

# memorandum

DATE: January 12, 2015

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-575)

TO: Jason Hunt  
Natural Resource Specialist – TFBV-OLYMPIA

**Proposed Action:** Vegetation management along the Port Angeles-Sappho No. 1 corridor

**Pollution Prevention and Abatement Project No.:** 3,085

**Location:** Clallam County, Washington: Bonneville Power Administration (BPA) Olympia District

**Proposed by:** BPA

**Description of the Proposal:** BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor and access roads along the entire length of the 115-kilovolt Port Angeles-Sappho No. 1 transmission line corridor. The right-of-way (ROW) corridor in the proposed project area measures 100 feet in width and crosses approximately 42 miles of terrain through suburban, rural residential, private timber, United States Forest Service, Washington Department of Natural Resources, and National Park Service land.

Letters, on-site meetings, emails, and phone calls would be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated.

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 Environmental Impact Statement (EIS) (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 566 acres of ROW, 384 structure sites, and 14.3 miles of access roads would be initially treated between January 2015 and April 2015. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 564 acres of ROW between mid-June 2015 and October 2015. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove nine trees in, or adjacent to, the ROW. Other tree clearing activities would include side-limbing 838 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 & Checklist was developed for this corridor that incorporates the requirements identified in BPA's EIS and ROD. 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 would 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. Private water wells/springs have been identified along the ROW. No herbicide application would occur within a 50 feet radius of the wellhead/spring (164 feet when using herbicides with ground/surface water advisory). For location information, see the Vegetation Control Prescription.

**Threatened and Endangered Species:** 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 for 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. 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: 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 would be inspected during the work period, January 2015 to October 2015. 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 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/ Oden Jahn  
Oden W. Jahn  
Environmental Scientist

CONCUR: /s/ Katherine S. Pierce  
Katherine S. Pierce  
NEPA Compliance Officer

DATE: January 13, 2015

References:  
Vegetation Management Prescription and Checklist  
Effects Determination