

# memorandum

DATE: October 16, 2019

REPLY TO  
ATTN OF: Emma Reinemann – EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-725)

TO: Jake Grinolds – Natural Resource Specialist– TFBV-SNOHOMISH

**Proposed Action:** Vegetation Management from structures 0/1 to 1/4 of the Maple Valley-Duwamish No. 1 line corridor, structures 1/1 to 9/5 of the Covington-Creston Seattle City Light (SCL) No. 1 line corridor, structures 1/1 to 9/4 of the Covington-Maple Valley No. 2 line corridor, and structures 4/1 to 12/5 of the Raver-Echo Lake No. 1 line corridor

**Pollution Prevention and Abatement Project No.:** 4251

**Location:** King County, Washington

**Description of the Proposal:** BPA proposes to clear unwanted vegetation in and adjacent to structures 0/1 to 1/4 of the Maple Valley-Duwamish No. 1 line corridor, structures 1/1 to 9/5 of the Covington-Creston SCL No. 1 line corridor, structures 1/1 to 9/4 of the Covington-Maple Valley No. 2 line corridor, and structures 4/1 to 12/5 of the Raver-Echo Lake No. 1 line corridor.

The Maple Valley-Duwamish No. 1 line corridor in the proposed project area measures from 250 to 700 feet in width and crosses approximately ½ mile of terrain, including privately owned land and land owned by Puget Sound Energy.

The Covington-Creston SCL No. 1 line corridor in the proposed project area measures from 250 to 800 feet in width and crosses approximately 9 miles of terrain, including less than 1 mile of land managed by Washington Department of Transportation; approximately 2 miles of land managed by King County Parks, and 6 miles of privately-owned urban and residential land.

The Covington-Maple Valley No. 2 line corridor in the proposed project area measures from 150 to 400 feet in width and crosses approximately 9 miles of privately-owned urban and residential land.

The Raver-Echo No. 1 corridor in the proposed project area measures from 170 to 1,500 feet in width and crosses approximately 9 miles of terrain, including approximately 2.5 miles of land managed by the Washington Department of natural resources, approximately 4.5 miles of land owned by Seattle Public Utilities, and approximately 2 miles of privately owned and rural lands. The land managed by Seattle Public Utilities is managed as a drinking water source for the City of Seattle and herbicide use is restricted.

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. Any additional measures proposed by landowners or land managers through ongoing communication would be incorporated into the vegetation management plan during project implementation.

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 right-of-way (ROW) to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods that may include hand cutting, mowing, 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 Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 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 750 acres of ROW and about 4,320 linear feet of access roads would be initially treated with herbicides. In addition, BPA proposes to side-limb up to 18 trees and remove up to 21 trees in, or adjacent to, the ROW. No herbicides would be applied on the lands managed by Seattle Public Utilities in the Cedar River Watershed as a drinking water source for the City of Seattle. 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 or agricultural irrigation sources 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, or irrigation source (164 feet when using herbicides with ground/surface water advisory). Approximately 4.5 linear miles of the project area is within the Cedar River Watershed, where herbicide use is restricted. All conditions set forth by the Seattle Public Utilities must be followed in this area.

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.

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, fall 2019 through fall 2020. A vendor scorecard 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/ Emma Reinemann

Emma Reinemann

Physical Scientist (Environmental)

CONCUR:

/s/ Katey Grange

Katey Grange

NEPA Compliance Officers

DATE: October 16, 2019

References:

Vegetation Management Prescription and Checklist

Effects Determination