DOE F 1325.8 e Electronic Form Approved by CGIR - 01/20/95
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United States Government **Department of Energy**

Bonneville Power Administration

memorandum

DATE: April 28, 2003

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-149-Captain Jack-Malin #1)

TO: Elizabeth Johnson
Natural Resource Specialist – TFR/The Dalles

Proposed Action: Vegetation Management for the Captain Jack-Malin #1 500 kV transmission line from structure 2/4 to Malin Substation (reference line). Right of way width averages 150 feet.

Location: The project location is within Klamath County, Oregon near the city of Malin, and is within the Redmond Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to remove unwanted vegetation along the right-of-way, access roads and around tower structures along the subject transmission line corridors. Approximately 95 acres of right-of-way will be treated using selective and non-selective methods that include manual, mechanical and herbicide treatments. Approximately 6 miles of access roads will be cleared using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Tower sites will be treated using selective and non-selective methods that include manual, mechanical and herbicide treatments. Vegetation management is required for unimpeded operation and maintenance of the subject transmission line. See Section 1 of the attached checklist for a complete description of the proposal.

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.

Unwanted vegetation will be removed and/or controlled using selective and nonselective methods that will include manual, mechanical and herbicide treatments. All methods of herbicide treatment will be used (except aerial) dependent on site conditions/restrictions, and no herbicides will be used on BLM lands. This proposal covers approximately 95 acres of land between towers 2/4 to the Malin Substation on the Captain Jack-Malin #1 500 kV transmission line corridor (corridor reference line). The entire width of the corridor needs to be managed.

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

The subject corridor traverses private and federal (BLM – Klamath District) land in Klamath County, used primarily for grazing and timber production. The subject corridor is in proximity to Klamath Nation lands, and is located within areas of traditional use.

Landowners requiring notification are shown in Section 2 of the attached checklist. Consultation has occurred with the BLM and with the Klamath Nation. Any remaining landowners will be contacted (letters, personal contact, door hangers, etc.) by BPA before and during the project.

3. Identify natural resources and any mitigation.

Section 3 of the attached checklist identifies the natural resources present in the subject corridor. The following is a summary of natural resources found within the subject corridor and subsequent mitigation measures where applicable.

Riparian Habitat:
Includes all wetlands, streams, and creeks meeting the definition of riparian habitat. Several areas were identified. See Section 3.1 of the checklist for a complete listing of water resources and mitigation measures.

Riparian Habitat Mitigation:

- *BLM lands adjacent to surface water*. No herbicide applications are planned on BLM lands. No ground disturbing mechanical equipment will be used within 35 feet of surface water or on slopes greater than 20%. Ground disturbing mechanical equipment will be limited to periods of low soil moisture to prevent compaction.
- *County or private lands, within 100 feet of surface water*. Only manual, cut-stump and localized (spot spray) treatments using practically non-toxic to slightly toxic formulations of glyphosate, triclopyr (TEA) formulation, imazapyr, and metsulfuron-methyl (Escort) will be applied. No ground disturbing mechanical equipment will be used within 35 feet of surface water or on slopes greater than 20%.
- *Within 50 ft. of the edge of surface water*. Only cut-stump and localized (spot spray) treatments using practically non-toxic to slightly toxic formulations of glyphosate, triclopyr (TEA) formulation, imazapyr, and metsulfuron-methyl (Escort) will be applied. Moderately toxic to very highly toxic herbicides or those herbicides containing a groundwater or surface water label advisory will not be used in this zone. Triclopyr (Garlon 4) may be used only more than 100 ft. from streams or water.

Irrigation Source, Wells, or Springs:
Includes water sources, springs, wells and other sensitive lands within 100 ft. of sensitive riparian areas or water sources. See Section 3.2 of the checklist for a full description.

