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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: February 10, 2003

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-120 Hanford-Ostrander Corridor Maintenance

TO: William Erickson
TFP/Walla Walla
Natural Resource Specialist

Proposed Action: Vegetation Management for the Hanford-Ostrander Transmission Line Corridor from Tower 10/4 to Tower 17/2 + 770. The line is a 500kV Single Circuit Transmission Line having an easement width of 300 feet. The proposed work will be accomplished in the indicated sections of the transmission line corridor as referenced on the attached checklist.

Location: The subject right-of-way is located in Benton County, WA. In the Walla Walla Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: The work will include the performance of road maintenance and tower pad maintenance along the Hanford-Ostrander transmission line. Maintenance will be performed from Tower 10/1, close to Army Loop road near the northeast corner of 200 West Area of the Hanford Nuclear Reservation to the western edge of the Arid Lands Ecological Reserve (ALE) at Tower 17/2 + 700. Total distance of the work is approximately 7.5 miles. The planned work includes spraying with herbicides to minimize vegetation regrowth along the access roads and removing shrubs from within 50 feet of each transmission tower.

Analysis: Please see the attached checklist for the resources present. Applicable findings and mitigation measures are discussed below.

Planning Steps:

1. ***Identify facility and the vegetation management need.***

   BPA proposes to clear unwanted vegetation in the access roads and around tower structures that may impede the operation and maintenance of the subject transmission line. All work will be in accordance with BPA standards. BPA plans to conduct vegetation control with the goal of removing growing vegetation that is currently encumbering access to the transmission line. The work will provide system reliability and control noxious weeds.

Initial entry - Using hand cutting or mechanical means, BPA will complete brush management on the access roads and towers. Vegetation is currently encumbering the access roads and towers of the power lines; If needed, treat the associated stumps and stubble with herbicides (spot, localized, and broadcast treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines or creates a fire hazard.

Vegetation management will precede access road maintenance that may include grading, blading and shaping, and rock placement. Area soil will be replanted or reseeded with low-growing grasses if there is limited vegetation to re-establish the site or soil disturbance has removed the existing vegetation.

Keeping trucks and equipment on designated access roads will not disturb desirable plants on the ROW. All work will take place in existing access roads or ROW.

Slash and debris will be pulled at least 10 feet from the road surface and loped and scattered, or it will be mulched mechanically. Herbicides may be used to prevent the re-growth of bush species**.**

Subsequent entry - The vegetation management program will be designed to provide a 3-8 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all encumbering vegetation using a combination of manual, herbicide and mechanical treatments as outlined in the initial treatment

Future cycles - Future cycles of work will involve hand cutting and mechanical treatments. During routine patrols, the ROW will be examined for encumbering vegetation that will be removed as necessary.

2. Identify surrounding land use and landowners/managers and any mitigation.

The entire site is on the DOE Hanford Reservation. The Hanford-Ostrander section 13/1 to 17/2 is managed by the Fish and Wildlife Service and is the ALE. BPA has contracted with Pacific Northwest National Laboratory to perform a cultural and Ecological review of the proposed work area. Results of the review are discussed in section 3 below.

3. Identify natural resources and any mitigation.

Cold Creek is located between spans 13/3 and 13/4. It is an intermittent stream with no T&E species. Methods of herbicide applications as outlined in the Vegetation Management EIS and accompanying checklist will be followed.

The project area west of 16/1 has one species of T&E plant listed by the State of Washington as threatened (Columbia milkvetch) and one species listed as sensitive (Piper's daisy). To avoid impacts to these species, it is recommended that no road grading or broadcasting of herbicide applications occur west of 16/1 to the ALE boundary. No animal species protected under the Federal ESA or candidates for such protection were observed in the vicinity of the project area. The results of the records and literature review conducted by staff at the Hanford Cultural Resources Laboratory (HCRL) find that this project will have no affect to historic properties as no historic properties have been identified.

4. Determine vegetation control and debris disposal methods.

The US Fish and Wildlife Service has requested when using herbicides on the ALE (13/1 to 17/2), that only the listed herbicides for that area be used for vegetation management. Those listed herbicides are:

Clopyralid (Transline)
Imazapyr (Arsenal)
Glyphosate (Rodeo)
Sulfometuron (Oust)
Roundup
2,4, -D

BPA will work with these herbicides on US Fish and Wildlife lands unless it is determined that the inability to use other BPA approved herbicides would interfere with the operation and maintenance of the Federal Columbia River Transmission System per the Hanford Reach Proclamation.

For all other areas of work all manual, mechanical, and herbicidal treatments as prescribed in the Vegetation Management EIS will be used.

