

memorandum

DATE: July 9, 2020

REPLY TO
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-742)

TO: Jason Hunt
TFBV-Olympia

Proposed Action: Vegetation Management along the Port Angeles-Sappho corridor

Pollution Prevention and Abatement Project No.: 4338

Location: Clallam County, 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 Port Angeles-Sappho transmission line from Port Angeles Substation to Sappho Substation.

The right-of-way (ROW) corridor in the proposed project area measures approximately 100 feet in width and crosses approximately 43 miles of terrain through rural residential, small-scale agricultural, private timber, US Forest Service, and Washington Department of Natural Resources lands. 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 600 acres of ROW, 384 structure sites, and 10 miles of access roads would be initially treated between May 2020 and April 2021. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 600 acres of ROW between April 2021 and September 2021. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove approximately 1,500 trees that

have been identified along the ROW fringe and approximately 100 corridor trees within the ROW. Other tree clearing activities would include side-limbing approximately 1,000 trees. Additional vegetation management may be necessary in subsequent years where BPA personnel discover vegetation that poses a hazard to the transmission line. 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 marbled murrelet, Northern spotted owl, and bull trout and the designated critical habitat for the three species. BPA completed informal consultation with U.S. Fish and Wildlife Service on 7/1/2020 under consultation code 01EWF00-2020-I-0454. U.S. Fish and Wildlife Service concurred with BPA's determination that the proposed project would be not likely to adversely affect marbled murrelet and marbled murrelet designated critical habitat, northern spotted owl and northern spotted owl designated critical habitat, and bull trout and bull trout designated critical habitat using the conservation measures identified below.

- Danger tree cutting and side-limbing between structures 20/6 and 21/3 (representing VEG ID 605-617) and structures 28/3 and 29/2 (representing VEG ID 725-751) would be conducted outside of the marbled murrelet breeding season (April 1-September 23).
- All other work (corridor tree cutting; cut, lop, and scatter; mowing; herbicide application; etc) between structures 20/6 and 21/3 (representing VEG ID 605-617) and structures 28/3 and 29/2 (representing VEG ID 725-751) would be conducted using daily timing restrictions during the marbled murrelet breeding season (April 1-September 23). Daily timing restrictions means activities would be restricted to the period beginning two hours after official sunrise, and ending two hours prior to official sunset.

- All forms of vegetation management, including herbicide application, mowing, tree removal, and cut, lop, scatter techniques would not exceed 1% of the total acres of riparian habitat within a 6th field Hydrologic Unit Code per year.
- All water bodies (streams, rivers, lakes, wetlands) occurring in the project area would be noted in the Vegetation Control Prescription.
- All vegetation removal would be restricted to aboveground, leaving root systems intact and therefore retaining bank stability.
- When possible, all shrubs and all herbaceous material less than 10 feet in height, excluding noxious weeds, would be left untouched.
- Trees in riparian zones would be selectively cut to include only those that are within 50 feet of the conductor at maximum sag or are identified as corridor trees or danger trees. Other trees, (i.e. willows) would be left in place, where possible, to preserve shade conditions.
- On slopes greater than 20%, there would be no use of ground disturbing equipment.
- If it is necessary to manage vegetation within riparian areas and/or near sensitive water resources along the project corridor, buffer zones would be used.
- For all streams, ponds, wetlands, or other sensitive water resources, buffer zones would include only hand cutting and treatment with Triclopyr Triethylamine (TEA) salt (Garlon 3A/Tahoe 3A) in spot and localized applications between the water's edge and 100 feet on either side of the resource. Use of practically non-toxic to slightly toxic herbicides, other than Triclopyr TEA (Garlon 3A), between the water's edge and three feet from the water's edge is not permitted.

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 would 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 May 2020 to September 2021. 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

Katey Grange
NEPA Compliance Officers

DATE: July 9, 2020

References:

Vegetation Management Prescription and Checklist
Effects Determination
Biological Opinion
Sunrise and Sunset Times