

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-777)

**Pollution Prevention and Abatement Project Number 4,563**  
**Natural Resource Specialist/Project Manager: Craig Fackrell-TFBV-Bell-1**

Bonneville Power Administration  
Department of Energy



**Proposed Activities**

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way of high-voltage transmission lines and access roads in Boundary and Bonner Counties, Idaho, specifically the Libby – Bonners Ferry No. 1 and the Sand Creek – Bonners Ferry No. 1 & 2 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 100 feet in width and is 41 miles long. The corridor runs through primarily private lands, but some tracts are managed by the State of Idaho, the U.S. Forest Service – Idaho Panhandle National Forests (IPNF), and the Bureau of Land Management – Coeur ‘d Alene District. Land use is varied, with forested tracts, agricultural tracts, rural residential, and conservation/recreational tracts.

Approximately two miles of the Sand Creek – Bonners Ferry No. 1 & 2 transmission line corridor runs through USFS-managed lands (Bonners Ferry Ranger District). The IPNF was notified of the planned work, and provided acknowledgement, but no comments or concerns were expressed. For remaining properties: 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. To ensure that the roots are killed, prevent re-sprouts, and selectively manage vegetation that interferes with the operation and maintenance of transmission infrastructure; herbicides would be selectively applied using spot treatment (stump treatment) or localized treatments (basal treatment and/or low-volume foliar treatment). For worker safety and fire prevention, broad-spectrum (non-selective) residual

herbicide would be applied in a localized area beneath and immediately adjacent to switch platforms and selected transmission structures (primarily wood poles). All herbicides and adjuvants would be chosen from a list of approved chemicals in BPA's Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 2000) and subsequent supplement analyses to the FEIS.

Approximately a half-mile of access road and 350 acres of transmission line corridor would be initially treated in Fall of 2021. In addition, BPA proposes to remove approximately 225 trees and side-limb 1,150 trees. 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 chipping/mulching, or "cut, lop and scatter" 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 determination of "may effect, not likely to adversely effect" for Canada lynx, grizzly bear, bull trout, white sturgeon, and Spalding's catchfly. BPA made a determination of "may effect, but is not likely to result in jeopardy" of whitebark pine (a Candidate species). BPA submitted a Biological Assessment for the project to the northern Idaho office of U.S. Fish and Wildlife Service (USFWS) on June 16, 2021. The USFWS issued a letter of concurrence on September 13, 2021. In the course of the USFWS consultation process, BPA and the USFWS developed mitigation measures which will be implemented during project activities to reduce the potential for project activity to effect ESA-listed species.

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). No ESA-listed species or critical habitat under NMFS' jurisdiction are present in the project area, and no EFH is present in the project area.

#### 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 - September and October of 2021 through the end of the year. A follow-up treatment may occur after the initial treatment. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard would be used to document formal inspections and would be filed with the contracting officer.

#### Findings

BPA finds that the types of actions and the potential impacts related to the proposed activities have been examined, reviewed, and consulted upon and are similar to those analyzed in the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD. There are no substantial changes in the EIS's Proposed Action and no significant new circumstances or information relevant to environmental concerns bearing on the EIS's Proposed Action or its impacts within the meaning of 10 CFR § 1021.314(c)(1) and 40 CFR §1502.9(d). Therefore, no further NEPA analysis or documentation is required.

/s/ Aaron Siemers  
Aaron Siemers, EPR-4  
Physical Scientist

Concur:

/s/ Katey Grange  
Katey Grange  
NEPA Compliance Officer

Date: September 15, 2021

#### References:

Vegetation Control Cut Sheets  
USFWS Letter of Concurrence (reference code: FWS/IR9/ES/IFWO/2021-I-1822)