Herbicide use in these areas will include Glyphosate, Picloram, Imazapry, 2,4-d, triclopry and dicamba. These may be used for spot-foliar, cut stubble and broadcast-foliar treatments. In addition, escort and cylopyralid can be used for spot foliar and broadcast treatments.

Debris disposal will be by mulching and pulling un-mulched debris back 10 feet from the road surface and 50 feet from the tower footings.

5. Determine revegetation methods, if necessary.

Native seeds will be considered in all mixes. Seeding should be completed in the early fall when there is enough moisture to allow for 2 months of growth or in the late fall after the soil temperature is below 40 degrees F. Broadcast seeding with fallow up harrowing is one method of seeding. Mulching with straw or hydro mulching may be required to prevent wind erosion in the spring.

The Monument has also requested that Native species be used for re-vegetation work.

6. Determine monitoring needs.

The site will be inspected during treatment. In addition, routine observation by BPA ground and aerial patrols will determine if any follow-up measures will be needed.

7. Prepare appropriate environmental documentation.

Besides the subject cultural and ecological review performed by Pacific Northwest National Laboratory, no other environmental documentation should be necessary.

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/ Ken Hutchinson
Ken Hutchinson
Environmental Scientist – KEPR/Walla Walla

CONCUR:*/s/ Thomas C. McKinney* DATE:02/19/2003
Thomas C. McKinney
NEPA Compliance Officer

Attachment

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
J. Meyer – KEP-4
M. Hermeston – KEP-4
J. Sharpe – KEPR-4
K. Hutchinson – KEPR/Walla Walla
P. Key – LC-7
D. Hollen – TF/DOB-1
M. Richardson – TFP/Walla Walla
R. Duncan – TFP/Walla Walla
Environmental File – KEC-4
Official File – KEP-4 (EQ-14)

Khutchinson:kh:4722:2/12/2003 (KEP-KEPR/WALLA WALLA-W:\EP\2002 & 2003 FILES\EQ\EQ-14\FEIS-0285-SA-120-Hanford-Ostrander.doc)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way. Hanford Ostrander and the Hanford John Day line. Access road Vegetation Management

See Handbook — **List of Right-of-way Components** for checkboxes and the requirements for the components **Rights-of-way**, **Access Roads**, **Switch Platforms**, **Danger Trees**, and **Microwave Beam paths**

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Hanford Ostrander Hanford John Day	22 mile 500 kV 26 miles 500 kV	300	10/1 to 17/2+770

Access Roads

Maintenance crews use access roads to get to the transmission-line towers, substations, and other facilities**.**

Requirements Access roads have to be sufficiently free of vegetation so that our crews and their necessary machinery and vehicles can safely and efficiently travel over them to the electric facility for emergency and routine maintenance work. Vegetation management will also reduce the potential of fire hazards from vehicles that use these roads during dry weather.

Current Practice Access roads that we maintain are generally unimproved dirt or gravel roads. We keep them clear of trees and brushy vegetation, using manual cutting tools, machines on wheels or tracks, and herbicide sprayed with backpack sprayers and truck-mounted booms.

Access roads and Tower sites will be treated using non-selective methods that include, hand cutting, herbicides and mechanical means.

Right Of Way:
Transmission Structures – 72 structures
Access Road clearing - approximate miles 7.3 miles– up to 18 acres
Tower Clearing Specifications:

- Control all brush species within 50 ft. of transmission structures. Cut stumps are not to be taller than 4 in. These species include big sagebrush, gray rabbitbrush, green rabbitbrush, and other vegetation that, by size or density, might hinder routine inspection and maintenance work or make roads and work areas hazardous.
- Pull all un-mulched debris and slash out of the 50-ft. area around transmission structures.
- Ground broadcast an appropriate herbicide to prevent re-establishment of treated brush species.

Access Roads Specifications:

- Control all vegetation except grasses, to enable safe driving.
- The access road is to be 16 ft. wide. Cut stumps are not to be taller than 2-3 inches in the roadbed.
- Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.
- Pull all un-mulched debris back 10 feet from the access road.
- Ground broadcast an appropriate herbicide to prevent re-establishment of treated brush species.

1.2 Describe the vegetation needing management.

See handbook — **List of Vegetation Types**, **Density**, **Noxious Weeds** for checkboxes and requirements.

Vegetation Types:

Rangeland: Sagebrush Bunchgrass. Rainfall 6-10 inches
Big sagebrush, gray and green rabbitbrush, and other brush species
Sandy and Sandy Loam soil to silt loam. 6-12 inch

1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why.

See Handbook — for requirements and checkboxes.