Irrigation Source, Wells, or Springs Mitigation:
Only an approved aquatic glycophosphate formulation will be used. No herbicides will be used within 164 feet of water source. No mechanical equipment will be used within 35 feet of water source and slopes greater than 20%.

T & E Species and EFH:
No known Threatened and Endangered Species or Essential Fish Habitat are present in the proposed project area.

Wildlife Habitat Enhancement/Species Protection Measures:
Where possible and appropriate, brush piles are to be left for small animal habitat and dead trees (snags) are to be topped and left in place as wildlife habitat.

Cultural Resources:
No known cultural resources are present in the proposed project area.

Cultural Resources Mitigation:
No soil disturbing activities are proposed for this project. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the Klamath Nation will be contacted as well as the BPA Environmental Specialist. The Klamath Nation was contacted to determine the potential presence of traditional-use plants or other cultural resources and to determine the desired level of tribal involvement in planning efforts. Restrictions or mitigation measures such as seasonal constraints for vegetation control, avoidance of certain areas, or using methods that do not affect non-target plants may be required and included in the contract.

Steep/Unstable Slopes:
No steep/unstable slopes were identified in the proposed project area.

Spanned Canyons:
No spans were identified in the proposed project area.

4. Determine vegetation control and debris disposal methods.

Vegetation removal using manual, mechanical, and chemical methods will be implemented on all lands. Full descriptions of manual, mechanical and chemical treatment requirements can be found in Section 4 of the attached checklist. Debris will be disposed onsite using either lop and scatter, or mulch techniques as described in Section 5 of the attached checklist.

5. Determine revegetation methods, if necessary.

No soil disturbance is expected; therefore it is not likely that reseeding or replanting will be necessary.

6. Determine monitoring needs.

The right of way will be visited in late summer to determine whether target vegetation was cut and treated effectively, whether desired results were achieved for riparian and non-riparian areas, and if mitigation measures were appropriately utilized and effective.

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/ Oden W. Jahn
Oden W. Jahn
Physical Scientist (Environmental)-KEPR-4

CONCUR:*/s/ Thomas C. McKinney* DATE:05/02/2003
Thomas C. McKinney
NEPA Compliance Officer

Attachment

cc:
L. Croff – KEC-4
T. McKinney – KEC-4
C. Leiter – KEP-4
J. Meyer – KEP-4
F. Walasavage – KEP/Celilo
P. Key – LC-7
D. Hollen – TF/DOB-1
R. Fouse – TFR/Redmond
R. Melzer – TFR/Redmond
M. Oakland – TFRF/Redmond
Environmental File – KEC
Official File – KEP-4 (EQ-14)

Ojahn:oj:4722:4/22/2003 (KEP-KEPR-4-W:\EP\2002 & 2003 FILES\EQ\EQ-14\FEIS-0285-SA-149-CaptJack-Malin#1.doc)

Vegetation Management Checklist

Elizabeth Johnson
Natural Resource Specialist
Redmond Region
4/2/03.

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
Capt. Jack-Malin #1	500 kV – 8 miles	150' wide	6

- ☑ Right-of-Way – clearing in right-of-way from structure 2/4 to Malin Substation. Approx. 95 acres.
- ☑ Transmission Structures – clearing around every tower in segment.
- ☑ Access Road clearing - approximate miles – 6 miles

1.2 Describe the vegetation needing management.

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

Willow, pine, wild cherry – Low (50 stems or less/ per acre).
Noxious weeds – leafy spurge, medusa head, etc. – Klamath County has agreed to manage the noxious weeds in this area. Vehicles will be washed prior to entering row to prevent spread of existing or new infestations.

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 resprouting-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 – Selectively hand cut, mow and/or treat tall growing veg. Mow access roads & around structures. Work expected to start May and completed by June.

Subsequent entries – Row will not need another veg. mtce entry for at least 8 yrs.

Future cycles – Subsequent cycles will include mowing access roads & structures and with minor cutting w/ herbicide stump treatment on row.

