

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-902)

Pollution Prevention and Abatement Project Number 5067
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Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to portions of the Hatwai-Dworshak No 1, Lower Granite-Hatwai No 1, Dworshak-Taft No 1, Dworshak PH-Dworshak No 1, Dworshak PH-Orofino No 1, Lines Creek Radio Station Power Service, Taft-Bell No 1, Bell-Lancaster No 1, Bell-Trentwood No 1, Bell-Trentwood No 2, Lancaster-Noxon No 1, and Taft-Bell No 1 transmission lines, access roads, and communication sites in Spokane, Whitman, and Garfield Counties in Washington; Kootenai, Bonner, Nez Perce, Clearwater, Latah, and Shoshone Counties in Idaho; and Sanders, and Mineral Counties in Montana. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way (ROW) corridor and associated access roads along these transmission assets. All portions of the line would be treated except for the spans depicted in Table 1.

Line	Starting Structure	Ending Structure
Dworshak-Taft No 1	002/04	003/05
Dworshak PH-Dworshak No 1	001/01	004/02
Dworshak PH-Dworshak No 1	004/05	004/06
Hatwai-Dworshak No 1	002/02	002/03
Hatwai-Dworshak No 1	008/01	008/02
Hatwai-Dworshak No 1	009/01	009/02
Hatwai-Dworshak No 1	010/03	010/04
Hatwai-Dworshak No 1	013/02	013/04
Hatwai-Dworshak No 1	014/01	014/02
Hatwai-Dworshak No 1	014/03	015/01
Hatwai-Dworshak No 1	015/05	016/01
Hatwai-Dworshak No 1	016/02	016/04
Hatwai-Dworshak No 1	017/01	017/02
Hatwai-Dworshak No 1	017/04	018/01
Hatwai-Dworshak No 1	018/04	019/01
Hatwai-Dworshak No 1	020/01	020/02
Hatwai-Dworshak No 1	020/04	021/01
Hatwai-Dworshak No 1	021/02	021/03

Hatwai-Dworshak No 1	022/03	022/04
Hatwai-Dworshak No 1	024/04	024/05
Hatwai-Dworshak No 1	026/01	026/02
Hatwai-Dworshak No 1	026/03	026/04
Hatwai-Dworshak No 1	026/06	027/02
Hatwai-Dworshak No 1	027/04	028/02
Hatwai-Dworshak No 1	027/05	027/06
Hatwai-Dworshak No 1	027/06	028/01
Hatwai-Dworshak No 1	028/04	028/05
Hatwai-Dworshak No 1	028/05	028/06

Table 1. Spans along Dworshak PH-Dworshak No 1, Hatwai-Dworshak No 1, and Dworshak-Taft No 1 transmission line that are not proposed for vegetation management.

The corridors in the proposed project area measure approximately 30 to 560 ft. wide and cover approximately 330 miles of terrain through a variety of land uses, including urban, suburban, rural residential, range land, private forest land, and agricultural as well as land managed by the State of Idaho, the Bureau of Land Management including the Coeur d’ Alene District, the Nez Perce Reservation, and the US Forest Service including the Nez Perce-Clearwater, the Idaho Panhandle, the Lolo, and the Kootenai National Forest.

All public land managers were notified of the planned work and provided no additional comment. Letters, on-site meetings, emails, and phone calls would also be used to notify public land managers 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 330 acres of ROW, 75 miles of access roads and 80 structure sites would initially be treated in Fall 2024 through Fall 2025. In addition, BPA proposes to remove approximately 100 danger trees and 25 corridor trees, as well as limbs from 15 trees in, or adjacent to the ROW. A follow-up

treatment of re-sprouting target vegetation would be conducted as needed. 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

Vegetation Control Cut Sheets were 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 Section 7 of the Endangered Species Act (ESA), the Bonneville Power Administration (BPA) made a determination of whether its proposed project would have any effect on listed threatened and endangered species or designated critical habitat. For the Spokane district a determination of “No Effect” was made for all ESA-listed species and critical habitat except for the following: North American wolverine, monarch butterfly, Canada lynx, spalding’s catchfly, whitebark pine, grizzly bear, bull trout, and bull trout critical habitat. The proposed project “May Affect, but is Not Likely to Adversely Affect” the above listed species, except for the monarch butterfly, which received a “Not Likely to Result in Jeopardy of Proposed Species” determination.

BPA determined that the proposed vegetation management work is within the scope of activities and action area evaluated in the following U.S. Fish and Wildlife Services (USFWS) letter of concurrences (LOC):

LOC	Consultation Number	Date Delivered to BPA
Northern Idaho Inspection and Vegetation Management and 2024 SBA	2021-061521	September 2021
Kalispell Inspection and Vegetation Management	2021-00416	April 2021

Spokane District Rights-of-Way Inspection and Vegetation Management	2021-I-0878	May 2021
Kalispell Inspection and Vegetation Management Project	2022-0090873	October 2022
Spokane District Rights-of-Way Inspection and Vegetation Management Supplemental BA	2023-0086200	December 2023

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

The proposed vegetation management action is not one that typically has the potential to affect historic and/or cultural resources, except for the danger tree work. A cultural monitor will need to be present during danger tree work or a cultural survey will need to take place before danger tree cutting activities occur along several spans of the Dworshak-Taft No 1 transmission line. Locations that require cultural monitoring will be noted in the Spokane Sensitive Species and Cultural Resources Conservation Measures FY25 document. 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, Fall 2024 through Fall 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' Proposed Action and no substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the EIS' 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/ Zoe Wellschlager

Zoe Wellschlager
Physical Scientist

Concur:

/s/ Katey Grange

Katey Grange
NEPA Compliance Officer Date: October 31, 2024

References:

Vegetation Control Cut Sheets
Spokane Sensitive Species and Cultural Resources Conservation Measures FY25 document