

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-867)

**Pollution Prevention and Abatement Project Number 4,933**  
**Natural Resource Specialist/Project Manager: Kyle Goeke-Dee**

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, access roads, and communication sites in Lincoln, Flathead, Sanders, Mineral, and Lake counties, Montana, specifically the Noxon-Libby No. 1, Libby-Conkelley No. 1, Noxon-Hotsprings No. 1, Taft – Hotsprings No. 1, and Flathead – Hotsprings 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 ranges from approximately 115 feet in width to 250 feet in width and covers approximately 180 miles of terrain through rural residential areas, private forested tracts, remote private mountainous areas, as well as public lands managed by the State of Montana and the U.S. Forest Service (USFS), Kootenai National Forest and Lolo National Forest.

Approximately 55 miles of the planned vegetation management transmission line corridor runs through USFS-managed lands. The Lolo National Forest and Kootenai National Forest were notified of the planned work, provided acknowledgement, and did not provide additional comments. 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, and only applied 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 2,000 acres of transmission right-of-way would be cut, lopped and scattered, along with 1,400 acres of herbicide treatment after the cut. Approximately nine miles of access roads, and 15 structure sites would be initially treated in Fall of 2023 into 2024. In addition, BPA proposes to remove approximately 550 trees in, or adjacent to, the ROW and to remove limbs from approximately 140 trees in, or adjacent to, the ROW. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle 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 that the project would have "*No Effect*" for the migratory wetland bird, red knot. BPA made a determination of "*May effect, not likely to adversely affect*" for yellow-billed cuckoo, Canada lynx and Canada lynx designated critical habitat, bull trout and bull trout designated critical habitat, grizzly bear, North American wolverine, and Spalding's catchfly. BPA made a determination of "*Not likely to result in jeopardy of the proposed species*" for the candidate species monarch butterfly. The proposed vegetation management activities are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (USFWS) letter of concurrence (LOC) regarding: Kalispell Inspection and Vegetation Management, consultation number 2022-0090873, sent to BPA in October 2022, and Kalispell Inspection and Vegetation Management, consultation number 06E11000-2021-I-0365, sent to BPA in April of 2021, and conservation measures

would be implemented including herbicide buffers around ESA-fish streams and other waterways, maintaining vegetation near waterways to the extent practicable, identifying and avoiding milkweed, implementing food attractant storage requirements for grizzly bears, and scheduling vegetation management actions between March 16<sup>th</sup> and October 15<sup>th</sup> in those areas with moderate to optimal grizzly bear habitat to avoid impacting bears immediately before and after hibernation.

Since the time of the Section 7 consultations listed above, the whitebark pine has been formally protected as a threatened species under ESA. BPA has reached out to the USFWS field offices for guidance on updating the consultations, and in the meantime would identify whitebark pine habitat to vegetation management contractors and restrict cutting of all five-needle pine trees. Therefore, the project would have “No Effect” on whitebark pine.

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 action for potential effects to historical and cultural resources. The attached Table 1 shows those locations where tree removal shall be supervised by a cultural monitor. For the approximately 140 danger trees proposed for removal along the Flathead-Hot Springs No. 1 line, BPA made a determination of “No historic properties effected” and consulted with The Confederated Salish and Kootenai Tribe (CSKT) and the Montana State Historic Preservation Office. BPA received concurrence from the CSKT on October 31, 2023. Other vegetation management actions do not result in ground disturbance to the physical environment, so the actions are not those that typically have 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 Archaeologist would be contacted.

Table 1. Kalispell District FY 24 Periodic Vegetation Management and Flathead-Hotsprings No. 1 Danger Trees; Locations that require cultural monitoring to proceed with danger tree and corridor tree cut.

