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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: April 6, 2018

REPLY TO ATTN OF: EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program EIS (DOE/EIS-0285/SA-684)

TO: Joe Johnson – TFBV-Kalispell
Natural Resource Specialist

Proposed Action: Vegetation Management along the Garrison-Taft No. 1and No. 2 Transmission Lines, mile 1 to mile 71

Pollution Prevention and Abatement Project No.: 3795

Location: Powell, Granite and Missoula Counties, Montana

Description of the Proposal: BPA proposes to remove unwanted vegetation along and adjacent to the right-of-way and access roads of the Garrison-Taft No. 1 and No. 2 transmission lines from mile 1 to mile 71. The proposal covers approximately 70 miles of transmission line corridor with a right-of-way width that varies from 125 feet to 250 feet. Land along the project area consists of private, State and Federal (BLM, Lolo National Forest, Beaverhead-Deerlodge National Forest) managed lands. Primary land use includes timber production, grazing, game hunting and recreational uses. The right-of-way crosses several named and unnamed streams which should be considered fish bearing. Mapped wetlands are also found within the right-of-way.

Letters, on-site meetings, emails, and phone calls will be used to notify landowners approximately three weeks prior to commencing vegetation management activities. Door hangers will 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.

All vegetation management activities will be performed in accordance with the BPA Master Agreement Statement of Work for Vegetation Control on Bonneville Power Administration Transmission Line Rights-of-Way and in accordance with the specific details identified in the Vegetation Control Prescription. Low growing vegetation will be protected along the right-of-way with the exception of brush at the base of transmission structures, tower sites, helipads and within access roads.

A combination of selective and nonselective vegetation control methods, which may include hand cutting, mowing, and herbicidal treatment, would be used to perform the required work. Herbicide application, using spot or localized treatment methods, would be selectively applied using chemicals approved in BPA's Transmission System Vegetation Management Environmental Impact Statement (DOE/EIS-0285, May 2000) and Record of Decision (August 23, 2000). Herbicidal treatment is necessary to ensure roots are killed, to prevent new sprouts,

and to selectively eliminate vegetation that interferes with the operation and maintenance of the transmission line infrastructure.

Initial treatment of 1,086 acres of right of way, 19.96 miles of access roads and 5 structures will begin in 2018 with a follow-up treatment to be performed in 2019, depending on initial treatment and vegetation control effectiveness. In addition, 30 danger trees will be removed that have the potential to grow, fall, or bend into the transmission line. An additional 30 trees will be side limbed to prevent contact to the energized conductors. Cut, lop and scatter, and/or chipping techniques will be used along the right of way to dispose of debris. Where practical, machine mowing will be used in place of cut, lop and scatter. Reseeding using a native seed mix will occur as necessary to stabilize traveled surfaces. The transmission line right-of-way, structure sites, and access roads will be maintained on a 5 to 10-year treatment cycle.

The proposed action will allow safe and timely access to the subject transmission line structure which will help reduce outage times and maintain reliable power in the region. All work will be in accordance with the National Electrical Safety Code and BPA standards.

Analysis: A Vegetation Control Prescription was completed for this project in accordance with the requirements identified in BPA's EIS and ROD. The following summarizes natural resources occurring in the project area along with applicable conservation and avoidance measures outlined in the Vegetation Control Prescription's Conservation and Avoidance Measures cover sheet.

Water Resources: Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. Trees and brush in riparian zones will be selectively cut to include only those that are in violation of current BPA ground to conductor clearance electrical safety standards. Trees will be topped where shrubs are not present to provide shade and a silt buffer. No ground-disturbing vegetation management methods will be implemented, thus minimizing the risk for soil erosion and sedimentation near water bodies. Only BPA-approved herbicides using the specified buffer width from the edge of any water resource will be used for stump treatment. Vehicles will be kept away from water channels to minimize erosion and sedimentation of waters. No drinking water, irrigation wells, or water supplies were identified along the right-of-way.

T&E Species and Habitats: Pursuant to its obligations under the Endangered Species Act, BPA has made a determination of whether its proposed project will have any effects on any listed species. A species list was obtained from the United States Fish and Wildlife Service (USFWS) in March 2018, identifying threatened and endangered species and Critical Habitat Units potentially occurring in the project area. Based on the ESA review conducted, BPA made a determination of "No Effect" for all ESA-listed species and designated critical habitat that occur in the project area under the jurisdiction of the USFWS. BPA also conducted a review of species under the jurisdiction of the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS). No ESA-listed Pacific salmon species are found in the project area, thus a determination of "No Effect" was made for all ESA listed species under NOAA Fisheries' jurisdiction.

Essential Fish Habitat: A review of NMFS' and BPA's integrated GIS system database identified Essential Fish Habitat streams occurring in the project area. A determination was made that this project will have "No Effect" on essential fish habitat.

Cultural Resources: Vegetation management activities are not anticipated to affect cultural resources as there will not be any ground-disturbing activities. If archaeological material is discovered during the course of vegetation management activities, all work will be halted and the appropriate tribe, the BPA Environmental Representative, and the BPA archaeologist will be notified.

Revegetation: No revegetation would be conducted at this time due to very low ground disturbance. Any need for reseeding would be continually assessed as the project work progresses and would be performed if the need arises. In addition, equipment would be power washed to prevent the spread of weeds.

Monitoring: The right-of-way identified in the prescription will be inspected after completion of the work to determine if all target vegetation has been removed. Follow-up monitoring for vegetation control would combine work-in-progress inspections and next-season site reviews to determine the effectiveness of control methods.

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. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. Therefore, no further NEPA documentation is required.

/s/ *Michael A. Rosales*
Michael A. Rosales
Physical Scientist

CONCUR: /s/ *Stacy L. Mason* DATE: *April 6, 2018*
Stacy L. Mason
NEPA Compliance Officer

Attachment:
Vegetation Control Prescription
Effects Determination