

memorandum

DATE: August 14, 2019

REPLY TO
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-718)

TO: Jason Hunt
Natural Resource Specialist – TFBV-Olympia

Proposed Action: Vegetation Management along the Lexington-Longview #2 corridor, Longview-Chehalis #1 corridor, Olympia 500/230-kV Tie #1 corridor, Olympia-Grand Coulee #1 corridor, Olympia-St. Clair #1 corridor, Napavine-Allston #1 corridor, Paul-Allston #2 corridor, Paul-Centralia Thermal PH #1 corridor, and Centralia Tap Line to Chehalis-Covington #1 corridor.

Pollution Prevention and Abatement Project No.: 4239

Location: Cowlitz, Lewis, and Thurston 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 Lexington-Longview #2 corridor from Structure 1/1 to Structure 3/1, the Longview-Chehalis #1 corridor from Structure 4/4 to Structure 12/2, the Olympia 500/230-kV Tie #1 corridor from Structure 0/1 to Structure 1/1, the Olympia-Grand Coulee #1 corridor from Structure 1/2 to Structure 22/1, the Olympia-St. Clair #1 corridor from Structure 1/3 to Structure 1/7, the Napavine-Allston #1 corridor from Structure 0/1 to Structure 4/2, the Paul-Allston #2 corridor from Structure 1/1 to Structure 46/1, the Paul-Centralia Thermal PH #1 corridor from Structure 1/2 to Structure 1/4, and the Centralia Tap Line to Chehalis-Covington #1 from Structure 1/3 to Structure 2/1.

The right-of-way (ROW) corridor in the proposed project area measures 100 to 600 feet in width and crosses approximately 85 miles of terrain through rural residential, small-scale agricultural, private timber, and Washington Department of Natural Resources land. Letters notifying property owners of the proposed upcoming work have been mailed.

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 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 3,200 acres of ROW, 8 structure sites, and 10 miles of access roads would be initially treated between August 2019 and September 2020. A follow-up treatment of re-sprouting target vegetation would be conducted on approximately 3,300 acres of ROW between May 2020 and September 2020. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove approximately 88 trees along the edge of the ROW and approximately 92 trees within the ROW would be removed. Other tree-clearing activities would include side-limbing approximately 53 trees and 271 clusters of 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 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 and Essential Fish Habitat: 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 and critical habitat under USFWS' jurisdiction, except the Olympia pocket gopher, Yelm pocket gopher, Oregon spotted frog, and Oregon spotted frog designated critical habitat potentially located along the Olympia-Grand Coulee #1 and Olympia-St. Clair #1 transmission corridor. BPA determined that the project would "may affect, not likely to adversely affect" these species and critical habitat potentially present in this area. USFWS concurred with BPA's determination on September 26, 2017. BPA identified conservation measures that would be adhered to during project implementation for Oregon spotted frog, Olympia pocket gopher and Yelm pocket gopher as identified below.

Conservation measures specific to Oregon spotted frog and Oregon spotted frog critical habitat include:

- Vehicles used to access the project area would stay on established access roads and routes of travel.
- No herbicides would be applied within the Oregon spotted frog critical habitat.
- Spot treatments (stump or stubble treatment, basal treatment, and/or spot foliar) would be used rather than localized treatments (broadcast application and cut stubble treatments) to minimize application to non-target plants.
- All equipment would be cleaned prior to entering ROW to reduce the potential spread or introduction of noxious weeds or other exotic species.
- All work occurring in Oregon spotted frog habitat would occur between approximately July 1 and October 15th if no water is present (e.g., during or immediately after a major precipitation event that results in standing water)
- No work, including transportation in and out of the work site, would be conducted in standing water (this includes permanent waters and seasonally flooded areas when water is present).
- No herbicide would be applied in areas that contain permanent water or seasonally flooded wetlands.
- Not work during or immediately after a major precipitation event.
- Prior to conducting in-water work in the Upper Black River and Deschutes River-Capitol Lake watersheds, clothing or equipment or materials must be disinfected regardless of where the clothing or equipment was last used, including adjacent drainages also containing Oregon spotted frog (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 Oregon spotted frog. “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 Olympia-Grand Coulee #1 and Olympia-St. Clair #1 transmission line corridor, personnel must disinfect equipment prior to entering a water body between Olympia-Grand Coulee #1 Structure 1/5 and 1/6 and Olympia-St. Clair #1 Structure 1/4 and Structure 1/7. These drainage boundaries may change if new Oregon spotted frog-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.

Conservation measures specific to Olympia pocket gopher and Yelm pocket gopher include:

- All work in identified pocket gopher habitat must occur between July 1 and February 14.

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 August 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/ Katey Grange

DATE: August 14, 2019

Katey Grange

NEPA Compliance Officer

References:

Vegetation Management Prescription and Checklist

Effects Determination