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.

- ☑ Grazing lands
- ☑ Industrial Forest lands
- ☑ BLM – Klamath District
- ☑ Tribal Reservation - Klamath Tribe – row not on reservation but traditional use applies in the area. Letter to be sent to request info on Traditional use or other resource issues on 4/14. Checklist will be included.

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

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

Private landowners will be sent letters 3 weeks prior to operations.

On April 22nd, 2003 the BLM - Klamath District was notified of the proposed project with an attached copy of the Vegetation Management Checklist. The BLM will receive cover letter & checklist as soon as supplemental analysis is completed. Any additional issues raised will be discussed, mitigated and included on the detail sheet & contract addendum.

On April 15th, 2003, the Klamath Nation was sent a letter describing the proposed project, a copy of the Vegetation Management Checklist, and a map of the project area to determine the potential presence of traditional-use plants or other cultural resources that are not present in BPA's GIS database and to determine the desired level of tribal involvement in planning efforts.

2.3 List the specific land owner/landuse 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.**.

Below is a list of requirements for being on BLM – managed lands, or on or adjacent to agricultural lands.

On BLM – managed lands, herbicide use is permitted only for noxious weeds.

Prevent the spread of noxious weeds by cleaning seeds from equipment before entering cropland.

If on grazing lands and there is potential for pine needle poisoning, do not lop and scatter pine tree vegetative debris—machine-chip or haul debris off-site.

If using herbicides on grazing lands, comply with grazing restrictions as required per herbicide label.

If using herbicides near crops for consumption, comply with pesticide-free buffer zones, if any, as per label instructions.

For rights-of-way adjacent to agricultural fields, observe appropriate buffer zones necessary to ensure that no drift will affect crops.

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.

None identified.

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.

Recreationalists and hunters.

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.

PGE & PPL have adjacent lines within the corridor.

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.

- § In riparian areas, use selective control methods and take care not to affect non-target vegetation.
- § Leave vegetation intact, where possible.
- § Reseed all soil disturbed sites within 400 feet of a stream.
- § Any discharge of material (displaced soils, and in certain circumstances, vegetation debris) within a water of the U.S. may be subject to U.S. Army Corps of Engineers regulations under the Clean Water Act.
- § Do not permit debris from tree falling, cutting, or disposal to fall into or be placed in any watercourse, spring, pond, lake, or reservoir, unless there is approval from the appropriate authorities for stream habitat projects.
- § Do not burn piled vegetative debris in or next to watercourses.
- § For all methods using machinery or vehicles (i.e. chainsaws, trucks, graders) keep the equipment in good operating condition to eliminate oil or fuel spills.
- § Do not wash equipment or vehicles at a stream.
- § Notify inspector and the State of any amount of herbicide spill in or near water.
- § Consider climate, geology, and soil types in selecting the herbicide/adjuvant with lowest relative risk of migrating to water resources.
- § Use herbicide-thickening agents (as appropriate), label instructions, and weather restrictions to reduce the drift hazard to water resources.
- § When using granular formulations, consider overall climate and daily weather in ensuring herbicides are not washed offsite.
- § Always use appropriate anti-siphon devices/methods when filling herbicide tanks from any water sources.

- § Before herbicide application, thoroughly review the right-of-way to identify and mark, if necessary, the buffer requirements of competing resources.
- § The buffers in tables III-1 and III-2 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.
- § For noxious weed treatment, try to apply buffer zones, recognizing that treatment may be necessary within zones for control in compliance with local weed boards and Federal noxious weed laws.

