

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-875)

Pollution Prevention and Abatement Project Number 5005
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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 (ROW) of Bonneville PH 1-Alcoa 1&2 No. 1, spans 41/6 to 41/5, in Clark County, Washington. Bonneville PH 1-Alcoa 1&2 No. 1 shares the ROW with the Pioneer-Alcoa No. 1 transmission line. Vegetation management needs were assessed, and a Vegetation Control Cut Sheet document was created for the ROW corridor and the associated access roads along this transmission asset.

The corridor in the proposed project area measures approximately 908 feet in length and transverses through land owned by Washington State near Vancouver Lake.

The landowner was notified in time to commence vegetation management activities. 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). 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.

The proposed activities include the treatment of danger brush which could include side limbing with a follow up of an herbicide spot-treatment of hardwood stems. The initial treatment period would be spring 2024 through fall of 2024. A follow-up treatment of re-sprouting target vegetation would be conducted by 2025. 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. 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 ESA-listed species. A species list was obtained for federally-listed, proposed, and candidate species potentially occurring within the project boundaries from the 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 for monarch butterfly, a Candidate species, which received a "May Adversely Affect Individuals and habitat, but is not Likely to Result in Jeopardy of the Proposed Species" determination. Since monarch butterfly is a candidate species, consultation with U.S. Fish and Wildlife is not required under the Endangered Species Act. BPA will implement the following mitigation measures to limit potential impacts to monarch butterfly.

- 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, (i.e., willows) would be left in place, where possible, to preserve shade conditions and wildlife habitat.
- 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 practically non-toxic to slightly toxic herbicides (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.
- All work crew members that may be involved in on the ground vegetation management activities, including mowing and herbicide use, will be trained to

identify and avoid effects to milkweed (*Asclepias fascicularis* and *A. speciosa*) whenever possible.

- If possible, reduce/limit mowing frequency to no more than once per year, prior to June 1st or after September 30th, if possible to reduce impacts during vulnerable monarch life stages.
- Reduce spread of invasive plants by cleaning vehicles and equipment prior to moving to new work areas.

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.

Cultural Resources

The proposed vegetation management actions do not result in ground disturbance to the physical environment. An archeologist surveyed the work area and no cultural resource concerns were identified during the survey. The vegetation management actions were determined to not be actions that would 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, spring 2024, 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.

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Concur:

/s/ Katey C. Grange
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NEPA Compliance Officers Date: April 11, 2024