"