

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-921)

Pollution Prevention and Abatement Project Number 5035
Natural Resource Specialist/Project Manager: Cozette DeTray TFBV-Bell-1

Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to an 11-mile-long transmission corridor in Teton County, Idaho, specifically the Targhee Tap Switching Station to Targhee Tap-Swan Valley Teton No. 1 Structure 11/10. 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 crosses 11 miles of terrain through rural residential, urban, private agricultural, and Caribou-Targhee United States Forest Service (USFS) managed lands.

Approximately 0.4 miles of the transmission line corridor runs through USFS-managed lands. The Caribou-Targhee National Forest was notified of the planned work, and 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). Broadcast applications of liquid herbicide would be used if, and where, appropriate. 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 54 acres of ROW and around 2 structure sites would be initially treated in summer 2025. BPA proposes to remove approximately 9 trees in, or adjacent to, the ROW and to remove limbs from approximately 6 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted by fall 2025. 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.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

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 "may affect, but is not likely to adversely affect" Canada lynx, North American wolverine, and grizzly bear. 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) Biological Opinion (BiOp) regarding: Southern Idaho Inspection and Vegetation Management Project, consultation number 2024-0115212, sent to BPA in July 2025, and conservation measures would be implemented in the Targhee Tap-Swan Valley Teton ROW.

- BPA would record individual whitebark pine trees removed within the project area as and report these to USFWS yearly by December 31st.
- When possible, no soil residual herbicides would be applied 14 days prior to forecasted rain.
- Scheduled vegetation management activities would be conducted between March 16 and October 15, after the period when grizzly bears typically emerge from their winter dens and mate, and before they begin hibernation.
- BPA personnel and contractors would properly store and dispose of materials that could attract grizzly bears to the project area, which would substantially reduce the likelihood of bear mortality resulting from human-bear encounters.
- BPA would report grizzly bear sightings to USFWS within 24 hours, or as quickly as practicable, and include date, time, location, photos, direction of travel, presence of a radio collar, and any other descriptive information that might be useful in identifying the bear
- Overnight camping would not take place during the course of activities.
- BPA personnel and contractors performing activities in the ROW and away from their vehicles would be instructed to carry bear spray and know how to properly use it to deter attacking wildlife.
- If needed, modification, suspension, or temporary cessation of inspection or vegetation management activities would occur to resolve grizzly bear-human conflict situations.
- When possible, all shrubs and all herbaceous material less than 10 feet in height, excluding noxious weeds, would be left untouched.
- Trees in riparian zones (100 feet from the water's edge) would be selectively cut to include only those that are within 50 feet of the conductor at maximum sag or are identified as corridor trees or danger trees. If possible, with approval of underlying landowners, trees cut within the riparian zone would be left to recruit to the stream. Other riparian vegetation, (i.e. willows) would be left in place, where possible, to preserve shade conditions and wildlife habitat.
- If it is necessary to manage vegetation within riparian areas and/or near streams, ponds, wetlands, or other sensitive water resources along the ROW corridor, buffer zones would be used. Buffer zones are defined as: 100 feet of the water's edge for streams with ESA-listed species, and 35 feet from water's edge for streams without ESA-listed fish.

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). However, none were found in the project area. BPA made a determination that the project would have "No Effect" for all ESA-listed fish species and designated critical habitat under NMFS' jurisdiction, and the project would not adversely affect EFH.

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, the BPA Archaeologist and the Forest Service archaeologist and operations in the area 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, summer 2025 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 § 1502.9.¹ Therefore, no further NEPA analysis or documentation is required.

/s/ Julianna Martin

Julianna Martin, EPR-4
Physical Scientist

Concur:

/s/ Katey Grange

Katey Grange
NEPA Compliance Officer

Date: August 18, 2025

References:

Vegetation Control Cut Sheets

Biological Opinion References

Bonneville Power Administration (BPA). 2000. Bonneville Power Administration Transmission System Vegetation Management Program Final Environmental Impact Statement-Appendices, DOE/EIS0285. Available at
https://www.bpa.gov/efw/Analysis/NEPADocuments/Pages/Vegetation_Management.aspx

¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this SA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.