

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-846)

**Pollution Prevention and Abatement Project Number 4,723**  
**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 Kootenai, Shoshone, Clearwater, and Latah Counties, Idaho, and Mineral County, Montana. Specifically, BPA plans to cut danger trees and corridor trees in the Taft-Bell No. 1 and Dwarshak-Taft No. 1 transmission line right-of-ways. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor along these transmission assets.

The corridors in the proposed project area range from 100 – 300 ft. wide and cover approximately 120 miles of terrain through a variety of land uses, but primarily forested lands managed by the U.S. Forest Service (USFS).

BPA has notified the USFS Idaho Panhandle National Forest, Nez Perce Clearwater National Forest, and Lolo National Forest of planned vegetation management activities. The USFS provided no comments during the coordination sessions. Letters, on-site meetings, emails, and phone calls would be used to notify other landowners approximately three weeks prior to commencing vegetation management activities. 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.

The main component of the proposed action involves danger tree and corridor tree removal, however, a combination of selective and nonselective vegetation control methods may be used to perform other 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.

BPA proposes to cut approximately five corridor trees and 130 danger trees, or trees outside of the transmission easement that pose a risk of falling into the energized conductor. Approximately 50 trees would be side limbed. Work would be conducted by crews of two to six individuals, using standard equipment such as chainsaws, and sprayers, utilizing light duty trucks and all terrain vehicles. Additional vegetation management may be necessary in subsequent years in discrete areas 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 "May Affect, Not likely to adversely Affect" determination for Canada lynx, grizzly bear, bull trout and bull trout critical habitat, white sturgeon, and Spalding's catchfly. BPA made a "May effect, but not likely to result in jeopardy" determination for the candidate species whitebark pine and monarch butterfly. These determinations are consistent with recent consultations with USFWS for routine vegetation management actions along BPA transmission lines and access roads in the region (USFWS consultation codes 01EWF00-2021-I-0878 & 01EIFW00-2021-I-1822). The mitigation measures developed during the consultations and detailed in each letter of concurrence will be implemented during project activities to minimize the project's effects on species protected under the ESA.

BPA conducted a review of ESA-listed species 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). The proposed vegetation management activities are within

the scope of activities and action area evaluated in the Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho (SLOPES PBO) (WCR-2014-1600, September 22, 2016). Streams in the project area with documented presence of ESA-listed fish, designated critical habitat for one or more species, and/or identified as EFH have been noted in the Vegetation Control Cut Sheets. It was determined that, by complying with the project design criteria listed within the SLOPES PBO, potential effects to ESA-listed anadromous salmonids and EFH would be consistent with those evaluated and addressed in the SLOPES PBO.

#### Cultural Resources

BPA archaeologists have reviewed the proposed actions. For proposed tree removal along the Taft-Bell No. 1 corridor, proposed tree cut was determined to have no potential to cause effect to historic and/or cultural resources. For the proposed tree removal within the Dwarshak-Taft No. 1 transmission line corridor, BPA consulted with the Idaho State Historic Preservation Office (SHPO), Montana SHPO, Nez Perce Tribe, Confederated Salish and Kootenai Tribes, the Coeur d'Alene Tribe, and the United States Forest Service. Rather than conducting a cultural resources survey, BPA proposed cultural resources monitoring during tree cutting activities. Responses were received from the Nez Perce Tribe, Forest Service, and Montana SHPO. All agreed with the approach of monitoring the activity. No other responses were received, and cultural resource monitoring will be implemented during tree cut along the Dwarshak-Taft No. 1 corridor.

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 from tree cut.

#### Monitoring

The entire project would be inspected during the work period, summer of 2023, and potentially into fall of 2023. 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  
Physical Scientist

Concur:

*/s/ Katey Grange*  
Katey Grange Date: June 30, 2023  
NEPA Compliance Officer

References:

- 1) Vegetation Control Cut Sheets
- 2) Bonneville Power Administration (BPA). 2021. Northern Idaho Inspection and Vegetation Management Biological Assessment
- 3) Bonneville Power Administration (BPA). 2016. Endangered Species Act Section 7 Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Rebuild Projects for Transmission Line and Road Access Actions Authorized or Carried Out by the Bonneville Power Administration in Oregon, Washington, and Idaho