Not Promoting Low Growing Plant Communities, Describe Why?
Project only entails the clearing of roads and tower sites to facilitate access maintenance.

1.4 Describe overall management scheme/schedule.

See Handbook - **Overall Management Scheme/Schedule**.

Description of the Proposed Action: BPA proposes to clear unwanted vegetation in the access roads and around tower structures that may impede the operation and maintenance of the subject transmission line. All work will be in accordance with BPA standards. BPA plans to conduct vegetation control with the goal of removing growing vegetation that is currently encumbering access to the transmission line.

The work will provide system reliability.

Initial entry –

Using hand cutting or mechanical means, BPA will complete brush management on the access roads and towers. Vegetation is currently encumbering the access roads and towers of the power lines; If needed, treat the associated stumps and stubble with herbicides (spot, localized, and broadcast treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines or creates a fire hazard.

Vegetation management will occur before and after access road maintenance that may include grading, blading and shaping, and rock placement. Reseeding will occur if there is limited vegetation to re-establish the site, or soil disturbance has removed the existing vegetation. Areas with disturbed soils will be replanted or reseeded with low-growing grasses.

Keeping trucks and equipment on designated access roads will not disturb desirable plants on the ROW. All work will take place in existing access roads or ROW.

Slash and debris will be pulled at least 10 feet from the road surface and loped and scattered, or it will be mulched mechanically. Herbicides may be used to prevent the re-growth of bush species.

Subsequent entry -

The vegetation management program will be designed to provide a 3-8 year maintenance free interval. The overall vegetation management scheme will be to initially clear and remove all encumbering vegetation using a combination of manual, herbicide and mechanical treatments as outlined in the initial treatment

Future cycles -

Future cycles of work will involve hand cutting and mechanical treatments. During routine patrols, the ROW will be examined for encumbering vegetation and removed as necessary.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

See Handbook — **Landowners/Managers/Uses** for requirements, and **List of Landowners/Managers/Uses** for a checkbox list. See Handbook — **Methods for Notification and Requesting Information** for requirements.
BPA is working with DOE Richland and F&W

The entire site is on the Hanford Reservation. The Hanford-Ostrander section 13/1 to 17/2 is managed by the Fish and Wildlife Service (Arid Lands Ecological Reserve).

2.2 List the specific land owner/land use measures — determined from the handbook or through your consultations with the entities — that will be applied.

See handbook — **Requirements and Guidance for Various Landowners/Uses** for requirements and guidance, also **Residential/Commercial**, **Agricultural**, **Tribal Reservations**, **FS-managed lands**, **BLM –managed lands**, **Other federal lands**, **State/ Local Lands.**.

The US Fish and Wildlife Service has requested that when using herbicides on the ALE (13/1 to 17/2), that only the listed herbicides be used for vegetation management. BPA will work with these herbicides on US Fish and Wildlife lands unless it is determined that the inability to use other BPA approved herbicides would interfere with the operation and maintenance of the Federal Columbia River Transmission System per the Hanford Reach Proclamation.

The Monument has also requested that Native species be used for re-vegetation work.

Monument Approved Herbicides:
Clopyralid (Transline)
Imazapyr (Arsenal)
Glyphosate (Rodeo)
Sulfometuron (Oust)
Roundup
2,4, -D

“Several of these herbicides were approved for either a particular speciesor application method. Most are for general use within existing regulations and will not impact our ability to treat weeds in/along roads as we currently have an on-going program for weed control as part of our own road maintenance program.”

2.3 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.
See handbook — **Landowner Agreements** for requirements.

See above

The following landowners have responsibility for vegetation maintenance.
N/A

2.4 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure's to take due to the informal use.
See handbook — **Casual Informal Use of Right-of-way** for requirements.

Site currently closed to the public

2.5 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.
See handbook — **Other Potentially Affected Publics** for requirements and suggestions.

BPA has contracted with Pacific Northwest National Laboratory to perform a cultural and Ecological review during this process. They will lead the consultation with the Yakama, Umatilla, Wanapum, Colville, and Nez Pierce tribes. Results of this review are noted in the Cultural section of this checklist. (10/10/02)

3. IDENTIFY NATURAL RESOURCES

See Handbook — **Natural Resources**

3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.
See Handbook — **Water Resources** for requirements for working near water resources including buffer zones.

Span		Water body	T&E?	Method	Herbicide	Application Technique	Buffer
To	From						
13/3	13/4	Cold Creek Intermittent	No	Manual Herbicide mechanical	2,4-d dicamba, clopyralid, chlorsulfuron metsulfuron picloram	Spot, localized Ground Broadcast,	See specs

OTHER STREAMS: Lands 100 ft of a stream, water and wetlands. Available: all manual, spot and localized herbicide, and biological treatments. No mechanical treatments within 50 feet of streams or wetlands.

