

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: September 25, 2002

REPLY TO
ATTN OF: KEPR-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-111) - (Fairview-Bandon #1, Fairview-Bandon #2 and Fairview-Rogue #1 access road, danger tree and structure clearing)

TO: Benjamin Tilley
Natural Resource Specialist

Proposed Action: Vegetation Management for the Fairview-Bandon #1 and #2 and Fairview-Rogue #1 transmission lines.

Location: Throughout the Fairview-Bandon #1, Fairview-Bandon #2 and Fairview-Rogue #1 corridors located within Coos and Curry counties in Oregon.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed. Vegetation that will grow tall will be selectively eliminated before it reaches a height or density to begin competing with low-growing species. Cut-stump or follow-up herbicide treatments on re-sprouting-type species will be carried out to ensure that the roots are killed. Desirable low-growing plants will not be disturbed. Only selective vegetation control methods that have little potential to harm non-target vegetation will be used.

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

Planning Steps:

1. Vegetation management need.

The work will take place on Fairview-Bandon #1, Fairview-Bandon #2 and Fairview-Rogue #1 transmission line right-of-ways for access road clearing and transmission structure clearing of noxious weeds and tall growing species (including danger trees). The proposed treatment will be performed in designated areas along the ROW's with an easement width of 100 to 137.5 feet. See attached checklist and documents for exact locations of treatment within the corridor.

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

The subject corridor passes through rural, residential, agricultural, grazing lands, industrial forestlands and BLM. Form letters will be sent to applicable landowners three weeks prior to job start date for them to respond and comment on the proposed actions. No herbicides will be applied on three specific locations where the corridor passes through BLM – Coos District lands (see checklist).

3. Identify natural resources and any mitigation.

Anadromous fish runs were identified in certain sections of the Fairview-Bandon #1 and #2 ROW's. The Western Lily was identified near one structure in the Fairview-Bandon #1 ROW. Mitigation measures to assure no affect on these T & E species are described in Sections 3.1 and 3.3 of the checklist.

Along the Fairview-Bandon #2 ROW an irrigation ditch is located in the vicinity of two structures (Section 3.2). A 50 feet buffer will be implemented for the application of herbicides in the vicinity of the irrigation ditch.

No known cultural resources are present. The work will not cause any soil disturbance, therefore cultural resources, if present, will not be affected (see Section 3.6).

4. Determine vegetation control and debris disposal methods.

Herbicide application will be for spot/stump treatment of re-sprouting species and conducted using backpack sprayers containing 25% Garlon 4 and 75% crop oil mix. Mechanical removal of vegetation will be accomplished using various methods with debris being scattered to prevent increased fire hazards. Chipping, lop and scatter, and mulching are the three methods that will be used for debris disposal (see Section 4 and 5).

5. Determine re-vegetation methods, if necessary.

Re-vegetation is not necessary for this project. Reseeding will occur naturally in any areas that are lightly disturbed.

6. Determine monitoring needs.

Monitoring will occur in the form of inspection while work is being done in the area. When convenient, subsequent monitoring will occur by the Foreman 1 and his crew, as well as by the NRS. Helicopter patrols (4 times/year) and working patrols (yearly) will also keep the NRS updated on problem areas.

Erosion potential will be monitored during each inspection. Growth rate and return of species along tower sites and access roads will be monitored to predict accessibility in the foreseeable future.

7. Prepare appropriate environmental documentation.

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/ Shawn L. Barndt
Shawn L. Barndt
Physical Scientist – KEPR-4

CONCUR: /s/ Thomas C. McKinney
Thomas C. McKinney
NEPA Compliance Officer

DATE: 09/30/02

Attachment

cc:

L. Croff – KEC-4
T. McKinney – KEC-4
M. Hermeston – KEP-4
J. Meyer – KEP-4
B. Sherer – KEP-4
J. Sharpe – KEPR-4
P. Key – LC-7
M. Johnson – TF/DOB-1
A. DelaCruz – TFE/Alvey
M. Newbill – TFE/Chemawa
T. Jones – TFE/Alvey
G. Burbach – TFEF/Alvey
Environmental File – KEC
Official File – KEP-4 (EQ-14)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

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
Fairview-Bandon #1	26 miles 115 kV	100'	26 miles
Fairview-Bandon #2	21 miles 115 kV	100 – 137.5'	21 miles
Fairview-Rogue #1	66 miles 230 kV	100 – 137.5'	22 miles

Right Of Way:

Right-of-Way – clearing in right-of-way

Transmission Structures – clearing around

Access Road clearing - approximate miles – 15 miles (46 acres)

Switch Platforms

Danger Tree clearing

1.2 Describe the vegetation needing management.

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

Vegetation Types:

Douglas Fir

True Fir

Hemlock

Spruce

Alder

Maple

Cedar

Madrone

Wild Cherry

Ash

Noxious Weeds - scotch broom, gorse, tansy, Himalayan blackberry, and thistle (various spp.)

