JULY 2000

TRANSMISSION SYSTEM VEGETATION MANAGEMENT PROGRAM

Record of Decision
DOE/EIS-0285

Cooperating Agencies

Bonneville Power Administration
Transmission System Vegetation Management Program Record of Decision

Table of Contents

Summary of Decision **1**

For Further Information **2**

Background **3**

Decisions **4**
- Right-of-way Program 4
- Electric Yard Program 6
- Non-electric Program 6

Planning Steps and Mitigation Measures **6**

Approving New Techniques and Herbicides for Use **8**

All the Alternatives **9**
- Right-of-way Program 9
- Electric Yard Program 10
- Non-electric Program ..... **Error! Bookmark not defined.**

Rationale for the Decisions **11**
- Management Approach Alternative MA2 12
- Methods Package Alternative R4 13
- Vegetation Selection Alternative VS3 14
- Electric Yard Program Alternative E1 14
- Non-electric Program Alternative NE1 15

Cooperating Agencies **16**

Implementation **16**

Responsible Official **16**

Bureau of Land Management Record of Decision

Transmission System Vegetation Management Program Record of Decision

Summary of Decision

The Bonneville Power Administration (Bonneville) has chosen to respond to the need to keep vegetation a safe distance away from our electric power facilities and to control noxious weeds at our facilities by:

- promoting the establishment of low-growing plant communities on the rights-of-way to “out-compete” trees and tall-growing brush;
- having all possible vegetation control methods available for use to maintain rights-of-way (manual, mechanical, biological, and herbicide—spot, localized, broadcast, and aerial application);
- allowing the use of herbicides available to treat any kind of vegetation needing management for rights-of-way;
- continuing our current practice of controlling vegetation in electrical yards using mostly pre-emergent herbicides; and
- for other non-electric facilities, continuing to have available a variety of methods for use to manage vegetation, including manual and mechanical methods, herbicides, and fertilizers.

As indicated in the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) (June 2000) (DOE/EIS-0285), Bonneville has decided to adopt a vegetation management program direction that is cost-effective, sensitive to environmental concerns, responsive to public and agency comment, and consistent with integrated vegetation management strategies.

Bonneville will use this programmatic guidance for site-specific vegetation management projects, following steps outlined in the FEIS. For decisions on site-specific projects, a *Supplement Analysis* or *tiered*

ROD will be developed to comply with the National Environmental Policy Act (NEPA) and other applicable laws. The supplement analysis is a NEPA analysis that will be tiered to the program-wide FEIS and ROD and will compare the project-specific potential impacts with those disclosed in the FEIS. This analysis will ensure that impacts of the proposed projects are adequately analyzed within the range of alternatives addressed in the FEIS. Regulations on supplement analyses are at 40 Code of Federal Regulations section 1021.314.

Bonneville will conduct further NEPA review if anticipated impacts or site-specific work are substantially different from those evaluated in the FEIS, or if significant new circumstances or information relevant to environmental concerns are found. If further NEPA review were needed, it would be in the form of an Environmental Assessment or supplemental EIS, depending on the extent of the substantially different impacts.

Public notification and coordination regarding site-specific projects and the availability of the supplement analysis will be done with potentially affected landowners, agencies, tribes, and other publics, as appropriate.

Bonneville will distribute this ROD to all persons and entities known to be interested by the action.

For Further Information

For further information contact Stacy Mason, Environmental Project Manager, at (503) 230-5455. To receive copies of the FEIS, Appendices, or ROD, call Bonneville's request line at 1-800-622-4520. You may also access the documents on our web site at http://www.efw.bpa.gov.

Bonneville will publish notice and availability of any RODs tiered to the FEIS in the *BPA Journal*, which is located at www.bpa.gov/Corporate/KCC/jl/00jl/journalx.pdf. To subscribe to the journal call 1-800-622-4520.

Background

Bonneville is responsible for maintaining a network of 15,000 miles (mi.) of electric transmission lines, 350 substations, and other related facilities. This electric transmission system operates in seven states of the Pacific Northwest (Oregon, Washington, Idaho, western Montana, and small portions of northwest Wyoming, northern California and Utah).

