

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: May 14, 2003

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-153-Snohomish - Bothell No. 1)

TO: Don Atkinson Natural Resource Specialist - TFN/Snohomish

Proposed Action: Vegetation Management for portion of the Snohomish - Bothell No. 1 230 kV transmission line located from tower structure 2/4 to 8/11.

Location: Project location is in BPA Snohomish Region in Snohomish 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.

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.

Work will take place along the Snohomish - Bothell No. 1 230 kV transmission line. The project area includes the BPA right-of-way between towers 2/4 to 8/11 with an easement width of 115 to 300 feet.

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-sprouts 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, farmland, Mountain View Community Church, and many private landowners.

Landowners requiring notification are shown in Section 2 of the attached checklist. Letters will be sent or personal contact made with other 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.

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 100 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, triclopyr, 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 indicated the ROW crosses streams containing listed anadromous fish.

Using the Tview software a Bald Eagle has been identified along the ROW, the following mitigation measures will be followed

Bald Eagle Nesting Areas: During nesting season activities within 1/4 mile of the known site will be suspended from January 1st to August 15th. If maintenance activities are required within the buffer during this period then the Wildlife Species Coordinator will be contacted for direction on how to proceed. If perching birds or large nests (more than 24 inches in diameter) are seen within the maintenance area, especially around or on the transmission towers, discontinue the activity and contact the Wildlife Species Coordinator

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.

/s/ John Howington
 John Howington
 Physical Scientist – KEPR-4

CONCUR: /s/ Thomas C. McKinney
 Thomas C. McKinney
 NEPA Compliance Officer

DATE: 05/16/2003

Attachment

cc:

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

Vegetation Management Checklist

Snohomish - Bothell No.1

2/4 to 8/11 mile

Prepared By: **Don Atkinson**
Natural Resource Specialist
May 13, 2003 (revised)

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
Snohomish - Bothell No. 1	2/4 to 8/11 230kv	115' to 300'	Approx. 6 miles

§ **Rights-of way**

§ **Access Roads**

§ **Danger Trees**

1.2 Describe the vegetation needing management.

See handbook — [List of Vegetation Types](#), [Density](#), [Noxious Weeds](#) 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

Scotch broom – 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 and/or adjacent to 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 long-term goal is to develop low-growing plant communities within the right-of-way. The current action consists of 4 primary treatment zones:

Right-Of-Way – The total project area consists of approximately 89.4 acres. It is estimated that approximately 83 acres of the project area will be cut.

Access Road Clearing – Approximately 6 miles of access roads will be cleared.

Transmission Structures – Approximately 65 tower sites will be treated.

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, will be cut as part of this project. As site conditions allow danger trees may be treated with herbicides to prevent re-sprouting.

Maintenance will include treatments to manage the target vegetation. Maintenance activities in the ROW could occur every year for the first Maintenance Cycle. Normally, the vegetation would be treated every 3 to 4 years. Three general control methods are being considered. They can be used individually or in combination to control vegetation including noxious weeds. The project prescription cut sheet documents exactly which treatment is proposed on a site-specific location.

Manual methods:

- Mechanical methods
- Chemical methods

Manual Control Methods – are the control/management of vegetation by pulling or cutting with hand tools including the following techniques:

- **Pulling** - Physically pulling vegetation from the soil.
- **Cutting** - using shears, clippers, chainsaws, brush saws and axes to sever the above ground vegetation (including topping, pruning and side -trimming). The most common cutting prescription is “cut lop and scatter”. This is defined as cutting the vegetation from the stump, lopping or cutting the limbs from it to ensure contact with the ground, and hand scattering the cut limbs to avoid concentrations of debris.
- **Girdling** – cutting a ring completely around the trunk of the tree, sufficiently deep into the cambium layer to kill the tree, but leave it standing.

Mechanical Control Methods – are the control/management of vegetation by cutting it with mowing type equipment, mounted on rubber-tired or track-type tractors, including the following types of equipment:

- **Mowers** with rotary heads or rotating drums mounted on rubber tired or track-type tractors (track hoe).

- **Feller Bunchers**, track-mounted machines that grab the trees, cut them at the base, remove branches, cut to length, and then move them to a desired location. The feller buncher could be used during the removal of C-Trees (large trees within the right-of-way) or Danger Trees off the right of way.

