

# memorandum

DATE: January 14, 2019

REPLY TO  
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-710)

TO: Jason Hunt  
Natural Resource Specialist – TFBV-OLYMPIA

**Proposed Action:** Vegetation management along the Mossy Rock-Chehalis No.1 and Raver-Paul No.1 transmission line corridors.

**Pollution Prevention and Abatement Project No.:** 3895

**Location:** Lewis and Thurston counties, Washington

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

**Description of the Proposal:** BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor, and access roads along the Mossy Rock-Chehalis No. 1 transmission line corridor from structure 7/1 to Chehalis Substation, and the Raver-Paul from structure 48/2 to structure 68/2.

In the proposed project area, the right-of-way (ROW) corridor for the Mossy Rock-Chehalis is between 100 to 250 feet in width and crosses approximately 22 miles of terrain. In the proposed project area, the ROW corridor for Raver-Paul is between 250 to 300 feet in width and crosses approximately 20 miles of terrain. Both corridors consist of rural residential, small-scale agricultural, private timber, and Washington Department of Natural Resources land.

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. Land use for the project area consists of private forest, agricultural, and rural residential.

A combination of selective and nonselective vegetation control methods that may include hand cutting and herbicidal treatment would be used to perform the work. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Vegetation Management EIS, to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. Approximately 2,403 acres of ROW and 5.2 miles of access roads would be initially treated between January 2019 and October 2020. A follow-up

treatment of re-sprouting target vegetation would be conducted on approximately 2,403 acres of ROW. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove approximately 36 trees that have been identified along the ROW fringe of the Mossy Rock–Chehalis transmission line. Other tree-clearing activities would include side-limbing approximately 89 trees. Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All onsite 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) occurring in the project area are noted 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. For location information, see the Vegetation Control Prescription.

**Threatened and Endangered Species:** Pursuant to its obligations under the Endangered Species Act (ESA), BPA has 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.

BPA conducted a review of ESA-listed species and Essential Fish Habitat (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 archeologist 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, January 2019 to October 2020. A follow-up treatment would occur 3-4 months after the initial treatment. 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/ Phil Smith for

Greg Tippetts  
Environmental Scientist

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

DATE: January 14, 2019

References:

Vegetation Management Prescription and Checklist  
Effects Determination