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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: August 9, 2017

REPLY TO ATTN OF: EPI-Alvey

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-663)

TO: Joe Johnson
Natural Resource Specialist – TFBV-KALISPELL

Proposed Action: Vegetation management along the Libby-Bonners Ferry #1 transmission line corridor

Pollution Prevention and Abatement Project No.: 3712

Location: Lincoln County, Montana: Bonneville Power Administration (BPA) Kalispell District

Proposed by: BPA

Description of the Proposal: BPA proposes to clear unwanted vegetation via aerial herbicide application along the transmission line corridor of the 115-kilovolt (kV) Libby-Bonners Ferry #1 transmission line (spans 5/8 to 7/6). The right-of-way (ROW) corridor in the proposed project area measures 100 feet in width and crosses approximately two miles of terrain through industrial forest lands that is a restricted access site due to historic asbestos contamination.

In order to comply with Western Electricity Coordinating Council (WECC) 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 ROW to control the development of potentially threatening vegetation.

Selective herbicides would be used through helicopter aerial application because the contaminated area is not safely accessible by on-ground personnel. Appropriate herbicides and adjuvants registered for aerial application would be used and applied according to label instructions and restrictions. Use of drift reduction agents, application when wind velocity is less than 5 mph, and appropriate flying heights would minimize potential drift. A BPA and landowner approved heliport would be used. The herbicide would target tall-growing species within the right-of-way. Aerial herbicide application is consistent with the methods approved in BPA's Transmission System Vegetation Management Program Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000) and Record of Decision (August 23, 2000).

Analysis: A Vegetation Control Prescription & Checklist was developed for this corridor that incorporates the requirements identified in BPA's Transmission System Vegetation Management Program FEIS. The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. As conservation and avoidance measures, a 250 foot buffer will be applied to any existing waterway within or adjacent to the ROW. No waterways within or adjacent to the project area are known to contain threatened or endangered species. Riparian areas will remain

undisturbed and be left intact. No ground disturbing vegetation management methods would be implemented thus eliminating the risk for soil erosion and sedimentation near the streams. For location information, see the Vegetation Control Prescription.

Threatened and Endangered Species: Pursuant to its obligations under the Endangered Species Act (ESA), BPA has 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 all ESA listed species under USFWS' jurisdiction. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries). A determination of "No Effect" was made for all ESA listed species under NOAA Fisheries' jurisdiction, with the implementation of the conservation measures in Water Resources section above.

Essential Fish Habitat: A review of the NOAA Fisheries database identified no Essential Fish Habitat (EFH) streams occurring in the project area. Based on project location and conservation measures, it was determined that the project would not adversely affect EFH.

Cultural Resources: No ground disturbing work is proposed within the project area; however, if a cultural site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist, the BPA Archeologist, as well as local state and tribal personnel, would be contacted.

Re-Vegetation: Native grasses are present on the ROW and are expected to naturally seed into the areas that would have reduced competition from woody species due to the proposed vegetation management.

Monitoring: LIDAR inspection will occur on an annual basis to confirm the presence of vegetation within minimum distances consistent with BPA's Vegetation Management Standard. Follow up treatments will be considered as monitoring reveals encroaching vegetation.

Findings

This Supplement Analysis finds that (1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; (2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. Therefore, no further NEPA documentation is required.

/s/ Benjamin Tilley
Benjamin J. Tilley
Natural Resource Specialist

CONCUR: /s/ *Stacy L. Mason* DATE: *August 9, 2017*
Stacy L. Mason
NEPA Compliance Officer

Attachments:
Effects Determination