

# memorandum

DATE: May 13, 2016

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-619)

TO: Jacob Grinolds  
Natural Resource Specialist – TFBV-SNOHOMISH

**Proposed Action:** Vegetation management along the Schultz-Raver No. 1 Transmission Line Corridor

**Pollution Prevention and Abatement Project No.:** 3396

**Location:** King County, Washington: Bonneville Power Administration (BPA) Covington District.

**Proposed by:** BPA

**Description of the Proposal:** BPA proposes to remove trees to reclaim a strip of right-of-way (ROW) within a transmission line corridor that contains six transmission lines (the Schultz-Raver No. 1 500-kilovolt line, Schultz-Raver No. 3 500-kV line, Schultz-Raver No. 4 500-kV line, Olympia-Grand Coulee 287-kV line, Schultz-Echo Lake 500-kV line, and the Covington-Bettas Road 230-kV line). The treed area is in the middle of the corridor, and runs from structure 52/1 to 56/1 of the Schultz-Raver No. 1 line. The trees have the potential to fall or grow into the existing lines, threatening transmission reliability. The portion of ROW to be reclaimed measures approximately 114 acres, is between 50 and 820 feet in width, and crosses approximately 3.8 miles of terrain through City of Tacoma property.

BPA has coordinated project activities with City of Tacoma personnel.

In order to comply with Western Electricity Coordinating Council 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.

BPA proposes to clear unwanted vegetation within the subject transmission line corridor. All work would be in accordance with accepted forest practices and methods. No herbicides would be used during the course of the project. Approximately 114 acres of ROW would be cleared in the summer of 2016. BPA proposes to remove approximately 54,300 trees within the ROW. The majority of the trees (96%) are Douglas fir, with the remainder consisting of a mix of red alder, big leaf maple, western hemlock and noble fir. Approximately 26% of all tree species to

be removed are between 4 and 5 inches in diameter at breast height (dbh), 53% are between 6 and 11 inches dbh, 17% are between 12 and 16 inches dbh, and 4% (all Douglas fir) are greater than 17 inches dbh. Merchantable timber would be skidded and decked on-site or in adjacent areas, before being transported to a processing facility. Debris would be disposed of using on-site chip, lop and scatter, or mulching techniques. All onsite debris would be scattered along the ROW. Additional vegetation management may be necessary in subsequent years in discrete areas of noxious weeds, or where a BPA ROW patrol discovers vegetation that poses a hazard to the transmission line.

**Analysis:** A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's EIS and Record of Decision (ROD) (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) are present in the project area; however no herbicides would be used as part of the project, and no activities are proposed within at least 300 feet of a fish-bearing stream. Shrubs that are less than 10-feet-high would left in place where possible.

**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). No ESA-listed Pacific salmon species are found in the project area, thus a determination of "No Effect" was made for all ESA listed species under NOAA Fisheries' jurisdiction.

**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 vegetation is present on the entire ROW and is expected to naturally seed into the areas that would have lightly disturbed soil predominately located on the ROW roads.

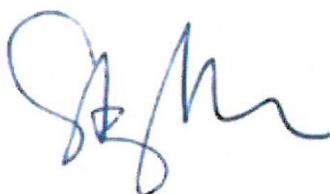
**Monitoring:** The entire project would be inspected during the work period, summer 2016. Additional monitoring and follow-up treatments would be conducted as necessary. A diary of inspection results would be used to document formal inspections and will be filed with the contracting officer.

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.



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Oden W. Jahn  
Environmental Scientist



CONCUR:  
Stacy Mason  
NEPA Compliance Officer

DATE: May 13<sup>th</sup>, 2016

References:  
Vegetation Management Prescription and Checklist  
Effects Determination

**bcc:**

J. Sharpe – EP-4

S. Hugill – EPI-4

B. Tilley – EPI-ALVEY

P. Smith – EPR-4

H. Adams – LC-7

S. Schildt – TFCF-COVINGTON

Official File – EP (EQ-13)

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