

memorandum

DATE: September 11, 2018

REPLY TO
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-696)

TO: Jacob Grinolds
Natural Resource Specialist – TFBV-SNOHOMISH

Proposed Action: Vegetation Management along the Snohomish-Beverly Park No. 3, Snohomish-Bothell No. 1, Snohomish-Murray No. 1, Chief Joseph-Snohomish No. 3, and Murray-Custer No. 1 Transmission Line Corridors.

Pollution Prevention and Abatement Project No.: 4041

Location: Snohomish County, Washington

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposal: BPA proposes to clear unwanted vegetation along, and adjacent to, the transmission line rights-of-way (ROWs) and access roads along the full lengths of the 115-kilovolt (kV) Snohomish-Beverly Park No. 3, the 230-kV Snohomish-Bothell No. 1, and 230-kV Snohomish-Murray No. 1 corridors; and portions of the 345-kV Chief Joseph-Snohomish No. 3 (from Monroe Substation to Snohomish Substation), and 230-kV Murray-Custer No. 1 (from Murray Substation to Structure 6/3) corridors. The ROW corridors in the proposed project area measure 125-525 feet in width and cross approximately 44 miles of terrain through rural and suburban residential, agricultural, private timber, and private undeveloped lands.

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 forestry, agricultural, and suburban 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 855 acres of ROW, 42 structure

sites, and 4.4 miles of access road would be initially treated in fall 2018. In addition, BPA proposes to side-limb up to 27 trees and remove up to 76 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 814 acres of ROW by fall of 2019; however, additional vegetation management may be necessary in subsequent years in discrete areas of noxious weeds, or where BPA personnel discover vegetation that poses a hazard to the transmission line. All debris would be disposed of onsite, along the ROW, using on-site chip, lop and scatter, or mulching techniques.

Analysis: Vegetation Control Cut Sheets were developed for these corridors that incorporate 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 Cut Sheets.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Cut Sheets. 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. Where private water wells/springs have been identified along the ROW and noted in the Vegetation Control Cut Sheets, no herbicide application would occur within a 50-foot radius of the wellhead/spring (164 feet when using herbicides with ground/surface water advisory).

Endangered Species Act and Magnuson-Stevens Act: 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 and designated critical habitat under USFWS' jurisdiction, except Oregon spotted frog. BPA made a determination that the proposed project would be "Likely to Adversely Affect" Oregon spotted frog. The USFWS concurred with this determination in a Biological Opinion (#01EWF00-2018-F-0790) dated August 10, 2018. Impact avoidance and minimization measures, agreed upon between BPA and USFWS during consultation, are noted in the Vegetation Control Cut Sheets and associated documents

BPA conducted a review of ESA-listed species and Essential Fish Habitat (EFH) (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 Cut Sheets. 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 August 2018 through September 2019. A vendor scorecard 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 Jahn

Physical Scientist

CONCUR: /s/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer

DATE: September 11, 2018

References:

Vegetation Control Cut Sheets

Effects Determination

Oregon Spotted Frog Conservation Measures