DATE: March 22, 2002

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-52)

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

Proposed Action: Vegetation Management on the Ashe-Marion #2 (138/1-150/2), Buckley-Marion (12/1-24/2), McNary-Santiam (109/1-119/3), and John Day-Marion (49/4-50/5) Transmission Line Corridors.

Location: The project area lies between Maupin and Pine Grove Oregon, and is in the Redmond Region. The project area begins at on the Ashe-Marion at structure 138/1 and terminates at Wapinitia Road, Pine Grove.

Proposed by: Bonneville Power Administration.

Description of the Proposed Action: BPA proposes to clear unwanted vegetation from the rights of way and access roads on approximately 12 miles (374 acres) on the Ashe-Marion and John Day-Marion transmission lines beginning April 2002, and ending July 2002.

Analysis: A Checklist (see attached) was completed for this project in accordance to the requirements identified in the Bonneville Power Administrations Transmission System Vegetation Management Program FEIS (DOE/EIS-0285). The Checklist evaluated the following areas:

- Description of right-of-way and vegetation management needed
- Vegetation to be controlled
- Surrounding land use and landowner
- Natural Resource
- Vegetation control methods
- Debris disposal.
- Monitoring
- Appropriate environmental documentation

In preparation of this Supplement Analysis, the Checklist was reviewed. Specific information regarding the areas as identified above are described the attached checklist.
**Finding:** 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/ Frederick J. Walasavage  
Frederick J. Walasavage  
Environmental Protection Specialist – KEP

CONCUR: /s/ Thomas C. McKinney  
Thomas C. McKinney  
NEPA Compliance Officer  
DATE: 03/26/02

Attachment
1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

<table>
<thead>
<tr>
<th>Corridor Name</th>
<th>Corridor Length &amp; kV</th>
<th>Easement width</th>
<th>Miles of Treatment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ashe-Marion #2 (138/1-150/2)</td>
<td>75 miles – 500kV</td>
<td>250 for TL corridor until McN-Sant exits row. Treatment width chgs to 150’ wide.</td>
<td>12</td>
</tr>
<tr>
<td>Buckley-Marion (12/1-24/2)</td>
<td>24 miles – 500kV</td>
<td>12</td>
<td>12</td>
</tr>
<tr>
<td>McNary-Santiam (109/1-119/3)</td>
<td>101 miles – 230kV</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>John Day-Marion (49/4-50/5)</td>
<td>57 miles – 500kV</td>
<td>160</td>
<td>1</td>
</tr>
</tbody>
</table>


- Right-of-Way – clearing in right-of-way
- Transmission Structures – clearing around
- Access Road clearing - approximate miles – 12 miles
  Work to commence April 2002 and completed by July 2002.

Rights-of-way Requirements
- Control all tall-growing species that are now or would be a hazard to the line.
- Cut stumps are not to be taller than 4 – 6 in.
- Control all tree and brush species within about 50 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 in. Pull all debris and slash out of the 50-ft. area around transmission structures.

1.2 Describe the vegetation needing management.

Tall growing pine, juniper, and hardwoods. Density is low-medium. Access roads & structures need treatment. No treatment of noxious weeds to occur at this time.

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 — Promoting Low-Growing Plant Communities for requirements and checkboxes.

Promoting Low Growing Plants. Bonneville’s overall goal is to have low-growing plant communities along the rights-of-way to control the development of potentially threatening vegetation. In some areas this is not possible.

- 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.
- 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 – This project is a maintenance entry. Vegetation will be cut with chain saws & mowers.

Subsequent entry’s – Every 8-10 yrs., the row will need to be manually/mechanically cut.

Future cycles - Same as subsequent entry.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

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

☒ Rural – Notification letter will be sent 2 weeks prior to commencement of operations.

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 2.1

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.

Land owned by private individuals. No FS, BLM, state, county or Tribal lands within this portion of row.

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.

No tree or agricultural agreements with landowners. Recently planted fields within row will be skipped over to avoid disturbance.

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.

None known at this time.
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.

Warm Springs Confederated Tribes - Notification letter will be sent 3/18/02.

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.

General requirements:

- Leave vegetation intact, where possible.
- 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.
- 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.