The Pacific Northwest offers a great diversity of vegetation. As that vegetation grows near or into our electrical facilities, or hampers access roads leading to those facilities, it can interfere with electric power flow, pose safety problems for us and neighboring members of the public, and interfere with our ability to carry out both routine and emergency maintenance of these facilities. We need to keep vegetation a safe distance away from our electric power facilities and to control noxious weeds at our facilities. **Bonneville's transmission system vegetation management program is the policy and direction for managing vegetation at our facilities throughout our service area.**

Our facilities include the following:

- **rights-of-way** (transmission lines—including trees just outside of the right-of-way, access roads, and microwave beam paths),
- **electric yards** (substations and switching stations), and
- **non-electric** facilities (maintenance work yards, landscaping around buildings, microwave sites).

Below are the four **general control methods** we have considered for managing vegetation at our facilities**:**

- manual (chainsaws, pulling, etc.),
- mechanical (heavy equipment such as mowers and choppers),
- biological control agents (the use of insects to control noxious weeds), and
- herbicides (the use of chemicals to control vegetation).

The herbicide method can be further divided into 4 **application techniques:**

- spot (targeting a single plant, such as cut-stump treatments or injection treatments),

- localized (targeting a small clump of plants such as the use of a backpack sprayer),
- broadcast (treating an area with a hydraulic sprayer attached to a truck or tractor), and
- aerial (treatment of an area with the use of a plane or helicopter).

Please see Chapter II of the final EIS for complete descriptions of the Methods.

Decisions

The decisions made through this FEIS lay down the framework for Bonneville's vegetation management program—the management goals and the tools available in our toolbox.

Bonneville selected the following alternatives for our vegetation management program:

Selected Alternatives		
Right-of-way Management Approach	**MA2**	**Promotion of Low-growing Plant Communities**
Right-of-way Methods Package	**R4**	**Manual, Mechanical, Biological, Herbicide – *spot, localized, broadcast + aerial application***
Right-of-way Vegetation Selection	**VS3**	**Any Vegetation**
Electric Yard	**E1**	**Herbicide Treatment**
Non-electric	**NE1**	**Mixed Methods with Herbicides**

Below is a description of the selected alternatives. Greater detail on all the alternatives is in Chapter IV of the FEIS.

Right-of-way Program

Management Approach MA2

For our rights-of-way, we are adopting a management approach (MA2) that seeks to promote the establishment of low-growing plant

communities on the right-of-way to “out-compete” trees and tall-growing brush. This management approach will be our goal for most rights-of-way, but it will not be possible to implement it throughout our entire system, given the site-specific nature of circumstances (such as underlying land uses, mitigation measures, or lack of natural vegetation in the area.)

We would promote low-growing plant communities by protecting low-growing plants from disturbance during maintenance and from competing tall-growing vegetation, so that low-growers can establish and propagate. Tall-growing vegetation needs to be controlled before it gets big enough to compete with low-growing species. Where possible, resprouting species need herbicide treatments to prevent resprout.

Methods Package R4

For our rights-of-way, we are adopting a package of methods (R4) that has all the possible methods available for use. The package includes manual, mechanical, biological, and herbicide methods. Possible herbicide application techniques available for use include spot, localized, broadcast, and aerial.

As with all the alternatives, the Planning Steps would be used to help determine the appropriate method for use at any given site. Manual (chainsaws) will be heavily relied upon for all types of vegetation control. Mechanical clearing will not be used as often, but will continue to be important for around tower legs and access roads and in densely vegetated areas. Where possible, biological controls will be used for noxious weed control. Herbicide use will be especially important for treating resprouting type vegetation and noxious weeds. The herbicide application techniques that will be most heavily relied upon will be spot and localized treatments. Broadcast and aerial applications will not be used as extensively, but may be considered for some situations such as for densely vegetated areas of tall-growing vegetation and noxious weeds. Broadcast applications may also be considered for access roads.

While Bonneville does not anticipate extensive use of the aerial spraying technique, we chose to adopt the alternative that includes this technique because it is sometimes the most effective, least intrusive means of achieving a vegetation management goal. As described in Chapters II and III of the FEIS, aerial spraying will be done only when: certain climatic factors are optimal; adjacent land uses are compatible (e.g., not near domestic water sources, some agricultural

areas, and densely populated areas); using only herbicides registered for aerial application; and using technology designed to help ensure safe, accurate applications.

