

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-830)

**Pollution Prevention and Abatement Project Number 4842**  
**Natural Resource Specialist/Project Manager: Jacob Grinolds**

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 and access roads in Snohomish, King, and Chelan counties, WA, specifically the Chief Joseph-Monroe No 1 and Chief Joseph-Snohomish No 3 transmission lines. The spans included in this treatment are 65/1-66/2, 66/4-66/5, 67/1-67/7, 68/2-72/4, 73/6-82/5, 82/6-84/4, 85/1-85/5, 87/1-88/1, 88/5-91/1, 91/4-98/1, 99/1-99/4, 100/2-104/1, and 104/3-105/3 on the Chief Joseph-Monroe No 1 transmission line and 80/3-81/1 and 100/4-103/2 on the Chief Joseph-Snohomish No 3 transmission line. 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.

The corridor in the proposed project area measures approximately 100-500 feet wide and 35 miles long through US Forest Service-managed Land. BPA coordinated with the US Forest Service in accordance with the Memorandum of Understanding between BPA and the US Forest Service.

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). BPA does not propose to cut trees in or along these spans as part of the action analyzed in this supplement analysis. 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 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 1,000 acres of ROW and 15 miles of access roads would be initially treated by chipping vegetation, applying herbicides, mowing, manual cutting (cut, lop, and scatter), and side limbing in Fall 2022 through fall 2023. A follow-up treatment of re-sprouting target vegetation would be conducted by October 2024. 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. 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 all ESA-listed species and designated critical habitat under USFWS’ jurisdiction except northern spotted owl, marbled murrelet, Canada lynx, gray wolf, and bull trout. BPA determined that the proposed project would be not likely to adversely affect northern spotted owl, Canada lynx, gray wolf, and bull trout and would be likely to adversely affect marbled murrelet. USFWS agreed with these determinations and issued a biological opinion (2022-0012394) dated September 26, 2022.

*Impact Avoidance and Minimization Measures:* The impact avoidance and minimization measures detailed below are specifically for the parts of the project area where threatened, endangered, proposed, and candidate species and habitats occur. Some of these measures would also be used in other parts of the project area.

- Conduct all vegetation management activities within 65 yards of suitable and highly suitable NW Forest Plan modeled northern spotted owl habitat during the late nesting season, post July 31<sup>st</sup> (See Table 1).
- Conduct all vegetation management activities within the NW Forest Plan’s protected Land Use Allocations (LUA); Late Successional Reserve and Congressional Reserve lands, as well as those areas

within 110 yards of moderately high and highest quality marbled murrelet habitat (NW Forest Plan's Habitat Model), located in contiguous habitat stands larger than 5 acres, at the end of the marbled murrelet nesting season, post September 23<sup>rd</sup> (See Table 2).

- Implement daily dawn/dusk timing restrictions in those sections of the Action Area that provide suitable marbled murrelet nesting habitat (NW Forest Plan) and have confirmed habitat characteristics from review of aerial photography. The daily timing restriction would limit project activities to two hours after official sunrise, and two hours before official sunset, when project activity would occur from April 1<sup>st</sup> to September 23<sup>rd</sup> (See Table 3).
- BPA will provide an annual report to the USFWS Westside Forest and Alpine Zone Team that details the specific individual tree removal from the previous calendar year. The report would be submitted by March 1<sup>st</sup>, to cover the tree removal from the previous calendar year. The report would include tree data such as location, species, diameter (DBH), and reason for removal, to the extent that the data is available.
- BPA personnel and contractors would be required to comply with National Forest food/attractant storage requirements. Overnight camping would not be permitted during the course of activities described in this BA.
- BPA personnel and contractors performing activities in the ROW and away from their vehicles would be instructed to carry bear spray and know how to properly use it to deter attacking wildlife.
- All water bodies (streams, rivers, lakes) occurring in the Action Area will be noted in the Vegetation Control Prescription.
- All vegetation removal would be restricted to aboveground, leaving root systems intact and therefore retaining bank stability. When possible, all shrubs and all herbaceous material less than 10' in height, excluding noxious weeds, would be left untouched.
- Trees in riparian zones would be selectively cut to include only those that are within 50 feet of the conductor at maximum sag or are identified as corridor trees or danger trees. Other riparian vegetation, (e.g. willows) would be left in place, where possible, to preserve shade conditions and wildlife habitat.
- BPA would work with the USFS and accommodate requests to enhance the availability of large woody debris in riparian areas when possible.
- On slopes greater than 20% and within 100 feet of waterbodies identified as bull trout habitat, there would be no use of ground disturbing equipment.
- If it is necessary to manage vegetation within riparian areas and/or near streams, ponds, wetlands, or other sensitive water resources along the ROW corridor, buffer zones would be used.
- Within buffer zones, only hand cutting and spot and localized herbicide applications with herbicides that have acute toxicities (to aquatic organisms) in the range of "practically non-toxic" to "slightly toxic" (e.g. triclopyr triethylamine (TEA) salt (Garlon 3A/Tahoe 3A)) would be used in between the water's edge and 100 feet on either side of the resource (35 feet for streams without ESA-listed fish). Other BPA-approved herbicides may be used beyond the 100- or 35-foot buffer.
- Herbicides would be applied according to label instructions by individuals certified by the State of Washington.
- ROWs and access road areas in "best" to moderate monarch butterfly habitat (Ranked 1-3) would be mowed prior to June 1 or after September 30, whenever possible, to reduce impacts during vulnerable monarch life stages.
- Whenever possible, reduce/limit mowing frequency to no more than once per year.
- All work crew members that may be involved in on the ground vegetation management activities, including planning, mowing, herbicide use and tree removal, will be trained to identify and avoid