Transmission Line	Span (line mile/structure number)	Tree Species (if available)	Number of Trees
Noxon-Hot Springs No 1	034/02		10
Noxon-Hot Springs No 1	034/04	Ponderosa Pine	1
Noxon-Hot Springs No 1	036/02	Ponderosa Pine	4
Noxon-Hot Springs No 1	036/04		10
Noxon-Hot Springs No 1	039/03	Douglas Fir	2
Libby-Conkelley No 1	007/03		1
Noxon-Libby No 1	007/04	Douglas Fir	1
Noxon-Libby No 1	008/02		10
Noxon-Libby No 1	012/05	Lodgepole Pine	3
Noxon-Libby No 1	013/03	Lodgepole Pine	1
Noxon-Libby No 1	013/04	Western Larch	1
Noxon-Libby No 1	014/03	Lodgepole Pine	9
Noxon-Libby No 1	014/04		3
Noxon-Libby No 1	014/05	Lodgepole Pine	1
Noxon-Libby No 1	014/05	Lodgepole Pine	2
Noxon-Libby No 1	015/01	Lodgepole Pine	1
Noxon-Libby No 1	015/02	Lodgepole Pine	1
Noxon-Libby No 1	015/02	Lodgepole Pine	1
Noxon-Libby No 1	015/03	Lodgepole Pine	2
Noxon-Libby No 1	016/01	Lodgepole Pine	1
Noxon-Libby No 1	016/01	Lodgepole Pine	1
Noxon-Libby No 1	016/01	Lodgepole Pine	1
Noxon-Libby No 1	016/01	Lodgepole Pine	2
Noxon-Libby No 1	018/01	Lodgepole Pine	1
Noxon-Libby No 1	018/04		10
Noxon-Libby No 1	019/02		5
Noxon-Libby No 1	020/01	Lodgepole Pine	1
Noxon-Libby No 1	021/04	Lodgepole Pine	4
Noxon-Libby No 1	022/03		0
Noxon-Libby No 1	023/02		3
Noxon-Libby No 1	023/03		3
Noxon-Libby No 1	023/03		5
Taft-Hot Springs No 1	002/04		5

Table 1. Continued

Taft-Hot Springs No 1	003/03		5
Taft-Hot Springs No 1	003/03	Douglas Fir	2
Taft-Hot Springs No 1	003/05		4
Taft-Hot Springs No 1	003/05		10
Taft-Hot Springs No 1	004/05		10
Taft-Hot Springs No 1	005/02	Douglas Fir	1
Taft-Hot Springs No 1	005/02	Douglas Fir	2
Taft-Hot Springs No 1	005/02	Douglas Fir	1
Taft-Hot Springs No 1	006/01	Douglas Fir	4
Taft-Hot Springs No 1	006/02	Douglas Fir	1
Taft-Hot Springs No 1	006/02	Douglas Fir	1
Taft-Hot Springs No 1	006/03	Douglas Fir	2
Taft-Hot Springs No 1	006/04		5
Taft-Hot Springs No 1	006/04		10
Taft-Hot Springs No 1	006/05		25
Taft-Hot Springs No 1	006/05	Western Red Cedar	1
Taft-Hot Springs No 1	007/02	Douglas Fir	1
Taft-Hot Springs No 1	007/03	Douglas Fir	4
Taft-Hot Springs No 1	007/06		5
Taft-Hot Springs No 1	007/06		5
Taft-Hot Springs No 1	008/02		8
Taft-Hot Springs No 1	009/03		5
Taft-Hot Springs No 1	009/04		10
Taft-Hot Springs No 1	009/05		5
Taft-Hot Springs No 1	010/05		5
Taft-Hot Springs No 1	011/04		3
Taft-Hot Springs No 1	011/05		5
Taft-Hot Springs No 1	011/05		5
Taft-Hot Springs No 1	012/02		3
Taft-Hot Springs No 1	012/03		5
Taft-Hot Springs No 1	012/03	Ponderosa Pine	1
Taft-Hot Springs No 1	013/01		5
Taft-Hot Springs No 1	013/02	Douglas Fir	2
Taft-Hot Springs No 1	013/05		5

### 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, Fall of 2024 through 2025. 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/ Sarah T. Biegel*

Sarah T. Biegel

NEPA Compliance Officer Date: December 4, 2023

References:

Vegetation Control Cut Sheets