

United States Government

Department of Energy

Bonneville Power Administration

memorandum

DATE: March 22, 2005

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-248) Approval for the Use of Two New Herbicides: Flumioxazin and Sulfentrazone

to: B. Tilley – TFE/Alvey E. Tompkins – TFO/LMT T. Murphy – TFS/Bell-1
M. Newbill – TFE/Chemawa J. Jellison – TFO/Olympia E. Johnson – TFR/The Dalles
D. Atkinson – TFN/Snohomish W. Erickson – TFP/Walla Walla J. Johnson – TFS/Kalispell

Proposed Action: BPA proposes to approve two new herbicides for use within its service area. The herbicides are flumioxazin and sulfentrazone. Both herbicides would be used in electrical facilities (substations and switches) and non-electrical facilities (maintenance facilities, storage yards, and control house grounds) where total vegetation management is required. As part of BPA's Integrated Vegetation Management Plan, the herbicides are also required to control invasive vegetation, which has become resistant to treatment by previously approved herbicides.

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 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 vegetation management (bareground). 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: Both 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 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 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. Therefore, no further NEPA documentation is required.

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

CONCUR: /s/ James Kehoe for
Thomas C. McKinney
NEPA Compliance Officer

DATE: 3/22/2005

Attachments:

Flumioxazin Herbicide Fact Sheet
Sulfentrazone Herbicide Fact Sheet

cc:

L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
B. Sherer – KEP-4
F. Walasavage – KEP/Celilo
J. Sharpe – KEPR-4
M. Rosales – KEPR/Bell-1
M. Martin – KEPR/Covington
G. Tippetts – KEPR/Olympia
K. Hutchinson – KEPR/Walla Walla
H. Adams – LC-7
J. Hilliard Creecy – T-DITT2
Environmental File – KEC-4
Official File – KEP (EQ-14)