Blackberries

Density:

Medium (50 – 250 stems/per acre)

Noxious Weeds:

If entering into a noxious weed program, state the entity and describe the program.

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.

Tall-growing vegetation that is currently or will soon be a hazard to the line will be removed. (In places where tall growing vegetation must be left in place, it may not be possible to promote low-growing plants.)

Cut-stump or follow-up herbicide treatments on re-sprouting-type species will be carried out to ensure that the roots are killed.

Vegetation that will grow tall will be selectively eliminated *before* it reaches a height or density to begin competing with low-growing species.

Desirable low-growing plants will not be disturbed. Only selective vegetation control methods that have little potential to harm non-target vegetation will be used.

1.4 Describe overall management scheme/schedule.

See Handbook - Overall Management Scheme/Schedule.

Initial entry – Initial entry will entail the activities described above (Promoting LGPC).

Subsequent entries – The line will be cut in such a way that there should be no concerns of tall-growing species under the lines for the duration of the 4-year cycle. A follow-up herbicide treatment will occur 6 – 12 months following the initial entry to eliminate re-sprouting noxious weeds and tall-growing species along access roads and tower sites.

Future cycles - This line is on a 4-year cycle due to its location on the south Oregon Coast. After completion of this cutting cycle, there is the potential to increase this cycle by another year (5-year cycle), depending on the growth vigor of trees surrounding the line.

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.

Landowners/Managers/Uses:

Rural

Residential

Agricultural

Grazing lands

Industrial Forest lands

BLM—Coos District

2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.

See Handbook — Methods for Notification and Requesting Information for requirements.

Form letters will be sent out to all known landowners of the right-of-way. These letters will be sent out 3 weeks prior to the job starting. This allows time for sufficient response of landowner's in case there is any overriding concerns, comments, or restrictions that may apply. Any letters that are returned will have a personal visit to the new landowner.

2.3 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.

Span		Landowner/use	Specific measures to be applied
To	From		
2\1 – 280'	2\7 + 1000'	BLM-Coos District	No herbicides to be applied.
3\2 + 360'	4\4 + 338'	BLM—Coos District	No herbicides to be applied.
5\5 + 905'	6\1 + 380'	BLM—Coos District	No herbicides to be applied.

2.4 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.

Refer to table above.

2.5 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.

Refer to table above.

2.6 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.

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		Waterbody	T&E?	Method	Herbicide	Application Technique	Buffer	Other
To	From							
1\3 + 220'	1\3 + 250'	N.F. Coquille River	Yes	CLS	None	N/A	N/A	Fairview-Bandon #1
3\3 + 1246'		Unnamed Creek	No	CLS	Garlon 4	Cut stump	35'	Noxious Weed and sprouting control only
3\2 + 817'	3\2 + 940'	Unnamed Creeks (2)	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
5\1 + 289'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
5\2 + 546'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
5\2 + 817'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
5\3 + 231'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
6\1 + 598'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
6\2 + 597'	6\2 + 677'	Middle Creek	Yes	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	100'	Noxious Weed and sprouting control only
6\3 + 719'	6\3 + 842'	Middle Creek	Yes	CLS	None	N/A	N/A	
6\4 + 309'	6\4 + 341'	Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
7\2 + 907'	7\2 + 975'	Middle Creek	Yes	CLS	None	N/A	N/A	

7\3 + 218'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
7\4 + 628'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
8\1 + 291'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
8\4 + 200'	8\4 + 310'	N.F. Coquille River	Yes	CLS	None	N/A	N/A	
9\2 + 639'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
9\5 + 485'	9\5 + 544'	N.F. Coquille River	Yes	CLS	None	N/A	N/A	
10\3+ 275'	10\3 + 325'	N.F. Coquille River	Yes	CLS	None	N/A	N/A	
11\ + 167'	11\2 + 347'	Unnamed Swamp	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
11\5+ 277'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
11\6+ 260'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
12\2 + 145'	12\2 + 468'	Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
12\4 + 570'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
12\5 + 470'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
12\7 + 580'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
13\1 + 165'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only

13\6 + 627'	13\6 + 654'	Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
15\5	15\6	Coquille River	Yes	No Veg. Control	None	N/A	N/A	
15\6	15\7	Hall Creek	Yes	No veg. control	None	N/A	N/A	
17\2 + 900'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
17\3 + 215'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
18\4 + 785'	18\4 + 885'	Unnamed Creeks (2)	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
19\2 + 140'	19\2 + 440'	Unnamed Creeks (3)	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
20\4 + 507'		Lampa Creek	Yes	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	100'	Noxious Weed and sprouting control only
21\3 + 739'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
23\5	23\6	Bear Creek	Yes	No Veg. Control	None	N/A	N/A	
24\7 + 380'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
25\1 + 627'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
25\2 + 283'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
25\3 + 398'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
25\7 + 285'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
26\1 + 380'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only

