

memorandum

DATE: July 30, 2020

REPLY TO
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-746)

Jason Hunt - TFBV-Olympia

Proposed Action: Vegetation Management along the Paul-Olympia and Chehalis-Olympia corridors.

Pollution Prevention and Abatement Project No.: 4450 and 4476

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 Paul-Olympia No. 1 transmission line from Paul Substation to Olympia Substation, the Chehalis-Olympia No. 1 from Chehalis Substation to Olympia Substation, the Paul-Satsop No. 1 transmission line from 21/5 to 22/1, and the Chehalis-Centralia No. 2 transmission line from 1/3 to 1/4.

The right-of-way (ROW) corridor in the proposed project area measures approximately 110 to 325 feet in width and crosses approximately 55 miles of terrain through rural residential, small-scale agricultural, private timber, Washington Department of Natural Resources land, and the Scatter Creek South Wildlife Area (WLA). Letters notifying property owners of the proposed upcoming work have been mailed.

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 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 1,000 acres of ROW and 5 miles of access roads would be treated by mowing or cut, lop, and scatter between October 2020 and

September 2021; however, 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. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove approximately 30 trees that have been identified along the ROW fringe known as danger trees and 25 trees from within the ROW known as corridor trees. Other tree clearing activities would include side-limbing approximately 50 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 and Essential Fish Habitat: 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 and designated critical habitat under USFWS' jurisdiction, except Taylor's checkerspot butterfly; Oregon spotted frog (OSF) and its designated critical habitat; Olympia pocket gopher; and Yelm pocket gopher. BPA made a determination that the proposed project would be "Likely to Adversely Affect" Taylor's checkerspot butterfly, "Likely to Adversely Affect" OSF, "Not Likely to Adversely Affect" Oregon spotted frog critical habitat, "Not Likely to Adversely Affect" Olympia pocket gopher, and "Not Likely to Adversely Affect" Yelm pocket gopher. The USFWS concurred with this determination in a Biological Opinion dated 5/4/2018. USFWS confirmed on 7/14/2020 that no changes to the Biological Opinion were needed and that routine vegetation management could continue under the Biological Opinion. Impact avoidance and minimization measures, agreed upon between BPA and USFWS during consultation, are noted in the Vegetation Control Prescription and include:

- No mowing or mechanized equipment would be used in the ROW, on existing access roads, and around structure sites where Taylor's checkerspot butterflies are known/assumed to be present. BPA would not mow or use mechanized equipment *in standing water* in OSF suitable habitat in identified potential habitat. BPA, therefore,

could mow these areas any time of year when the ground is dry. "Standing water" is defined as water of any depth that is connected to wetlands, creeks, etc. This does not include isolated puddles and potholes. "OSF suitable habitat" is defined as ephemeral or permanent bodies of fresh water including natural or manmade ponds, springs, lakes, slow-moving streams, wetlands, pools, canals, or ditches. OSF suitable habitat occurs outside of the designated critical habitat boundaries. "OSF potential habitat" is a buffer around mapped aquatic features that indicates that suitable habitat could be present and occupied by OSF. OSF potential habitat was provided to BPA by USFWS in a shapefile, and is meant to inform those carrying out the proposed action that they should be looking for suitable habitat. OSF potential habitat occurs outside of the designated critical habitat boundaries.

- 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. Only Triclopyr TEA (Garlon 3A) would be used between the water's edge and 100 feet of wetlands and waterbodies providing suitable OSF habitat (35 feet for non-sensitive wetlands and waterbodies). Herbicide application to standing water is prohibited.
- Herbicides would be mixed according to label instruction and applied by an individual certified through BPA's pesticide applicator certification plan (BPA, 2000b).
- BPA would minimize vegetation management and vehicle access within the Taylor's checkerspot reintroduction area within the WDFW Scatter Creek South Wildlife Area (WLA), between 183rd Ave SW and the wooded area to the north (approx. 1,350 feet). Whenever possible, this area would be accessed on foot.
- All vegetation management activities would occur between September 1 and January 15 in Taylor's checkerspot butterfly habitat.
- Inspection activities between January 16 and August 31, in Taylor's checkerspot butterfly habitat, would be conducted on foot.
- BPA would coordinate with WDFW to use an alternate access on the east side of the Scatter Creek South WLA to get to the project area and avoid driving through the Taylor's checkerspot introduction area.
- BPA would coordinate with WDFW and allow them the opportunity to monitor BPA's vegetation management contractor within the Scatter Creek South WLA and ensure that all avoidance and minimization measures are followed and disturbance to sensitive species is avoided or minimized.
- All equipment that would be used off of existing roads and routes of travel would be cleaned prior to entering ROW to reduce the potential spread or introduction of noxious weeds or other exotic species.
- Except for inspections, all work occurring in standing water in suitable habitat in potential habitat for OSF would occur between July 1 and October 15.
- If encroaching hazardous vegetation needing management is discovered within permanent waters that are known or assumed to provide habitat to OSF, and the hazardous vegetation must be removed outside of the dry season (July 1 and October 15).

