

# memorandum

DATE: October 11, 2018

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-703)

TO: Joe A. Johnson  
Natural Resource Specialist – TFBV- Kalispell

**Proposed Action:** Vegetation management along the Libby – Conkelly No. 1 Corridor

**Pollution Prevention and Abatement Project No.:** 4047

**Location:** Flathead County, Montana

**Proposed by:** BPA

**Description of the Proposal:** BPA proposes to clear unwanted vegetation along and adjacent to the transmission line corridor, and access roads along the 230-kilovolt Libby – Conkelly No. 1 transmission line corridor from Structure 26/4 to Structure 86/6. An additional line that is present within the Libby – Conkelly No. 1 corridor is the Flathead – Hot springs No. 1 line. The right-of-way (ROW) corridor in the proposed project area measures 150 feet in width and crosses approximately 59 miles of terrain through rural residential, agricultural, public and private lands.

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.

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.

A combination of selective and nonselective vegetation control methods that may include herbicidal treatment would be used to perform the work. Herbicides would be selectively applied using spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (broadcast application and cut stubble treatments) with chemicals approved in BPA's Vegetation Management EIS, to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that interferes with the operation and maintenance of transmission infrastructure. Approximately 6,000 acres of ROW and 286 structures would be treated in the fall of 2018. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove up to 10 trees in or adjacent to, the ROW. Other tree clearing activities would include side-limbing of up to 100 trees. Debris would be disposed of using onsite chip, lop, and scatter, or mulching techniques. All onsite debris would be scattered along the ROW.

**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 (DOE/EIS-0285, May 2000) 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 Prescription.

**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, 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 will 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. 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 Essential Fish Habitat (EFH) streams occurring in the project area. Measures identified for water resources would be followed for EFH. Based on project conservation measures, it was determined that the project would not adversely affect EFH.

**Cultural Resources:** The proposed vegetation management actions would 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, and the BPA archeologist 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 predominately located on the ROW roads.

**Monitoring:** The entire project would be inspected during the work period, October to November 2018. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor scorecard of inspection results would be used to document formal inspections and will be filed with the contracting officer.

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/ Michelle Colletti

Michelle Colletti

Physical Scientist, EPR-4

CONCUR:

/s/ Stacy L. Mason

NEPA Compliance Officer

Date: October 11, 2018

References:

Vegetation Management Prescription and Checklist  
Effects Determination