Table G-1: BLM Buffer Zones Adjacent to Dwellings, Domestic Water Sources, Agricultural Land, Streams, Lakes, and Ponds

Method	**Buffer Width** (from waters edge)
***No* Ground-disturbing Mechanical** (Tractor operations will be limited to periods of low soil moisture to reduce the chance of soil compaction.)	"so far as practical on the contour to reduce the chance of soil erosion"
***No* Spot-herbicide Applications** (Herbicides will be wiped on individual plants within 3 m or 10 ft. of water where application is critical.) (For noxious weed control, herbicides may be wiped on individual plants to the high water line where application is critical.)	Within 3 m or 10 ft.
***No* Broadcast Herbicide**	Within 7.6 m or 25 ft.
***No* Aerial Herbicide**	Within 30.5 m or 100 ft.

Span		**Waterbody**	**T&E?**	**Method**	**Herbicide**	**Application Technique**	**Buffer**	**Other**
From	**To**							
3/3	3/4+ 1000	Intermittent creek – north side of row.	No	Hand cut individual trees w/in buffer or on slopes > 20%.	None BLM Lands	None		No machinery w/in 35' of stream or on slopes ≥20%.
4/2 +700	4/2 +750	Intermittent Cr.	No	Hand cut individual trees w/in buffer or on slopes > 20%.	Approved aquatic glyphosate formulation .	Cut stump/Spot spray	Private land high water mark.	No machinery w/in 35' of stream or on slopes ≥20%.
4/2 +160 0	4/2 +165 0	Intermittent Cr. & Wetland (PEMC)	No	Hand cut individual trees w/in buffer or on slopes > 20%.	Approved aquatic glyphosate formulation .	Cut stump/Spot spray	Private land high water mark.	No machinery w/in 35' of stream or on slopes ≥20%.
5/5	6/1	Intermittent Cr. & Wetland (PEMC)	No	Hand cut individual trees w/in	None BLM Lands	None		No machinery w/in 35' of

				buffer or on slopes > 20%.				stream or on slopes ≥20%.
6/4 +850	6/4 +900	Intermittent Cr.	No	Hand cut individual trees w/in buffer or on slopes > 20%.	None BLM Lands	None		No machinery w/in 35' of stream or on slopes ≥20%.
6/5 +700	6/5 +750	Intermittent Cr.	No	Hand cut individual trees w/in buffer or on slopes > 20%.	None BLM Lands	None		No machinery w/in 35' of stream or on slopes ≥20%.
6/6 +200	7/2	Intermittent Cr.	No	Hand cut individual trees w/in buffer or on slopes > 20%.	None BLM Lands	None		No machinery w/in 35' of stream or on slopes ≥20%.
7/3 +650	7/6 +800	Intermittent Cr. & dry pond	No	Hand cut individual trees w/in buffer or on slopes > 20%.	Approved aquatic glyphosate formulation.	Cut stump/Spot spray. No herb w/in 164' radius around pond.	Private land high water mark.	No machinery w/in 35' of stream or on slopes ≥20%.

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
From	To				
5/1	6/1	Dry reservoir	None	No machinery w/in 35' of stream or on slopes ≥20%.	
7/3 +650	7/6 +800	Dry pond	Approved aquatic glyphosate formulation.	No herb. w/in 164' radius around pond.	No machinery w/in 35' of stream or on slopes ≥20%.

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.

No T & E plant or animal species identified. No Essential Fish Habitat (EFH) identified.

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

See Handbook — **Protecting Other Species** for requirements.

- § Where possible and appropriate, leave brush piles for small animal habitats.
- § Where possible and appropriate, top and leave tall dead trees (snags) in place for wildlife habitat.

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

See Handbook — **Visual Sensitive Areas** for requirements.

None identified.

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

See Handbook – **Cultural Resources** for requirements.

No soil disturbing activities proposed.

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.

None identified.

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

See Handbook – **Spanned Canyons** for requirements.

None identified.

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.

