memorandum

DATE: February 13, 2012

REPLY TO ATTN OF: KEPR-4


PP&A Project #2181

TO: Jacob Grinolds
Natural Resource Specialist – TFBV-SNOHOMISH

Proposed Action: Vegetation management along the Olympia-Grand Coulee No. 1 287-kilovolt (kV) transmission line right-of-way (ROW) corridor from structure 53/4 to 70/6. The project area includes the entire 125-foot ROW width over approximately 17 miles of terrain.

Location: King and Pierce Counties, Washington, within the Covington District

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposal: BPA proposes to remove tall-growing and noxious vegetation from the Olympia-Grand Coulee No.1 287-kV transmission line corridor and associated access roads between structures 53/4 and 70/6. The Olympia-Grand Coulee No. 1 line is the only line in this segment of ROW.

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 as early as March 2012 and be completed by October 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 Final Environmental Impact Statement (FEIS). 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 the BPA Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). Previously completed Supplement Analyses for the project corridor were also considered, including DOE/EIS-0285/SA-99, August 2002; and DOE/EIS-0285/SA-377, 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 identified 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 streams.

**Threatened and Endangered Species**: Pursuant to its obligations under the Endangered Species Act (ESA), a species list was obtained for federally listed, proposed, and candidate species and designated critical habitat potentially occurring within the project area from the U.S. Fish and Wildlife Service (USFWS). In addition, a review of ESA species under the jurisdiction of National Oceanic and Atmospheric Administration (NOAA) Fisheries was conducted. A determination of “No Effect” was made for all ESA listed species and designated critical habitat.

**Essential Fish Habitat**: A review of the NOAA database identified Pacific salmon Essential Fish Habitat (EFH) occurring in the project area. Measures identified for water resources will be followed for EFH. A determination of “No Effect” was made for EFH in the project area.

**Cultural Resources**: Routine vegetation management activities result in little or no ground disturbance and therefore are not anticipated to affect cultural resources that may be present. If archaeological material is discovered during the course of project activities, work would be stopped in the vicinity and the appropriate tribe, BPA Environmental Representative and a BPA archeologist will be notified.

**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: Stacy Mason  
Stacy Mason  
NEPA Compliance Officer  

DATE: February 13, 2012

References:  
Vegetation Management Prescription  
Effects Determination