

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-919)

**Pollution Prevention and Abatement Project Number 6878**  
**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 certain portions of the Rocky Reach-Maple Valley No 1 right-of-way (ROW) in Kittitas County Washington. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the ROW corridor.

The corridor in the proposed project area measures approximately 150 feet wide and is less than 1 mile long through United States Forest Service (USFS) managed land. Coordination with USFS has occurred and no concerns were expressed.

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 ROW to control the development of potentially threatening vegetation.

BPA proposes to remove approximately 460 corridor trees in the ROW between structures 87/2 and 87/4. 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 lop and scatter, or mulching techniques.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

**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. Trees within 126 feet of the streams would be topped to preserve 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.

#### 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 under USFWS’ jurisdiction, except northern spotted owl, northern spotted owl critical habitat, marbled murrelet, bull trout, bull trout critical habitat, and gray wolf. The United States Fish and Wildlife Service (USFWS) agreed with BPA’s determination of not likely to adversely affect those species in a letter dated July 9, 2025 (FWS/R1/2025-0086114). Impact avoidance and minimization measures include

- Daily timing restrictions would be used during dawn and dusk hours during the project (Two hours after sunrise and two hours before sunset). This would apply to all construction-related activities including human presence, vehicle traffic, and tree cutting. Pre-work meetings occurring within two hours of sunrise must occur off-site at a developed location.
- Absolutely no food scraps of any kind or project-related trash of any kind can be left exposed and unattended for any amount of time. No food may be fed to or left for wildlife. All food and project-related trash must be transported off-site after each workday. The BPA environmental lead will inspect the work area and provide trash management recommendations anytime they are on-site and find trash or food being improperly managed.
- Seasonal work restrictions would be used to prevent disturbance to breeding individuals. All work must be completed between July 16 and the last day in February.
- Trees within 126 feet of the two creeks in the action area would be topped, not cut down entirely, to maintain riparian habitat.

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. Locations throughout the project that require cultural surveys or monitoring are also noted in the cutsheets.

#### **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, 2025 through 2026. 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' Proposed Action and no substantial new circumstances or information about the

significance of the adverse effects that bear on the analysis in the EIS' Proposed Action or its impacts within the meaning of the DOE National Environmental Policy Act (NEPA), Implementing Procedures (dated June 30, 2025) and 40 CFR § 1502.9.<sup>1</sup> Therefore, no further NEPA analysis or documentation is required.

/s/ Jonnel Deacon

Jonnel Deacon

Physical Scientist (Environmental)

Concur:

/s/ Katey Grange

Katey Grange

NEPA Compliance Officer

Date: July 28, 2025

References:

Vegetation Control Cut Sheets

---

<sup>1</sup> BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this SA BPA is voluntarily relying on the CEQ regulations, in addition to the DOE NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.