memorandum

DATE: April 20, 2017

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-662)

то: Jacob Grinolds Natural Resource Specialist – TFBV-Snohomish

Proposed Action: Vegetation Management along the North Bonneville-Midway No. 1 and Wautoma-Ostrander No. 1 Transmission Line Corridor

Pollution Prevention and Abatement Project No.: 3671

Location: Klickitat and Yakima counties, Washington

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor and access roads of the 230-kilovolt (kV) North Bonneville-Midway No. 1 transmission line and the 500-kV Wautoma-Ostrander No. 1 transmission line located within the boundaries of the Yakama Indian Reservation. The ROW corridor in the project ranges from 150-feet wide to 300-feet wide, and traverses approximately 37 miles. BPA has entered into an intergovernmental contract agreement with the Yakama Tribe (Yakama Power) to complete the proposed vegetation management activities.

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 safety-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. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove 26 trees in, or adjacent to, the ROW. 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 or hauled off-site, if necessary.

<u>Analysis</u>: 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.

<u>Water Resources</u>: There are seven water bodies (Yakima River, Satus Creek, Bull Creek, North Fork Dry Creek, Logy Creek, Kusshi Creek, and Unnamed Creek) that the ROW crosses in the project area. Trees in riparian zones would be selectively cut to include only those that would grow into the minimum

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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. 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-threatened and endangered 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 private water wells/springs have been previously identified along the ROW. If any wells are found during project activities, no herbicide application would occur within a 50-foot radius of the wellhead/spring (164 feet when using herbicides with ground/surface water advisory).

<u>Threatened and Endangered Species</u>: Pursuant to its obligations under the Endangered Species Act (ESA), BPA has made a determination of whether its proposed project would have 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 made a determination that the project would have "No Effect" for all ESAlisted 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 the jurisdiction of NMFS with the implementation of project conservation measures, including additional measures listed in the Water Resources section above.

Essential Fish Habitat: A review of the NMFS database did identify Essential Fish Habitat (EFH) present for Chinook salmon (Yakima River) in the project area. The proposed vegetation management activities are within the scope of activities and action area evaluated in the *Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho* (SLOPES PBO) (WCR-2014-1600, September 22, 2016). Streams in the project area with documented presence of ESA-listed fish, designated as critical habitat for one or more species, *and/or identified as Essential Fish Habitat (EFH),* have been noted in the vegetation control prescription. It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

<u>Cultural Resources</u>: No ground-disturbing vegetation management methods would be implemented along the project corridor. If cultural resources are discovered during the course of vegetation control, work would be stopped in the vicinity, and the Yakama THPO, BPA archeologist, and BPA Environmental Specialist would be contacted immediately.

<u>Re-Vegetation</u>: 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. In addition, equipment would be power-washed to prevent the spread of weeds.

<u>Monitoring</u>: The entire project would be inspected during the work period in fiscal year 2017. A followup treatment would occur 6-12 months after the initial treatment, if necessary. Additional monitoring for follow-up treatment would be conducted, as needed. A diary of inspection results would be used to document formal inspections and would be filed with the contracting officer.

<u>Findings</u>: 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.

<u>/s/ Shawn Barndt</u> Shawn L. Barndt Environmental Scientist, Tri-Cities District

DATE: April 20, 2017

CONCUR: /s/ <u>Sarah T. Biegel</u> Sarah Biegel NEPA Compliance Officer

References: Vegetation Management Prescription Effects Determination