Supplement Analysis

for the

Transmission System Vegetation Management Program EIS

(DOE/EA/EIS-0285/SA-922)

Pollution Prevention and Abatement Project Number 5035

Natural Resource Specialist/Project Manager: Cozette DeTray TFBV-Bell-1

Bonneville Power Administration

Department of Energy

Proposed Activities

BPA proposes to clear unwanted vegetation in and adjacent to about 37 miles of transmission corridor and adjacent access roads in Bonneville and Teton Couties, Idaho and Teton County, Wyoming, specifically the Swan Valley-Teton No. 1 transmission line. Vegetation management needs were assessed, and Vegetation Control Cut Sheets were created for the right-of-way corridor and associated access roads along these transmission assets.

The corridor in the proposed project area measures approximately 150 feet in width over 37 miles of terrain through rural, rural residential, US Bureau of Land Management (BLM)-managed lands, and Caribou-Targhee National Forest.

Approximately 36 miles of the Swan Valley-Teton No. 1 & 2 transmission line corridor runs through US Forest Service (USFS)-managed lands. The Caribou-Targhee National Forest and Bridger Teton National Forest was notified of the planned work, USFS provided acknowledgement and requested herbicide treatment records at the conclusion of vegetation management within the Bridger Teton National Forest. Caribou-Targhee National Forest provided acknowledgment and no comment. Letters, on-site meetings, emails, and phone calls were sent to notify landowners and land managers, including the BLM, approximately 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 would be used to perform the work, and may include hand cutting, mowing, herbicidal treatment, or a combination of those methods. To ensure that the roots are killed, prevent re-sprouts, and selectively manage vegetation that interferes with the operation and maintenance of transmission infrastructure, herbicides would be selectively applied using spot treatment (stump treatment) or localized treatments (basal treatment and/or low-volume foliar treatment). Broadcast applications of liquid herbicide would be used if, and where,

appropriate. For work applied and fire prevention, broad-spectrum (non-selective) residual herbicide would be applied, and only applied immediately adjacent to switch platforms and selected transmission structures (primarily wood poles). [Note any other project-specific details not captured above that pertain to methods to be used.] 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.

Approximately 370 acres of herbicide treatment, 180 acres of manual cut, lop, and scatter (CLS), 13,780 feet of access road maintenance, and tree topping in urban areas, would be initially treated in summer 2025. Within this area, BPA proposes to remove approximately 152 trees in, or adjacent to, the ROW and to remove limbs from approximately 2 trees in, or adjacent to, the ROW. A follow-up treatment of re-sprouting target vegetation would be conducted by fall 2025. Additional vegetation management may be necessary in subsequent years of the vegetation management cycle 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 chipping/mulching, or cut, lop, and scatter techniques.

The Federal Columbia River Transmission System Act directs BPA to construct, acquire, operate, maintain, repair, relocate, and replace the transmission system, including facilities and structures appurtenant thereto. (16 United States Code [U.S.C] § 838i(b)). The Administrator is further charged with maintaining electrical stability and reliability, selling transmission and interconnection services, and providing service to BPA's customers. (16 U.S.C § 838b(b-d)). The Administrator is also authorized to conduct electrical research, development, experimentation, tests, and investigation related to construction, operation, and maintenance of transmission systems and facilities. (16 U.S.C § 838i(b)(3)).

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 the determination that the project "may affect but is not likely to adversely affect" Canada lynx, North American wolverine, grizzly bear, and yellow-billed cuckoo, as well as a determination of "may affect, and is likely to adversely affect" Ute Ladies'-tresses and whitebark pine. 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) Biological Opinion (BiOp) regarding: Southern Idaho Inspection and Vegetation Management Project, consultation number 2024-0115212, sent to BPA in July 2025, and conservation measures would be implemented in the Swan Valley-Teton ROW.

