DATE: July 21, 2005

REPLY TO ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Watershed Management Program EIS (DOE/EIS-0265/SA-216)

TO: Ms. Dorie Welch
Fish and Wildlife Project Manager, KEWU-4

Proposed Action: Grande Ronde Model Watershed—Wallowa Canyonlands Weed Removal

Project No: 1992-026-01

Watershed Management Techniques or Actions Addressed Under This Supplement Analysis (See App. A of the Watershed Management Program EIS):
- 2.7 Avoid exotic species;
- 2.10 Biological vegetation control;
- 2.11 Hand pulling;
- 3.1 Plant/protect vegetative/conservation cover;
- 3.30 Apply herbicides/pesticides selectively.

Location: Lower Grande Ronde River, Lower Joseph Creek, Snake River, and Lower Imnaha River, Wallowa County, OR

Proposed by: Bonneville Power Administration (BPA), The Grande Ronde Model Watershed Program (GRMWP), and Wallowa Resources.

Description of the Proposed Action: BPA, in cooperation with GRMWP and Wallowa Resources, proposes to fund a noxious weed control project in the canyon lands within and around the north and east sides of Wallowa County, OR. The project is designed to implement early detection for high priority weed species in the highest risk sites within the project area. Specific activities include:
- Upland weed inventory/assessment;
- Riparian weed inventory/assessment;
- Biocontrol assessment;
- Biological, chemical, and mechanical vegetation control in high priority areas; and
- Grass seed revegetation.

Analysis: This project is in support of a regional effort to maintain and protect the native plant communities of the canyon lands from noxious weed invasion. The project will protect long-term water quality across the four different watersheds. Noxious weeds, most of which have shallow root systems, have been found to degrade water quality by contributing to increased sedimentation rates and diminished riparian structure and function.

The compliance checklist for this project was completed by Coby Menton, GRMWP, and meets the standards and guidelines for the Watershed Management Program Environmental Impact Statement (EIS) and Record of Decision (ROD).
The Endangered Species Act listed species in the proposed project area include: Canada lynx, bald eagle, bull trout, Howell’s spectacular thelypody, MacFarlane’s four-o’clock, Spalding’s campion, Snake River Basin steelhead, and Snake River spring, summer and fall chinook salmon. In January 2002, USFWS issued a Biological Opinion (BO) for Formal Section 7 Consultation for the BLM’s Vale District Integrated Noxious Weed Management Program: 2001 to 2010. All proposed actions and affiliated environmental impacts are discussed in the BO. In August 2003, NOAA issued a Habitat Improvement Program BO (HIP BO). Proposed activities and the impacts of herbicide usage and noxious weed control are discussed in the HIP BO. All terms and conditions, as outlined by the USFWS Noxious Weed Management Program BO and NOAA’s HIP BO must be strictly adhered to.

Herbicide treatments will be limited to those areas and herbicides approved on the HIP BO Proposed Herbicide Application (see attached). See Section 1.2.9.3 for terms, conditions, and reporting requirements that must be strictly adhered to. Because specific areas of treatment are unknown until site inventories are conducted, detailed mapping of affected and treated areas is mandatory and as per the requirements of the HIP BO and reporting will be required. Treatments will also be conducted in consultation with the staff of Oregon Department of Agriculture, Weed Control Department.

All proposed activities occur on previously disturbed grazing or agricultural land. No ground-breaking activities are proposed and therefore no cultural resource surveys or consultations, as outlined by Section 106 of the National Historic Preservation Act, are required. However, in the very unlikely circumstance that suspected cultural or historic properties are found, all work must cease in the surrounding area and a BPA archaeologist will be notified immediately.

The Wallowa Canyonlands Weed Removal project has been discussed at various GRMWP meetings, which are open to the public and advertised on the radio and in the local newspaper. The project was reviewed, ranked as high priority, and approved by the GRMWP Technical Committee and Board of Directors, which include the Oregon Department of Fish and Wildlife, Tribes and local government representatives. As educational outreach, project information and results of the inventory will be made public via a GRMWP database available on the Internet. A newspaper article mentioning the noxious weed control efforts was written in the Wallowa County Chieftain in July 2005. This overall noxious weed control effort, the project included, is part of a regional partnership between Oregon, Idaho, and Washington; Local, State, and Federal agencies; private landowners and Tribes. Extensive monitoring, inventory and mapping will occur on a continual and cooperative basis.
**Findings:** The project is generally consistent with the Northwest Power Planning Council’s Fish and Wildlife Program, as well as BPA’s Watershed Management Program EIS (DOE/EIS-0265) and ROD. This Supplement Analysis finds that: 1) implementing the proposed action will not result in any substantial changes to the Watershed Management Program that are relevant to environmental concerns; and 2) there are no significant new circumstances or information relevant to environmental concerns and bearing on the Watershed Management Program or its impacts. Therefore, no further NEPA documentation is required.

/s/ Kelly Mason 7-21-05  
Kelly Mason  
Environmental Specialist – KEC-4

CONCUR:

/s/ Kathy Pierce  
DATE: 7-21-05  
Kathy Pierce  
NEPA Compliance Officer – KEC-4

**Attachments:**  
SA checklist  
2005 HIP BO herbicide application

cc: (w/o attachments)  
Mr. Mark Porter - Wallowa Resources  
Mr. Coby Menton - GRMWP