

memorandum

DATE: January 7, 2019

REPLY TO
ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-709)

TO: Craig Fackrell
Natural Resource Specialist – TFBV- Tri Cities

Proposed Action: Vegetation management for the FY 19 Ellensburg District Bundle

Pollution Prevention and Abatement Project No.: 4,121

Location: Benton Co., Chelan Co., Grant Co., Kittitas Co., Klickitat Co., and Yakima Co., Washington

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation along and adjacent to eight transmission corridors in the BPA Transmission Line Maintenance (TLM) Ellensburg District in east central Washington. The transmission lines include Columbia-Ellensburg No. 1, East Ellensburg Tap to Columbia-Ellensburg No. 1, Ellensburg-Moxee No. 1, Grandview-Red Mountain No. 1, Midway-Grandview No. 1, Midway-Moxee No. 1, Midway-Rocky Ford No.1, and Wautoma-Ostrander No. 1. The ROW corridor in the proposed project area varies from 100 to 625 ft. feet in width, and crosses approximately 250 miles of terrain through urban, residential, rural residential, agricultural, range lands, and timber lands.

These transmission lines share ROW corridors with eleven other BPA transmission lines as they merge and branch off, forming the high-voltage transmission network of east central Washington. These lines include Midway-Potholes No. 1, Grand Coulee-Handford No. 1, Potholes-Grand Coulee No. 1, Wine Country-Midway No. 1, Schultz-Wautoma No. 1, N. Bonneville-Midway No. 1, Grand Coulee-Schultz No. 1, Grand Coulee to Schultz No. 2, Olympia-Grand Coulee No. 1, Bettas Road-Columbia No. 1, and Midway-Grandview No. 1.

The project crosses tribal land, federally-managed land, state lands, and private lands. While the overall project area spans approximately 250 miles, actual work areas are isolated along specific spans of the transmission line, usually near waterways where vegetation tends to proliferate in the otherwise dry climate of east-central Washington.

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.

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 would

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 would cut or treat with herbicide approximately 127 acres of ROW, 34 structure sites, and 617 linear feet of access roads starting in 2019. In addition, 11 danger trees would be removed and 2 trees would be side-limbed. All vegetation control methods including selective cutting, mowing, and herbicide treatments are consistent with the methods approved in BPA's Transmission System Vegetation Management Program EIS. 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 these corridors 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.

Water Resources: Water bodies (streams, rivers, irrigation canals, 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 would 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 work near irrigation canals, a 50-foot buffer from the bank for any herbicide application would be maintained.

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) on December 18, 2018. 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 (NMFS). A determination of "No Effect" was made for all ESA-listed species under NMFS' jurisdiction with the implementation of the conservation measures in the Water Resources section above.

Essential Fish Habitat: A review of the NMFS 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: The proposed action is considered to be routine vegetation maintenance necessary to preserve the reliability of the transmission line and public safety. The project involves the cutting of brush within the existing managed ROW, an activity that occurs on a regularly periodic basis. According to the scope of the proposed work, the activity is not a type that would result in changes in the character or use of historic properties, if any such historic properties are located in the area of potential effects. 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: Grasses and shrubs are present on the non-cultivated sections of the ROW and are expected to naturally seed into the areas that would have lightly disturbed soil.

Monitoring: The entire project would be inspected during the work period and additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard would be used to document formal inspections and 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/ Aaron Siemers

Aaron Siemers

Physical Scientist (Environmental)

CONCUR:

/s/ Sarah T. Biegel

Sarah T. Biegel

NEPA Compliance Officer

Date: January 7, 2019

References:

Vegetation Management Prescription and Checklist
Effects Determination