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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: September 7, 2017

REPLY TO ATTN OF: EPR/Covington

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-667

TO: Jacob Grinolds
Natural Resource Specialist – TFBV-SNOHOMISH

Proposed Action: Vegetation Management along the Perimeters of Covington and Raver Substations

Pollution Prevention and Abatement Project No.: 3776

Location: King County, Washington

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation adjacent to the Covington and Raver substations that may impede the operation and maintenance of the subject transmission lines. All work would be done on BPA fee-owned land.

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.

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), 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 acres of BPA fee-owned land would be initially treated in the fall of 2017 and would include the removal of approximately 435 trees. A follow-up treatment of re-sprouting target vegetation may be required by spring of 2018 and 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 either be lopped and scattered onsite or chipped and removed from site depending on location of vegetation.

Analysis: A Vegetation Control Prescription and Checklist was developed for this corridor that incorporates the requirements identified in BPA's Final 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 and Checklist.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. No work is planned that would encroach closer than 150 feet from any water body. No ground-disturbing vegetation management methods would be implemented, thus eliminating the risk for soil erosion and sedimentation.

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 under USFWS' jurisdiction.

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: 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 archaeologist would be contacted.

Re-Vegetation: An initial replanting of the area would occur late fall/early winter with low-growing, native vegetation. BPA is committed to establishing the areas with a low-growing, native plant community that will not become a hazard to transmission line infrastructure.

Monitoring: The entire project would be inspected during the work period of fall 2017. Additional monitoring and follow-up treatments 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/ Chad Browning
Chad A. Browning
Environmental Scientist

CONCUR: /s/ *Sarah T. Biegel* DATE: *September 7, 2017*
Sarah T. Biegel
NEPA Compliance Officer

References:
Vegetation Management Prescription and Checklist
Effects Determination