

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-914)

**Pollution Prevention and Abatement Project Number 5084**  
**Natural Resource Specialist/Project Manager: Jason Hunt (BPA) – TFBV-Olympia-1**

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

The Bonneville Power Administration (BPA) proposes to clear unwanted vegetation in and adjacent to the rights-of-way of high-voltage transmission lines and access roads in Pacific, Mason, and Callam counties, Washington. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the rights-of-way (ROW) corridors and associated access roads along the Naselle-Tarlett Nos. 1 and 2, Fairmount-Port Angeles No. 1, and Olympia-Shelton Nos. 1 to 4. Portions of these ROWs were analyzed in this Supplement Analysis and are identified in the table below (Table 1).

<b>Corridor</b>	<b>Transmission Line</b>	<b>Spans</b>
<b>CHMH_NASE-LOBE-1</b>	Naselle-Tarlett No 1	1/6-1/11, 4/1 - 4/5, 4/6 - 4/8, 9/5 - 9/8, 11/3 - 12/1, 13/1 - 13/5, 13/6 - 14/6, 16/5 - 16/9, 17/1 - 17/2
<b>CHMH_NASE-LOBE-1</b>	Naselle-Tarlett No 2	12/4 -12/5, 14/3 - 14/7, 15/10 - 18/2, 18/3 - 18/4, 18/6 - 18/7
<b>OLMH_FAMT-POAN-1</b>	Fairmount-Port Angeles No 1	8/1 - 8/2
<b>OLMH_SHEL-SHEL-4</b>	Olympia-Shelton No 4	12/2 – 13/1

**Table 1: Corridor spans proposed for treatment**

The corridors in the proposed project area range in width from approximately 100 to 500 feet and extending to a total length of roughly 115 miles. The corridors run through primarily private lands, but some tracts are managed by the State of Washington and Washington Department of Natural Resources (WA DNR). Land use is varied; with urban, suburban, rural-residential, agricultural, forestry, commercial and industrial uses present along the ROW corridors.

BPA has coordinated with WA DNR and work occurring on their land is known and they did not express any concerns. Letters, on-site meetings, emails, and phone calls would be used to notify additional 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 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.

The proposed activities include the treatment of up to 5,015 acres of shrubs and saplings using selective hand-cutting methods followed immediately by an herbicide spot-treatment of hardwood stems, as well as the treatment of up to 5,131 acres using localized herbicide applications. The proposed activities also include the treatment of approximately 3 miles of access roads, and 57 structure sites using mowing techniques and other approved methods. In addition, BPA proposes to remove limbs from approximately 22 trees in, or adjacent to, the ROW. Approximately 1 corridor tree and 5 danger trees would be removed and chipped. The initial treatment period would be from March 2025 through December 2025. A follow-up treatment of re-sprouting target vegetation would be conducted. 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.

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. 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 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 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 Columbian white-tailed deer, North American wolverine, marbled murrelet, marbled murrelet critical habitat, Northern spotted owl, streak horned lark, western snowy plover, yellow-billed cuckoo, Northwestern pond turtle, bull trout, bull trout critical habitat, Dolly Varden, monarch butterfly, and Kincaid's lupine ESA-listed species and designated critical habitat under USFWS' jurisdiction. The proposed vegetation management activities are within the scope of activities and action area evaluated in BPA's biological assessment that determined that vegetation management activities along the Raver-Paul Vegetation Management Project would be not likely to adversely affect Yelm pocket gopher. The USFWS sent a letter of concurrence (LOC) (O1EWF00-2021-I-1335) to BPA in July 2021. The following conservation measures would be implemented:

- All vegetation removal would be restricted to aboveground, leaving root systems intact.
- Vehicles, other than ATVs and UTVs, used to access the project area, would stay on established access roads and routes of travel.
- Spot and localized treatments (stump treatment, basal treatment, and/or low-volume foliar) would be used to minimize application to non-target plants.
- BPA-approved herbicides, Triclopyr TEA and BEE (Garlon 3A and Garlon 4, respectively), would be used within project areas with potential sensitive terrestrial species.
- Herbicides would be mixed according to label instruction and applied by an individual certified through BPA's pesticide applicator certification plan (BPA 2000).

The attached Olympia FY25 Vegetation Management Review includes sensitive species conservation measures that are required where the Vegetation Control Cut Sheets note that ESA-listed/sensitive species or their habitat are potentially present.

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, 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.

### 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 2025 through Winter 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 10 CFR § 1021.314 and 40 CFR § 1502.9.<sup>1</sup> Therefore, no further NEPA analysis or documentation is required.

/s/ Brenna Blankenship

Brenna Blankenship  
Biological Scientist

Concur:

/s/ Katey Grange

Katey Grange  
NEPA Compliance Officer

Date: March 25, 2025

References:

Olympia FY25 Vegetation Management Review  
Vegetation Control Cut Sheets  
Olympia FY25 VGMT Resource Review

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<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 DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*