Manual Requirements

- § When crews are working during the fire season (defined by the fire protection district with jurisdiction in the area), each crew shall have the proper fire-suppression tools and materials, as required by the responsible fire control agency.
- § Equip power-cutting tools with approved spark arresters.
- § Cut conifers below the lowest live limb to eliminate the continued growth of lateral branches.
- § If planning follow-up herbicide stump treatment, cut stumps flat for application of the chemical.
- § If planning follow-up herbicide stump treatment in rights-of-way, cut deciduous brush about 15.2 cm to 20.3 cm (6 to 8 in.) above the ground line.
- § If planning follow-up herbicide stump treatment in access roads, cut deciduous stumps 5 to 10 cm (2 to 4 in.) above the ground line.

- § If planning follow-up herbicide stump treatment, apply herbicides as soon as possible after cutting. (If herbicide is not applied soon after the vegetation has been cut, it may be best to wait until resprouting has occurred and then spray by foliar technique.)
- § For safety, cut all brush stumps flat where possible. (Angular cuts leave a sharp point that could cause injuries if fallen upon.)
- § For cutting trees close to "live" power lines, use only qualified personnel.

Mechanical Requirements

- § Do not use ground-disturbing mechanical equipment to clear on slopes over 20%.
- § Perform soil-disturbing or heavy mechanical clearing when the ground is sufficiently dry to sustain heavy equipment and excessive rutting will not occur.
- § Use measures to control the spread of noxious weeds.
- § Do not use ground-disturbing mechanical methods in areas with T&E plant species unless determined appropriate through consultations.
- § Do not use ground-disturbing mechanical methods in areas with cultural resources unless determined appropriate through consultations.
- § Do not use ground-disturbing mechanical methods in riparian areas.

Herbicides Requirements

- § Follow product label directions, as required by FIFRA, including “mandatory” statements (such as registered uses, maximum use rates, application restrictions, worker safety standards, restricted entry intervals, environmental hazards, weather restrictions, and equipment cleaning).
- § Follow all product label “advisory” statements (such as techniques for mixing, applying and cleaning within the mandatory requirements, recommendations for protection clothing, guidelines for differing soil types, etc).
- § Always have a copy of the herbicide label and Material Safety Data Sheets (MSDS) at work sites during all mixing and applications.
- § Ensure that all herbicide applications are conducted in the presence of a licensed applicator valid for the state where the work is located.
- § Keep records of each application, including the active ingredient, formulation, application rate, date, time, location, etc. Records must be available to state and Federal inspectors, and may need to be supplied to landowners (e.g. Forest Service and WA DNR).
- § Ensure the use of EPA-approved herbicides that have been reviewed by Bonneville for effectiveness and environmental considerations.
- § Never leave herbicides or equipment unattended in unrestricted access areas.
- § See Water Resources for herbicide mitigation measures near wetlands, streams, rivers, ponds, and wells.
- § *Before application*, thoroughly review the right-of-way to identify and mark, if necessary, the buffer requirements.
- § Protect drinking water sources by following all buffer zone restrictions.
- § Observe restricted entry intervals specified by the herbicide label and post public warning signs where required.

Span		**Methods,** including herbicide active ingredient, trade name, application technique
From	**To**	
3/5 +1100	5/1 +750	Cut stump treatment. Garlon 4 (triclopyr) to be at least 50' away from creeks. Garlon 3A (triclopyr) or an aquatic formulation of glyphosate to be used in riparian areas. No herb to be used w/in 164' radius of ponds or reservoir.
7/2 +650	7/3 +800	Cut stump treatment. Garlon 4 (triclopyr) to be at least 50' away from creeks. Garlon 3A (triclopyr) or an aquatic formulation of glyphosate to be used in riparian areas. No herb to be used w/in 164' radius of ponds or reservoir.

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.

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.

None identified. No soil disturbance expected.

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

See 5.2

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

NA

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.

Right-of-way will be visited during operations and late summer after contractor has completed work to determine if target vegetation was cut and treated effectively, whether desired results were achieved for riparian as well as non-riparian areas and if mitigation measures were appropriately utilized and effective.

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

NA

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".

NA

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

NA