

Rare Species Habitat Management

Montague, Massachusetts

PREPARED FOR

EVERSOURCE

NSTAR Electric Company d/b/a Eversource
Energy
107 Selden Street
Berlin, CT 06037

PREPARED BY



120 Front Street, Suite 500
Worcester, MA 01608

March 28, 2022



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Request for Determination of Applicability Form

› WPA Form 1



Massachusetts Department of Environmental Protection

Bureau of Resource Protection - Wetlands

City/Town _____

WPA Form 1- Request for Determination of Applicability

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

A. General Information

Important:

When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



1. Applicant:

Name _____

E-Mail Address _____

Mailing Address _____

City/Town _____

State _____

Zip Code _____

Phone Number _____

Fax Number (if applicable) _____

2. Representative (if any):

Firm _____

Contact Name _____

E-Mail Address _____

Mailing Address _____

City/Town _____

State _____

Zip Code _____

Phone Number _____

Fax Number (if applicable) _____

B. Determinations

1. I request the _____ make the following determination(s). Check any that apply:
Conservation Commission

- ☐ a. whether the **area** depicted on plan(s) and/or map(s) referenced below is an area subject to jurisdiction of the Wetlands Protection Act.
- ☐ b. whether the **boundaries** of resource area(s) depicted on plan(s) and/or map(s) referenced below are accurately delineated.
- ☐ c. whether the **work** depicted on plan(s) referenced below is subject to the Wetlands Protection Act.
- ☐ d. whether the area and/or work depicted on plan(s) referenced below is subject to the jurisdiction of any **municipal wetlands ordinance** or **bylaw** of:

Name of Municipality

- ☐ e. whether the following **scope of alternatives** is adequate for work in the Riverfront Area as depicted on referenced plan(s).



WPA Form 1- Request for Determination of Applicability

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

C. Project Description

1. a. Project Location (use maps and plans to identify the location of the area subject to this request):

Street Address

City/Town

Assessors Map/Plat Number

Parcel/Lot Number

- b. Area Description (use additional paper, if necessary):

Please refer to the attached narrative for additional information.

- c. Plan and/or Map Reference(s):

Title

Date

Title

Date

Title

Date

2. a. Work Description (use additional paper and/or provide plan(s) of work, if necessary):

The proposed work includes herbicide treatment of invasive plant species by licensed herbicide applicators. Please refer to the attached narrative for additional information.



Massachusetts Department of Environmental Protection

Bureau of Resource Protection - Wetlands

City/Town _____

WPA Form 1- Request for Determination of Applicability

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

C. Project Description (cont.)

b. Identify provisions of the Wetlands Protection Act or regulations which may exempt the applicant from having to file a Notice of Intent for all or part of the described work (use additional paper, if necessary).

3. a. If this application is a Request for Determination of Scope of Alternatives for work in the Riverfront Area, indicate the one classification below that best describes the project.

- ☐ Single family house on a lot recorded on or before 8/1/96
- ☐ Single family house on a lot recorded after 8/1/96
- ☐ Expansion of an existing structure on a lot recorded after 8/1/96
- ☐ Project, other than a single-family house or public project, where the applicant owned the lot before 8/7/96
- ☐ New agriculture or aquaculture project
- ☐ Public project where funds were appropriated prior to 8/7/96
- ☐ Project on a lot shown on an approved, definitive subdivision plan where there is a recorded deed restriction limiting total alteration of the Riverfront Area for the entire subdivision
- ☐ Residential subdivision; institutional, industrial, or commercial project
- ☐ Municipal project
- ☐ District, county, state, or federal government project
- ☐ Project required to evaluate off-site alternatives in more than one municipality in an Environmental Impact Report under MEPA or in an alternatives analysis pursuant to an application for a 404 permit from the U.S. Army Corps of Engineers or 401 Water Quality Certification from the Department of Environmental Protection.

b. Provide evidence (e.g., record of date subdivision lot was recorded) supporting the classification above (use additional paper and/or attach appropriate documents, if necessary.)



Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

City/Town _____

WPA Form 1- Request for Determination of Applicability

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

D. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Request for Determination of Applicability and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge.

I further certify that the property owner, if different from the applicant, and the appropriate DEP Regional Office were sent a complete copy of this Request (including all appropriate documentation) simultaneously with the submittal of this Request to the Conservation Commission.

Failure by the applicant to send copies in a timely manner may result in dismissal of the Request for Determination of Applicability.

Name and address of the property owner:

Name

Mailing Address

City/Town

State

Zip Code

Signatures:

I also understand that notification of this Request will be placed in a local newspaper at my expense in accordance with Section 10.05(3)(b)(1) of the Wetlands Protection Act regulations.

