memorandum

DATE: July 19, 2002

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-96) - Snohomish District Substations

TO: Dennis Sjoquist - TFN/Snohomish
    Snohomish Regional Manager

Proposed Action: Vegetation Management for the following facilities located in the Snohomish District:

Bellingham
Custer
Fidalgo
Intalco
Lopez Island
Monroe
Murray, V.M.
Snohomish
Snoking

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes total vegetation management (bareground) in the electrical substations, and noxious weed management and maintenance of landscaping within the property boundaries of the listed facilities. These facilities are all located within the Snohomish District of the Snohomish Region.

Description of the Proposal: BPA proposes to manage vegetation inside and around electrical substations and associated facilities. Vegetation management within the substations will include bareground management by herbicides of all areas within the fenced perimeter of the facility including a bareground zone of up to 3 meters (10 feet) outside of the fenced area. The management of vegetation outside the substation and associated facilities will include: 1) bare ground management of perimeter roads and parking areas; 2) control of noxious weeds throughout property boundaries; 3) mowing, fertilizing, and weed control of landscaped lawn and mulched areas; 4) weed control in ornamental shrub areas; and 5) areas requiring only mechanical control to manage unwanted/danger trees, grasses, and shrubs.

Analysis: The attached checklist shows the resources that were found during this analysis and what mitigation measures are required to protect those resources. In addition, each facility is supported by a file containing drawings, aerial photographs, topographic maps, and the mitigation measures to be applied. Applicable findings are discussed below.
Planning Steps:

1. **Identify facility and the vegetation management need.**

   See proposed action.

2. **Identify surrounding land use and landowners/managers and any mitigation.**

   All of the sites are fee-owned by BPA and consist of pre-existing electrical and non-electrical facilities restricted from public access and use.

3. **Identify natural resources.**

   Wetlands, drinking water resources and riparian habitat have been identified near some of the facilities as shown in Table 3.1 of the attached checklist. Mitigation measures, consistent with the FEIS, are listed for these sites in Section 3 of the attached checklist.

4. **Determine vegetation control and debris disposal methods.**

   For switchyards and up to ten feet outside of fenced areas, the goal is total vegetation management. Facilities requiring landscaping are designed to be low maintenance and are consistent with Integrated Pest Management procedures, such as native, low-growing, types, mulches, rock covers, etc. All of the vegetation management techniques are designed to be permanent.

5. **Determine revegetation methods, if necessary.**

   Not applicable, except as mentioned above when landscaping requires replacement.

6. **Determine monitoring needs.**

   Monitoring is two-fold. Monitoring for evaluation of BPA/contractor treatment practices to ensure vegetation management practices will be handled through contract specifications. Environmental monitoring to ensure environmentally sound application practices will be determined in the future as outlined in the BPA/NMFS/USFWS Biological Assessment.
7. Prepare appropriate environmental documentation.

**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/ Mark Hermeston  
Mark W. Hermeston  
Physical Scientist (Environmental) - KEP-4  
Licensed Hydrogeologist (WA 663)

CONCUR:/s/ Thomas C. McKinney  
Thomas C. McKinney  
NEPA Compliance Officer  
DATE:07/25/2002

Attachment

cc:
L. Croff – KEC-4  
T. McKinney – KEC-4  
P. Key – LC-7  
M. Hermeston – KEP-4  
J. Meyer – KEP-4  
J. Sharpe – KEPR-4  
M. Martin – KEPR-Covington  
M. Johnson – TF/DOB-1  
L. Alvarez - TFN/Snohomish  
S. Davis – TFN/Snohomish  
D. Atkinson – TFN/Snohomish  
Environmental File – KEC-4  
Official File – KEP-4 (EQ-14)
1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe facility: (More than one facility may be listed and analyzed.)

