Supplement Analysis for the Transmission System Vegetation Management Program EIS (DOE/EA/EIS-0285/SA-836)

Pollution Prevention and Abatement Project Number 4877 Natural Resource Specialist/Project Manager: Craig Fackrell – TFBV – BELL-1

Bonneville Power Administration Department of Energy



Proposed Activities

The Bonneville Power Administration (BPA) proposes to clear unwanted vegetation in and adjacent to the right-of-way (ROW) of high-voltage transmission lines and access roads in Stevens, Pend Oreille, Ferry, and Spokane Counties, Washington; and Bonner County, Idaho. Specifically, BPA plans to conduct periodic vegetation management along the Vera Tap to Trentwood-Valley Way No 1, Green Bluff Tap to Bell-Trentwood No 2, Grand Coulee-Bell No 3, Grand Coulee-Bell No 5, Grand Coulee-Bell No 6, Westside AVA-Bell No 1, Albeni Falls-Sand Creek No 1, Albeni Falls-Pine Street No 1, Priest River Tap to Albeni Falls-Sand Creek No 1, Boundary-Sacheen No 1, Usk-Boundary No 1, Trentwood-Valley Way No 1, and the Bell-Trentwood No 1 high voltage transmission lines. Boundary-Nelway No 1, Boundary-Waneta No 1 and Sacheen-Bell No 1 would also undergo periodic vegetation management for all parts of the line that are not located on US Forest Service-managed property. 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 corridors in the proposed project area range from approximately 30 to 500 feet in width and cover approximately 235 miles of terrain through a variety of land uses, including urban, suburban, rural residential, range land, private timber lands, and agricultural as well as land managed by the State of Washington and the US Bureau of Land Management (BLM).

BPA coordinated with the State of Washington and BLM land managers in the fall of 2022. Further, 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.

Approximately 2,900 acres of cut, lop and scatter of tall-growing vegetation within the right-of way corridor would be initially treated in 2023, along with approximately 1,330 acres of herbicide treatment. Approximately 45 trees would be side limbed, and vegetation near approximately 45 structures would be cleared and herbicide selectively applied. Approximately 8 miles of access road maintenance is also planned, which involves clearing vegetation in the roadway and trimming trees to allow for vehicle passage. Urban tree work is also planned to maintain safety and reliability clearances in city and suburban areas. Work would be conducted by crews of two to four, using standard equipment such as mowers, chainsaws, and sprayers, utilizing light duty trucks and all-terrain vehicles. Additional vegetation management may be necessary in subsequent years 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 chip, lop and scatter, or mulching techniques.

<u>Analysis</u>

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 Gallon 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 or their habitat located along the Vera Tap to Trentwood-Valley Way No 1, Green Bluff Tap to Bell-Trentwood No 2, Boundary-Nelway No 1, Boundary-Waneta No 1, Sacheen-Bell No 1, Grand Coulee-Bell No 3, Grand Coulee-Bell No 5, Grand Coulee-Bell No 6, Westside AVA-Bell No 1, Albeni Falls-Sand Creek No 1, Albeni Falls-Pine Street No 1, Priest River Tap to Albeni Falls-Sand Creek No 1, Boundary-Sacheen No 1, Usk-Boundary No 1, Trentwood-Valley Way No 1, and the Bell-Trentwood No. 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 Canada lynx, grizzly bear, bull trout, and bull trout critical habitat. BPA determined that the proposed project *may affect, but is not likely to adversely affect* the above listed species. BPA also made a *not likely to jeopardize* determination for monarch butterfly (candidate for ESA listing). The USFWS concurred with these determinations in a letter dated September 3rd, 2021 (reference code: FWS/IR9/ES/IFWO/2021-I-1822) and in an additional letter on May 4, 2021 (reference code: 01EWFW00-2021-I-0878). Conservation measures, agreed upon between BPA and USFWS during consultation, are noted in the USFWS letter of concurrence, the biological assessment created for this region, Vegetation Control Cut Sheets, and other work management documents.

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.

<u>Cultural Resources</u>: 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.

<u>Re-Vegetation</u>: 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.

<u>Monitoring</u>: The entire project would be inspected during the work period May 2023 through September 2023. 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/ <u>Zoe Wellschlager</u> Zoe Wellschlager, EPR-4 Physical Scientist

Concur:

/s/ <u>Katey Grange</u> Date: <u>March 27, 2023</u> Katey Grange NEPA Compliance Officer

References: Vegetation Control Cut Sheets