memorandum

Department of Energy

Bonneville Power Administration

DATE: July 08, 2016

REPLY TO ATTN OF: EPR/Olympia

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285/SA 630)

то: Jason Hunt Natural Resource Specialist – TFBV-Olympia

Proposed Action: Vegetation management along the Paul-Allston transmission lines corridor.

Pollution Prevention and Abatement Project No.: 3428

Location: Cowlitz and Lewis Counties, Washington and Columbia County Oregon, in Bonneville Power Administration's (BPA) Olympia and Longview Maintenance Districts.

Proposed by: BPA

Description of the Proposal: BPA proposes to control vegetation along the transmission lines and access roads leading to the Paul-Allston transmission line corridor. The project extends from Chehalis Substation (located in Napavine, Washington), to Allston Substation (located in, Columbia county Oregon). The right-of-way (ROW) corridor measures from 100 to 900 feet in width and encompasses 1,390 acres over approximately 51 miles of terrain. Underlying land ownership includes; rural residential, agricultural, private and industrial timber, and Washington State DNR properties. Also included are 7 miles of transmission line access roads with an average width of 12-14 feet.

The project area consists of the properties within and adjacent to the ROW easement boundary of the Paul-Allston transmission lines corridor. Several segments of other transmission lines listed on the following table are partially located within the right of way corridor.

Transmission Line	Segment	Transmission Line	Segment
Longview-Bakers Corner	LONG to 1/4	Lexington-Longview No 2	6/4 to LONG
Longview-Allston No 1	LONG to ALSN	Longview-Chehalis 1&3 No 1	12/2 to CHEH
Longview-Allston No 2	LONG to ALSN	Longview-Chehalis 1&3 No 3	2/5 to CHEH
Longview-Allston No 3	LONG to ALSN	Mossy rock-Chehalis No 1	27/8 to CHEH
Longview-Allston No 4	LONG to ALSN	Paul-Napavine No 1	PAUL to NAPV
Napavine-Allston No 1	35/5 to ALSN	Napavine-Allston No 1	NAPV to 35/5
Chehalis-Centralia No 1	CHEH to 6/6	Raver-Paul No 1	68/3 to PAUL
Chehalis-Covington No 1	CHEH to 11/3	Paul-TransAlta Centralia No 1	All
Chehalis-Mayfield No 1	CHEH to 1/4	Paul-TransAlta Centralia No 2	All
Chehalis-Raymond No 1	CHEH to 3/11	Big Hannaford Tap to Paul-	All
		TransAlta Centralia	
Lexington-Longview No 1	6/4 to LONG	PP&L-Centralia Tap	1/01 to 3/01

In order to comply with Western Electricity Coordinating Council standards and to help provide system reliability, 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 will be used to perform the work. All methods including selective cutting, mowing, and herbicide treatments are consistent with the methods approved in the Vegetation Management Program, Transmission System Vegetation Management Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000 and Record of Decision (ROD) (August 23, 2000). 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) using chemicals consistent with the EIS.

Approximately 3,190 acres of ROW, 976 structure sites, and 7 miles of access roads would be initially treated starting in June 2016. A follow-up treatment of re-sprouting target vegetation would be conducted approximately 6-12 months after the initial treatment, and will be scheduled considering weather, and timing restrictions for listed species in the project area. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove 403 trees in, or adjacent to, the ROW. Other tree clearing activities would include side-limbing 1,760 trees along the edge of the ROW. 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: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (DOE/EIS-0285, May 2000) and ROD. A Vegetation Management Control Prescription and Checklist were completed for this project in accordance with the requirements identified in BPA's Transmission System Vegetation Management Program FEIS and ROD. The subject corridor traverses public and private lands in Cowlitz and Lewis Counties Washington and Columbia County Oregon. Land parcels transected by the corridor consist of, private residential, agricultural, private industrial timber, and Washington State DNR properties. No tribal lands are involved. 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 noted in the Vegetation Control Prescription. 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. No in-stream work would be conducted with the proposed project.

Where herbicide applications are prescribed, 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 water resource (stream, pond, and wetland) where threatened or endangered species have the potential to occur. For non-T&E water resources, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 35-foot buffer up to the water's edge.

Threatened and Endangered Species/Essential Fish Habitat: Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. Species lists from the United States Fish and Wildlife Service (USFWS) for the proposed project area were reviewed on June 08th, 2016. The lists identify Threatened and Endangered species and critical habitat units potentially occurring in the project area. In addition, a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration

(NOAA) Fisheries was conducted. A determination of "No Effect" was made for all ESA listed species and designated critical habitat for the project. A determination of "Not likely to adversely affect" was made for Essential Fish Habitat waters that occur in the project area.

Cultural Resources: No cultural resources are known to occur within the project area; additionally no ground disturbing activities are planned for this project that could potentially affect unknown cultural resources. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the appropriate tribe, the BPA Environmental Specialist and the BPA archeologist will be contacted.

Monitoring: The entire project will be inspected during the work period. Additionally, the line will be patrolled annually after treatment to monitor the effectiveness of the treatment and any issues associated with the project.

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. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

<u>/s/ Greg P. Tippetts</u> Greg P. Tippetts Physical Scientist (Environmental)

DATE: July 8, 2016

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

Attachments: Vegetation Control Prescription & Checklist Effects Determination for Threatened and Endangered Species and Essential Fish Habitat