Manual: Hand tools and chainsaws.

Mechanical: None, within 50 feet of streams or wetlands except for Access Roads and Tower sites.

Herbicide: Only Non-toxic formulations and slightly toxic (to aquatic species) formulations of glyphosate (such as Rodeo®), dicamba (Trooper/Vanquish), Telar, Escort, clopyralid, picloram, and 2-4-d may be prescribed for wick, and spot-foliar treatments (localized). Ground Broadcast treatments can be completed with the appropriate buffers on access roads and tower sites.

Table III-1: Buffer Widths to Minimize Impacts on Non-target Resources

Herbicide & Adjuvant Ecological Toxicities and Characteristics	Buffer Width from Habitat Source per Application Method (i.e., stream, wetland, or sensitive habitat)				
	Spot	**Localized**	**Broadcast[1]**	**Aerial[2]**	**Mixing, Loading, Cleaning**
Practically Non-Toxic to Slightly Toxic	Up to Edge[3]	Up to Edge[3, 4]	10.7m[3] (35 ft.)	30.5m[4] (100 ft.)	30.5m[5] (100 ft.)
Moderately Toxic, or if Label Advisory for Ground/ Surface Water	7.6m[3] (25 ft.)	10.7m[3](35 ft.)	30.5m[3] (100 ft.)	76.2m[4] (250 ft.)	76.2m[5] (250 ft.)
Highly Toxic toVery Highly Toxic	10.7 m[3] (35 ft.)	30.5m[3](100 ft.)	Noxious weed control only. Buffer as per local ordinance	Noxious weed control only. Buffer as per local ordinance	76.2m[5] (250 ft.)

The buffers in this table are to be used unless other agencies, local authorities, or T&E consultations require more strict buffers. In cases of more strict local buffers, those would apply.

See table 7a for general aquatic toxicities of and label advisories of the active ingredients.

1) Using ultra low volume (ULV) nozzles with orifice size and spray pressure set to produce droplets at a minimum of 150 microns, boom or nozzle heights at the lowest possible height, and crosswind speed of less than 10 mph.

2) Using ULV nozzles with orifice size and spray pressure set to produce droplets at a minimum of 150 microns, minimizing air shear relative to nozzle angle and aircraft speed, boom length at 70% or less of wingspan/rotor, swath adjustment not to exceed 60 feet based on maximum cross-wind speed of less than 10 mph, minimum safety clearance application height, and herbicide tank mixture dynamic surface tension is less than 50 dynes/cm.3

3) Goodrich-Mahoney, J.W., Determination of the Effectiveness of Herbicide Buffer Zones in Protecting Water Quality, Electric Power Research Institute, Report No. TR-113160, September 1999

4) Calculated from: A Summary of Ground Application Studies, Spray Drift Task Force, 1997

5) BPA Best Management Practice

3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).

See Handbook — Herbicide Use Near Irrigation, Wells or Springs for buffers and herbicide restrictions.

None

3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.

See Handbook — **T&E Plant or Animal Species** for requirements and determining presence.

BPA contracted with the Pacific Northwest National Laboratory to perform a Biological review of the project. The project area west of 16/1 has one species listed by the State of Washington and threatened (Columbia milkvetch) and one species listed as sensitive (Piper's daisy). To avoid impacts to these species it is recommended that no road grading or broadcast herbicide applications occur west of 16/1 to the ALE boundary.

There are no plant or animal species protected under the Federal ESA or candidates for such protection that were observed in the vicinity of the project area.

The review is valid to April 15th 2003.

Span		Species	Site	Mitigation
To	From			
16/1	17/1	Columbian Milkvetch Astragalus columbianus	Occurs in access roads	No blading or grading of roads. No Broadcast herbicide spraying. Spot herbicide (backpack) treatments for specific noxious weeds only
16/1	17/1	Piper's daisy Erigeron piperianus	Occurs in access roads	No blading or grading of roads. No Broadcast herbicide spraying. Spot herbicide (backpack) treatments for specific noxious weeds only

VEGETATION MANAGEMENT SENSITIVE PLANT SPECIES: 16/1 to 17/1

Land with no environmental constraints. Available: all manual, mechanical, biological, and herbicidal treatments. Limit vegetation management after April 15th.

Manual: Hand tools and chainsaws.