Chemical Methods - include spot treatment (stump or stubble treatment, basal treatment, and/or spot foliar), or localized treatments (including broadcast application and cut stubble treatments with Garlon 4 to ensure that the roots are killed preventing new sprouts and selectively eliminating vegetation that prevents access to the power lines. 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.

Critical Design Elements

Streams and Wetlands:

Buffer zones have been established for all aquatic resources as follows:

- For T&E streams a 400-foot (on each side of stream) no herbicide buffer.
- For non T&E streams and wetlands a 100-foot (on each side) no herbicide buffer.
- For other water resource buffers (springs, well and irrigation) see section 3.2
- 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 identified buffer.

Threatened and Endangered Species Areas:

Aquatic Species

- For T&E streams a 400-foot (on each side of stream) no herbicide buffer.
- No mechanical treatments within the buffer except along access roads and around structures

Bald Eagles

- **Nesting Areas:** During nesting season activities within 1/4 mile of the known site will be suspended from January 1st to August 15th. If maintenance activities are required within the buffer during this period then the Wildlife Species Coordinator will be contacted for direction on how to proceed. If perching birds or large nests (more than 24 inches in diameter) are seen within the maintenance area, especially around or on the transmission towers, discontinue the activity and contact the Wildlife Species Coordinator.

Steep Slopes and Spanned Canyons

- Do not use ground disturbing mechanical equipment on slopes over 20%.
- Perform mechanical clearing when the ground is dry enough to sustain heavy equipment.
- Areas with the potential for erosion may be re-seeded with low-growing vegetation or grasses if there is limited vegetation for re-establishment of the site.
- Any areas in the corridor with greater than 38.1 m (125 ft.) vertical distance between the ground surface and transmission lines will have selective tree removal. Individual trees that could encroach into the conductor danger zone will be identified and selected for removal in each management entry

Specific Measures to be implemented during the project:

- When chainsaws are used, conifers will be cut below the lowest live limb to eliminate continued growth of the lateral branches.
- Control all tree and brush species within about 30 ft. of transmission structures. Cut stumps are not to be taller than 2 – 4 inches.
- Pull all debris and slash out of the 30-ft. area around transmission structures.
- Access Road Clearing Requirements: - (there are approximately 6 miles of machine and hand cutting)
- Control all vegetation except grasses, to enable safe driving.
- The access road is to be 14 to 25 ft. wide with a 15-ft.- high clearance. Limbs should not hang down into the access road.
- Cut stumps are not to be taller than 2 – 4 inches in the roadbed.
- Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.
- Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.
- Pull all debris back from the access road as prescribed. Cut stumps horizontal to the ground to prevent personal injuries and tire puncture.
- Areas may be re-seeded with low-growing vegetation or grasses if there is limited vegetation for re-establishment of the site.
- Areas where vegetation densities are high, or that have high densities of scotch broom and /or blackberries will be mowed using a track mounted mowing head.
- All access roads and structure sites will also be mowed and chemically treated off-National Forest Lands.
- Trim limbs back as flush to the trunk as possible when trees are rooted outside of the access road.
- Pull all debris back from the access road as prescribed.

Subsequent entries – 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 project description 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 — [Landowners/Managers/Uses](#) for requirements, and [List of Landowners/Managers/Uses](#) for a checkbox list.

The project area consists of rural residential, farmland, Mountain View Community Church, 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.

Personal contact by BPA and/or the contractor along with door hangers or letters. 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 — [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](#).

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.

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.

Snohomish - Bothell No. 1 (See attached maps for locations)

Span		Landowner/use	Specific measures to be applied
From	To		
3/1 + 50	3/3 + 210	Tree & Brush Agreement	Landowner will maintain
3/6 + 180	3/7 + 50	Tree & Brush Agreement	Landowner will maintain
6/4 + 380	6/4 + 480	Tree & Brush Agreement	Landowner will maintain
6/5 + 170	6/5 + 225	Tree & Brush Agreement	Landowner will maintain
6/5 + 340	6/6 + 170	Tree & Brush Agreement	Landowner will maintain
7/5 + 250	7/5 + 350	Tree & Brush Agreement	Landowner will maintain
8/2 + 100	8/3 + 200	Tree & Brush Agreement	Landowner will maintain

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.

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.

None Known.