Vegetation Selection VS3

For our rights-of-way, we are adopting VS3, which allows us to consider treating any type of vegetation with herbicides (e.g. conifers, deciduous plants, and noxious weeds). Being able to treat any vegetation allows for the option to injection-treat a stand of conifers in the right-of-way and leave the dead trees standing for habitat, while also eliminating the costs and the impacts on non-target plants that could occur from felling trees, chopping them up, and disposing of them.

Electric Yard Program

E1

For our electric yards, we will continue our current practice (E1) of controlling vegetation mostly with the use of pre-emergent herbicides, which are applied to the ground to keep vegetation from germinating. For the few cases where vegetation *is* able to grow within the electric yard, we would use a follow-up post-emergent herbicide, weed burners, steamers, or selective hand-pulling.

Non-electric Program

NE1

For our non-electric facilities, we are adopting Alternative NE1, under which we would continue to have available a variety of methods for use to manage vegetation: manual (chainsaws, hoes, clippers, permeable black plastic etc.), mechanical methods (lawn mowers, etc.), herbicides, and fertilizers.

Planning Steps and Mitigation Measures

We have also adopted the seven Planning Steps and associated mitigation measures for site-specific vegetation management projects.

All the mitigation measures listed in the FEIS were adopted for use. The Planning Steps and integrated mitigation measures function as the Mitigation Action Plan for the FEIS. See Chapter III of the final EIS for a complete list of mitigation measures adopted. By adopting these

measures, Bonneville has embraced all practicable means to avoid or minimize environmental harm from the alternatives selected.

BPA will develop a checklist for vegetation control managers to use to facilitate the use of the Planning Steps and the implementation of the mitigation measures. Additional NEPA documentation—supplement analyses, environmental assessments, supplemental EISs, or RODs—for specific projects or plans will be tiered to the FEIS and this ROD.

Below is a summary of the Planning Steps and their associated mitigation measures listed in the FEIS and adopted with this ROD.

1. Step 1, **Identify facility and the vegetation management need,** includes measures for: safe operation of the line, electric yards and non-electric facilities; promoting low-growing vegetation on rights-of-way; and control and prevention of noxious weeds.
2. Step 2, **Identify surrounding land use and landowners/ managers,** includes measures for: notifying and working with various publics (U.S. Forest Service, the Bureau of Land Management, other federal agencies, Tribes, private landowners etc.). Bonneville's public involvement efforts will vary depending upon a project's size, duration, location, affected resources, and anticipated impacts. This step also contains measures specific to agricultural areas and residential lands.
3. Step 3, **Identify natural resources,** includes measures for: protecting water resources (such as using herbicide buffer zones); determining potential presence of threatened and endangered species and appropriate consultations; promoting habitats; protecting visually sensitive areas, cultural resources, and steep slopes; and spanning canyons.
4. Step 4, **Determine vegetation control methods,** has mitigation measures specific to the methods (manual, mechanical, biological, and herbicide).
5. Step 5, **Determine debris disposal and revegetation methods,** has measures specific to disposing of vegetative debris and reseeding or replanting.
6. Step 6, **Determine monitoring needs**, includes measures for monitoring the effectiveness of the vegetation control activities and of the mitigation measures.

7. Step 7, **Prepare appropriate environmental documentation,** outlines the process for environmental NEPA compliance. Through this step and step 2, Bonneville will involve appropriate publics, and government and tribal entities, in the planning and analysis of projects.

Approving New Techniques and Herbicides for Use

Bonneville also adopted a process for adding or eliminating method techniques and herbicide ingredients in our program. Environmental analysis for adopting new method techniques or herbicide ingredients will be tiered to the FEIS. During the analysis, Bonneville will solicit public and agency input and comment. The analysis process will conclude with a supplement analysis or record of decision tiered to this ROD and FEIS. Please see Chapter II of the FEIS for more detail on approving new techniques and herbicides for use. Below is a list of herbicide active ingredients currently approved for use.

