memorandum

DATE: April 4, 2011

REPLY TO ATTN OF: KEP-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA 446 - East Ellensburg Tap to Columbia-Ellensburg #1 Transmission Line Corridor) Project No. PP&A # 1937

TO: Tom Murphy
   Project Manager – TFBV/Bell

**Proposed Action:** Vegetation management along the East Ellensburg Tap to the Columbia-Ellensburg #1 115-kV transmission line corridor right-of-way (ROW) from mile 1 to mile 4 and access roads

**Location:** Kittitas County, Washington, in the Wenatchee District

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

**Description of the Proposed Action:** BPA proposes to remove tall-growing and noxious vegetation from the entire length (4.5 miles) and width (100 feet) of the ROW, structure sites, and access roads that can potentially interfere with the operation, maintenance, and reliability of the transmission lines. All vegetation management activities will be performed in accordance with the BPA Master Agreement Statement of Work for Vegetation Control on BPA Transmission Line Rights-of-Way and in accordance with the specific details identified in the vegetation control prescription and checklist.

Target vegetation and reclaim trees will be removed and/or controlled inside the ROW using selective and nonselective methods that may include hand cutting, mowing, and herbicide treatments. Danger trees adjacent to the ROW will also be removed and/or controlled. Low-growing vegetation will be protected along the ROW with the exception of brush at the base of transmission structures, tower sites, and within and along access roads.

Debris disposal will be a combination of lop and scatter, mechanical chipping, and mulching. Re-seeding using a basin, dry site 90% native seed mix will occur as necessary to stabilize traveled surfaces. Germination success will be monitored during the next growing season and follow-up seeding will be performed as needed. Initial treatment will begin in April 2011 and continue through September 2011. Continuing vegetation management treatments will occur on a 4 to 5-year cycle.

The proposed action will allow safe and timely access to the transmission lines, which will help reduce outage times and maintain reliable power in the region. The proposed action will maintain vegetation clearances as required by the Western Energy Coordinating Council. All work will be done in accordance with the National Electric Safety Code and BPA standards.
Analysis: A Vegetation Management Prescription and Checklist was completed for this project in accordance with the requirements identified by the BPA’s Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) (May 2000) and Record of Decision (ROD) (August 23, 2000).

Lands along the project corridors traverse public and private lands in Kittitas County, Washington. Land along the corridor consists of residential and agricultural lands, and Washington State University Extension-owned lands. No tribal lands are involved.

Section 3 of the checklist and the prescription identify the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures:

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are listed in the Vegetation Management Prescription. No ground-disturbing management methods will be implemented, thus minimizing the risk for soil erosion and sedimentation near water bodies. Trees and brush in riparian zones will be topped, trimmed, or selectively cut to include only those that are within 50 feet of the transmission conductor at maximum sag. Trees will be topped where shrubs are not present to provide shade and a silt buffer. No broadcast herbicide treatments are prescribed for this project. Cut stump herbicide application is prescribed for the initial treatment of the project. Triclopyr BEE (common formulations of Garlon 4 & Tahoe 4E) and formulations of glyphosate may be applied. Irrigation and drinking water wells, or other domestic water supplies located on the ROW will have a 165-foot radius buffer excluding all herbicide use.

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 will have any effects on any listed species. A species list was reviewed from the United States Fish and Wildlife Service on March 25, 2011, identifying 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 Fisheries was conducted. By implementing conservation and avoidance measures detailed in the Effects Determination for this project, a determination of “No Effect” was made for all ESA-listed species and designated critical habitats that occur in the project area. A determination of “No Effect” was also made for Essential Fish Habitat waters that occur in the project area.

Cultural Resources: No cultural or historic resources are known to occur in the project areas. There will be no ground-disturbing vegetation management methods implemented during this project. It has been determined that this project will not affect any cultural or historic resources. If a site or archaeological material is discovered during the course of vegetation management activities, all work will be stopped in the vicinity and the appropriate tribe(s), the BPA Environmental Specialist, and the BPA archaeologist will be contacted.

Monitoring: The entire project will be inspected daily during the work period to ensure all target vegetation has been managed. Follow-up monitoring for vegetation control will combine line maintenance patrols and next season’s site reviews to determine any follow-up actions that
would be required. Additionally, the line will be patrolled annually by ground after the initial treatment to monitor the long-term effectiveness of the treatments.

**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 will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ Stuart Hugill, for:
Benjamin Tilley
Natural Resource Specialist

Concur: /s/ Katherine S. Pierce
Katherine S. Pierce
NEPA Compliance Officer

DATE: April 4, 2011

Attachment(s)
Vegetation Management Checklist
Vegetation Survey of Anticipated Work
Effects Determination for T&E Species