1\5 + 584'		Steele Creek	Yes	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	100'	Fairview-Bandon #2
3\2 + 395'		Blair Creek	Yes	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	100'	Noxious Weed and sprouting control only
3\3 + 650'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
6\4 + 749'	6\4 + 1386'	Unnamed Creeks (5)	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
7\1 + 955'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
8\4 + 216'	8\4 + 447'	Coquille River	Yes	No Veg. Control	None	N/A	N/A	
10\4 + 422'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
10\5 + 315'		Unnamed Creek	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Noxious Weed and sprouting control only
11\2 + 1400'		Little Fish Trap Creek	Yes	No Veg. Control	None	N/A	N/A	
12\5+ 1161'		Rollan Creek	Yes	No Veg. Control	None	N/A	N/A	
21\4+ 150'	21\4+ 210'	Unnamed Slough	No	CLS	Garlon 4 (25%) WEB Oil (75%)	Cut Stump	35'	Fairview-Rogue #1

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.

Span		Well/irrigation/or spring	Herbicide	Buffer	Other notes/measures
To	From				
2\3 + 593'		Irrigation ditch	Garlon 4 (25%) WEB Oil (75%)	50'	Fairview-Bandon #2
2\4 + 360		Irrigation ditch	Garlon 4 (25%) WEB Oil (75%)	50'	Fairview-Bandon #2

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.

Span		T&E Species	Method/mitigation or avoidance measures
To	From		
24\5 +		Western Lily (Fairview-Bandon #1)	No vegetation control to be done in this area.
		Anadromous fish	Listed in 3.1—Water Resources

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.

See Handbook — Protecting Other Species for requirements.

Span		Species	Measures
To	From		
		Large Game	Possible creation of grazing meadows for large game. Coordination with the Rocky Mountain Elk Foundation.

3.5 List any visually sensitive areas and the measures to be taken at these areas.

See Handbook — Visual Sensitive Areas for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
			Refer to detail sheet for chipping acres near road crossings.

3.6 List areas with cultural resources and the measures to be taken in those areas.

See Handbook — Cultural Resources for requirements.

Span		Describe sensitivity	Method/mitigation measures
To	From		
			No known cultural resources present. No ground-disturbing activity will occur. If evidence is found of cultural resources (artifacts, features, burial sites), work will cease immediately and the appropriate authorities will be contacted.

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.

Span		Describe sensitivity	Method/mitigation measures
To	From		
			Removal of vegetation on steep slopes restricted to tall-growing species that are a hazard to the transmission line.

3.8 List areas of spanned canyons and the type of cutting needed.

See Handbook – Spanned Canyons for requirements.

Span		Methods, cutting
To	From	
		Removal of vegetation in spanned canyons restricted to tall-growing species that are a hazard to the transmission line.

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — Methods

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

See Handbook — Manual, Mechanical, Biological, and Herbicides for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
To	From	
		Select Cut= cut, lop and scatter to extent necessary to prevent fire hazard. Low Cut= Remove all vegetation at ground level, CLS to prevent fire. Chip Acres= select cut and chip all debris generated Access Road Acres= select/low cut method on access roads Side-limb=remove limbs/tops of large trees Tower Sites=low cut method 30-50' radius around tower site Herbicide application—spot/stump treatment of re-sprouting species. Backpacks will be used with a 25% Garlon 4 / 75% crop oil mix. ---Refer to the attached detail sheet for span-by-span analysis.

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.

Debris Disposal:

Chip (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

Lop and Scatter (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

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.)

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.

Span		Reason for Reseed/plant	Type of Seed or Plants	Native?
To	From			
		Native, naturalized, and non-native grasses are present on the entire ROW that will reseed into the areas that have been lightly disturbed by vegetation management activities.	N/A	N/A

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

N/A

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

N/A

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.

Monitoring will occur in the form of inspection while the work is being done. Subsequent monitoring will occur by the Foreman 1 and his crew as well as by the Natural Resource Specialist at convenient times. Helicopter reports (4x/yr.) and working patrol (yearly) will keep the NRS updated on hot spots.

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

Survey vegetation growth of native and weed species in sensitive areas. Monitor for erosion potential during every inspection. Monitor growth rate and return of species along tower sites and access roads to predict accessibility in the foreseeable future.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — Prepare Appropriate Environmental Documentation for requirements. . Also prepare Supplement Analysis Supplement Analysis for signature.

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”.

None

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

None