memorandum

Bonneville Power Administration

DATE: April 29, 2003

REPLY TO ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-146-Custer-Ingledow No.1&2

то: Don Atkinson Natural Resource Specialist - TFN/Snohomish

Proposed Action: Vegetation Management for portion of the Custer-Ingledow No.1&2 500 kV transmission line located from tower structure 1/4 to 9/6.

Location: Project location is in BPA Snohomish Region in Whatcom County, Washington.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to clear targeted vegetation within the Right-of-Ways along access roads and around towers that may impede the operation and maintenance of the subject transmission lines. See Section 1.4 of the attached checklists for a complete description of the proposed action.

<u>Analysis</u>: 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.

Work will take place along the Custer-Ingledow No.1&2 500 kV transmission line. The project area includes the BPA right-of-way between towers 1/1 and 9/6 with an easement width from 125 to 700 feet. The ROW is located in Whatcom County, Washington in the BPA Snohomish Region.

Tall growing vegetation of the types listed in Section 1.2 of the attached checklist are present in the ROW and will soon pose a hazard to the lines. Project involves clearing tall growing vegetation and treatment of the associated stumps and re-spouts with approved herbicides to ensure that the roots are killed.

Vegetation on access roads and around tower sites that impede the operation and maintenance of the transmission line will also be cleared and/or treated.

Cut-stump or follow-up spot herbicide treatments on species that re-sprout will be carried out to ensure that the roots are killed (follow-up treatment may take place during the next growing season).

Herbicides will not be applied using high volume methods to ensure that non-target species are not treated.

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

The project area consists of rural residential, farms (including blueberry farms), grazing lands, private lands and many private landowners.

Letters will be sent or personal contact made with landowners before and during the project. Door hangers may also be used to notify landowners of project work. The prescription/cut sheets will be modified as needed based on any input received during the project. See Section 2.4 of the attached checklist for existing landowner agreements.

A letter was sent to the Lummi Nation to determine the potential presence of traditional-use plants or other cultural resources and to determine the desired level of 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 cut sheets.

3. Identify natural resources and any mitigation.

Section 3 of the attached checklist identifies the natural resources present in the area of the proposed work. The following cites resources found along with applicable mitigation measures:

Riparian Habitat:

Includes all wetlands, streams, creeks and ponds meeting the definition of riparian habitat. Riparian areas were identified which may include essential fish habitat. See Section 3.1 of the attached checklist for a complete listing of identified water resources.

Riparian Habitat Mitigation:

- No herbicides will be used within 200 feet of the stream or wetland. Vegetation control methods may include all manual, some mechanical, and biological treatments, except grazing.
- On slopes less than 20% no ground disturbing mechanical equipment will be used within 35 feet of the stream or wetland. On slopes greater than 20% no ground disturbing mechanical equipment will be used within 200 feet of the stream or wetland.

Irrigation Source, Wells, or Springs:

Includes water sources, springs, wells and other sensitive lands within 100 feet of sensitive riparian areas or water sources. See Section 3.2 of the attached checklist for a complete listing.

Irrigation Source, Wells, or Springs Mitigation:

• No herbicides will be used within 100 feet of irrigation sources, wells, or springs. Only herbicides that do not have a ground or surface water advisory will be used between 100 and 165 feet of wellhead. Approved herbicides include: glyphosate, imazapyr, tryclopyr, and Escort.

T & E Species / Essential Fish Habitat:

Section 3.3 of the attached checklist presents any Threatened or Endangered Species identified in the area of the proposed work. Review of the software application TVIEW indicates the ROW crosses streams containing listed anadromous fish. No terrestrial T&E species were identified.

T & E Species / Essential Fish Habitat Mitigation:

• No herbicides will be applied within 400 feet of the waters edge of any T&E or Essential Fish Habitat listed water bodies. On slopes less than 20%, there will be no disturbance with 35 feet of the stream or water source. On slopes greater than 20%, there will be no disturbance within 400 feet of the stream or water source. By following these mitigation measures, the proposed work will have no effect on listed anadromous fish or their essential habitat.

