

memorandum

DATE: March 4, 2020

REPLY TO
ATTN OF: Emma Reinemann – EPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-737)

TO: Michael Burgan – Supervisory Natural Resource Specialist– TFBV-Bell

Proposed Action: Vegetation Management of the Rattlesnake-Garrison No. 1 transmission line corridor

Pollution Prevention and Abatement Project No.: 4289

Location: Missoula, Granite, and Powell counties, Montana

Description of the Proposal: BPA proposes to clear unwanted vegetation in and adjacent to the Rattlesnake-Garrison No. 1 230 kV transmission line corridor. The Rattlesnake-Garrison No. 1 line corridor measures from 125 to 650 feet in width and crosses approximately 62 miles of terrain, including 4 miles of Lolo National Forest, 1.5 miles of lands managed by the State of Montana, 2 miles of land managed by the Bureau of Land Management, and 55 miles of privately-owned undeveloped and rural-residential land.

Letters, on-site meetings, emails, and phone calls would be used to notify landowners and land managing agencies at least three weeks prior to commencing vegetation management activities. Door hangers would 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.

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.

A combination of selective and nonselective vegetation control methods that may include hand cutting, mowing, 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 Program Final Environmental Impact Statement (FEIS) (DOE/EIS-0285, May 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 300 acres of ROW and 5 structure sites would be initially treated with herbicide in 2020. In addition, BPA proposes to side-limb up to 100 trees and remove up to 30 trees in, or adjacent to, the ROW. Approximately 2 miles of access road would be treated with herbicide. Approximately 60 acres of ROW would be mowed. Additional vegetation management may be necessary in subsequent years 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 chip, lop and scatter, or mulching techniques.

Analysis: Vegetation Control Cut Sheets were developed for these corridors that incorporate 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 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 will 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 a ground/surface water advisory).

Endangered Species Act and Magnuson-Stevens Act: 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 and designated critical habitat under USFWS' jurisdiction.

No ESA-listed anadromous salmonids and Essential Fish Habitat (EFH) are located within the project area; therefore, the proposed activities would have no effect on ESA-listed anadromous salmonids and EFH.

Cultural Resources: The proposed vegetation management actions do 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 predominantly located on the ROW roads.

Monitoring: The entire project would be inspected during the work period, spring 2020 through spring 2021. A vendor scorecard would be used to document formal inspections and would 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/ Emma Reinemann

Emma Reinemann
Physical Scientist (Environmental)

CONCUR:

/s/ Katey Grange

Katey Grange
NEPA Compliance Officers

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References:

Vegetation Management Prescription and Checklist
Effects Determination