## memorandum

DATE: October 26, 2018

**Bonneville Power Administration** 

REPLY TO ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-704)

To: Jake Grinolds Natural Resource Specialist – TFBV-SNOHOMISH

**Proposed Action:** Vegetation Management around Squak Mountain Radio Site and Maple Valley Substation to clear vegetation obstructing the communication beam paths.

## Pollution Prevention and Abatement Project No.: 4085

Location: King County, Washington

## Proposed by: BPA

**Description of the Proposal:** BPA proposes to clear unwanted vegetation along and adjacent to the telecommunication corridors surrounding Squak Mountain Radio Site (RS) and Maple Valley Substation.

The right-of-way (ROW) corridor in the proposed project area measures approximately 3 acres of terrain through King County parks, private residential, and BPA fee-owned property.

BPA has identified approximately 115 trees that are currently causing a partial blockage of the beam path between the different radio sites. The 115 trees will be cut using chain-saws. All onsite debris would be scattered along the ROW.

<u>Analysis</u>: A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Final EIS and Record of Decision (ROD) (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.

<u>Water Resources</u>: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. All vegetation removal would be restricted to aboveground, leaving root systems intact and therefore retaining bank stability. Only selected trees that interfere with the communication pathway will be removed. All other vegetation will remain. On slopes greater than 20%, there would be no use of ground disturbing equipment. No herbicide will be applied as part of this project. Trees within the communication pathway will be removed via mechanical means only. All removed trees will be cut, lopped, and scattered.

<u>Endangered Species Act and Magnuson-Stevens Act</u>: 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.

Marbled murrelet

• All work would occur outside of the marbled murrelet breeding season, which is from April 1 to September 23.

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.* 

<u>Cultural Resources</u>: 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.

<u>Re-Vegetation</u>: 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.

<u>Monitoring</u>: The entire project would be inspected during the work period, September 2018 to March 2019. 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 will be filed with the contracting officer.

<u>Findings</u>: 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.

<u>/s/ Chad Browning</u> Chad A. Browning Environmental Scientist

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CONCUR: /s/ <u>Stacy L. Mason</u> Stacy Mason NEPA Compliance Officer

References: Vegetation Management Prescription and Checklist Effects Determination