

**Supplement Analysis**  
for the  
**Transmission System Vegetation Management Program EIS**  
(DOE/EA/EIS-0285/SA-848)

**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 Columbia Falls – Trego No. 1 high-voltage transmission line in Flathead and Lincoln Counties, 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 100 feet in width and traverses approximately 11 miles of terrain through land managed by the U.S. Forest Service; Flathead National Forest and Kootenai National Forest.

Flathead National Forest and Kootenai National Forest was notified of the planned work, and provided acknowledgement with no additional comments. Any additional measures proposed by 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 30 danger trees and corridor trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation may be conducted in 2024. 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 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. 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 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. The proposed vegetation management activities are within the scope of activities and action area evaluated in the U.S. Fish and Wildlife Service's (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 ESA-fish streams 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 16<sup>th</sup> and October 15<sup>th</sup> 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 of the species 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

BPA distributed an initiation of consultation and finding of no historic properties affected letter and attached APE map to the Montana State Historic Preservation Office (SHPO), Kootenai National Forest, Flathead National Forest, and Confederated Salish and Kootenai Tribes on June 21, 2023. On July 21, 2023, BPA received a response from the Confederated Salish and Kootenai Tribes concurring with BPA's determination of no historic properties affected on July 20, 2023. A response from Montana SHPO on July 14, 2023 requested additional information about cultural resources near the APE. BPA reviewed the available resource information and on July 26, 2023, BPA submitted a revised initiation and determination letter to the Montana SHPO, the Flathead National Forest, and Kootenai National Forest. On August 1, 2023, BPA responded directly to the Confederated Salish and Kootenai Tribes with a revised initiation and determination letter. As of September 5, 2023, BPA has not received responses from the Montana SHPO, Flathead National Forest, Kootenai National Forest, and Confederated Salish and Kootenai Tribes regarding the revised initiation and determination of effects letter. Therefore, Section 106 is complete with a determination of no historic properties affected. Cultural monitoring is required during the removal of danger trees and corridor.

### 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, 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*    Date: September 11, 2023

Katey Grange

NEPA Compliance Officer

References: Vegetation Control Cut Sheets