

# memorandum

DATE: March 29, 2011

REPLY TO  
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA 444) - Keller Tap to Grand Coulee-Okanogan #2  
Project No. PP&A 1919

TO: Tom Murphy – TFBV-Bell-1  
Natural Resource Specialist

**Proposed Action:** Vegetation management along portions of the Keller Tap to Grand Coulee-Okanogan #2 115-kV transmission line corridor from tower structures 1/1 to 21/2

**Location:** The project is located in Douglas, Okanogan and Ferry counties, Washington.

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

**Description of the Proposal:** BPA proposes to remove tall growing and noxious vegetation from the ROWs, structure sites and access roads that can potentially interfere with the operation, maintenance, and reliability of the various transmission lines. All vegetation management activities will be performed in accordance with the BPA Master Agreement Statement of Work for Vegetation Control on BPA Transmission Line Rights-of-Way and in accordance with the specific details identified in the vegetation management checklist and detail/prescription sheet.

Tall growing and noxious vegetation and reclaim trees will be removed and/or controlled inside the approximately 20 mile long, 100 foot wide ROW using selective and nonselective methods that may include hand cutting, mowing and herbicidal treatment. Danger trees adjacent to the ROWs will also be removed and/or controlled. Low growing vegetation will be protected along the ROWs with the exception of brush at the base of transmission structures, tower sites and within access roads.

Debris disposal will be a combination of lop and scatter, mulching and mechanical chipping. Re-seeding using a native seed mix will occur as necessary to stabilize traveled surfaces. Germination success will be monitored during the next growing season and follow-up seeding will be performed as needed. Initial treatment will begin in 2011 and the transmission line ROWs, structure sites and access roads will be maintained on a 10-year cycle.

The proposed action will allow safe and timely access to the various transmission lines, which will help reduce outage times and maintain reliable power in the region. All work performed will be in accordance with the National Electrical Safety Code and BPA safety standards.

**Analysis:** A Vegetation Management Checklist was completed for this project in accordance with the requirements identified in BPA's Transmission System Vegetation Management Program FEIS (DOE/EIS-0285).

Land along the project corridor consists of approximately 10% private woodlot owners and 90% Confederated Tribes of the Colville Reservation (Colville) tribal lands. Primary uses for lands within the project area include timber production, grazing, game hunting and recreational uses.

Section 3 of the checklist identifies any 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:* Various water resources (streams, rivers, lakes, wetlands, etc.) are located within ½ mile of the ROWs and have the potential to be fish bearing; therefore, the following conservation and avoidance measures will be observed to the maximum extent possible during project activities: Trees and brush in riparian zones will be selectively cut to include only those that are in violation of current BPA ground-to-conductor clearance electrical safety standards. Trees will be topped where shrubs are not present to provide shade and a silt buffer. No ground disturbing vegetation management methods will be implemented, thus minimizing the risk for soil erosion and sedimentation near water bodies. Only BPA-approved herbicides using the specified buffer width from the edge of any water resource will be used for stump treatment. No drinking water, irrigation wells, or water supplies were identified along the ROWs.

*T&E Species and Habitats:* Pursuant to its obligations under the Endangered Species Act (ESA), 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) in March 2011, identifying Threatened and Endangered species and Critical Habitat Units potentially occurring in the project area. In addition, a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration (NOAA) Fisheries was conducted.

There are no ESA listed species, Designated Critical Habitat or Essential Fish Habitat present in or near the project area. A determination of “No Effect” was made for all ESA listed species, designated critical habitat and Essential Fish Habitat for the project.

*Cultural Resources:* Vegetation management activities are not anticipated to affect cultural resources as there will not be any ground disturbing activities. If archaeological material is discovered during the course of vegetation management activities, all work will be halted and the Colville tribe, the BPA Environmental District Representative and the BPA archaeologist will be notified.

*Monitoring:* The ROWs identified in the checklist will be inspected after completion of the work to determine if all target vegetation has been removed from these areas. Follow up monitoring for vegetation control will combine work in progress inspections and next-season site reviews to determine the effectiveness of control methods. Follow-up herbicide application will be performed as needed six to nine months after initial treatment.

**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. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ Philip W. Smith, for:

Michael A. Rosales

Physical Scientist - Environmental

CONCUR: /s/ Katherine S. Pierce

Katherine S. Pierce

NEPA Compliance Officer

DATE: March 29, 2011

Attachment:

Vegetation Management Checklist

Vegetation Detail Sheets

Effects Determination