

United States Government

Department of Energy  
Bonneville Power Administration

# memorandum

DATE: JAN 05 2010

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplemental Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA 413), KEP Project No: **1455**. (This SA supersedes all previous SAs for the subject transmission line corridor including but not limited to: (DOE/EIS-0285/SA 31, & DOE/EIS-0285/SA 290).

to: Steve Narolski – TFBV-Olympia  
Natural Resource Specialist

**Proposed Action:** Vegetation management along the Fairmount-Port Angeles No. 1, (reference line) 230-kV transmission line corridor.

**Location:** The project line is located in Jefferson and Clallam counties, Washington, from Fairmount substation near Discovery Bay, Washington extending 27 miles west to Port Angeles Substation located in Port Angeles, Washington. The project is located in the Olympia maintenance district.

**Proposed by:** Bonneville Power Administration (BPA)

**Description of the Proposal:** BPA plans 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.) New WECC standards have been adopted that decrease the allowable height of vegetation. The target vegetation includes both on and off right-of-way (ROW) vegetation including danger trees. (Danger trees are trees that are off of the ROW but have been determined to be a hazard to the transmission line). BPA's overall goal is to have low-growing plant communities along the ROWs to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods will be used to perform the work. All methods including selective cutting, mowing, and herbicide treatments are consistent with the methods analyzed in BPA's Transmission System Vegetation Management Program EIS (DOE/EIS-0285). The work will increase system reliability. Debris will be disposed of using onsite chip, lop and scatter, or mulching techniques. All onsite debris will be scattered along the ROW. The project is designed and adopted in the Record of Decision (ROD) to focus on the removal of tall growing species. The intent is to promote a community of low growing vegetation along the ROW. No areas needing revegetation have been identified.

**Analysis:** A Vegetation Management Checklist (Checklist) was completed for this project in accordance with the requirements identified in the Bonneville Power Administrations Transmission System Vegetation Management Program EIS and ROD.

The subject corridor traverses public and private lands in Jefferson and Clallam counties, Washington. Landowners include Washington State Department of Natural Resources (DNR), United States Forest Service (USFS)-Quilcene Ranger Station, residential and private, and industrial timber properties. No tribal lands are involved.

Section 3 of the Checklist & Vegetation Control Prescription identifies the natural resources present in the area of the proposed work. The following summarizes natural resources occurring in the project area along with applicable mitigation measures.

**Water Resources:** Water bodies (streams, rivers, lakes, and wetlands) occurring in the project area and their associated attributes are detailed in the Vegetation Management prescription. Trees in riparian zones will be selectively cut to include only those that are within 55 feet of the conductor at maximum sag. No ground disturbing vegetation management methods will be implemented thus minimizing the risk of soil erosion and sedimentation near the water resources. The following herbicide buffers will be implemented for the project. Outside a 100 foot buffer from any river, stream, pond, or wetlands Triclopyr BEE (common formulations, Garlon 4 and Tahoe 4E) may be applied. Formulations of Triclopyr TEA (common formulations Garlon 3A and Tahoe 3A) may be applied for spot or localized applications up to one yard of the waters edge for threatened and endangered (T&E) listed resources and or Essential Fish Habitat resources. Formulations of Triclopyr TEA (common formulations Garlon 3A and Tahoe 3A) may be applied for spot or localized applications up to the water's edge for any other water resource.

**Threatened and Endangered Species/Essential Fish Habitat:** Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. A species list was reviewed from the United States Fish and Wildlife Service (USFWS) on November 18, 2009, identifying T&E species and Critical Habitat Units potentially occurring in the project area. In addition, a review of species under the jurisdiction of NOAA Fisheries was conducted. A determination of "No Effect" was made for all ESA listed species and designated critical habitat for the project. A determination of "No Effect" was made for Essential Fish Habitat waters that occur in the project area.

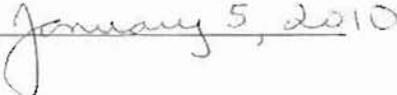
**Cultural Resources:** No cultural resources are known for the project area. No ground disturbing vegetation management methods will be implemented, thus minimizing the risk of disturbing any unknown cultural sites. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the appropriate tribe, the BPA Environmental Specialist and the BPA archeologist will be contacted.

**Monitoring:** The entire project will be inspected during the work period. Additionally, the line will be patrolled annually after treatment to monitor the effectiveness of the treatment and any issues associated with the project.

**Findings:** This Supplement Analysis finds that (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS and ROD, and; (2) there are no new circumstances or information relevant to

environmental concerns and bearing on the proposed actions or their impacts. This Supplemental Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

  
For Greg P. Tippetts  
Physical Scientist (Environmental)

CONCUR:  DATE:   
Katherine S. Pierce  
NEPA Compliance Officer

Attachment:

Vegetation Control Prescription & Checklist (VMTS spreadsheet)

Effects Determination for: Threatened and Endangered Species and Essential Fish Habitat