☐ Ashe Marion Corridor

<table>
<thead>
<tr>
<th>Span</th>
<th>Waterbody</th>
<th>T&amp;E?</th>
<th>Method</th>
<th>Herbicide</th>
<th>Application Technique</th>
<th>Buffer</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>139/3 +600</td>
<td>139/4 +100</td>
<td>Intermittent Crs.</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>NA</td>
<td>35' Both sides – No machinery to operate w/in zone. Where possible, maintain 50' clearance from treetops to conductor.</td>
</tr>
<tr>
<td>139/4 +600</td>
<td>139/4 +670</td>
<td>Intermittent Cr.</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>NA</td>
<td>35' Both sides – No machinery to operate w/in zone. Where possible, maintain 50' clearance from treetops to conductor.</td>
</tr>
<tr>
<td>139/5 +700</td>
<td>139/5 +770</td>
<td>Intermittent Cr.</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>NA</td>
<td>35' Both sides – No machinery to operate w/in zone. Where possible, maintain 50' clearance from treetops to conductor.</td>
</tr>
<tr>
<td>Span From</td>
<td>Span To</td>
<td>Waterbody</td>
<td>T&amp;E?</td>
<td>Method</td>
<td>Herbicide</td>
<td>Application Technique</td>
<td>Buffer</td>
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</tr>
<tr>
<td>140/1</td>
<td>+200</td>
<td>140/1 +270</td>
<td></td>
<td></td>
<td>NA</td>
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<tr>
<td></td>
<td></td>
<td>Intermittent Cr.</td>
<td></td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate w/in zone.</td>
<td></td>
</tr>
<tr>
<td>141/5</td>
<td>+150</td>
<td>141/5 +220</td>
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<td></td>
<td>NA</td>
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<tr>
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<td></td>
<td>Intermittent Cr.</td>
<td></td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate w/in zone.</td>
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</tr>
<tr>
<td>143/2</td>
<td>+850</td>
<td>143/2 +920</td>
<td></td>
<td></td>
<td>NA</td>
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<tr>
<td></td>
<td></td>
<td>Intermittent Cr.</td>
<td></td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate w/in zone.</td>
<td></td>
</tr>
<tr>
<td>145/3</td>
<td>+600</td>
<td>145/3 +870</td>
<td></td>
<td></td>
<td>NA</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Intermittent Cr.</td>
<td></td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate w/in zone.</td>
<td></td>
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<tr>
<td>146/1</td>
<td>+550</td>
<td>146/2 +300</td>
<td>Yes</td>
<td></td>
<td>NA</td>
<td>150’ Both sides – No machinery. Rimrock canyon.</td>
<td></td>
</tr>
<tr>
<td>146/2</td>
<td>+500</td>
<td>146/3 +300</td>
<td>Yes</td>
<td></td>
<td>NA</td>
<td>200’ Both sides – No machinery. Rimrock canyon.</td>
<td></td>
</tr>
<tr>
<td>146/3</td>
<td>+800</td>
<td>146/4 +300</td>
<td></td>
<td></td>
<td>NA</td>
<td>100’ Both sides – No machinery. Rimrock canyon.</td>
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</tr>
<tr>
<td>147/2</td>
<td>+350</td>
<td>147/2 +420</td>
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<td>35’ Both sides – No machinery to operate w/in zone.</td>
<td></td>
</tr>
<tr>
<td>147/3</td>
<td>+550</td>
<td>147/3 +620</td>
<td></td>
<td></td>
<td>NA</td>
<td>35’ Both sides – No machinery to operate w/in zone.</td>
<td></td>
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<tr>
<td>147/5</td>
<td>+50</td>
<td>147/5 +120</td>
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<td></td>
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<td>35’ Both sides – No machinery to operate w/in zone.</td>
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<tr>
<td>148/1</td>
<td>+550</td>
<td>148/1 +620</td>
<td></td>
<td></td>
<td>NA</td>
<td>35’ Both sides – No machinery to operate w/in zone.</td>
<td></td>
</tr>
<tr>
<td>Span From</td>
<td>Waterbody From</td>
<td>T&amp;E?</td>
<td>Method</td>
<td>Herbicide</td>
<td>Application Technique</td>
<td>Buffer</td>
<td>Other</td>
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</tr>
<tr>
<td>148/3</td>
<td>148/3</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate on slopes &gt;20%.</td>
<td>&gt;110’ from grd to conductor. Select cut only trees w/tops within 50’ of conductor.</td>
<td></td>
</tr>
<tr>
<td>+450</td>
<td>+520</td>
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<td></td>
</tr>
<tr>
<td>148/4</td>
<td>148/4</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate on slopes &gt;20%.</td>
<td>Where possible, maintain 50’ clearance from treetops to conductor.</td>
<td></td>
</tr>
<tr>
<td>+550</td>
<td>+620</td>
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<tr>
<td>149/1</td>
<td>149/1</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate on slopes &gt;20%.</td>
<td>Where possible, maintain 50’ clearance from treetops to conductor.</td>
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<tr>
<td>+750</td>
<td>+820</td>
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<tr>
<td>149/2</td>
<td>149/2</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate on slopes &gt;20%.</td>
<td>&gt;110’ from grd to conductor. Select cut only trees w/tops within 50’ of conductor.</td>
<td></td>
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<tr>
<td>+800</td>
<td>+870</td>
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</tr>
<tr>
<td>149/3</td>
<td>149/3</td>
<td>No</td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate on slopes &gt;20%.</td>
<td>&gt;110’ from grd to conductor. Select cut only trees w/tops within 50’ of conductor.</td>
<td></td>
</tr>
<tr>
<td>+350</td>
<td>+420</td>
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<td></td>
</tr>
<tr>
<td>150/1</td>
<td>150/1</td>
<td>Yes</td>
<td>Hand cut</td>
<td>None</td>
<td>35' Both sides – No machinery to operate on slopes &gt;20%.</td>
<td>Where possible, maintain 50’ clearance from treetops to conductor.</td>
<td></td>
</tr>
<tr>
<td>+850</td>
<td>+920</td>
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</tr>
</tbody>
</table>