<table>
<thead>
<tr>
<th>Substation/Facility Name</th>
<th>Maximum Size of Area to be Treated</th>
<th>Nearest 1/4 Section Township/Range or GPS Coordinates</th>
<th>County</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bellingham</td>
<td>21.14</td>
<td>48.47.51.5152N 122.25.17.5322W</td>
<td>Whatcom</td>
<td>WA</td>
</tr>
<tr>
<td>Custer</td>
<td>111</td>
<td>48.54.19.3598N 122.37.27.6952W</td>
<td>Whatcom</td>
<td>WA</td>
</tr>
<tr>
<td>Fidalgo</td>
<td>3.7</td>
<td>48.30.2.7555N 122.41.20.3092W</td>
<td>Skagit</td>
<td>WA</td>
</tr>
<tr>
<td>Intalco</td>
<td>10.25</td>
<td>48.50.58.0815N 122.42.10.6672W</td>
<td>Whatcom</td>
<td>WA</td>
</tr>
<tr>
<td>Lopez Island</td>
<td>3.31</td>
<td>48.29.34.1073N 122.51.52.7365W</td>
<td>San Juan</td>
<td>WA</td>
</tr>
<tr>
<td>Monroe</td>
<td>427</td>
<td>47.53.49.4748N 121.53.21.3679W</td>
<td>Snohomish</td>
<td>WA</td>
</tr>
<tr>
<td>Murray, V.M.</td>
<td>3</td>
<td>48.9.18.6000N 122.45.9.7000W</td>
<td>Snohomish</td>
<td>WA</td>
</tr>
<tr>
<td>Snohomish</td>
<td>80</td>
<td>47.55.25.4401N 122.6.3.3124W</td>
<td>Snohomish</td>
<td>WA</td>
</tr>
<tr>
<td>Snoking</td>
<td>70.01</td>
<td>47.48.47.4419N 122.11.7.6186W</td>
<td>Snohomish</td>
<td>WA</td>
</tr>
</tbody>
</table>

1.2 Describe vegetation needing management:

Substation (Total vegetation management (TVM) needs no further description.)

Required at all of the facilities listed above.

Non-Electrical Facility (Describe all landscaping vegetation management.)

Landscaping is required at Bellingham, Custer, Fidalgo, Intalco, Monroe, Murray, Snohomish, and Snoking substations in addition to total vegetation management.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses around your facility.

These sites are all fee-owned by BPA and are surrounded by a combination of private, state and federal lands. The surrounding land is used for residential, schools, agricultural, and forested uses.

2.2 Determine if there is a need to notify surrounding landowners of vegetation management activities. If so, why and how?

One substation in the Snohomish District, Snohomish Substation, has leased land to the Snohomish School District adjacent to areas needing herbicide treatment. Drift can be controlled by implementing all label requirements for the reduction of drift. If the leased areas need herbicide treatment to control noxious weeds or tall-growing species, the lessee will be contacted through the Regional Realty Specialist, to determine the type of agricultural use, i.e., grazing or crops. Mitigation will be derived from existing label requirements and the needs of BPA and the lessee.
2.3 List any specific measures to be taken based on surrounding landowners/use.

See above.

3. IDENTIFY NATURAL RESOURCES

3.1 Water Resources

List or describe any water resources (streams, rivers, lakes, wetlands, undeveloped springs, etc.) near the facility.

<table>
<thead>
<tr>
<th>Substation/Facility Name</th>
<th>Water Resources (Within 400 feet)</th>
<th>Aquatic T&amp;E Species</th>
<th>Direct Pathway</th>
<th>Mitigation 1,2,3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bellingham</td>
<td>Squalicum Creek/Surface water</td>
<td>No</td>
<td>Yes</td>
<td>GW/SW</td>
</tr>
<tr>
<td>Custer</td>
<td>Shallow Groundwater/Surface water</td>
<td>No</td>
<td>Yes</td>
<td>GW/SW</td>
</tr>
<tr>
<td>Fidalgo</td>
<td>Puget Sound/Shallow Groundwater</td>
<td>No</td>
<td>No</td>
<td>None</td>
</tr>
<tr>
<td>Intalco</td>
<td>None</td>
<td>No</td>
<td>Yes</td>
<td>GW/SW</td>
</tr>
<tr>
<td>Lopez Island</td>
<td>Puget Sound/Shallow Groundwater/ Surface water</td>
<td>No</td>
<td>No</td>
<td>None</td>
</tr>
<tr>
<td>Monroe</td>
<td>None</td>
<td>No</td>
<td>Yes</td>
<td>GW/SW</td>
</tr>
<tr>
<td>Murray, V.M.</td>
<td>Surface water</td>
<td>No</td>
<td>No</td>
<td>None</td>
</tr>
<tr>
<td>Snohomish</td>
<td>Surface water</td>
<td>No</td>
<td>Yes</td>
<td>SW</td>
</tr>
<tr>
<td>Snoking</td>
<td>BPA Well</td>
<td>No</td>
<td>No</td>
<td>None</td>
</tr>
</tbody>
</table>

