

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-877)

**Pollution Prevention and Abatement Project Number 4916**  
**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 the right-of-way of high-voltage transmission lines and access roads in BPA's Idaho Falls Transmission Line Maintenance District, in Fremont County, Idaho and Gallatin County, Montana; specifically the Macks Inn – Madison No. 1 line. 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 to 200 feet in width, and the treatment area covers approximately 19 linear miles through mostly forested mountainous terrain. Only a small section of the proposed treatment area runs through private lands. The majority of the project is on United States Forest Service (USFS)-managed lands of the Caribou-Targhee and Custer-Gallatin National Forests.

Letters, on-site meetings, emails, and phone calls would be used to notify private landowners approximately three weeks prior to commencing vegetation management activities. BPA notified and solicited input from the Caribou-Targhee and Custer Gallatin National Forests starting in June 2023 and continuing through June 2024. BPA also discussed upcoming vegetation management activities at a yearly coordination meeting with each of these National Forests. 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 would 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, to prevent re-sprouts, and to 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.

The proposed activities include the treatment of up to four acres using selective hand cutting methods followed immediately by an herbicide spot-treatment of hardwood stems, as well as the treatment of up to 172 acres using localized herbicide applications. The proposed activities also include the treatment of 159 structure sites using mowing techniques. In addition, BPA proposes to remove approximately 49 trees in, or adjacent to, the ROW, and to remove limbs from approximately six 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.

### **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 35 feet waterways and wetlands. 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 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 ESA-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 determined that the proposed project would have "no effect" after minimization measures were applied on all ESA-listed species and designated critical habitat under USFWS' jurisdiction, except grizzly bear. BPA determined that the proposed project "may affect, but is not likely to adversely affect" grizzly bear, and the USFWS concurred with this determination on May 20, 2024.

In accordance with no effect determination, BPA's Biological Assessment and USFWS' Letter of Concurrence the following conservation measures would be noted in the Vegetation Control Cut Sheets and other project documents:

- BPA personnel and contractors would follow applicable food storage requirements (attached) while on USFS lands
- To avoid disturbance to grizzly bears during the fall and denning season, scheduled vegetation management activities would be conducted between March 16 and October 15 for all ROW corridor segments and access roads within the Greater Yellowstone Grizzly Bear Recovery Zone and moderate to optimal grizzly bear modeled habitat (from structure 10/6 to 18/6).
- Overnight camping would not take place during the course of project 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.
- Herbicides would be applied according to label instructions by individuals certified by the State of Montana and Idaho.
- Five-needle pines would not be cut or treated, unless positively identified as not whitebark pine.

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” on ESA-listed fish species and designated critical habitat under NMFS’s jurisdiction, and the project would not adversely affect EFH.

#### Cultural Resources

A BPA Archaeologist reviewed all activities for their potential to affect historic and/or cultural resources. The Archaeologist determined that danger tree and corridor tree cutting have the potential to affect historic and/or cultural resources, and therefore require the presence of a cultural monitor to ensure no historic and/or cultural resources are impacted. If a site is discovered during the course of project activities, 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 of 2024 through fall of 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 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/ Oden Jahn*

Oden Jahn – EPR-4

Physical Scientist (Environmental)

Concur:

*/s/ Katey Grange*

Katey C. Grange

NEPA Compliance Officers    Date: June 25, 2024

References:

Custer-Gallatin Food Storage Order

USFWS Letter of Concurrence – BPA Macks Inn-Madison Vegetation Management - Fremont County, Idaho and Gallatin County, Montana

Vegetation Control Cut Sheets