In accordance with no effect determination, BPA's Biological Assessment and USFWS' Letter of Concurrence the following conservation measures would be noted in the Vegetation Control Cut Sheets and other project documents:

- BPA would record individual whitebark pine trees removed as part of the project activities and report these to USFWS yearly by December 31st.
- When possible, no spraying, spot or otherwise when wind is greater than 10 mph in whitebark pine habitat (structure 19/4 to 36/5).
- When possible, no soil residual herbicides would be applied 14 days prior to forecasted rain.
- Scheduled vegetation management activities would be conducted between March 16 and October 15, after the period when grizzly bears typically emerge from their winter dens and mate, and before they begin hibernation.
- BPA personnel and contractors would be required to properly store and dispose of materials that could attract grizzly bears, which would substantially reduce the likelihood of bear mortality resulting from human-bear encounters.
- BPA will report grizzly bear sightings to USFWS within 24 hours, or as quickly as practicable, and include date, time, location, photos, direction of travel, presence of a radio collar, and any other descriptive information that might be useful in identifying the bear
- Overnight camping would not take place during the course of activities described in this SA.
- BPA personnel and contractors performing activities in the ROW and away from their vehicles would be instructed to carry bear spray and know how to properly use it to deter attacking wildlife.
- If needed, modification, suspension, or temporary cessation of inspection or vegetation management activities to resolve grizzly bear-human conflict situations.
- Trees in riparian zones (100 feet from the water's edge) would be selectively cut to include only those that are within 50 feet of the conductor at maximum sag or are identified as corridor trees or danger trees. If possible, with approval of underlying landowners, trees cut within the riparian zone would be left to recruit to the stream. Other riparian vegetation, (i.e. willows) would be left in place, where possible, to preserve shade conditions and wildlife habitat.
- If it is necessary to manage vegetation within riparian areas and/or near streams, ponds, wetlands, or other sensitive water resources along the ROW corridor, buffer zones would be used. Buffer zones are defined as: 100 feet of the water's edge for streams with ESA-listed species, and 35 feet from water's edge for streams without ESA-listed fish.
- Herbicides would be applied according to label instructions by individuals certified by the State of Idaho and Wyoming.
- When possible, all shrubs and all herbaceous material less than 10 feet in height, excluding noxious weeds, would be left untouched.

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 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

The proposed vegetation management actions are unlikely to result in ground disturbance to the physical environment and have a low potential to affect historic and/or cultural resources. However, a number of sites would require a cultural monitor to be present while the work is occurring. These locations are noted in Attachment A: Areas Requiring Cultural Resources Monitor. If a site is discovered during the course of vegetation control, work would be stopped in the vicinity and the BPA Environmental Specialist, the BPA Archaeologist and the Forest Service archaeologist and operations in the area 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, summer 2025 through fall 2025. 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' Proposed Action and no substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the EIS' Proposed Action or its impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9.[1] Therefore, no further NEPA analysis or documentation is required.

/s/ *Julianna Martin*
Julianna Martin, EPR-4
Physical Scientist

Concur:

/s/ *Katey Grange*
Katey Grange
NEPA Compliance Officer Date: *August 18, 2025*

References:
Vegetation Control Cut Sheets
Biological Opinion References
Bonneville Power Administration (BPA). 2000. Bonneville Power Administration Transmission System Vegetation Management Program Final Environmental Impact Statement-Appendices, DOE/EIS-0285. Available at https://www.bpa.gov/efw/Analysis/NEPADocuments/Pages/Vegetation_Management.aspx

[1] BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this SA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

Attachment A: Areas Requiring Cultural Resources Monitor

Corridor	Line Name	From Mile	To Mile	Unit Description	Lat.	Long.
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/03	004/04	Structure Site	43.50547	-111.365
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/04	004/05	Herbicide	43.50686	-111.364
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/04	004/05	Manual CLS	43.50685	-111.364
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/04	004/05	Structure Site	43.50615	-111.364
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/05	004/06	Herbicide	43.50839	-111.362
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/05	004/06	Manual CLS	43.50839	-111.362
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/05	004/06	Structure Site	43.50769	-111.363
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/06	004/07	Herbicide	43.50886	-111.361
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/06	004/07	Manual CLS	43.50886	-111.361
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	004/06	004/07	Structure Site	43.5083	-111.362
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	029/05	029/06	Structure Site	43.49497	-110.94
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	029/06	029/07	Herbicide	43.49515	-110.934
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	029/06	029/07	Structure Site	43.49534	-110.937
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	029/07	030/01	Structure Site	43.49487	-110.934
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	030/01	030/02	Structure Site	43.49473	-110.931
IFDM_SWVY-TETN-1	Swan Valley-Teton No 1	030/02	030/03	Structure Site	43.49463	-110.93