Cultural Resources: There are no known Cultural Resources within the project area. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the local tribe will be contacted as well as the BPA Environmental Specialist.

Steep Slope: See Section 3.7 of the attached checklist for areas having a steep slope requiring vegetation management. Manual, herbicide, and biological treatments are available for treatment on BPA fee-owned, State DNR, or private land. Ground disturbing mechanical equipment is not allowed to clear on slopes greater than 20% except for treatment on access roads and around structures.

4. Determine vegetation control and debris disposal methods.

Vegetation will be removed using manual, mechanical, and chemical methods.

Manual control methods include cutting with shears, clippers, or chainsaws; and girdling by cutting a ring around the tree. Chainsaws will be used to cut conifers below the lowest live limb to eliminate continued growth of the lateral branches.

Mechanical methods include the use of brush mowers and feller bunchers. Ground-disturbing mechanical equipment will not be used on slopes over 20% or in riparian areas. Work will be done when the ground is sufficiently dry enough to sustain heavy equipment and minimize excessive rutting.

The herbicide treatments prescribed for the project area are spot stump treatment, localized basal treatment, and localized foliar treatment. Where possible the deciduous stumps will be treated to prevent resprouting. If the stumps cannot be treated during the project, a localized foliar treatment will be performed the next growing season. A localized basal treatment will be used in areas where the trees are less than 6 feet tall and the density is light.

The following herbicides are proposed for the work: Glyphosate, triclopyr (Garlon 3A and 4), imazapyr, and dicamba may be prescribed for cut-stump, stem-injection and basal-stem treatments. Escort and clopyralid may be used for spot foliar and broadcast treatments. 2,4-d amine may be used to control noxious weed species.

Debris will either be disposed on-site or trucked off-site using either chip, lop and scatter, or mulch techniques as described in Section 5 of the attached checklist.

5. Determine revegetation methods, if necessary.

No ground disturbance or exposed soil is expected during the duration of this project. However, if soil disturbance occurs during the project, the area will be reseeded.

6. Determine monitoring needs.

The project area will be inspected during treatment. In addition, it will be reviewed during routine patrols by the line crew and within one year by the NRS.

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. This Supplement Analysis also finds the proposed actions will have no effect on threatened or endangered species. Therefore, no further NEPA or ESA documentation is required.

<u>/s/ Aaron Shurtliff</u> Aaron Shurtliff Physical Scientist – KEPR-4

CONCUR:<u>/s/ Thomas C. McKinney</u> Thomas C. McKinney NEPA Compliance Officer DATE:05/02/2003

Attachment

cc: L. Croff – KEC-4 T. McKinney – KEC-4 C. Leiter – KEP-4 J. Meyer – KEP-4 M. Martin – KEPR/Covington P. Key – LC-7 D. Hollen – TF/DOB-1 A. De La Cruz – TFN/Snohomish L. Alvarez – TFN/Snohomish R. Sweet – TFNF/Snohomish Environmental File – KEC-4 Official File – KEP-4 (EQ-14)

Ashurtliff:as:4722:4/14/2003 (KEP-KEPR-4-W:\EP\2002 & 2003 FILES\EQ\EQ-14\FEIS-0285-SA-146-Custer-Ingledow River.doc)

Vegetation Management Checklist

Custer - Ingledow No.1 1/4 to 9/6 mile Custer - Ingledow No.2 1/4 to 9/6 mile

Prepared By: Don Atkinson

Natural Resource Specialist March 24, 2003

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

See Handbook — <u>List of Right-of-way Components</u> for checkboxes and the requirements for the components <u>Rights-of-way</u>, <u>Access Roads</u>, <u>Switch Platforms</u>, <u>Danger Trees</u>, and <u>Microwave Beam</u> <u>paths</u>.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Custer – Ingledow No. 1&2 No.1	1/4 to 9/6 500kv	125' to 700'	Approx. 9 miles

Right Of Way:

<u>Right-Of-Way</u> – Clearing trees and brush within the right-of-way and treating with herbicides. The right-of-way will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. Herbicide treatments will include spot treatment (stump treatment, basal treatment, and/or spot foliar), or localized treatments (including broadcast application and cut stubble treatments). The total project area consists of approximately 260.9 acres. It is estimated that approximately 238 acres of the project area will be cut.

