

# memorandum

DATE: September 16, 2020

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-750)

TO: Leonard Rieman  
Natural Resource Specialist – TFBV-SCHULTZ

**Proposed Action:** Vegetation Management along the Vantage – Schultz No. 1 Transmission Line Corridor

**Pollution Prevention and Abatement Project No.:** 4,438

**Location:** Kittitas County, Washington

**Description of the Proposal:** BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way and access roads of the 500kV Vantage – Schultz No. 1 transmission line in the BPA Wenatchee District. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads from structure 1/1 to 33/5.

The corridor in the proposed project area measures approximately 500 feet in width and crosses approximately 35 miles of terrain through rural residential, agricultural, and private lands; as well as lands managed by the Washington Department of Natural Resources and US Department of Defense.

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. Coordination with the Washington Department of Natural Resources and US Department of Defense occurred in September 2020.

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. Herbicides would be selectively applied using spot treatment

(stump or stubble treatment, basal treatment, and/or spot foliar) or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 2000), to ensure that the roots are killed - preventing new sprouts - and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure.

Approximately 250 acres of ROW and 44 miles of access roads would be treated in the fall of 2020. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove up to 50 trees in or adjacent to, the ROW. Other tree clearing activities would include side-limbing up to 50 trees. Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

**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 will 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 has 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.

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: 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 archeologist 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 2020 through spring 2021. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

Findings: This Supplement Analysis finds that: (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD and (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Michelle Colletti  
Michelle K. Colletti  
Environmental Scientist

CONCUR:

/s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer

DATE: September 16, 2020

References:  
Vegetation Management Prescription and Checklist  
Effects Determination