

memorandum

DATE: April 21, 2017

REPLY TO
ATTN OF: EP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-659)

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

Proposed Action: Vegetation Management along the Garrison – Taft No. 1&2 Corridor

Pollution Prevention and Abatement Project No.: 3,550

Location: Mineral County, Montana and Missoula 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 entire length of the 500-kilovolt Garrison-Taft No. 1 & 2 transmission line corridor from Taft Substation to structure 71/1 near US 93/12 in Missoula, MT. The right-of-way (ROW) corridor in the proposed project area measures 125 feet in width, and crosses approximately 90 miles of terrain through rural residential lands and the Lolo National Forest.

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. Coordination with the Forest Service occurred in February 2017.

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 would 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 safety-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), 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 1,388 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 35 trees in, or adjacent to, the ROW. Other tree-clearing activities would include side-limbing 10 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 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 (e.g., 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 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. Private water wells/springs have been identified along the ROW. No herbicide application would occur within a 50-foot radius of the wellhead/spring (164 feet when using herbicides with ground/surface water advisory). 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 additional implementation of the conservation measures in the 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 (NMFS). 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 NMFS' jurisdiction.

Essential Fish Habitat: A review of the NMFS 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 predominantly located on the ROW roads.

Monitoring: The entire project would be inspected during the work period in summer 2017. Additional monitoring for follow-up treatment would be conducted as necessary. A vendor score card 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 K. Colletti
Physical Scientist

CONCUR: /s/ Sarah T. Biegel
Sarah T. Biegel
NEPA Compliance Officer

DATE: April 21, 2017

References:
Vegetation Management Prescription and Checklist
Effects Determination