Mechanical: Can be used on roads and towers, during fall and winter season for all areas suitable for mechanical treatment. Must be performed in a manner so that the soil is not disturbed.
Herbicide: Glyphosate, Picloram, Imazapyr, picloram, 2,4-d, Escort, clopyralid, Triclopyr (Garlon 3A and Garlon 4), Dicamba may be prescribed for spot-foliar treatments of individual noxious weeds and brush.

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.
See Handbook — **Protecting Other Species** for requirements.

See above
Grass seeding with mixtures indicated in Section 5.2.

The proposed activities are not likely to adversely affect the local population of jackrabbits.

To minimize potential impacts to nesting migratory birds, it is recommended that all ground or vegetation disturbing activities take place prior to April 2003.

3.5 List any visually sensitive areas and the measures to be taken at these areas.
See Handbook — **Visual Sensitive Areas** for requirements.

3.6 List areas with cultural resources and the measures to be taken in those areas.
See Handbook – **Cultural Resources** for requirements.

A cultural resources review completed for the U.S. Department of Energy, Bonneville Power Administration, Walla Walla Region by the Pacific Northwest National Laboratory located in Richland, Washington. The results of the records and literature review conducted by staff at the Hanford Cultural Resources Laboratory (HCRL) are described in the attached reviews. As indicated in the review, the HCRL recommends that BPA implements "Option A". BPA concurs with this recommendation and will implement that option resulting in a no-affect to historical properties determination.

1. It is the finding of HCRL that this project will have no affect to historic properties as no historic properties have been identified. The Hanford Ostrander Road Maintenance Project will impact HT-2002-039. However, HCRL has concluded that HT-2002-039 is not eligible to the Register, and therefore not a historic property, because any information that can be obtained from the site has been collected by site recording activities. Road construction through HT-2002-039 will not affect historic properties.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.
See Handbook – **Steep/Unstable Slopes** for requirements.

Erosion treatments and seeding will be applied to eroding areas.

3.8 List areas of spanned canyons and the type of cutting needed.
See Handbook – **Spanned Canyons** for requirements.

N/A

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — **Methods**

4.1 List Methods that will be used in areas not previously addressed in steps above.

WHEN THERE ARE NO ENVIRONMENTAL CONSTRAINTS

Land with no environmental constraints. Available: all manual, mechanical, biological, and herbicidal treatments

Manual: Hand tools and chainsaws.
Mechanical: Can be used on roads and towers, all areas suitable for mechanical treatment. No ground disturbing activities on slopes over 20%.

Herbicide: Glyphosate, Picloram, Imazapyr, picloram, 2,4-d, Triclopyr (Garlon 3A and Garlon 4), Dicamba may be prescribed for spot-foliar, cut stubble and broadcast-foliar treatments. In addition, Escort and clopyralid can be used for spot foliar and broadcast treatments.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

See Handbook — **Debris disposal** for a checkbox list and requirements.

- ☑ Mulch (Mulching is a debris treatment that falls between chipping and lop-and-scatter. The debris is cut into 1-to-2-ft. lengths, scattered on the right-of-way and left to decompose. This method is used when terrain and conditions do not allow the use of mechanical chipping equipment.)
- ☑ Other – Pull un-mulched debris back 10 feet from road surface and 50 feet from tower area.

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

See Handbook — **Reseeding/replanting** for requirements.

If re-seeding is needed, mixtures of the following grasses will be used

Approved and Suggested seeds	*Native	Reason for seeding
Mixes can be developed from the following seed species. Based on site and adaptation. Sandy and Sandy loam soils, silt loams 6-12 inch precipitation Name Indian Ricegrass N Thickspike wheatgrass N Bluebunch Wheatgrass N Sand dropseed N Needlegrass N Siberian wheatgrass I Crested Wheatgrass I Sheep Fescue N Big Bluegrass N	N-Native I=Introduced	Re-vegetate area where soil disturbance has occurred and to re-establish ground cover to prevent erosion.

5.3 If not using native seed/plants, describe why.

Natives will be considered in all mixes.

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

Native seeds will be considered in all mixes. Seeding should be completed in the early fall when there is enough moisture to allow for seedling to develop to the 4-5 leaf stage before winter or in the late fall or winter when the soil temperature is below 40 degrees F. Broadcast seeding with follow up harrowing is one method of seeding for small area. Mulching with weed free straw or hydro mulching may be required to prevent wind erosion in the spring.

6. DETERMINE MONITORING NEEDS

See handbook — **Monitoring** for requirements.

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

Site will be inspected during treatment. In addition, routine patrols by BPA ground and aerial patrols.

6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.

Routine patrols by BPA ground and aerial patrols.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — **Prepare Appropriate Environmental Documentation** for requirements.

7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are "substantial".

No.

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

No.