

# memorandum

DATE: November 23, 2016

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-644)

TO: Jason Hunt  
Natural Resource Specialist – TFBV-OLYMPIA

**Proposed Action:** Vegetation Management along the Olympia-Grand Coulee #1 Transmission Line Corridor

**Pollution Prevention and Abatement Project No.:** 3473

**Location:** Thurston County, Washington

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposal:** BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor, and access roads of the 287-kilovolt (kV) Olympia-Grand Coulee #1 transmission line corridor from Olympia Substation to Structure 22/1. Also included in this project are the 230-kV Olympia-South Tacoma #1 from 1/7 to Structure 22/1, and the Olympia 500/230-kV Tie. Each right-of-way (ROW) corridor in the proposed project area measures from 125- to 250-feet in width and crosses approximately 21 miles of terrain through suburban residential, commercial, rural, agricultural, and United States Department of Defense (Fort Lewis Military Reservation) lands.

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.

A combination of selective and nonselective vegetation control methods would be used to perform the work. All 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 on-site chip, lop and scatter, or mulching techniques. All on-site debris would be scattered along the ROW.

**Analysis:** A Vegetation Control Prescription & Checklist was developed 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. As conservation and avoidance measures, 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. 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. Private water wells/springs were identified along the ROW. No herbicide application would be made within a 50-foot radius of the wellhead/spring (164 feet when using herbicides with a ground/surface water advisory). For location information, see 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. 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 found the Olympia pocket gopher, Tenino pocket gopher, & Yelm pocket gopher occurred within the project area. BPA will implement a 100-foot buffer from known populations to avoid disturbance.

A determination was made that the project would have "No Effect" for 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 (NMFS). A determination of "No Effect" was made for all ESA-listed species under NMFS' jurisdiction, with the implementation of the conservation measures in Water Resources section above.

Essential Fish Habitat: A review of the NMFS 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 ground-disturbing work is proposed within the project area; however, if a cultural site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist, the BPA Archeologist, and the Yakama Cultural Resources Program 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. All cutting operations will occur from January 1<sup>st</sup> to April 1<sup>st</sup>, 2017, and spray operation will occur from June 15<sup>th</sup> to September 15<sup>th</sup>, 2017. 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/ John B. Wiley

John B Wiley

Environmental Scientist

CONCUR: /s/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer

DATE: November 23, 2016

References:

Vegetation Management Prescription and Checklist  
Effects Determination