effects to milkweed (*Asclepias fascicularis* and *A. speciosa*) and whitebark pine (*Pinus albicaulis*) whenever possible

- Reduce spread of invasive plants by cleaning vehicles and equipment prior to moving to new work areas.

Table 1. Action Area within 65 Yards of NSO Habitat – Timing Restrictions to Apply (work to be completed after July 31<sup>st</sup>).

<b>Action Area within 65 yards of suitable and highly suitable northern spotted owl habitat</b>		
<b>BPA asset</b>	<b>Structure line mile/number</b>	<b>Access roads</b>
Chief Joseph Monroe No. 1	41/3-105/1	All BPA access roads

Table 2. Action Area within 110 Yards of modeled marbled murrelet habitat – Seasonal Timing Restrictions to Apply (work to be completed prior to April 1st or post Sept. 23rd)**Action area within 110 yards of moderately high and high quality marbled murrelet habitat (>5 acres contiguous habitat) and NW Forest Plan Land Use Allocations (LUA) Protected Habitat**

<b>BPA asset</b>	<b>NW Forest Plan LUA</b>	<b>Structure line mile/number</b>	<b>Access Roads</b>
Chief Joseph-Monroe No. 1	Late Successional Reserve	81/1-86/3	All associated BPA roads
		92/1-94/1	All associated BPA roads
	Congressional Reserve Late Successional Reserve	95/4-98/1	All associated BPA roads
	Late Successional Reserve	100/2-101/1	All associated BPA roads
Chief Joseph-Monroe No. 3 and 4	Late Successional Reserve	100/2-101/5	All associated BPA roads
		103/2-104/5	All associated BPA roads
Chief Joseph-Monroe No. 1	Late Successional Reserve	102/4-104/2	All associated BPA roads
		108/3-109/2	All associated BPA roads

Table 3. Action Area with suitable modeled marbled murrelet nesting habitat – Daily Timing Restrictions to apply when work is completed from April 1st – Sept. 23rd.

<b>Areas within suitable marbled murrelet habitat (NW Forest Plan and aerial imagery)</b>			
<b>BPA asset</b>	<b>Structure line mile/number</b>	<b>Notes</b>	<b>Access Roads</b>
Chief Joseph-Monroe No. 1	86/3-95/4	Portions in seasonal breeding restriction	All associated BPA roads

	101/1-102/4		All associated BPA roads
Chief Joseph-Snohomish No. 3	101/5-103/2		All associated BPA roads
Chief Joseph-Monroe No. 1	106/3-107/2		All associated BPA roads
	109/2-109/5		All associated BPA roads

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 as critical habitat for one or more species, and/or identified as Essential Fish Habitat (EFH) have been noted in the vegetation control prescription. 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, Fall 2022 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 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/ Jonnel Deacon*

Jonnel Deacon  
Physical Scientist (Environmental)

Concur:

*/s/ Katey Grange*

Katey Grange      Date: October 20, 2022  
NEPA Compliance Officer

References: Vegetation Control Cut Sheets