

# memorandum

DATE: June 24, 2016

REPLY TO  
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-631)

TO: Robert Hoff  
Forester – TERS-OLYMPIA

**Proposed Action:** Tree clearing along the perimeter of Custer Substation

**Pollution Prevention and Abatement Project No.:** 3452

**Location:** Whatcom County, Washington: Bonneville Power Administration (BPA) Snohomish District.

**Proposed by:** BPA

**Description of the Proposal:** BPA proposes to remove conifers and other tall-growing hardwood species that have the potential to strike the Custer Substation perimeter fence or other BPA facilities within the fence. The project would take place on BPA fee-owned property and privately owned property adjacent to the substation.

BPA has coordinated project activities with the adjacent property owners through letters, email and phone calls.

In order to comply with Western Electricity Coordinating Council 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 facility (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 facility, causing an electrical arc, relay, outage, or other physical damage). The overall goal of BPA is to establish low-growing plant communities surrounding the facility to control the development of potentially threatening vegetation.

BPA proposes to manage approximately 1.7 acres of land in the summer of 2016. All work would be in accordance with accepted forest practices and methods. No herbicides would be used during the course of the project. Approximately 286 conifers that are within 150 feet of the fence would be removed, as well as tall-growing hardwood species. Understory species and hardwood species that do not have the potential to strike the facility or fence would be left in place. Merchantable timber from BPA property would be skidded and decked on-site or in adjacent areas, before being transported to a processing facility. Adjacent property owners have the option to keep the felled trees or allow BPA to manage them. 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 timber cruise, appraisal, and narrative were prepared for the project area that incorporates the requirements identified in BPA's 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.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) are present in the project area; however no herbicides would be used as part of the project, and no activities are proposed within at least 300 feet of a fish-bearing stream.

**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 any effects on any listed species under the jurisdictions of the United States Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries). Species lists were obtained for federally listed, proposed and candidate species potentially occurring within the project boundaries from USFWS and NOAA Fisheries. Based on the ESA review conducted, BPA determined that known populations of marbled murrelet, streaked horned lark, and yellow-billed cuckoo do not occur within at least 1/4-mile of the project area. It was determined that the project area is located several miles away from the nearest marbled murrelet, streaked horned lark, Puget Sound Chinook, Puget Sound steelhead, and bull trout critical habitat.

Puget Sound Chinook, Puget Sound steelhead and bull trout are known to inhabit California Creek, near the project area, at some point during their lifecycle. No project activities would take place within at least 300 feet of any stream containing ESA-listed species, the proposed work would be limited non-riparian areas, no construction-related sediment impacts are anticipated, and no herbicides would be used. Thus, it was determined that this project would have "No Effect" on Puget Sound Chinook, Puget Sound steelhead, or bull trout.

**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:** No cultural resources are known for the project area. 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:** Native vegetation is present in the project area and is expected to naturally seed into the areas that would have lightly disturbed soil.

**Monitoring:** The entire project would be inspected during the work period, summer 2016. Additional monitoring and follow-up treatments would be conducted as necessary. A diary of inspection results would be used to document formal inspections and will 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/ Oden W. Jahn

Oden W. Jahn

Environmental Scientist

CONCUR: /s/ Stacy L. Mason

Stacy Mason

NEPA Compliance Officer

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References:

Vegetation Management Prescription and Checklist

Effects Determination