

# memorandum

DATE: October 18, 2017

REPLY TO  
ATTN OF: EPI-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-674)

TO: Jason Hunt  
Natural Resource Specialist – TFBV-OLYMPIA

**Proposed Action:** Vegetation Management along the Olympia-Grand Coulee #1 Transmission Line Corridor - Part 2

**Pollution Prevention and Abatement Project No.:** 3473

**Location:** Thurston County, Washington

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposal:** BPA proposes to clear unwanted vegetation within 5 discrete locations along and adjacent to the 287-kilovolt (kV) Olympia-Grand Coulee #1 transmission line corridor.

Site 1: Located in Olympia, Washington near the cross streets of 54th Ave SW and Miner Dr. SW. Two sections make up site 1 equaling total of approximately 4,000 linear feet or approximately 11.4 acres. The first section is located on the Olympia - Grand Coulee No. 1 transmission line beginning at 54th AVE or mile/structure 1/5 to 1/6. The right of way at this location of the transmission line has an approximate width of 125 feet with a length of approximately 1060 linear feet or approximately 3 acres within Oregon spotted frog (OSF) known habitat.

The second section of site 1 is located along the Olympia-Tacoma No. 1 Transmission line from mile/structure 1/4 to 1/7. 2,500 feet of this section is located within the OSF Critical Habitat and 433 feet within known OSF habitat for an area of approximately 8.4 acres. (Figure 2)

Site 2: Located in Tumwater, Washington adjacent to I-5 at the cross streets of Kingswood Dr SW and Tyee Dr SW. The transmission line right of way at mile structure 2/5 has an approximate width of 250 feet. The approximate length of site 2 is 880 linear feet or approximately 5 acres. (Figure 3)

Site 3: Located in Olympia, Washington south of the Hunter family farm at the cross streets of 73rd Ave SE and Canterwood Drive SE. Site 3 is located within the transmission line right of way from mile/structure 8/4 to 10/1 is approximately 6,900 feet long 250 feet wide or approximately 39.6 acres. (Figure 4)

Site 4: Located in Olympia, Washington near the cross streets of Yelm Hwy SE and Lake St Clair Dr SE. Site 4 is located within the transmission line right of way from mile/structure 11/5 to just west to 12/2 measuring approximately 2,225 feet long and 250 feet wide or approximately 12.8 acres. (Figure 5)

Site 5: Located in Yelm, Washington near the cross streets of Mud Run RD SE and Yelm Hwy SE. Site 5 is located within the transmission line right of way south of mile/structure 18/5 to south of 18/8 measuring 1,015 feet long and 250 feet wide or approximately 5.8 acres. (Figure 6)

To comply with Western Electricity Coordinating Council (WECC) 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.

A combination of selective and nonselective vegetation control methods would be used to perform the work. All methods including selective cutting, mowing, and herbicide treatments are consistent with the methods approved in BPA's Transmission System Vegetation Management Program EIS. Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All on-site debris would be scattered along the ROW.

**Analysis:** A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285, May 2000) 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 Prescription & Checklist.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) that occur within the project area are described in the Vegetation Control Prescription. 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 will 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. Private water wells/springs were identified along the ROW. No herbicide application would be made within a 50-foot radius of the wellhead/spring (164 feet when using herbicides with a ground/surface water advisory). For location information, see the Vegetation Control Prescription.

**Threatened and Endangered Species:** Pursuant to its obligations under the Endangered Species Act (ESA), BPA entered into informal consultation with USFWS/Washington Fish and Wildlife Office for potential effects on the Olympia pocket gopher (*Thomomys mazama pugetensis*), Yelm pocket gopher (*Thomomys mazama yelmensis*), Oregon spotted frog (*Rana pretiosa*), and critical habitat for the Oregon spotted frog.

On September 27, 2017, BPA received the concurrence from the Service with BPA's determination that the proposed project as described above "may affect, and is not likely to adversely affect" Olympia pocket gopher, Yelm pocket gopher, Oregon spotted frog, and designated critical habitat for Oregon spotted frog.

A determination was made that the project would have "No Effect" for ESA-listed species under USFWS' jurisdiction. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). A determination of "No Effect" was made for all ESA-listed species under NMFS' jurisdiction, with the implementation of the conservation measures in Water Resources section above.

**Essential Fish Habitat:** A review of the NMFS database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources would be followed for EFH. Based on project conservation measures, it was determined that the project would not adversely affect EFH.

Cultural Resources: No ground-disturbing work is proposed within the project area; however, if a cultural site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist, the BPA Archeologist, and the Yakama Cultural Resources Program would be contacted.

Re-Vegetation: Native grasses and low-growing shrubs are present on the ROW and are expected to naturally seed into the areas that would have lightly disturbed soil.

Monitoring: The entire project would be inspected during the work period. All cutting operations will occur from January 1 to April 1, 2017, and spray operation will occur from June 15 to September 15, 2017. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard of inspection results would be used to document formal inspections and would be filed with the contracting officer.

**Findings:**

This Supplement Analysis finds that: (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

*/s/ John B. Wiley*

John B Wiley  
Environmental Scientist

CONCUR */s/ Sarah T. Biegel*  
Sarah T. Biegel  
NEPA Compliance Officer

DATE: October 18, 2017

References:  
Vegetation Management Prescription and Checklist  
Effects Determination

USFWS Letter of Concurrence, 01EWF00-2017-1-1023, dated September 27, 2017.