2,4-D right-of-way non-electric	**Fosamine ammonium** right-of-way	**Oryzalin** non-electric
Azafenidin right-of-way electric yard non-electric	**Glyphosate** right-of-way electric yard	**Paclobutrazol** right-of-way
Bromacil right-of-way electric yard	**Halosulfuron-Methyl** non-electric	**Picloram** right-of-way
Chlorsulfuron right-of-way	**Hexazinone** right-of-way	**Sulfometuron-Methyl** electric yard
Clopyralid right-of-way non-electric	**Imazapyr** right-of-way	**Tebuthiuron** right-of-way electric yard
Dicamba right-of-way non-electric	**Isoxaben** right-of-way electric yard non-electric	**Triclopyr** right-of-way non-electric **TEA** **BEE**
Dichlobenil non-electric	**Mefluidide** non-electric	**Trinexapac-Ethyl** non-electric
Diuron right-of-way electric yard	**Metsulfuron-Methyl** right-of-way	

All the Alternatives

Bonneville considered a range of alternatives that could be combined to provide an overall vegetation management program. The alternatives are described in detail in Chapter IV of the FEIS. Below is a list of all the programs and alternatives considered.

The shading indicates the selected alternative in each case.

Right-of-way Program

This program had three sets of alternatives that could be combined in different ways to create an overall right-of-way program. The three sets of alternatives consisted of:

1. The Management Approach Alternatives
2. The Method Package Alternatives
3. The Vegetation Selection Alternatives

The **Management Approach Alternatives** had two ways to manage vegetative growth on rights-of-way.

Management Approach Alternatives	
MA1	**Time-Driven** - uses repetitive maintenance cycles for vegetation control.
MA2 (*environmentally preferred)*	**Promotion of Low-growing Plant Communities** – promotes low-growing plants where possible along the right-of-way.

The **Method Package Alternatives** offered four ways to combine the methods that could be available for controlling right-of-way vegetation (the "tools" in the "toolbox").

Methods Package Alternatives	
R1	**Manual, Mechanical, Biological**
R2 *(environmentally preferred)*	Manual, Mechanical, Biological + **Herbicide – *spot and localized application***

R3	Manual, Mechanical, Biological, Herbicide – *spot, localized* + ***broadcast application***
R4	Manual, Mechanical, Biological, Herbicide – *spot, localized, broadcast* **+ *aerial application***

The **Vegetation Selection Alternatives** offered three choices as to types of vegetation that could be treated with herbicides.

Vegetation Selection Alternatives	
VS1	**Noxious Weeds** only
VS2 *(environmentally preferred)*	**Noxious Weeds & Deciduous**
VS3	**Any Vegetation**

Electric Yard Program

The Electric Yard Program had one choice for how to control vegetation in electric yards: using herbicides with a variety of other tools as needed.

Electric Yard Program Alternative	
E1	**Herbicide Treatment**

For safety reasons, we eliminated from consideration the alternative of not relying on pre-emergent herbicides in electric yards. If we did not use pre-emergent herbicides, people would have to treat all vegetation after it has sprouted. A plant in an electric yard has to grow up through a metal ground mat and could provide another grounding path for electricity. If a person were to come in contact with a plant in the yard during a fault in or near the substation, he or she could be electrocuted.

Non-electric Program

The Non-electric Program had two combinations of methods available for controlling vegetation around these facilities. One alternative included herbicide use, the other did not.

Non-electric Program Alternatives	
NE1	**Mixed Methods with Herbicides**
NE2 *(environmentally preferred)*	**Non-herbicide Methods**

Rationale for the Decisions

In determining what alternatives to select, Bonneville took the following steps:

- analyzed the environmental impacts of all the alternatives;
- determined how the alternatives would meet our need to control vegetation at our various facilities;
- determined how the alternatives would meet our program objectives or purposes, which are to
  - minimize adverse environmental impacts,
  - achieve cost and administrative efficiency,
  - and comply with laws and regulations; and
- considered all public comments received on the Draft EIS.

One of the main issues raised through public involvement and considered in this EIS process was *whether or not to use herbicides, and, if so, to what extent*. The alternatives we have selected reflect Bonneville's decision to have herbicides available for use (in conjunction with all the methods) and to allow for the greatest flexibility of their use (all application techniques are available and they would be available for any vegetation type).

Taking into consideration the impacts and risks of all of the methods, Bonneville decided that all methods have a role in managing vegetation. We developed *Planning Steps* to make sure the appropriate methods were used for specific circumstances and *strong mitigation measures* to lessen potential impacts. Specific herbicides were scrutinized, and a process set in place to ensure the scrutiny of

any herbicides that might be added to or deleted from the list in the future.

For the right-of-way program in particular, herbicide use is essential to allow Bonneville to use the management approach of promoting low-growing plant communities. This approach requires some use of herbicides (to prevent some tall-growing species from resprouting); however, in the long run, promoting low-growing plants will help lessen the intensity of maintenance needed, including the amount of herbicide used.

