

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: May 15, 2006

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-285 Approval for the Use of Four New Herbicides: Aminopyralid, Clethodim, Imazapic, and Sethoxydim)

TO: Natural Resource Specialists: TFE/Alvey; TFE/Chemawa; TFN/Snohomish; TFO/LMT; TFO/Olympia; TFP/Walla Walla; TFR/The Dalles; TFS/Bell-1; TFS/Kalispell;

Proposed Action: BPA proposes to approve four new herbicides for use within its service area. The herbicides are aminopyralid, clethodim, imazapic, and sethoxydim. The four herbicides would be used in ROWs, electrical facilities (substations and switches) and non-electrical facilities (maintenance facilities, storage yards, and control house grounds) where total and/or invasive vegetation management is required.

Location: The proposed herbicides could be used within the entire BPA service area as allowed by regulating authorities in the States of Idaho, Montana, Oregon, Washington, and Wyoming. This proposal does not include any BPA facilities in the State of California.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: Currently, BPA conducts total and invasive vegetation management activities within the facilities listed above for safety reasons pursuant to the existing Vegetation Management EIS. Invasive weeds such as kochia, and, nutsedge and thistle species have become resistant to herbicides BPA currently uses. In order to prevent the spread and increased resistance of invasive weeds BPA must begin treatment with newly State-approved herbicides. The listed facilities are already managed for total and invasive vegetation management. Other treatment methods listed in the EIS, such as manual treatment, are not effective in controlling invasive weeds and could result in human health and safety concerns. Application methods, handling, storage, disposal, record keeping, etc., would remain the same as identified and analyzed in the EIS.

Analysis: The four herbicides were analyzed for ecological and human toxicities and characteristics. Herbicide Fact Sheets were developed for each herbicide and are attached to this document. Water bodies, T&E species and habitat, water supply facilities, land ownership, etc., occurring in the total vegetation management areas have already been identified and mapped by BPA. Appropriate buffers and mitigation measures currently exist within this framework that adequately addresses any environmental or human concerns since the four proposed herbicides are within the maximum exposure scenarios of the existing approved herbicides previously analyzed in the EIS.

Consistent with the process specified in the transmission system vegetation management program record of decision July 2000, a public review and comment period was held April 1 – May 5, 2006 on this proposal to add use of four new herbicides. No comments were received on this proposal.

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. This Supplement Analysis also finds the proposed actions will not affect threatened or endangered species. The herbicides listed are also not part of the NW Toxics Coalition court injunction. Therefore, no further NEPA documentation is required.

/s/ James R. Meyer for
Mark W. Hermeston
Environmental Scientist
Licensed Hydrogeologist (WA-663)

CONCUR: /s/ Katherine S. Pierce
Katherine S. Pierce
NEPA Compliance Officer

DATE: 5-17-06

Attachments:

Aminopyralid Herbicide Fact Sheet
Clethodim Herbicide Fact Sheet
Imazapic Herbicide Fact Sheet
Sethoxydim Herbicide Fact Sheet