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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: November 17, 2011

REPLY TO ATTN OF: KEPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285 / SA-454 Schultz-Raver No.1 Transmission Line Corridor)
PP&A Project #2102

TO: Jacob Grinolds
Natural Resource Specialist – TFBV-SNOHOMISH

Proposed Action: Vegetation management along the Schultz-Raver No. 1 500-kilovolt (kV) transmission line shared corridor rights-of-way (ROW) and associated access roads from line mile 37/2 to Raver Substation. The corridor includes segments of a total of eight different transmission lines, ranges from 300 to approximately 900 feet in width, and traverses approximately 41 miles of terrain.

Location: King and Kittitas counties, Washington, in the Bonneville Power Administration's (BPA) Covington District

Proposed by: BPA

Description of the Proposal: BPA proposes to remove tall-growing and noxious vegetation from the transmission line corridors and access roads on the following segments:

500-kV Schultz-Raver No. 1 (37/2 to Raver), 500-kV Schultz-Raver No. 2 (operated as Schultz-Echo Lake No. 1, 37/2 to 76/1), 500-kV Schultz-Raver No. 3 (37/1 to Raver), 500-kV Schultz-Raver No. 4 (37/1 to Raver), 230-kV Covington-Bettas Road No. 1 (12/1 to 50/3), 287-kV Olympia-Grand Coulee No. 1 (70/6 to 94/3), 500-kV Raver-Echo Lake No. 1 (Raver to 4/2), and 500-kV Raver tap to Schultz-Echo Lake No. 1 (75/5 to Raver).

In order 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 work supports system reliability. The overall goal of BPA is to establish low-growing plant communities along the ROW to control the development of potentially threatening vegetation. The proposed project would begin in December 2011 and be completed by September 2012. A follow-up treatment may occur 6-12 months after the initial treatment.

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 the Vegetation Management Program EIS. Debris would be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

Analysis: A Vegetation Control Prescription and Checklist was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). Previously completed SAs were also considered and include *DOE/EIS-0285/SA-17-July 2001, DOE/EIS-0285/SA-23–August 2001, DOE/EIS-0285/SA-223-September 2005,* and *DOE/EIS-0285/SA-378-June 2008*.

The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription and Effects Determination.

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 basal treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to one yard of the high-water mark 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. Trees will be topped where shrubs are not present to provide shade and a silt buffer, and shrubs less than 10 feet high would not be cut where ground to conductor clearance allows.

No ground disturbing vegetation management methods would be implemented near the resource, thus eliminating the risk for soil erosion and sedimentation near the streams.

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 and Wildlife Service (USFWS). Based on the ESA review conducted, BPA made a determination that the project would have "No Effect" for all ESA listed species under USFWS jurisdiction. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service. A determination of "No Effect" was made for all ESA listed species under NOAA Fisheries jurisdiction.

Essential Fish Habitat: A review of the NOAA Fisheries database identified Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources would be followed for EFH. A determination of "No Effect" was made for EFH waters that occur in the project area.

Cultural Resources: Vegetation management activities will have limited ground disturbance and are not anticipated to affect cultural resources that may be present. If archaeological material is discovered during the course of vegetation management activities, work would be stopped in the vicinity and the appropriate tribe, BPA Environmental Representative and a BPA archeologist will be notified. On National Forest System land, the Forest Archaeologist is to be notified to coordinate any needed investigation or mitigation measures.

Re-Vegetation: Native grasses are present on the entire ROW and are expected to naturally seed into the areas that would have lightly disturbed soil, predominately located on the ROW roads.

Monitoring: The entire project area would be inspected during and after the work period to determine if all hazard trees have been removed. A diary of inspection results would be used to

document formal inspections and will be filed with the contracting officer. Follow-up monitoring for vegetation control would occur 6-12 months after the initial treatment, as needed.

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/ Makary A. Hutson
Makary A. Hutson
Environmental Scientist

CONCUR: */s/ Rick Yarde, for:* DATE: *November 17, 2011*
Katherine S. Pierce
NEPA Compliance Officer

References:
Vegetation Management Prescription
Effects Determination