

memorandum

DATE: July 25, 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 632)

TO: Chris Morse
Natural Resource Specialist – TFBV-LMT

Proposed Action: Vegetation Management along the Bonneville-Alcoa Transmission Lines Corridor.

Pollution Prevention and Abatement Project No.: 3447

Location: Skamania and Clark Counties, Washington

Proposed by: BPA

Description of the Proposal: BPA proposes to control vegetation along the transmission lines and access roads leading to the Bonneville-Alcoa transmission line corridor. The project extends from near North Bonneville Substation (located in North Bonneville, Washington), to Alcoa Substation (located in Vancouver, Washington). The right-of-way (ROW) corridor measures from 60- to 225-feet in width and encompasses 339 acres over approximately 29 miles of terrain. Also included are 4 miles of transmission line access roads with an average width of 12- to 14-feet.

The project area consists of the properties within and adjacent to the ROW easement boundary of the Bonneville-Alcoa transmission lines corridor. The subject corridor traverses public and private lands in Skamania and Clark counties, Washington. Land parcels transected by the corridor consist of private residential, agricultural, private industrial timber, Washington State DNR forest, Gifford Pinchot National Forest, Beacon Rock State Park, and the U.S. Fish and Wildlife Service's Pierce and Franz Lake wildlife refuges. No tribal lands are involved. The first 18 miles of the corridor are within the boundaries of the Columbia River George National Scenic Area. Several segments of other transmission lines listed on the following table are partially located within the ROW corridor.

Transmission Line	Segment
Bonneville PH 1-Alcoa 1&2 No. 2	3/3 to 27/6
North Camas-Sifton No. 1	1/1 to 6/6
Bonneville PH 1-North Camas No. 1	3/3 to 22/2
Bonneville PH 1-Alcoa 1&2 No. 2	1/5 to 1/12
Bonneville PH 1-Alcoa 1&2 No. 2	38/4 to Alcoa

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 would 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 would be used to perform the work. All methods including selective cutting, mowing, and herbicidal 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 339 acres of ROW and 4 miles of access roads would be initially treated starting in July 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 conditions. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove 20 trees in, or adjacent to, the ROW. Other tree clearing activities would include side-limbing 617 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 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. 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 (T&E) 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. No drinking water, irrigation wells, or water supplies were identified along the ROW.

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 would 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 15th, 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), National Marine Fisheries Service 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 would be stopped in the vicinity and the appropriate tribe, BPA Environmental Specialist, and BPA archaeologist would be contacted.

Monitoring: The entire project area would be inspected during the work period. Additionally, the line would 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 would not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ Phil Smith, for
Greg P. Tippetts
Physical Scientist (Environmental)

CONCUR: /s/ Sarah T. Biegel
Sarah T. Biegel
NEPA Compliance Officer

DATE: July 25, 2016

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