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 identified or known at this time. No herbicides planned for this treatment.
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.

- None identified or known at this time.

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

See Handbook — Protecting Other Species for requirements.

- None identified or known at this time.

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


- None identified or known at this time.

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

See Handbook – Cultural Resources for requirements.

- None identified. Plan to contact Warm Springs Confederated Tribes 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.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.


- Do not use ground (soil)-disturbing mechanical equipment to clear on slopes over 20%.
- Perform mechanical clearing when the ground is dry enough to sustain heavy equipment.

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

See Handbook – Spanned Canyons for requirements.

- Avoid removing vegetation where it will not grow-up into the safety zones of the transmission line.

- Ashe Marion Corridor

<table>
<thead>
<tr>
<th>Span</th>
<th>Methods, cutting</th>
</tr>
</thead>
<tbody>
<tr>
<td>From</td>
<td>To</td>
</tr>
<tr>
<td>146/1+550</td>
<td>146/2-300 (Conductor height is &gt;110’. Only individual trees whose tops are within 50’ of conductor will be hand cut.)</td>
</tr>
<tr>
<td>146/2+500</td>
<td>146/3-300 (Conductor height is &gt;130’. Only individual trees whose tops are within 50’ of conductor will be hand cut.)</td>
</tr>
</tbody>
</table>

02/27/01 6
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, Herbicides for requirements for each of the methods.

Hand cutting and mowing are the only methods prescribed.

General:

- 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.
- Cut conifers below the lowest live limb to eliminate the continued growth of lateral branches.
- 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.

<table>
<thead>
<tr>
<th>Span</th>
<th>Methods, cutting</th>
</tr>
</thead>
<tbody>
<tr>
<td>From</td>
<td>To</td>
</tr>
<tr>
<td>146/3 +800</td>
<td>146/4</td>
</tr>
<tr>
<td>148/3 +450</td>
<td>148/4 - 1000</td>
</tr>
<tr>
<td>149/2 +800</td>
<td>149/3 - 300</td>
</tr>
<tr>
<td>149/3 +350</td>
<td>149/4 - 700</td>
</tr>
</tbody>
</table>
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 debris with mower.

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

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

NA

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 late summer 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. ROW mgmt plan will be developed from this review and implemented next cutting cycle.

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

None