<u>Access Road Clearing</u> – Approximately 9 miles of clearing using selective and nonselective methods that include hand cutting, mowing and herbicide treatments. Note, when the access roads traverse a riparian area they will not be treated with herbicides.

<u>**Transmission Structures</u>** – Approximately 85 tower sites will be treated using selective and non-selective methods that include hand cutting, mowing and herbicide treatments. The herbicide treatments include spot (cut stump or basal treatment), localized and broadcast applications including cut stubble treatments. Structures located within riparian areas will not be treated with herbicides. **Clearing Requirements:**</u>

<u>Reclaim ("C") Trees</u> – C trees will be cut as part of this project.

Danger Trees (off right-of-way): – All off-right-of-way trees (danger trees) that are marked as potentially unstable, or trees that are identified during the project, that would fall within the minimum approach distance (MAD) or into the safety zone of the power line, may be cut as part of this project. Danger trees may be treated with herbicides to prevent resprouting.

1.2 Describe the vegetation needing management.

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

Vegetation Types: Western Red Cedar Douglas fir Grand fir Hemlock Alder Willows – mid span or where ground to conductor clearance is low Cottonwoods Wild Cherry **Scotchbroom** – along access roads and around structures or mid span where ground to conductor clearance is low

Blackberries - along access roads and around structures or mid span where ground to conductor clearance is low

Density:

The density is variable through the project and ranges from Low (50 stems or less per acre) to as High (250 + stems per acre).

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.

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.

Cut-stump or follow-up spot herbicide treatments on species that re-sprout will be carried out to ensure that the roots are killed (follow-up treatment may take place during the next growing season). Herbicides will not be applied using high volume methods to ensure that non-target species are not treated.

1.4 Describe overall management scheme/schedule.

See Handbook - Overall Management Scheme/Schedule.

Description of the Proposed Action: The project consists of clearing unwanted vegetation within the right-of-way, around structures, and along access roads that may impede the operation and maintenance of the subject transmission line. All work will be in accordance with the National Electrical Safety Code and BPA standards.

It is the goal of this project to remove the tall growing vegetation that is currently or will soon be a hazard to the transmission line. The overall goal is to develop low-growing plant communities within the right-of-way.

Initial entry – Using hand cutting or mechanical mowers, BPA will complete brush management activities on the right-of-way, access roads and towers sites, chemically treat stumps and stubbles with herbicides (spot and localized treatments) to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines. Areas may be replanted or re-seeded with low-growing vegetation or grasses if there is limited vegetation for re-establishment of the site. Cut, lop and scatter, and stump treatment (where possible to prevent resprouting) are the preferred methods on State and Private lands. Areas where densities are high, or that have a lot of Scotch Broom and /or blackberries will be mowed using a track mounted mowing head. Access roads and structure sites will also be mowed and chemically treated.

<u>Subsequent entries</u> – Follow-up/re-treatment, within the right-of-way, around structure sites, and along access roads, is planned within the next growing season. This will be done with herbicides in areas that were not treated due to adverse weather conditions, there was not a good kill, or that were not treated in the initial entry.

Future cycles – This area is being managed on a 3 to 5 year maintenance free cycle for brush and danger trees. During routine patrol, the right-of-way will be examined for tall growing trees on the right-of-way and danger trees (DT's) off the right-of-way. The overall vegetation management scheme will be to cut and treat all encumbering vegetation on the right-of-way using a combination of manual, mechanical and herbicide treatments as outlined in the initial treatment every 3 to 5 years.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor. See Handbook — <u>Landowners/Managers/Uses</u> for requirements, and <u>List of</u> <u>Landowners/Managers/Uses</u> for a checkbox list.

