

memorandum

DATE: September 27, 2016

REPLY TO
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-636)

TO: Jason Hunt
Natural Resource Specialist – TFBV-Olympia

Proposed Action: Vegetation management along the Lexington – Longview No.1 & 2 and Longview – Chehalis No 1 & 2.

Pollution Prevention and Abatement Project No.: 3,473

Location: Cowlitz County, Washington: Bonneville Power Administration (BPA) Longview District.

Proposed by: BPA

Description of the Proposal: BPA proposes to remove select vegetation along and adjacent to the transmission line corridor and access roads of the 115 KV Lexington-Longview Transmission Line from structures 1/1 to 6/4. Other transmission lines in this corridor include Longview-Chehalis No.1 4/3 to 12/1 and Lexington-Delemeter No. 1 24/7 to 30/11.

The corridor ranges from 175 to 400 feet in width and is 10 miles in length, totaling approximately 339 acres. The corridor crosses private residential, agricultural, and industrial timber properties with timber DBH less than 30 inches. No County, State, Federal, or Tribal Lands are traversed by the proposed activities.

In order to comply with Western Electricity Coordinating Council (WECC) standards, BPA proposes to remove 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 right-of-way (ROW) to control the development of potentially threatening vegetation.

The vegetation management would include cutting or chemical treatment of tall growing and noxious weeds within the corridor and 6.6 miles of access road will have vegetation managed for vehicle accessibility. In addition, approximately 93 trees adjacent to the ROW that have been identified as a potential hazard to safety and operation of the transmission ROW will also be removed as Danger Trees—the surrounding timberlands are managed private forestlands.

A combination of selective and nonselective vegetation control methods that may include hand cutting and herbicidal treatment would be used to perform the work. 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) with chemicals approved in BPA's Transmission System Vegetation Management Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000), to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. All debris would be disposed of onsite, along the ROW, using on-site chip, lop and scatter, or mulching techniques.

Analysis: A site-specific Vegetation Control Prescription & Checklist was developed by the BPA Natural Resource Specialist for this corridor 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 & Checklist.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription and evaluated in the Effects Determination. To avoid adverse impacts to aquatic species, 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 stream containing threatened or endangered species. To avoid water temperature changes, 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 preserve 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. Private water wells/springs were identified along the ROW. No herbicide application would occur within a 50 foot radius of the wellhead/spring (164 feet when using herbicides with ground/surface water advisory). Locations are identified on the Vegetation Control Prescription.

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. Species lists were 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 and project conservation measures, BPA determines that there are no incidences of avian or terrestrial threatened and endangered species within 5.4 miles of the project.

The project would therefore have "No Effect" for any of the ESA species under the County general list 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 the jurisdiction of NOAA Fisheries with the implementation of project conservation measures including measures listed in the Water Resources section above.

Additionally, eagle nest proximity to the work areas was assessed, and no nests were less than 0.75 miles (4,000 feet) away from the line; this is substantially in excess of the larger 660 foot buffer recommended by USFWS. There should be no adverse impacts on eagle nesting.

Essential Fish Habitat: A review of the NOAA Fisheries database identified Essential Fish Habitat (EFH) present in the project area for coho and Chinook salmon. Measures identified for water resources would protect EFH from adverse impact. Based on project conservation measures to protect aquatic resources, it was determined that the project would not adversely affect EFH.

Cultural Resources: No cultural resources are known for the project area and ground disturbing activities are not within the scope of the project. If a site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist and BPA Archeology would be contacted.

Re-Vegetation: Native grasses and low-growing shrubs are present on the ROW and are expected to naturally seed into the areas that would have lightly disturbed soil.

Monitoring: The entire project would be inspected during the work period, spring 2016 to fall 2016. A follow-up treatment would occur 6-12 months after the initial treatment. Additional monitoring for follow-up treatment 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/ John B. Wiley

John B. Wiley

Environmental Scientist

CONCUR: /s/ Stacy L. Mason

Stacy Mason

NEPA Compliance Officer

DATE: September 27, 2016

References:

Vegetation Management Prescription and Checklist
Effects Determination