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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: June 10, 2016

REPLY TO ATTN OF: EPR-Olympia

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-629)

TO: Robert Hoff
Valuation and Forestry – TERS- Olympia

Proposed Action: Vegetation Management within the Olympia-Shelton and Shelton-Fairmount transmission line corridors.

Pollution Prevention and Abatement Project No.: 3451

Location: Mason County, Washington

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation within the first 3 miles of the Shelton-Fairmount and the last three spans of the Olympia-Shelton transmission line corridors. Several transmission lines are located within the subject transmission line right-of-way (ROW) corridors. The subject vegetation consists of isolated islands of trees located between the lines within the entire corridor and average 150 feet in width. The ROW in the project area consists of fee owned, rural residential, agricultural, industrial, Mason county, and City of Shelton properties.

See table below for ROW names and locations.

Transmission Line/ROW	Structures/Spans	Township	Range	Section
Olympia-Shelton	20/1 to 20/3	20N	4W	13
Shelton-Fairmount	1/1 to 2/8	20N	3W	6 &7

Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities.

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.

Starting in June 2016, BPA would selectively cut an estimated 1,176 danger trees located between the transmission lines within the ROW corridors. The project includes approximately

30 acres of ROW cumulatively, and will focus on selectively removing Douglas fir and Lodgepole pine.

All vegetation control 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 onsite 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 project 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.

Water Resources: No water resources (streams, rivers, lakes, wetlands) occur within the propose project areas. No ground-disturbing vegetation management methods would be implemented thus, eliminating the risk for soil erosion and sedimentation from the project.

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 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 also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries). A determination of "No Effect" was made for all ESA-listed species under NOAA Fisheries' jurisdiction.

Essential Fish Habitat: A review of the NOAA Fisheries 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: The proposed action is considered to be routine vegetation maintenance necessary to preserve the reliability of the transmission line and public safety. The project involves the cutting of brush and immature trees within the existing managed ROW, an activity that occurs on a regularly reoccurring basis. According to the scope of the proposed work, the activity is not a type that would result in changes in the character or use of historic properties, if any such historic properties are located in the area of potential effects. 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: The project includes only selective removal of Douglas fir and Lodgepole pine. The Oregon white oak trees present will be left untouched. The contractor has been directed to take every action possible to minimize the impacts to exixting understory species. Grasses and shrubs are present on the non-cultivated sections of the ROW and are expected to naturally seed

into the areas that would have lightly disturbed soil. In addition, equipment would be power-washed to prevent the spread of weeds.

Monitoring: The entire project would be inspected during the work period and additional monitoring for follow-up treatment would be conducted as necessary. A diary 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
District Environmental Scientist EPR-Olympia

CONCUR: /s/ *Sarah T. Biegel* DATE: *June 10, 2016*
Sarah Biegel
NEPA Compliance Officer

References:
Vegetation Management Prescription and Checklist
Effects Determination