The project area consists of rural residential, farms (including blueberry farms), grazing lands, private lands and many private landowners.

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.

Letters or personal contact by BPA and/or the contractor along with door hangers. This will be done before and during the project. The prescription/cut sheets will be modified as needed based on any input received during the project.

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 — <u>Requirements and Guidance for Various Landowners/Uses</u> for requirements and guidance, also <u>Residential/Commercial</u>, <u>Agricultural</u>, <u>Tribal Reservations</u>, <u>FS-managed lands</u>,

BLM –managed lands, Other federal lands, State/ Local Lands.

No specific landowner measures needed. Note – not all areas within the project area will be treated with herbicides. Riparian areas and areas where the landowners do not want herbicides used, will not be treated. Herbicides will also not be used in areas where there are berry farms.

2.4 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table below any provisions that need to be followed and where they are located.

See handbook — Landowner Agreements for requirements.

Span		Landowner/use	Specific measures to be applied
From	То		
1/4 +	1/6 +	Tony Moore - Tree & Brush	Landowner will maintain – Berry Fields
600	1060	Agreement	
3/3 +	3/3 +	Jeff Creasey – Tree & Brush	Landowner will maintain
620	1030	Agreement	
3/4+	3/4 +	Kendall - Tree & Brush	Landowner will maintain
300	870	Agreement	

Custer - Ingledow No. 1 & 2 (See attached maps for locations)

6/3 +	6/4 +	Robert Martin – Sensitive	No Spray Area
100	450	Landowner	
8/2 + 940	8/2 + 1000	Sensitive Landowner	No Spray Area
8/3 + 980	8/3 + 1170	Sensitive Landowner	No Spray Area
9/1 +	9/2 +	Farlin - Tree & Brush	Landowner will maintain
530	70	Agreement	
9/3 +	9/3 +	Ed Spence - Tree & Brush	Landowner will maintain
200	430	Agreement	

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 — <u>Casual Informal Use of Right-of-way</u> for requirements.

None Known

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.

Letter sent to the Lumi Tribe.

3. IDENTIFY NATURAL RESOURCES

See Handbook — <u>Natural Resources</u>

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 — <u>Water Resources</u> for requirements for working near water resources including buffer zones.

Sp	an	Waterbody	T&E?	Treatment	Herbicide	Application	Buffer	Other
From	То			Zone		Technique		
2/1 + 650	2/2 + 60	Ditch Line	No	Riparian	See below	See below	See below	
2/2 + 700	2/2 + 930	Pond	No	Riparian	See below	See below	See below	
2/3 + 530	2/3 + 990	Creek	No	Riparian	See below	See below	See below	
3/5 + 100	3/5 + 570	Pond	No	Riparian	See below	See below	See below	

Custer - Ingledow No. 1 (See attached maps for locations)

3/5 + 1000	4/1 - 590	+ Wetland	No	Riparian	See below	See below	See below	
4/4 + 00	4/4 - 120	+ Well	No	Riparian	See below	See below	See below	
5/2 + 1030	5/3 + 440	Creeks	No	Riparian	See below	See below	See below	
5/4 + 450	6/1 + 200	Creeks	Yes	Riparian T&E	See below	See below	See below	Listed Anadromous fish
6/2 + 760	6/2 + 906	Well	No	Riparian	See below	See below	See below	
7/1 + 910	7/2 + 940	Dakota Creek	Yes	Riparian T&E	See below	See below	See below	Listed Anadromous fish
8/1 + 680	8/1 + 1100		No	Riparian	See below	See below	See below	
RiparianRIPARIAN: County or private lands, within 61.0 m (200 ft.) of a stream or open w Available: all manual, some mechanical, and biological treatments, except grazing slopes less than 20% there will be no disturbance within 35ft. of the stream or weth slopes greater than 20% there will be no disturbance within the buffer.Herbicides: No herbicides within buffer zone.						zing. On		
Riparian T&ERIPARIAN SALMON: BPA, county, or private lands, within 122 m (400 ft.) of a listed salmon stream. Available: all manual, some mechanical, and biological treatments, ex grazing. On slopes less than 20% there will be no disturbance within 35ft. of the stream wetland. On slopes greater than 20% there will be no disturbance within the buffer.Herbicides: No herbicides within buffer zone.					nents, except he stream or			