Below are the rationales for each of the decisions.

Management Approach Alternative MA2

The **MA2 management approach** alternative meets our need to control vegetation.

This MA2 alternative will lessen environmental impact in the long term because promoting low-growing plant communities helps keep some tall-growing vegetation from surviving, lessening both the need for vegetation control and the impacts associated with controlling vegetation. Because MA2 will lessen environmental impacts in the long run, it was the environmentally preferred alternative.

MA2 achieves cost and administrative efficiency in the long term by lessening the intensity of maintenance activities where low-growing plants can be promoted. However, this will cost more (than the other alternative) in the short term, because activities will need to be conducted so as not to disturb low-growing plants, and the growth of tall plants may need to be checked more often at first in order to give low-growing plants a competitive edge.

It will be possible to comply with laws and regulations with MA2.

There were no changes to this alternative based on public comment. However, it was noted that, in some areas, promoting low-growing vegetation might not be compatible with Canadian lynx (a threatened species) habitat. The Planning Steps and consultations will help determine the appropriate site-specific management approach.

The alternative MA1 would also have met the need and complied with laws and regulations. MA1 would have cost less to implement in the short term (because it would not require making sure that low-growing species were not disturbed nor would it require checking for tall-growing species before they reached a height that would compete with other plants). However, it would have cost more in the long run (because of the intensity of maintenance needed would have remained

constant or increased as tall-growing vegetation grew back). MA1 would have had more environmental impacts in the long run, because the constant or increased need for maintenance with this alternative would have caused more environmental impacts.

Methods Package Alternative R4

The methods package chosen for rights-of-way, **R4,** includes all methods considered in the toolbox. With all the methods available for use, we can meet our need for vegetation control along the rights-of-way.

Alternative R4 has the most *potential* for environmental impact from herbicide use because it includes all the herbicide techniques available. However, *mitigation measures* have been adopted to eliminate or lessen those potential impacts. The Planning Steps and mitigation measures adopted in conjunction with this alternative will minimize adverse environmental impacts by helping determine appropriate methods for given site characteristics or sensitivities, as is consistent with integrated vegetation management strategies.

This alternative provides cost and administrative efficiencies by allowing the most flexibility to determine appropriate and cost-effective methods in any given situation.

It will be possible to comply with appropriate laws and regulations with R4.

Some of the mitigation measures associated with alternative R4 were changed due to public comment. The herbicide buffer zones were revised to include the consideration of the herbicide toxicity (rather than the herbicide application technique alone). We also added the consideration of the adjuvant toxicity when considering buffer zones. We added measures to work with the state and local land managers as appropriate, including the consideration of locally listed or sensitive species. We strengthened the commitment to take erosion control measures on slopes with potential erosion problems. And, we added a measure to work with appropriate tribes regarding cultural resources off-reservation lands.

Alternatives R2 and R3 would have also met our need for vegetation control; R1, which did not allow herbicide use, might not have been able to meet the need—especially for noxious weed control. Alternative R2 was the environmentally preferred alternative because it would have allowed for herbicide use to treat noxious weeds and tall-growing resprouting vegetation, as well as for the promotion of low-growing plants while using application techniques (spot and

localized) that are selective and less likely to treat non-target vegetation and resources. These alternatives (R1, R2, and R3), offer less flexibility, and less cost and administrative efficiency than the chosen alternative. These other alternatives would have complied with laws and regulations; however, with R1 it would have been difficult to comply with noxious weed laws.

Vegetation Selection Alternative VS3

The vegetation selection alternative chosen for rights-of-way, VS3, allows for herbicides to be used on any type of vegetation appropriate (noxious weeds, deciduous plants, and conifers). This alternative allows us to meet our need for vegetation control.

Although VS3 was not the environmentally preferred alternative, it helps foster the environmentally desirable promotion of low-growing plant communities, and mitigation measures help reduce potential impacts.

VS3 will achieve cost and administrative efficiencies because it offers flexibility to determine the most appropriate and cost-effective means of controlling vegetation on any given right-of-way.

We will be able to comply with applicable laws and regulations with VS3.

This alternative itself was not changed due to public comment, although some mitigation measures associated with herbicide use were changed.

