

# memorandum

DATE: April 19, 2021

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-769)

TO: Daniel Misch  
Natural Resource Specialist – TFBV-KALISPELL

**Proposed Action:** Vegetation Management along the Lancaster-Noxon No. 1, Libby-Bonnors Ferry No. 1, Rattlesnake-Garrison No. 1, Garrison-Anaconda No. 1, and the Anaconda-Divide No. 1 transmission lines.

**Pollution Prevention and Abatement Project No.:** 4553

**Location:** Deer Lodge, Granite, Lincoln, Missoula, Powell, Sanders, and Silverbow Counties, Montana

**Description of the Proposal:** BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way and access roads of several of the high-voltage transmission lines in western Montana, specifically the Lancaster-Noxon No. 1, Libby-Bonnors Ferry No. 1, Rattlesnake-Garrison No. 1, Garrison-Anaconda No. 1, and the Anaconda-Divide No. 1 transmission lines. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads along these transmission assets.

The corridor in the proposed project area measures approximately 125 feet in width and crosses approximately 150 miles of terrain through rural residential, agricultural, private, and commercial forestry lands, lands managed by the State of Montana lands, as well as lands managed by the United States Forest Service; Kootenai National Forest, Kaniksu National Forest, and Lolo National Forest.

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 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 would be used to perform the work, and may include hand cutting, mowing, herbicidal treatment, or a combination of those methods. 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 1,200 acres of ROW and 40 miles of access road would be initially treated in spring and summer of 2021. In addition, BPA proposes to remove up to 190 trees in, or adjacent to, the ROW, and limb up to 800 trees along the edge of the ROW. 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:** A Vegetation Control Cut Sheet was developed for this corridor that incorporated the requirements identified in BPA's Transmission System Vegetation Management Program FEIS 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 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. 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).

**Endangered Species Act and Magnuson-Stevens Act:** Pursuant to its obligations under the Endangered Species Act (ESA), BPA 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 *no effect* determination for all ESA-listed species and designated critical habitat under USFWS' jurisdiction, except Canada lynx, grizzly bear, bull trout, bull trout critical habitat, and white sturgeon. BPA determined that the proposed project *may affect, but is not likely to adversely affect* the above listed species. The USFWS concurred with these determinations in a

letter dated April 16, 2021. Impact avoidance and minimization measures, agreed upon between BPA and USFWS during consultation, are noted in the Vegetation Control Cut Sheets.

BPA conducted a review of ESA-listed species, designated critical habitat, 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); however, none were found in the project area. BPA made a determination that the project would have “No Effect” for all ESA-listed fish species and designated critical habitat under NMFS’ jurisdiction, and the project would not adversely affect EFH.

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, spring of 2021 through fall 2021. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

Findings: BPA 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 C. Siemers  
Environmental Scientist

CONCUR:

/s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer

DATE: April 19, 2021

References:  
Vegetation Control Cut Sheets  
USFWS Letter of Concurrence