BPA would contact USFWS to discuss methods and mitigations that would be implemented to remove the hazard.

- Except for inspections, no work would occur during or immediately after a major precipitation event (>0.50 inches).
- BPA would work with the USFWS to identify road segments in the right-of-way that are seasonally flooded, suitable for OSF, and where a limitation on road use would effectively reduce the potential for driving over OSF in all life stages. Those identified road segments would not be driven over when flooded unless on-foot access is not sufficient for meeting the need for inspection and maintenance.
- Prior to conducting in-water work in identified drainages for the Black River Watershed containing OSF, clothing or equipment or materials must be disinfected. (See *Disinfection Procedures*, below). These drainages include the following:
 - Black Lake
 - Dempsey Creek
 - Salmon Creek
 - Black River
 - Beaver Creek
 - Blooms Ditch
 - Mima Creek
 - Allen Creek

Disinfection Procedures

Disinfection procedures must be implemented when entering or leaving the above- identified drainages. Disinfection must be performed regardless of where the clothing or equipment was last used, including adjacent drainages also contain OSF. By “in-water work” refers to when boots or other equipment enter standing water in suitable habitat in potential habitat. This requirement does not apply to vehicles that remained on existing roads and routes of travel.

All personnel entering ponds and wetlands are required to follow disinfection techniques for the control of chytrid fungus (*Batrachochytrium dendrobatidis*), ranavirus, and other potentially unknown diseases or parasites. For this specific consultation covering BPA’s Paul-Satsop and Olympia-Chehalis powerline easement, personnel must disinfect equipment prior to entering a water body in the following Black River watershed drainages. These drainage boundaries may change if new OSF occupied locations are discovered. Disinfection is not necessary between sites if sites are within the same drainage. If moving between drainages, disinfect equipment while at the site of exposure.

1. All field equipment must be cleaned of organic matter (dirt, mud, vegetation). Equipment includes all materials that may have contact with the water body, including waders and boots. (A stiff scrub brush is very helpful.)
2. All disinfection and rinsing must be done away from all water bodies.
3. All field equipment must be disinfected with a 10% liquid chlorine bleach (be sure bleach has a 6% concentration of sodium hypochlorite)* solution or with a anti-fungal/anti-bacterial solution approved by USFWS. The preferred method is to submerge equipment in a tub or sturdy plastic bag filled with the bleach solution; however, spray application may be used IF all surfaces are generously saturated,

including all crevasses such as under wader ankle protectors. Sprayed or dipped equipment must remain wet with bleach solution for at least 3-5 minutes and then be thoroughly rinsed with clean water. (If a scrub brush is used for removing organic material, remember to disinfect it between sites).

The Service will continue to update the BPA with the most effective and efficient protocols as new information and protocols become available.

* Bleach breaks down rapidly. Do not use an expired bleach bottle or one that has been open for more than one month. Fresh bleach solution should be mixed at the beginning of each field day to retain potency.

This protocol was adapted from disinfection procedures established in the US National Park Service's 2014 Equipment Decontamination Protocol for Field Staff in Sequoia and Kings Canyon National Parks and the Washington Department of Fish and Wildlife's Oregon spotted frog egg mass survey protocol.

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 of October 2020 to September 2021. A follow-up treatment may occur 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/ Jonnel Deacon

Jonnel Deacon

Environmental Scientist

CONCUR:

/s/ Katey Grange

DATE: July 30, 2020

Katey Grange

NEPA Compliance Officer

References:

Vegetation Management Prescription and Checklist
Effects Determination