Alternative VS1 would have made it difficult to meet our need; it would also not have allowed us to promote low-growing plant communities. VS2 would have met our need; it was the environmentally preferred alternative because it would have lessened the amount of herbicides used while still allowing the treatment noxious weeds and tall-growing resprouting vegetation, as well as for the promotion of low-growing plants. However, VS1 and VS2 both offer lesser degrees of flexibility, and fewer cost or administrative efficiencies than the chosen alternative.

Electric Yard Program Alternative E1

For the electric yard program, one alternative, E1 – Herbicide treatment (with other methods as appropriate), was adopted. An alternative that did not use herbicides was considered, but eliminated from further consideration because of safety issues in electric yards associated with controlling vegetation after it has sprouted (potential electrocution).

We will be able to comply with applicable laws and regulations with E1.

This E1 alternative was not changed due to public comment. However, one herbicide that would have been used in the electric yard program (trifluralin) was dropped from our approved list of herbicides due to public comment. Public comment caused us to rereview the need for this herbicide, which has a high toxicity rating for aquatic species.

Non-electric Program Alternative NE1

For the non-electric yard program, Bonneville chose alternative NE1, which uses a combination of methods (including herbicides) to control vegetation. This alternative meets our need for vegetation control at these facilities.

Although NE1 was not the environmentally preferred alternative, mitigation measures for herbicide use will lessen potential impacts.

NE1 achieves cost and administrative efficiencies. It will be less expensive to implement than the alternative, because being able to use some herbicide is less expensive for landscape-type maintenance than using manual and mechanical methods alone.

NE1 will comply with laws and regulations.

This alternative, NE1, was not changed due to public comment. However, two herbicides (Benifin and Pendimethaline) that would have been used in this program were dropped from our approved list of herbicides due to public comment. Public comment caused us to rereview the need for these herbicides, which have high toxicity ratings for aquatic species.

Alternative NE2—Non-herbicide method—would have also met our need for vegetation control at non-electric facilities. NE2 was the environmentally preferred alternative because it would have lessened potential impacts of herbicide use without causing substantial increased impacts from the other methods used. However, this alternative would have been more expensive to implement with only the use of manual, mechanical, and some biological means. NE2 would have also complied with laws and regulations, although noxious weed control in some areas would be more difficult with this alternative than the chosen alternative.

Cooperating Agencies

As cooperating agencies in the development of this EIS, the Forest Service and BLM worked to help develop measures or protocols to be used for Bonneville corridors and facilities on these lands. These protocols will be used for site-specific vegetation management actions and the NEPA analysis will be tiered to the FEIS. The Forest Service may determine that analysis through their NEPA processes are needed. Please see Chapter III for a complete listing of measures. Please see Appendices F and G for additional measures that vary from Forest to Forest or District to District, or that may be revised through Forest Service or BLM documents.

Implementation

Bonneville will begin to phase-in implementation of the selected alternatives and Planning Steps with approval of this ROD.

Responsible Official

/s/ Judith A. Johansen *7/28/00*

Judith A. Johansen date
Administrator
Bonneville Power Administration

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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IN REPLY REFER TO:
2800/1790 (OR-933)

July 28, 2000

Transmission System Vegetation Management Program Record of Decision - for Bonneville Power Administration Facilities on Bureau Managed Lands in California, Idaho, Montana, Oregon, Utah, Washington, and Wyoming

Introduction: This Record of Decision (ROD) has been prepared on behalf of the Bureau of Land Management (Bureau) State Directors and Field Managers throughout the Bonneville Power Administration (BPA) area of operations. It was developed to be consistent with the 1982 Subsidiary Memorandum of Understanding between the Bureau and BPA, which specifically anticipated joint decision-making and development of right-of-way management plans. It applies to the vegetation management program for existing BPA facilities as well as any facilities which may be constructed, acquired, or otherwise come under BPA management responsibilities. Bureau staffs were involved in the development, analysis, and public and interagency review of the associated Environmental Impact Statement (EIS). The Bureau participated as a formal cooperator in the EIS as anticipated in the Council of Environmental Quality procedures in *40 Code of Federal Regulations 1501.6.*

Decision: On the basis of the analysis contained in the Draft and Final EIS, the proposed BPA transmission system vegetation management program is adopted and approved for application on Bureau lands. The program is described in full detail in the EIS and BPA ROD. The vegetation management approach is consistent with Bureau policies for integrated vegetation management and will be implemented at the field level consistent with local Bureau land use plans. Implementation of the program is expected to minimize adverse environmental impacts to Bureau-managed resources, achieve cost and administrative efficiency for both BPA and the Bureau, and comply with applicable laws, regulations, and any other applicable program constraints.

