

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: May 23, 2006

REPLY TO
ATTN OF: KEC-4

SUBJECT: Supplement Analysis, for the Iskuulpa Watershed Project, to the Watershed Management Program EIS (DOE/EIS-0265/SA-262)

TO: Sabrina Keen - KEWU-4
Fish and Wildlife Project Manager

Proposed Action: Continuation of the Iskuulpa Watershed Project Operation and Maintenance, and Monitoring and Evaluation for FY06-07

Project No: 1995-060-01

Available Management Techniques or Actions Addressed Under This Supplement Analysis (See App. A of the Watershed Management Program EIS): 2.9 Vegetation Treatment-Mechanical Vegetation Removal; 2.11 Vegetation Treatment-Hand Pulling; and 8.13 Forest Management-Stand Thinning.

Location: Iskuulpa Watershed, Umatilla County, OR

Proposed by: Bonneville Power Administration (BPA), and the Confederated Tribes of the Umatilla Indian Reservation of Oregon (CTUIRO)

Description of the Proposed Action: BPA is proposing to continue to fund the CTUIRO to implement projects within the Iskuulpa Creek watershed that would mitigate for effects to fish and wildlife. This review is to ensure that project activities continue to be consistent with the Watershed Management Program Environmental Impact Statement (EIS), and that there continues to be no effects on endangered species or cultural resources. The CTUIRO proposes to continue operations, maintenance, monitoring, evaluation, and adaptive management activities related to improving fish and wildlife habitat within the Iskuulpa watershed. Activities include: 1) improve forest health in the uplands; and 2) control and reduce infestation of non-native vegetation in riparian zones.

Analysis: The Watershed Management Program compliance checklist for 2006-2007 projects was completed and signed on 04/17/2006 by Ms. Jenny Barnett, CTUIRO Wildlife Biologist (attached). Activities will include an expanded vegetation management plan to control Himalayan blackberry and noxious weeds with the use of physical control and herbicides. CTUIRO proposes to control blackberry on approximately 10 acres, but work is anticipated to continue in future years over additional acreage. The upstream-most portion of the infested area is targeted for control in 2006.

The Bradley Method will be used to prioritize areas for treatment. The primary control method will be mechanical, with chemical follow-up on re-sprouting vegetation. It is proposed that blackberry be hand-pulled, cut with clippers or weed eaters, or pulled out of the soil with a mechanical arm attached to a bob-cat. Proposed chemical treatment could include wicking, wiping or spraying freshly cut stumps, spot spray of resprouting suckers following mechanical removal, or foliar spot-spray of denser clumps. ATV or back-pack mounted sprayers would be used for spot-spraying. No aerial spraying will be used.

Hand pulling and clipping are proposed to be conducted anytime of the year, but mechanical control, using a bob-cat with a mechanical-arm attachment, would occur in the summer or fall only. Selection and use of herbicides will follow the guidelines and buffer widths identified in BPA's Habitat Improvement Program Biological Opinion (NOAA 2003). Only triclopyr and aquatic formulations of glyphosate are being proposed for use on Iskuulpa. Wiping or wicking to cut blackberry stumps are the only applications that would occur within 15 feet of the Iskuulpa Creek streambed; spot-spraying would not be conducted within 15 feet of the Iskuulpa Creek streambed. In order to identify the sprayed areas, an aquatic formulation of the dye "dynamark" would be added to the herbicide tank mix. Chemicals will be applied only when wind speeds are less than five miles per hour. No direct spraying of chemicals into the water column will be conducted. For noxious weeds, routine search patrols of roads and recreational areas will be initiated. When weeds are located, the location will be documented using a global positioning device, and the weeds will be pulled out by hand. The diffuse knapweed patch is proposed to be hand-pulled, using a volunteer labor crew to lessen the risk of increased sedimentation. Successful control and adaptive management implementations will be monitored by repeating blackberry and noxious weed surveys, establishing permanent photographic points, and by mapping vegetative conditions.

In the uplands, activities will include thinning approximately 80 acres of timber in a pre-commercial thinning operation in ponderosa pine forest type. Forty acres will be thinned in 2006, and forty acres will be thinned in 2008. The proposed sites are located along the Telephone Ridge Road. No new roads will be constructed. The goals of the project are to decrease tree competition and improve vigor, and to reduce the potential of damage from wildfire, pests, and moisture stress. Project objectives are to achieve a desired stocking rate of 200 trees per acre which will require the removal of approximately 300 trees per acre. Thinning will focus on saplings and small pole sized trees less than 6 inches in diameter at breast height. Shrubs and hardwoods would be protected. Trees would be cut with a chainsaw or by hand. Slash would be lopped to a minimum of four foot lengths, and scattered. Stumps would be flush-cut at the ground surface. Timber thinning will occur between August 1 and February 1 to minimize potential insect damage. A no-cut zone will be maintained adjacent to roads, to protect visual screens and hiding cover. No-cut zones will be a minimum of 200 feet wide, from the edge of the road to the thinning unit boundary.

