

memorandum

DATE: November 6, 2017

REPLY TO
ATTN OF: EPR/Olympia

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285/SA 671)

TO: Jason Hunt
Natural Resource Specialist – TFBV-Olympia

Proposed Action: Vegetation management along the Shelton-Fairmount and Port Angeles-Sappho Transmission Line corridors.

Pollution Prevention and Abatement Project Numbers: 3746

Location: Mason, Jefferson, and Clallam Counties, Washington in Bonneville Power Administration's (BPA) Olympia Ross Maintenance District.

Proposed by: BPA

Description of the Proposal: BPA proposes to control vegetation along the transmission line corridors and access roads leading to the easements of the below listed transmission lines. The project starts approximately 2 miles East of Shelton substation and continues North along the Shelton-Fairmount transmission line corridor to Fairmount Substation located near Discovery Bay, WA. The project also includes the Port Angeles Sappho No. 1 transmission line corridor extending from Port Angeles substation to Sappho Substation located in Sappho Washington. The Shelton-Fairmount right-of-way (ROW) corridor measures from 258 to 347 feet in width and encompasses 1,138.6 acres over approximately 58 miles of terrain. Also included are 16.2 miles of transmission line access roads with an average width of 12-14 feet. The Port Angeles-Sappho right-of-way (ROW) corridor measures 100 feet in width and encompasses 556.3 acres over approximately 43 miles of terrain. Also included are 14.3 miles of transmission line access roads with an average width of 12-14 feet. Two taps located completely within the transmission line right of way corridors will also be managed under this project.

Transmission Line	Segment	Transmission Line	Segment
Shelton-Fairmount No. 3&4 double circuit (reference line)	2/2 to FAMT	Port Angeles-Sappho No. 1 (reference line)	POAN to SAPO
Shelton-Fairmount No. 1	2/2 to FAMT	Silverado tap to Port Angeles-Sappho No. 1	1/1 to 1/3
Shelton-Fairmount No. 2	2/2 to FAMT		
Potlatch tap to Shelton-Fairmount	1/1 to 1/3		

In order to comply with Western Electricity Coordinating Council standards and to help provide system reliability, 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 will 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, Transmission System Vegetation Management Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000 and Record of Decision (ROD) (August 23, 2000). 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) using chemicals and methods consistent with the EIS.

The initial treatments including cutting, mowing, and herbicide application will begin in October 2017. A follow-up treatment of re-sprouting target vegetation would be conducted approximately 6-12 months after the initial treatment, and will be scheduled considering weather conditions. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove 386 trees in, or adjacent to, the ROW corridors. Other tree clearing activities would include side-limbing 1816 trees along the edge of the ROW corridors. 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: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (DOE/EIS-0285, May 2000) and ROD. A Vegetation Management Control Prescription and Checklist were completed for this project in accordance with the requirements identified in BPA's Transmission System Vegetation Management Program FEIS and ROD. The subject corridors traverse public and private lands in Mason, Jefferson, and Clallam Counties, Washington. Land parcels transected by the corridors consist of agricultural, private rural residential, private timber, Washington State DNR, US Forest Service, National Park Service, and Tribal managed lands. The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist. BPA has coordinated with the Skokomish Tribe and the Olympic National Forest staff regarding actions on their respective managed lands.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area noted in the Vegetation Control Prescription. 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 eliminating the risk for soil erosion and sedimentation near the streams. No in-stream work would be conducted with the proposed project.

Where herbicide applications are prescribed, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to the water's edge of any water resource (stream, pond, and wetland) where threatened or endangered species have the potential to occur. For non-T&E water resources, only spot and localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 35-foot buffer up to the water's edge.

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. Species lists from the United States Fish and Wildlife Service (USFWS) for the proposed project area were reviewed on September 28th, 2017. The lists identify Threatened and Endangered species and critical habitat units potentially occurring in the project area. A determination of "No Effect" was made for all ESA listed (USFWS) species and designated critical habitat for the project. All breeding season timing restrictions will be applied.

In addition, a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration (NOAA) Fisheries was conducted. The proposed vegetation management activities

are within the scope of activities and action area evaluated in the *Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho*, WCR-2014-1600 (BPA SLOPES PBO). It has been determined that by complying with the project design criteria listed within the BPA SLOPES PBO, potential effects to ESA-listed anadromous salmonids and Essential Fish Habitat (EFH) would be consistent with those evaluated and addressed in the BPA SLOPES PBO.

Cultural Resources: No cultural resources are known to occur within the project area; additionally no ground disturbing activities are planned for this project that could potentially affect unknown cultural resources. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the appropriate tribe, the BPA Environmental Specialist and the BPA archeologist will be contacted.

Monitoring: The entire project will be inspected during the work period. Additionally, the line will be patrolled annually after treatment to monitor the effectiveness of the treatment and any issues associated with the project.

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.

Joseph Sharpe for
Greg P. Tippetts
Physical Scientist (Environmental)

CONCUR: /s/ Stacy L. Mason
Stacy L. Mason
NEPA Compliance Officer

DATE: November 6, 2017

Attachments:
Vegetation Control Prescription & Checklist
Effects Determination for Threatened and Endangered Species and Essential Fish Habitat