Custer - Ingledow No. 2(See attached maps for locations)

Span		Waterbody	T&E?	Treatment	Herbicide	Application	Buffer	
From	То			Zone		Technique		
9/2 + 380	9/2 + 840	Creek	No	Riparian	See below	See below	See below	
9/4 +1370	9/5 +260	Pond	No	Riparian	See below	See below	See below	
Riparian	Available slopes les	RIPARIAN : County or private lands, within 61.0 m (200 ft.) of a stream or open water. Available: all manual, some mechanical, and biological treatments, except grazing. On slopes less than 20% there will be no disturbance within 35ft. of the stream or wetland. On slopes greater than 20% there will be no disturbance within the buffer.						
	Herbicides: No herbicides within buffer zone.							

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 — <u>Herbicide Use Near Irrigation, Wells or Springs</u> for buffers and herbicide restriction

Sp	an	Wells, Irrigation	Treatment Zone	Buffer					
From	То	or Springs							
4/4 +	4/4 +	Well	Non Herbicide Area	100 ft. radius around well head					
00	120								
6/2 +	6/2 +	Well	Non Herbicide Area	100 ft. radius around well head					
760	906								
NON-	NON-	NON-HERBICIDE AREAS							
HERB	Water	sources, springs, well	ls and other sensitive la	ands within 100 feet of sensitive					
	Ripari	an areas or water sour	ces. Hand Cutting Met	hods only, no Herbicides					
	allowe	allowed.							
	WELLS: No herbicides allowed within 100 feet of wellhead. Use only herbicides								
	that do not have ground or surface water advisories between 100 and 165 feet of								
	wellhe	ead. Approved herbic	ides include: glyphosat	e, imazapyr, tryclopyr, Escort,					

Custer - Ingledow No. 1 & 2 (See attached maps for locations)

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 — <u>**T&E Plant or Animal Species</u>** for requirements and determining presence.</u>

Custer - Ingledow No. 1 & 2 (See attached maps for locations)

-	an	Threatened or Endangered	Method/mitigation measures	
То	From	Plant or Animal Species		
5/4 + 450	6/1 + 200	Anadromous Fish – Creeks	See Below	
7/1 + 910	7/2 + 940	Anadromous Fish – Dakota Creek	See Below	
Riparian T&ERIPARIAN T&E: BPA, county, or private lands, within 122 m (400 ft.) of a listed salmon or bull trout stream. Available: all manual, some mechanical, a biological treatments, except grazing. No mechanical treatments except along access roads and around structures. On slopes less than 20% there will be no disturbance within 35ft. of the stream or wetland. On slopes greater than 20% there will be no disturbance within the buffer.Herbicides: No herbicide treatments allowed within the buffer zone.				

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

See Handbook — <u>Protecting Other Species</u> for requirements.

None mapped. Machines will not be used with the high water level of the creeks or within the wetlands. Shrubs along the creeks will be maintained to provide shade and debris.

3.5 List any visually sensitive areas and the measures to be taken at these areas. See Handbook — <u>Visual Sensitive Areas</u> for requirements.

None known within the project area.

3.6 List areas with cultural resources and the measures to be taken in those areas. See Handbook – <u>Cultural Resources</u> for requirements.

None known within the right-of-way.

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

See Handbook – <u>Steep/Unstable Slopes</u> for requirements. See attached maps for exact locations.