Rationale: This decision is based on the expectation that implementation will follow the seven-step process as described in detail in Chapter III of the Final EIS. We expect that BPA and Bureau field staff will use the measures and protocols described in the EIS to develop facility-specific vegetation management plans. In most instances, further analysis under the National Environmental Policy Act will be required, and mitigation measures will reflect the Final EIS Appendix G, *BLM Mitigation Measures and Background*, as well as any other measures which may be developed and approved through Bureau procedures. Individual Bureau actions to implement the vegetation management program will be documented, tiered to the subject EIS and ROD, and available for public review, comment, and appeal under 43 CFR Part 4.

Elaine Zielinski

Elaine Zielinski
State Director, Oregon/Washington
Bureau of Land Management

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File Code: 2720

Date: AUG 11 2000

Ms. Judi Johansen
Administration and Chief Exective Officer
Bonneville Power Administration
TF-DOB1
5411 NE Highway 99
Vancouver, Washington 98663

Dear Ms. Johansen:

The USDA Forest Service has reviewed the May 2000,Final Environmental Impact Statement (FEIS) for your agency's Transmission System Vegetation Management Program (DOE/EIS-0285). We have been a Cooperating Agency in the development of the analysis documented in the FEIS. I want to personally thank you and those on Bonneville's planning staff who worked with my Lands Staff here in our National Headquarters office, and with managers and staffs in our various Regional and field offices responsible for the administration of those segments of your right-of-way system located on National Forest System (NFS) lands. Those Bonneville employees who conducted this analysis and documented it went the extra mile in soliciting our input and concerns about vegetation management techniques and methods, in relation to our management objectives for the NFS lands occupied by BPA's electrical facilities. For the most part, our input and concerns have been addressed and documented in the Draft and Final EIS's for this project.

Your FEIS provides excellent baseline information with respect to the estimated environmental effects of applying different methods and techniques to achieve vegetative management objectives. It has the potential to serve as a valuable set of standards and guidelines that can streamline and provide consistency to the development of site-specific vegetative management plans, and the updating of such plans where they already exist.

Forest Service field staff will work with Bonneville in applying the procedures and findings in this FEIS, including use of the seven step process described in Chapter III in site-specific vegetative management planning efforts. For most site-specific vegetative management plans, the provisions of the National Environmental Policy Act, terms and conditions of existing special use authorizations, and regulations governing the use and occupancy of National Forest System lands, will likely dictate the need for additional analysis and documentation. Unless already provided in existing special use authorizations, site-specific vegetative management plans developed pursuant to this FEIS will need review and approval of an authorized Forest Officer.

As a Cooperating Agency in this project, the Forest Service identified potential opportunities for both our agencies to review and revise the variety of existing Memorandums of Understanding (MOU's) and authorizations that authorize your agency's use and occupancy of NFS lands with electrical facilities throughout the Pacific Northwest. After your agency signs the Record of Decision pursuant to this FEIS, it would be an opportune time for us to further explore those possibilities. I believe we can significantly streamline the manner in which your facilities on NFS lands are authorized, by replacing existing, outdated permits, MOU's, and land use grant instruments (LUGI's) with consolidated, modern day, long term special use authorizations.

We would like to explore that opportunity with you. By conditioning those new authorizations in a manner that captures the measures, protocols, and findings of this FEIS and your Record of Decision, we believe we can minimize the number of case-specific agency decisions that will need to be made for site-specific vegetative management plans. If we can do so, your agency could maximize the return on your investment in this programmatic planning effort, through administrative efficiencies and cost savings in working with us concerning the management of rights-of-way on NFS lands. If you are interested in pursuing these possiblities, I recommend you contact Randy Karstaedt, our Special Uses Program Leader, at this office, at (202) 205-1256.

Thank you again inviting us to participate as a Cooperating Agency in this effort. We hope we can build upon this effort in capturing the benefits that it has the potential of providing us.

Sincerely,

Gregory Smith

/FOR/ JACK L. CRAVEN
Director of Lands

Bonneville Power Administration

PO Box 3621 Portland, Oregon 97208-3621

DOE/BP–3315 JULY 2000 700