DOE F 1325.8e Electronic Form Approved by Forms Mgmt. 04/19/2006
(08-89)

United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: November 4, 2014

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-565)

TO: Jacob Grinolds
Natural Resource Specialist – TFBV-SNOHOMISH

Proposed Action: Vegetation management for the Monroe-Custer No. 1 and No. 2 and Custer-Ingledow No. 1 and No. 2 transmission line corridors

Pollution Prevention and Abatement Project No.: 3,049

Location: Snohomish, Skagit, and Whatcom counties, Washington: Bonneville Power Administration (BPA) Snohomish District

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to the entire length of the 500-kilovolt Monroe-Custer No. 1 and No. 2 and Custer-Ingledow No. 1 and No. 2 transmission line rights-of-way (ROW) from Monroe Substation to the U.S./Canada border. The ROW corridor in the proposed project area measures approximately 300-460 feet in width and crosses approximately 109 miles of terrain through rural residential, agricultural, private forests, and Washington State owned lands.

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 overall goal of BPA is to establish low-growing plant communities along the ROW to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods that may include hand cutting and herbicidal treatment would be used to perform the work. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285, May 2000) and Record of Decision (ROD) (August 23, 2000), to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. Approximately 109 miles of ROW, 1,028 structure sites, and 36 miles of off-ROW access roads would be initially treated between November 2014 and May 2015. A follow-up treatment of re-sprouting target vegetation would be conducted between mid-June 2015 and September 2015. To prevent trees from coming into

contact with the energized conductors, BPA proposes to remove approximately 750 trees that have been identified along the ROW fringe. Other tree clearing activities would include side-limbing approximately 350 trees. Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

Analysis: A Vegetation Control Prescription was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS and ROD. The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription.

Water Resources: As conservation and avoidance measures, only spot treatment with Garlon 3A (Triclopyr TEA) would be used within a 100 foot buffer up to the water's edge of any waterway. 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, other trees would be left in place or topped to preserved 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 minimizing the risk for soil erosion and sedimentation near the streams. No in-stream work would be conducted with the proposed project. For location information, see the Vegetation Control Prescription.

Threatened and Endangered (T&E) Species and Habitats: 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 from the United States Fish 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, National Marine Fisheries Service (NOAA Fisheries). A determination of "No Effect" was made for all ESA listed species under NOAA Fisheries' jurisdiction, with the implementation of the conservation measures in Water Resources section above.

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 to avoid impacting EFH. Based on project conservation measures, it was determined that the project would not adversely affect EFH.

Cultural Resources: No cultural resources are known for the project area and no ground disturbing activities are planned for this project that could affect cultural resources. However, if a site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist, and the BPA archeologist would be contacted.

Re-Vegetation: Based on site specific evaluations by BPA that considers environmental regulations, landowner preferences, and the prevention of invasive weed proliferation the majority of the project area will re-vegetate naturally. Other unique and sensitive areas may be re-vegetated using active seeding techniques if deemed necessary. BPA's overall goal is to promote low-growing native vegetation within BPA ROWs and target invasive weeds and tall-growing vegetation when warranted by ground to conductor clearance distances.

Monitoring: The entire project would be inspected during the work period, November 2014 to October 2015. A follow-up treatment would occur 6-10 months after the initial treatment. Additional monitoring for follow-up treatment would be conducted as necessary. A diary of inspection results would be used to document formal inspections and will be filed with the contracting officer.

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/ Chad Browning
Chad Browning
Biological Scientist (Environmental)

CONCUR: */s/ Stacy Mason* DATE: *November 4, 2014*
Stacy Mason
NEPA Compliance Officer

Attachments:
Vegetation Management Checklist
Effects Determination