## **Bonneville Power Administration**

## memorandum

DATE: August 18, 2006

REPLY TO

ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS

(DOE/EIS-0285/SA-314) Approval for the Use of Two New Herbicides: Oxadiazon and

Prodiamine

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 two new herbicides for use within its service area. The herbicides are oxadiazon and prodiamine. The two herbicides would be used in landscaping situations only for the control of unwanted and/or invasive vegetation.

<u>Location:</u> 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 unwanted and/or invasive vegetation management activities within the facilities listed above for landscaping purposes pursuant to the existing Vegetation Management EIS. Unwanted vegetation such as broadleaf weeds and grasses, and, invasive weeds such as kochia, nutsedge and thistle species have become resistant to herbicides BPA currently uses. In order to maintain landscaping themese, and, to prevent the spread and increased resistance of invasive weeds, BPA must begin treatment with new State-approved herbicides. The listed facilities are already managed for landscape vegetation management. Other treatment methods listed in the EIS, such as manual treatment, are not effective in controlling unwanted and/or invasive weeds in landscaped areas. Non-treatment could result in the spread of vegetation in areas already managed for total vegetation control and could subsequently 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.

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

**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.

DATE: 8-21-06

/s/ James R. Meyer (for)\_\_\_\_\_

Mark W. Hermeston Environmental Scientist Licensed Hydrogeologist (WA-663)

CONCUR:/s/Katherine S. Pierce

Kathy S. Pierce NEPA Compliance Officer

Attachments:

Oxadiazon Herbicide Fact Sheet Prodiamine Herbicide Fact Sheet