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.

Snohomish - Bothell No. 1 (See attached maps for locations)

Span		Waterbody Type	T&E Species?	Cut Method	Herbicide Product	Herbicide Application Technique	Buffer Width (Feet)	Other
From	To							
3/5 + 485	3/6 + 370	Creek	No	Cut Lop & Scatter	None	N/A	No Herbicide	
3/9 + 150	3/11 + 275	Snohomish River	Yes	Cut Lop & Scatter	None	N/A	No Herbicide	Listed Anadromous fish & Bull Trout
4/3 + 675	4/5 + 240	Ditch	No	Cut Lop & Scatter	None	N/A	No Herbicide	
4/8 + 160	5/1 + 630	Ditch	No	Cut Lop & Scatter	None	N/A	No Herbicide	
5/8 + 660	6/1 + 340	Creek	No	Cut Lop & Scatter	None	N/A	No Herbicide	
6/3 + 00	6/3 + 452	Creek	No	Cut Lop & Scatter	None	N/A	No Herbicide	
6/4 + 380	6/4 + 740	Wetland	No	Cut Lop & Scatter	None	N/A	No Herbicide	
7/5 + 350	7/5 + 620	Wetland	No	Cut Lop & Scatter	None	N/A	No Herbicide	
7/8 + 210	7/8 + 520	Wetland	No	Cut Lop & Scatter	None	N/A	No Herbicide	
8/2 + 150	8/3 + 140	Wetland	No	Cut Lop & Scatter	None	N/A	No Herbicide	
8/4 + 410	8/6 + 410	Wetland	No	Cut Lop & Scatter	None	N/A	No Herbicide	

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 restriction

None Known

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.

Snohomish - Bothell No. 1 (See attached maps for locations)

Span		Threatened or Endangered Plant or Animal Species	Method/mitigation measures
To	From		
3/9 + 250	3/11 + 190	Anadromous Fish & Bull Trout – Snohomish River	For T&E streams a 400-foot (on each side of stream) no herbicide buffer. No mechanical treatments within the buffer except along access roads and around structures
3/10 + 250		Bald Eagle Nest	Nesting Areas: During nesting season activities within 1/4 mile of the known site will be suspended from January 1 st to August 15 th . If maintenance activities are required within the buffer during this period then the Wildlife Species Coordinator will be contacted for direction on how to proceed. If perching birds or large nests (more than 24 inches in diameter) are seen within the maintenance area, especially around or on the transmission towers, discontinue the activity and contact the Wildlife Species Coordinator.

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

See Handbook — [Protecting Other Species](#) 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 — [Visual Sensitive Areas](#) 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 – [Cultural Resources](#) for requirements.

Within the right-of-way none known

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. See attached maps for exact locations.

Snohomish - Bothell No. 1 (See attached maps for locations)

Span		Describe sensitivity	Method/mitigation measures
From	To		
2/5 + 00	2/5 + 135	Steep slope	Slopes > 20 % No mechanical treatment on Right of Way. Garlon 4: Cut Stump or Basal.
3/10 + 40	3/10 + 100	Steep slope	Slopes > 20 % No mechanical treatment on Right of Way. Garlon 4: Cut Stump or Basal.
5/8 + 160	5/8 + 725	Steep slope	Slopes > 20 % No mechanical treatment on Right of Way. Garlon 4: Cut Stump or Basal.
6/1 + 280	6/1 + 420	Steep slope	Slopes > 20 % No mechanical treatment on Right of Way. Garlon 4: Cut Stump or Basal.
6/4 + 615	6/5 + 340	Steep slope	Slopes > 20 % No mechanical treatment on Right of Way. Garlon 4: Cut Stump or Basal.
6/6 + 170	6/6 + 430	Steep slope	Slopes > 20 % No mechanical treatment on Right of Way. Garlon 4: Cut Stump or Basal.

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

See Handbook – [Spanned Canyons](#) for requirements.

There are NO spanned canyons 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 — [Manual](#), [Mechanical](#), [Biological](#), and [Herbicides](#) 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 the RIGHT-OF-WAY MAINTENANCE CONTROL PRESCRIPTION (cut sheets) for the location of the Control Methods along the ROW

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.

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 — [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 — [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.

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”.

The Effects of this project 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 additional NEPA documentation is needed for this project.