1 If indicated, do not use chemicals with a groundwater (GW) or surface water (SW) label advisory.
2 If indicated, only use chemicals Practically Non-Toxic to Slightly Toxic (TOX) to aquatic species.
3 All chemicals are selected from BPA’s List of Approved Herbicides, ESP E-VGM-004

Does the substation/facility drainage have a direct pathway to the water body?

See Table above.

What measures will you take to limit potential impacts to water resources? As appropriate, list any buffers that will be applied.

In addition to the Table above, the following mitigation measures apply at the following facilities:

Murray: No chemical treatment inside secondary containment lagoon. Glyphosate okay between liner and fence.

Echo Lake: No chemical treatment inside secondary containment lagoon. Glyphosate okay between liner and fence.
3.2 Herbicide Use Near Irrigation Sources and Domestic and Public Drinking Water Supplies

List or describe any irrigation or domestic/public water source.

See Table above.

Does the substation/facility drainage have a pathway to the water supply?

Murray and Snoking substations contain BPA wells. The wells at Murray and Snoking are 220 and 187 feet deep, respectively. The well at Murray is for non-potable uses and the well at Snoking is used for both potable and non-potable uses. Both wells are cased and grouted in accordance with state regulations. Well logs indicate varying layers of clay and shale.

What measures will you take to limit potential impacts to irrigation and drinking water supplies? As appropriate, list any buffers that will be applied.

The wells at Murray and Snoking substations need no protection due to well construction and favorable geology that would restrict/prevent downward movement of chemicals.

3.3 Threatened and Endangered Plant or Animal Species

Are there any T&E species in the area that could be affected? List if necessary.

None.

What measures will you take to limit potential impacts to each T&E species? As appropriate, list any buffers that will be applied.

NA

3.4 Steep Slopes/ Unstable Slopes (Soils)

Will herbicide treatment be occurring on any steep slopes?

NA

As appropriate, list any buffers, reseeding and/or ground disturbing restrictions that will be applied.

None.

3.5 Attach drawing showing location of all required buffers.

Drawings showing the locations of all facilities with buffers are attached.
4. DETERMINE VEGETATION CONTROL METHODS

Describe overall vegetation management scheme and schedule:

Initial: For switchyards, and up to ten feet outside of fenced areas, the goal is TVM. Facilities requiring landscaping are designed to be low maintenance and are consistent with Integrated Pest Management procedures, such as, native, low-growing types, mulches, etc.

Subsequent: These facilities and their vegetation management schemes are designed to be permanent.

Future: See above.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

Describe debris disposal and re-vegetation, if any.

Debris disposal will take place on site. Re-vegetation will be consistent with the permanent nature of the facilities but will incorporate native species where practical.

6. DETERMINE MONITORING NEEDS

6.1 Describe evaluations of BPA/contractor treatment practices to ensure re-vegetation management measures are working.

Monitoring will be undertaken through contract specifications.

6.2 Is there a need to monitor adjacent areas for potential herbicide movement/contamination? If so, describe monitoring plan. (Unless monitoring for other reasons, this section should be consistent with BPA-system wide herbicide monitoring plan not yet finalized.)

Monitoring will be established at a later date consistent with the Maintenance BA.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are "substantial".

None.

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

No.