

Supplement Analysis
for the
Transmission System Vegetation Management Program EIS
(DOE/EA/EIS-0285/SA-843)

Pollution Prevention and Abatement Project Number 4,828
Natural Resource Specialist/Project Manager: Kyle Goeke Dee, TFBV-KALISPELL

Bonneville Power Administration
Department of Energy



Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to the right-of-way of the Hungry Horse – Columbia Falls No. 1 high-voltage transmission line in Flathead County, Montana. Vegetation management needs were assessed, and a Vegetation Control Cut Sheet was created for the right-of-way corridor and associated access roads along these transmission assets.

The corridor in the proposed project area measures approximately 200 feet in width and traverses approximately 9 miles of terrain primarily through land managed by the U.S. Forest Service, Flathead National Forest, but also some private lands near Columbia Falls, Montana.

Approximately six miles of the transmission line corridor runs through USFS-managed lands. Flathead National Forest was notified of the planned work, and provided acknowledgement with no 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.

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 remove approximately 70 danger trees and corridor trees in, or adjacent to, the right-of-way, and side limb approximately 300 trees. A follow-up treatment of re-sprouting target vegetation may be conducted in 2024 and subsequent years. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle in discrete areas 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 preserve 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 right-of-way 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 critical habitat, bull trout and bull trout 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 and whitebark pine. The proposed vegetation management activities are within the scope of activities and action area evaluated in the 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 streams containing ESA-listed fish 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 16th and October 15th in those areas with moderate to optimal grizzly bear habitat to avoid impacting bears immediately before and after hibernation.

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

Based on the results of a prior inventory where no cultural resources were identified, BPA initiated consultation and made a determination of no historic properties affected with the Montana State Historic Preservation Office (SHPO), Flathead National Forest, and Confederated Salish and Kootenai Tribes (CSKT). Both the Flathead National Forest and staff from the CSKT agreed with BPA's determination. No response was received from the SHPO.

Re-Vegetation

Existing naturalized grasses and woody shrubs are present on the entire right-of-way and are expected to naturally seed into the areas that would have lightly-disturbed soil predominantly located on the right-of-way roads.

Monitoring

The entire project would be inspected during the work period, summer of 2023. 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/ Katey Grange

Katey Grange Date: June 29, 2023
NEPA Compliance Officer

References:

Vegetation Control Cut Sheets