## **Supplement Analysis**

for the

# Transmission System Vegetation Management Program EIS

(DOE/EA/EIS-0285/SA-913)

Pollution Prevention and Abatement Project Number 4917
Natural Resource Specialist/Project Manager: Jacob Marti – TFBV-THE DALLES

Bonneville Power Administration
Department of Energy



## **Proposed Activities**

BPA proposes to remove approximately 60 trees in and adjacent to the Ashe-Marion No. 1 transmission line right-of-way corridor in Wasco county, Oregon. Vegetation management needs were assessed, and a Tree Cut List was created for the subject corridor in BPA's Redmond District and within the Confederated Tribes of the Warm Springs Reservation.

BPA contacted the Confederated Tribes of the Warm Springs to secure rights to remove these trees located between structures 158/4 and 126/3. 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 onsite chip, lop and scatter, or mulching techniques. The work is anticipated to take place from March through November 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**

Tree Cut Lists 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 Tree Cut Lists and other project documents.

#### Water Resources

No herbicides would be used, and no ground-disturbing vegetation management methods would be implemented; therefore, there would be no impact to water resources.

## Endangered Species Act and Magnuson-Stevens Act

Pursuant to its obligations under the ESA, BPA made determinations of whether its proposed project would have any effects on any ESA-listed species. For all spans discussed above, 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 be consistent with scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) Biological Opinion (BiOp) and letter of concurrence (LOC) to BPA 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 sheets.

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**

All activities were reviewed for their potential to affect historic and/or cultural resources and it was determined that danger tree and corridor tree cutting have the potential to affect historic and/or cultural resources; however, a cultural monitor is not required. If a site is discovered during the course of project activities, work would be stopped in the vicinity and the BPA Archaeologist and BPA Environmental Specialist would be contacted.

#### Re-Vegetation

Existing naturalized grasses and woody shrubs are present in the project area and are expected to naturally seed into the areas that would have lightly-disturbed soil.

#### Monitoring

The entire project would be inspected during the work period - January through November 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.

Date: March 17, 2025

/s/ <u>Oden Jahn</u> Oden Jahn, EPR-4 Physical Scientist (Environmental)

Concur:

/s/ <u>Katey Grange</u>
Katey Grange
NEPA Compliance Officer

Attachments: Tree Cut List for Redmond Sensitive Species Conditions

<sup>&</sup>lt;sup>1</sup> 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.