

memorandum

DATE: January 31, 2019

REPLY TO
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-712)

TO: Jacob Grinolds
Natural Resource Specialist – TFBV-Snohomish

Proposed Action: Vegetation Management along the Custer-Ingledow #1 Corridor, the Custer-Intalco #1 Corridor, the Custer-Intalco #2 Corridor, the Echo Lake-Monroe #1 Corridor, and the Sno-King tap to Echo Lake-Monroe #1 Corridor.

Pollution Prevention and Abatement Project No.: 4136

Location: King, Snohomish, and Whatcom counties, Washington

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor, and access roads along the Custer-Ingledow #1 corridor from Structure 1/4 to Structure 9/7, the Custer-Intalco #1 corridor from Custer Substation to Intalco Substation, the Custer-Intalco #2 corridor from Structure 1/1 to Intalco Substation, the Echo Lake-Monroe #1 corridor from Structure 10/1 to Monroe Substation, and the Sno-King tap to Echo Lake-Monroe #1 corridor from Structure 1/1 to Sno-King Substation.

The right-of-way (ROW) corridor in the proposed project area measures 120-300 feet in width and crosses approximately 55 miles of terrain through rural residential, small-scale agricultural, private timber, and Washington Department of Natural Resources land.

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. Land use for the project area consists of private forest, agricultural, and rural residential.

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 Vegetation Management EIS, 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 325 acres of ROW, 37 structure

sites, and 6 miles of access roads would be initially treated between February 2019 and May 2019. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 525 acres of ROW between May 2019 and September 2019. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove approximately 28 trees that have been identified along the ROW fringe. Other tree-clearing activities would include side-limbing approximately 1 tree. 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 & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285, May 2000) and Record of Decision (August 23, 2000). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

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 localized treatment with Garlon 3A (Triclopyr TEA) would be used within a 100-foot buffer up to the water's edge 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, 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. For location information, see the Vegetation Control Prescription.

Threatened and Endangered Species: Pursuant to its obligations under the Endangered Species Act (ESA), BPA 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. Conservation measures specific to Oregon spotted frog include:

Oregon spotted frog

- Prior to conducting in-water work in the Woods Creek-Skykomish River watershed, clothing or equipment or materials must be disinfected regardless of where the clothing or equipment was last used, including adjacent drainages also containing OSF (See *Disinfection Procedures*, below).

Disinfection Procedures

Disinfection procedures must be implemented when entering or leaving the above-identified drainages. Disinfection must be performed regardless of where the clothing or equipment was last used, including adjacent drainages also containing OSF. “In-water work” refers to when boots or other equipment enter standing water in suitable habitat in potential habitat. This requirement does not apply to vehicles that remained on existing roads and routes of travel.

All personnel entering ponds and wetlands are required to follow disinfection techniques for the control of chytrid fungus (*Batrachochytrium dendrobatidis*), ranavirus, and other potentially unknown diseases or parasites. For this specific project covering BPA’s Echo Lake-Monroe No. 1 transmission line corridor, personnel must disinfect equipment prior to entering a water body between Echo Lake-Monroe structure 23/5 and Monroe Substation. These drainage boundaries may change if new OSF occupied locations are discovered. Disinfection is not necessary between sites if sites are within the same drainage. If moving between drainages, disinfect equipment while at the site of exposure.

1. All field equipment must be cleaned of organic matter (dirt, mud, vegetation). Equipment includes all materials that may have contact with the water body, including waders and boots. (A stiff scrub brush is very helpful.)
2. All disinfection and rinsing must be done away from all water bodies.
3. All field equipment must be disinfected with a 10% liquid chlorine bleach (be sure bleach has a 6% concentration of sodium hypochlorite)* solution or with an anti-fungal/anti-bacterial solution approved by USFWS. The preferred method is to submerge equipment in a tub or sturdy plastic bag filled with the bleach solution; however, spray application may be used IF all surfaces are generously saturated, including all crevasses such as under wader ankle protectors. Sprayed or dipped equipment must remain wet with bleach solution for at least 3-5 minutes and then be thoroughly rinsed with clean water. (If a scrub brush is used for removing organic material, remember to disinfect it between sites).

The Service will continue to update the BPA with the most effective and efficient protocols as new information and protocols become available.

* Bleach breaks down rapidly. Do not use an expired bleach bottle or one that has been open for more than one month. Fresh bleach solution should be mixed at the beginning of each field day to retain potency.

This protocol was adapted from disinfection procedures established in the US National Park Service’s 2014 Equipment Decontamination Protocol for Field Staff in Sequoia and Kings Canyon National Parks and the Washington Department of Fish and Wildlife’s Oregon spotted frog egg mass survey protocol.

BPA conducted a review of ESA-listed species and Essential Fish Habitat (as defined by the Magnuson-Stevens Act), under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS). 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 (SLOPES PBO) (WCR-2014-1600, September 22, 2016)*. Streams in the project area with documented presence of ESA-listed fish, designated as critical habitat for one or more species, and/or identified as Essential Fish Habitat (EFH) have been noted in the vegetation control prescription. It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

Cultural Resources: The proposed vegetation management actions do not result in ground disturbance to the physical environment, so the action is not one that typically has the potential to affect historic and/or cultural resources. 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: Existing naturalized grasses and woody shrubs are present on the entire ROW and are expected to naturally seed into the areas that would have lightly-disturbed soil predominantly located on the ROW roads.

Monitoring: The entire project would be inspected during the work period of January 2019 to September 2020. A follow-up treatment would occur 3-4 months after the initial treatment. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard of inspection results would be used to document formal inspections and would 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/ Jonnel Deacon

Jonnel Deacon

Environmental Scientist

CONCUR:

/s/ Sarah T. Biegel

DATE: January 31, 2019

Sarah T. Biegel

NEPA Compliance Officer

References:

Vegetation Management Prescription and Checklist
Effects Determination