Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-920)

Pollution Prevention and Abatement Project Number 6886
Natural Resource Specialist/Project Manager: Len Rieman

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, access roads, and communication sites in Douglas, Okanogan, Klickitat and Yakima Counties, WA, specifically the following segments of transmission lines: 22/3 to 33/4 of Wautoma-Knight No. 1, 77/3 to 99/3 of North Bonneville-Midway No 1, 1/1 to 35/2 of Chief Joseph-East Omak No 1, 1/3 to 1/6 of East Omak tap to Grand Coulee-Foster Creek No 1, and 40/1 to 40/3 of Grand Coulee-Okanogan No 2 (Table 1). 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.

All work would be conducted in and adjacent to the right-of-way (ROW). ROWs are approximately 250 feet in width and total approximately 67 linear miles. The approximate total area of the proposed treatment area is 2,030 acres. The Wautoma-Knight and North Bonneville-Midway corridors lie within the Yakama Nation Reservation and the Chief Joseph-East Omak and Grand Coulee Okanogan corridors lie within the Colville Confederated Tribes Reservation.

Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Public notices would be posted at proposed herbicide application areas. 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 208 acres of transmission right-of-way would be cut, lopped and scattered, 283 acres of mowing, along with 378 acres of herbicide treatment after the cut. Approximately 70 miles of access roads and 261 structure sites would be initially treated summer and fall of 2025. In addition, BPA proposes to remove approximately 143 trees in, or adjacent to, the ROW and to remove limbs from approximately 41 trees in, or adjacent to, the ROW. 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.

Transmission Line Name	Span (line mile/structure number)	
Wautoma-Knight No 1	22/3	33/4
North Bonneville-Midway No 1	77/3	99/3
Chief Joseph-East Omak No 1	1/1	35/2
Grand Coulee-Okanogan No 2	40/1	40/3
East Omak Tap to Grand Coulee-Foster Creek No 1	1/3	1/6

Table 1. Wenatchee District FY25 Locations authorized in this Phase 3 SA.

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 these corridors 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-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 Canada lynx, bull trout, gray wolf, North American wolverine, and yellow-billed cuckoo. BPA made a determination of "not likely to result in jeopardy of proposed species" for monarch butterfly.

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 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, 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. BPA

archaeologists have reviewed the proposed action for potential effects to historical and cultural resources. Other vegetation management actions do not result in ground disturbance to the physical environment, so the actions are not those that 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. The Colville Confederated Tribes, Tribal Historic Preservation Officer (THPO) agreed to the content of the proposed public notices to be posted during herbicide application on July 8, 2025.

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, summer 2025 through fall 2025. 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 § 1502.9.1 Therefore, no further NEPA analysis or documentation is required.

/s/ *Justin Carr*
Justin Carr
Physical Scientist

Concur:

/s/ *Katey Grange*
Katey Grange
NEPA Compliance Officer Date: *August 19, 2025*

References:
Vegetation Control Cut Sheets

[1] 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.