Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-881)

Pollution Prevention and Abatement Project Number 4934
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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 communication sites in Chelan and Douglas counties, WA, specifically the following transmission lines: Chief Joseph-Monroe No 1. 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.

All work would be conducted in and adjacent to the right-of-way (ROW). ROWs range from 200 to 500 feet in width. These corridors lie within private forested and agricultural tracts, as well as public lands managed by the State of Washington and the U.S. Forest Service.

Approximately 30 miles of the planned vegetation management transmission line corridor runs through USFS managed lands. The Wenatchee National Forest was notified of the planned work, provided acknowledgement, and did not provide additional comments. 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). Broadcast applications of liquid herbicide would be used if, and where, appropriate. 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.

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" for yellow-billed cuckoo, showy stickseed, Spalding's catchfly, Ute ladies'-tresses, Wenatchee Mountains checkermallow, and whitebark pine. BPA made a determination of not likely to adversely affect for Canada lynx, gray wolf, North American wolverine, northern spotted owl and northern spotted owl designated critical habitat, and bull trout and bull trout designated critical habitat. BPA made a determination of "not likely to result in jeopardy of 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) Biological Assessment (BiOp) regarding: Chief Joseph – Monroe No. 1 Periodic Vegetation Management FWS/R1/2022-0012394, sent to BPA in September 2022, and conservation measures would be implemented including herbicide buffers around ESA-fish streams and other waterways, maintaining vegetation near waterways to the extent practicable, identifying and avoiding milkweed, and scheduling vegetation management action after July 31st in those areas identified as suitable habitat for northern spotted owl.

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

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. BPA archaeologists have reviewed the proposed action for potential effects to historical and cultural resources. 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 2023 through Fall 2024. 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

Transmission Line Name	Span (line mile/structure number		Unit Description	Number of Trees	Land Owner
Chief Joseph-Monroe No 1	37/4	37/5	Cut Corridor Tree	4	WA DNR
	44/1	44/2	Cut Danger Tree	10	WA DNR
	44/1	44/2	Cut Danger Tree	1	USFS/WA DNR
	44/2	44/3	Cut Danger Tree	9	WA DNR
	44/4	45/1	Cut Danger Tree	1	WA DNR
	50/5	51/1	Cut Danger Tree	3	WA DNR/Private
	51/1	51/2	Cut Danger Tree	3	WA DNR/Private
	51/2	51/3	Cut Danger Tree	1	WA DNR
	51/3	51/4	Cut Danger Tree	5	WA DNR

Table 1. Wenatchee District FY24 Locations of proposed danger and corridor tree cutting that are authorized in this SA; NHPA Section 106 analysis complete.

Transmission Line Name	Span (line mile/structure number		Unit Description	Number of Trees	Land Owner
Chief Joseph-Monroe No 1	37/3	37/4	Cut Danger Tree	1	USFS (Wenatchee NF)
	42/3	42/4	Cut Danger Tree	5	USFS (Wenatchee NF)
	42/4	42/5	Cut Danger Tree	3	USFS (Wenatchee NF)
	42/5	43/1	Cut Danger Tree	1	USFS (Wenatchee NF)
	43/3	43/4	Cut Danger Tree	9	USFS (Wenatchee NF)
	43/5	43/6	Cut Danger Tree	1	USFS (Wenatchee NF)
	43/6	44/1	Cut Corridor Tree	1	USFS (Wenatchee NF)
	43/6	44/1	Cut Danger Tree	8	USFS (Wenatchee NF)
	44/1	44/2	Cut Corridor Tree	3	USFS (Wenatchee NF)
	44/1	44/2	Cut Danger Tree	5	USFS (Wenatchee NF)
	44/2	44/3	Cut Danger Tree	23	USFS (Wenatchee NF)
	44/3	44/4	Cut Danger Tree	5	USFS (Wenatchee NF)
	45/1	45/2	Cut Danger Tree	19	USFS (Wenatchee NF)

	45/3	45/4	Cut Danger Tree	32	USFS (Wenatchee NF)
	47/4	48/1	Cut Danger Tree	1	USFS (Wenatchee NF)
	48/1	48/2	Cut Danger Tree	6	USFS (Wenatchee NF)
	48/2	48/3	Cut Danger Tree	3	USFS (Wenatchee NF)
	48/3	48/4	Cut Danger Tree	1	USFS (Wenatchee NF)
	48/4	49/1	Cut Danger Tree	1	USFS (Wenatchee NF)
	49/1	49/2	Cut Danger Tree	16	USFS (Wenatchee NF)
	50/1	50/2	Cut Corridor Tree	2	USFS (Wenatchee NF)
	54/1	54/2	Cut Danger Tree	1	USFS (Wenatchee NF)
	54/4	55/1	Cut Danger Tree	27	USFS (Wenatchee NF)
	55/1	55/2	Cut Danger Tree	8	USFS (Wenatchee NF)
	55/3	55/4	Cut Danger Tree	4	USFS (Wenatchee NF)
	55/4	55/5	Cut Danger Tree	1	USFS (Wenatchee NF)
	58/3	58/4	Cut Danger Tree	2	USFS (Wenatchee NF)
	58/4	58/5	Cut Danger Tree	1	USFS (Wenatchee NF)
	58/6	58/7	Cut Danger Tree	3	USFS (Wenatchee NF)
	59/1	59/2	Cut Danger Tree	1	USFS (Wenatchee NF)
	59/2	59/3	Cut Danger Tree	1	USFS (Wenatchee NF)
	59/5	59/6	Cut Danger Tree	1	USFS (Wenatchee NF)
	59/6	60/1	Cut Corridor Tree	1	USFS (Wenatchee NF)/Private
	59/6	60/1	Cut Danger Tree	1	USFS (Wenatchee NF)/Private
	60/3	60/4	Cut Danger Tree	1	USFS (Wenatchee NF)
	60/4	61/1	Cut Corridor Tree	1	USFS (Wenatchee NF)
	60/4	61/1	Cut Danger Tree	9	USFS (Wenatchee NF)

	61/3	61/4	Cut Danger Tree	2	USFS (Wenatchee NF)
	61/4	62/1	Cut Danger Tree	2	USFS (Wenatchee NF)
	62/1	62/2	Cut Danger Tree	1	USFS (Wenatchee NF)
	62/2	62/3	Cut Danger Tree	11	USFS (Wenatchee NF)
	62/3	62/4	Cut Danger Tree	9	USFS (Wenatchee NF)
	63/1	63/2	Cut Danger Tree	10	USFS (Wenatchee NF)
	64/4	64/5	Cut Danger Tree	16	USFS (Wenatchee NF)

Table 2. Wenatchee District FY24 Locations where cultural monitoring requirement has been removed.

System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD. There are no substantial changes in the EIS's Proposed Action and no significant new circumstances or information relevant to environmental concerns bearing on the EIS's Proposed Action or its impacts within the meaning of 10 CFR § 1021.314(c)(1) and 40 CFR §1502.9(d). Therefore, no further NEPA analysis or documentation is required.

/s/ *Justin Carr*
Justin Carr
Physical Scientist

Concur:

/s/ *Sarah T. Biegel*
Sarah T. Biegel
NEPA Compliance Officer Date: *July 18, 2024*

References:
Vegetation Control Cut Sheets