

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-884)

Pollution Prevention and Abatement Project Number 5,032
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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 Flathead, Granite, Lincoln, Mineral, Missoula, and Powell Counties, Montana, specifically the Garrison-Taft No. 1 corridor, the Libby-Conkelley No. 1 corridor, and the Libby-Bonnerr's Ferry No. 1 corridor. 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 corridors in the proposed project area vary from 100 ft. to 250 ft. wide and cover approximately 225 linear miles of terrain through lands managed by the U.S. Forest Service (USFS), Beaverhead-Deerlodge National Forest, Lolo National Forest, and Kootenai National Forest, as well as Bureau of Land Management, the U.S. Fish and Wildlife Service (USFWS)-managed Lost Trail National Wildlife Refuge, state managed lands, and private rural residential, agricultural, and forested lands.

Approximately 155 miles of the Garrison-Taft No. 1 and Libby-Bonnerr's Ferry No. 1 transmission line corridor runs through USFS-managed lands. The National Forests were notified of the planned work, and provided acknowledgement and authorization. The USFWS Lost Trail National Wildlife Refuge was also contacted requesting coordination. Letters, on-site meetings, emails, and phone calls would be used to notify all other 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.

BPA proposes to cut, lop and scatter small, immature conifers, hardwoods, and other incompatible species where located in approximately 1800 acres of ROW, along with approximately 1200 acres of localized herbicide treatment, 70 miles of access road vegetation management, and clearing vegetation and applying herbicide at 30 structure sites. In addition, BPA proposes to remove approximately 750 trees in, or adjacent to, the 155 miles of ROW that have the potential to grow-into transmission line safety clearances, cut 620 danger trees that are high risk of falling into the line, and side limb approximately 20 trees. Mowing is planned in approximately 80 acres to cut high-growing vegetation, and urban tree work is also planned in rural residential areas. Work would initially begin in fall of 2024 and proceed into 2025. A follow-up treatment of re-sprouting target vegetation would be conducted by 2026. 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 of "*May effect, not likely to adversely affect*" for yellow-billed cuckoo, Canada lynx and Canada lynx critical habitat, bull trout and bull trout critical habitat, grizzly bear, North American wolverine, and Spalding's catchfly. 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. At the time of the consultation, BPA made a determination that the project would "Not Likely to Result in Jeopardy" of whitebark pine. BPA is in the process of updating the consultation to account for the formal listing of whitebark pine and has been in ongoing correspondence with US Fish and Wildlife Service. Conservation measures from the consultations would be implemented including herbicide buffers around ESA-fish streams and other waterways, prohibiting the cutting of 5-needle pine trees, 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 16th and October 15th in those areas with moderate to optimal grizzly bear habitat to avoid impacting bears immediately before and after hibernation.

Cultural Resources

BPA archaeologists have reviewed the proposed work, conducted field surveys, and engaged in correspondence with stakeholders such as USFS, tribal nations, and others in regard to the proposed action. BPA has determined that the undertaking has no potential to cause effect to historic 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.

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, 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 substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the EIS's Proposed Action or its impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9. Therefore, no further NEPA analysis or documentation is required.

/s/ Aaron Siemers
Aaron Siemers
Physical Scientist

Concur:

/s/ Katey Grange
Katey Grange
NEPA Compliance Officer Date: October 2, 2024

References: Vegetation Control Cut Sheets