Opportunities will be provided for local contractors to bid on the timber thinning contract. For the proposed activities, all materials when available will be purchased locally. Appropriate best management practices will be implemented.

Pursuant to its obligations under the Endangered Species Act (ESA), an updated species list (attached) for Umatilla County, Oregon, was obtained. Bull trout critical habitat for the Umatilla River, which Iskuulpa Creek is a tributary, was an addition to the list. A biological assessment (BA) was submitted to USFWS on April 13, 2006, initiating informal Section 7 consultation. ESA listed species considered in the BA include: bull trout (*Salvelinus confluentus*), grey wolf (*Canis lupis*), Canada lynx (*Lynx canadensis*), bald eagle (*Haliaeetus leucocephalus*), and bull trout critical habitat. Candidate species considered in the BA include: yellow-billed cuckoo (*Coccyzus americanus*), Columbia spotted frog (*Rana luteiventris*), and Washington ground squirrel (*Spermophilus washingtoni*). A Letter of Concurrence was received from USFWS on May 16, 2006 (attached). USFWS concurs with BPA's determinations that the proposed Iskuulpa Creek Watershed Project will have a may affect, not likely to adversely affect determination for bull trout, and for bull trout critical habitat. USFWS notes the may affect, not likely to adversely affect determination made by BPA for the Columbia spotted frog in association with this proposed project. A no effect determination for grey wolf, bald eagle, and Canada lynx is outlined in the BA, as are the details determining a no significant impact to yellow-billed cuckoo, and Washington ground squirrel.

Summer steelhead are located with in the project area. The Habitat Improvement Program Biological Opinion Form 1 (attached) was completed which puts terms and conditions on project activities. There is no expected loss of eggs, fry, adults, or spawning habitat from project activities. The short-term impacts to riparian vegetation will be balanced by long-term benefits of allowing native vegetation to re-establish along Iskuulpa Creek. As management activities proceed in the future, BPA will annually re-assess potential effects of planned activities on listed species.

BPA initiated Section 106 consultation with the CTUIRO Tribal Historic Preservation Officer on February 06, 2006 (attached). Additional information was sent on February 22, 2006, providing more concise maps. The project area is located wholly within CTUIRO lands. The CTUIRO cultural resources program will determine if the project will have an effect on cultural or historic resources, prior to the implementation of any ground disturbing activities. This review will include a literature search and a field survey by a qualified Tribal cultural resource specialist. If cultural deposits are found during any phase of the proposed project, or if the nature of the undertaking changes, ground-disturbing work will cease and a cultural resource specialist will be contacted immediately.

Public involvement is coordinated through tribal government resources. Road closure signs are signed by a tribal government representative, and posted at road closure sites. Contact telephone numbers are provided on the signs should the public require additional information. Public use of the area is advertised through the CTUIRO hunting tag program.

Standard protection measures for activities in or near streams and wetlands will be followed during the implementation of the Project.

The necessary permit approvals for this project either have been obtained or are in the process of being obtained. U.S. Army Corps of Engineer's Regional permit for large woody debris additions into Iskuulpa Creek have been obtained and are current. A stream zone alteration permit from CTUIR for proposed work has been applied for by Ms. Barnett. The HIP BO non-

discretionary terms and conditions include mitigation measures for construction activities. Work is not authorized to begin until the applicant has obtained all required permits and approvals.

Findings: The project is generally consistent with the Northwest Power and Conservation 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 actions 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 BPA's Watershed Management Program EIS or its impacts. Therefore, no further NEPA documentation is required.

/s/ Sandra Ackley

Sandra Ackley

Fish and Wildlife Biologist – KEC-4

CONCUR:

/s/ Katherine S. Pierce

Katherine S. Pierce

NEPA Compliance Officer

DATE: May 23, 2006

Attachments:

NEPA Compliance Checklist for Watershed management Projects, 04/17/2006

USFWS Species List

USFWS 06-1507/ 8330.01064(06) Letter of Concurrence, 05/16/2006

HIP BO Form 1 04/20/2006

HIP BO Approval Terms and Conditions, 04/12/2006

HIP BO Authorization Letter from BPA to J.Barnett, 04/20/2006

Section 106 Cultural Resource Consultation Request Letter, 02/06/2006

cc (w/ attachments)

Ms. Jenny Barnett, Wildlife Biologist, Confederated Tribes of the Warm Springs Reservation of Oregon