

# memorandum

DATE: March 30, 2017

REPLY TO  
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-654)

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

**Proposed Action:** Vegetation management along the Macks Inn - Madison No. 1 corridor

**Pollution Prevention and Abatement Project No.:** 3576

**Location:** Gallatin County, Montana and Fremont County, Idaho: Bonneville Power Administration (BPA) Idaho Falls District.

**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 entire length of the 115-kilovolt Macks Inn-Madison No. 1 transmission line corridor from Macks Inn Substation to Madison Substation. The right-of-way (ROW) corridor in the proposed project area measures 90 feet in width, and crosses approximately 17 miles of terrain through rural residential and the Targhee and Gallatin National Forests.

Letters, on-site meetings, emails, and phone calls would be used to notify all public and private landowners at least three weeks prior to commencing vegetation management activities. Door hangers would also be used at properties where special treatments are anticipated. Coordination with the Forest Service occurred on March 28, 2017.

In order 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 ROW to control the development of potentially threatening vegetation.

A combination of selective and nonselective vegetation control methods that may include hand cutting and 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 Transmission System Vegetation Management Environmental Impact Statement (EIS) (DOE/EIS-0285, May 2000) and Record of Decision (August 23, 2000), 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 180 acres of ROW would be treated in the summer of 2017. To prevent trees from coming into contact with the energized conductors, BPA proposes to remove 20 trees in, or adjacent to, the ROW. Other tree clearing activities would include side-limbing 20 trees.

Debris would be disposed of using on-site 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 EIS and Record of Decision (ROD) (August 23, 2000). The following summarizes natural resources occurring in the project area along with applicable mitigation measures outlined in the Vegetation Control Prescription & Checklist.

**Water Resources:** Water bodies (streams, rivers, lakes, wetlands) occurring in the project area are noted in the Vegetation Control Prescription. Only practically non-toxic to slightly toxic herbicides would be used within 35 ft of streams, wetlands, or sensitive habitat. No ground disturbing vegetation management methods would be implemented thus eliminating the risk for soil erosion and sedimentation near the streams. No private water wells/springs have been identified along the ROW. 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, with the implementation of the conservation measures in Water Resources section above, 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). 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 the NOAA Fisheries database did not identify Essential Fish Habitat (EFH) occurring in the project area, thus it was determined that the project would not adversely affect EFH.

**Cultural Resources:** No cultural resources are known for the project area. 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:** Native grasses 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, summer 2017. A diary 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 K. Colletti  
Michelle K. Colletti  
Physical Scientist

CONCUR: /s/ Stacy L. Mason  
Stacy L. Mason  
NEPA Compliance Officer

DATE: March 30, 2017

References:  
Vegetation Management Prescription and Checklist  
Effects Determination