`	pan	Describe	Method/mitigation measures			
From	То	sensitivity				
5/5 + 200	5/5 + 290	Steep slope	See below			
5/5 + 1000	5/5 + 1200	Steep slope	See below			
6/1 + 920	6/1 + 1000	Steep slope	See below			
7/2 + 80	7/2 + 180	Steep slope	See below			
7/4 + 750	7/4 + 890	Steep slope	See below			
8/1 + 780	8/1 + 980	Steep slope	See below			
8/5 + 290	8/5 + 420	Steep slope	See below			
Resource	Treatment Al	ternatives				
SS	BPA Fee owned State DNR, or private lands where a steep slope or visual resources precludes mechanical treatments except on access roads and around structures. Available: all manual and biological treatments. All herbicide treatments including cut-stubble treatment following a mechanical treatment on access roads and structure sites.					
	Herbicides: glyphosate, triclopyr (Garlon 3A and 4), imazapyr, dicamba may be prescribed for cut-stump, stem-injection, and basal- stem treatments. In addition to the above herbicides, Escort, and clopyralid can be used spot foliar and broadcast treatments. 2,4-d amine can be added to the list to control noxious weed species. See Table 111-1: Buffer width to Minimize Impacts on non-target Resources. (Transmission Vegetation Management EIS)					

Custer - Ingledow No. 1 & 2 (See attached maps for locations)

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

See Handbook - Spanned Canyons for requirements.

None mapped within the project area.

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 — <u>Manual</u>, <u>Mechanical</u>, <u>Biological</u>, <u>and Herbicides</u> for requirements for each of the methods.

MANUAL: Manual control methods include the following: cutting with shears, clippers, or chainsaws; and girdling by cutting a ring around the tree. When chainsaws are used cut conifers below the lowest live limb to eliminate continued growth of the lateral branches and cut all stumps flat where possible.

MECHANICAL: Mechanical methods include the use of brush mowers and feller bunchers. Ground-disturbing mechanical equipment will not be used on slopes over 20% or in riparian areas (Refer to 3.1). Work will be done when the ground is sufficiently dry enough to sustain heavy equipment and minimize excessive rutting.

HERBICIDES: The herbicide treatments prescribed for the project area are spot stump treatment, localized basal treatment, and localized foliar treatment. Where possible the deciduous stumps will be treated to prevent resprouting. If we are unable to treat the stumps during the project, we will wait until the next growing season and do a localized foliar treatment. In areas where the trees are less than 6ft. tall and the density is light we may do a localized basal treatment.

PROPOSED HERBICIDES: Glyphosate, triclopyr (Garlon 3A and 4), imazapyr, and dicamba may be prescribed for cut-stump, stem-injection, and basal-stem treatments. In addition to the above herbicides, Escort, and clopyralid can be used for spot foliar and Broadcast treatments. 2,4-d amine may be added to the list to control Noxious weed species. See Tables 111-1: Buffer width to Minimize Impacts on non-target Resources, and 5-7: Herbicide Ecological Toxicities and Characteristics. (Transmission Vegetation Management EIS).

SEE CUT SHEET FOR CONTROL METHODS

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations. See Handbook — <u>Debris disposal</u> for a checkbox list and requirements.

Mulching/Mowing – This will be done on access roads and around structure sites.

Lope and Scatter – These areas are identified in the VEGETATION CONTROL PRESCRIPTION as Cut, Lope, and Scatter.

Some areas may require that the brush be chipped. These areas are identified in the VEGETATION CONTROL PRESCRIPTION as cut and treat as needed, and will depend on the requirements of the landowners.

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

See Handbook — $\underline{Reseeding/replanting}$ for requirements.

Not planned at this time. However, if soil disturbance occurs during the project the area will be reseeded.

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

Native seed will be considered in all mixes. Introduced species may be more competitive against invading tree species and protecting against erosion.

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

Not planned at this time. However, if reseeding is necessary it will take place in the fall just before the fall rains.

6. DETERMINE MONITORING NEEDS

See handbook — <u>Monitoring</u> for requirements.

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

The project area will be inspected during treatment. In addition, it will be reviewed during routine patrols by the line crew and within one year by the NRS.

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

Will review during line patrol by the line crew and within one year by the NRS.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — Prepare Appropriate Environmental Documentation for requirements.

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".

Effects are expected to be the same or less than the description provided in the EIS.

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

No