Signature of Applicant

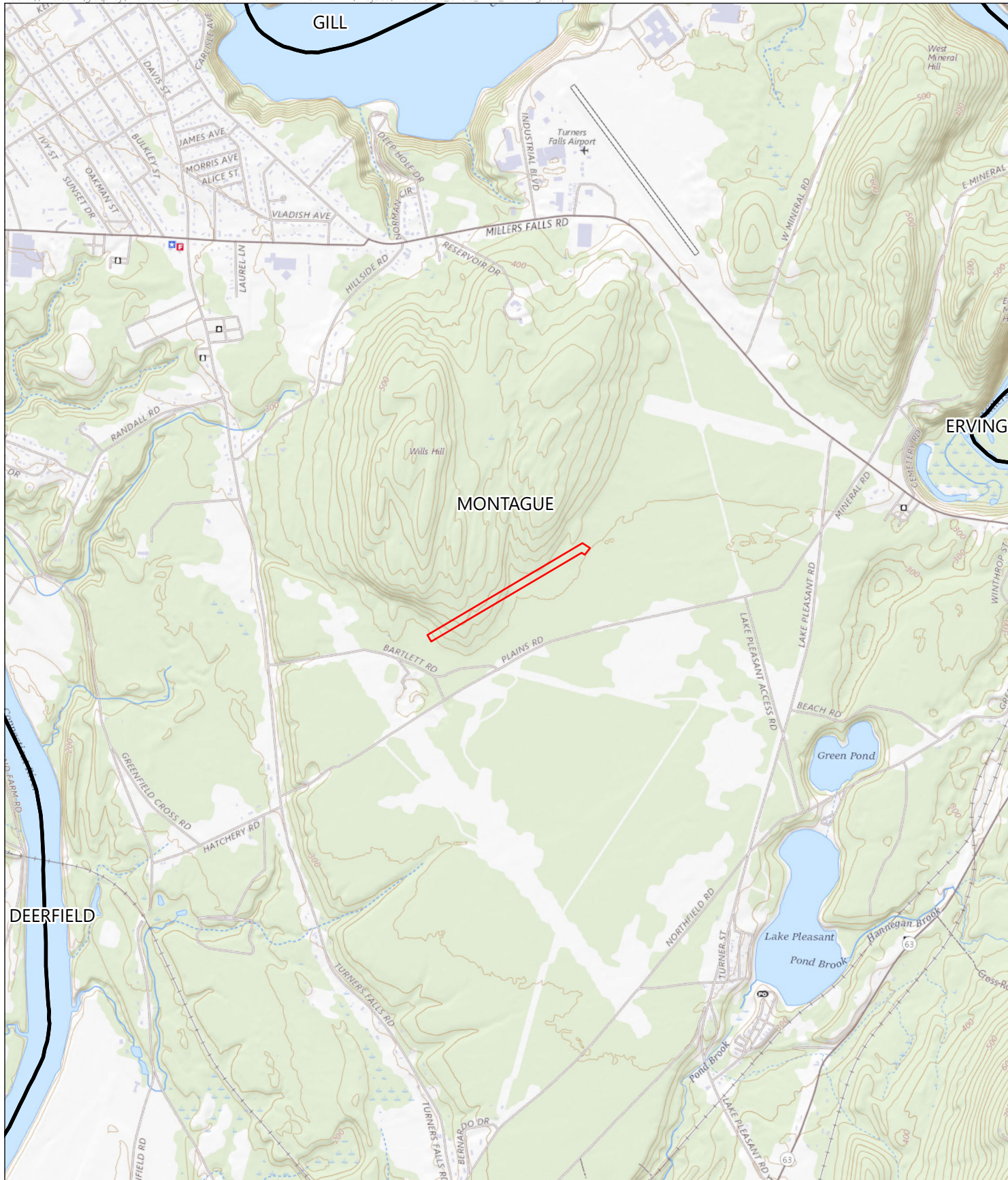
Date

Signature of Representative (if any)

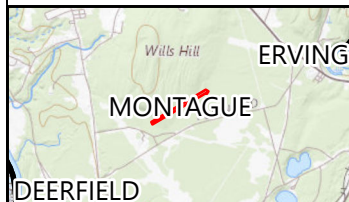
Date

Request for Determination of Applicability Figures


- › Figure 1 – Site Locus Map
- › Figure 2 – Site Aerial Map
- › Figure 3 – Site Aerial with NHESP Overlay
- › Figure 4 – FEMA FIRMettes



INDEX MAP



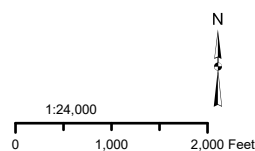
Legend

 Montague Habitat Management Area

EVERSOURCE

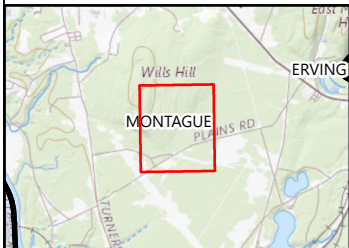
Site Locus Map
Eversource Rare Species
Habitat Management Project
Montague, MA

March 2022





INDEX MAP



Legend

- Structures
- Montague Habitat Management Area



1:5,000
0 250 500 Feet

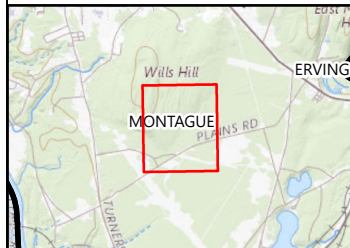
EVERSOURCE

Site Aerial Map
Eversource Rare Species
Habitat Management Project
Montague, MA

March 2022

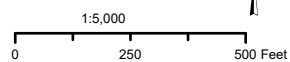


INDEX MAP



Legend

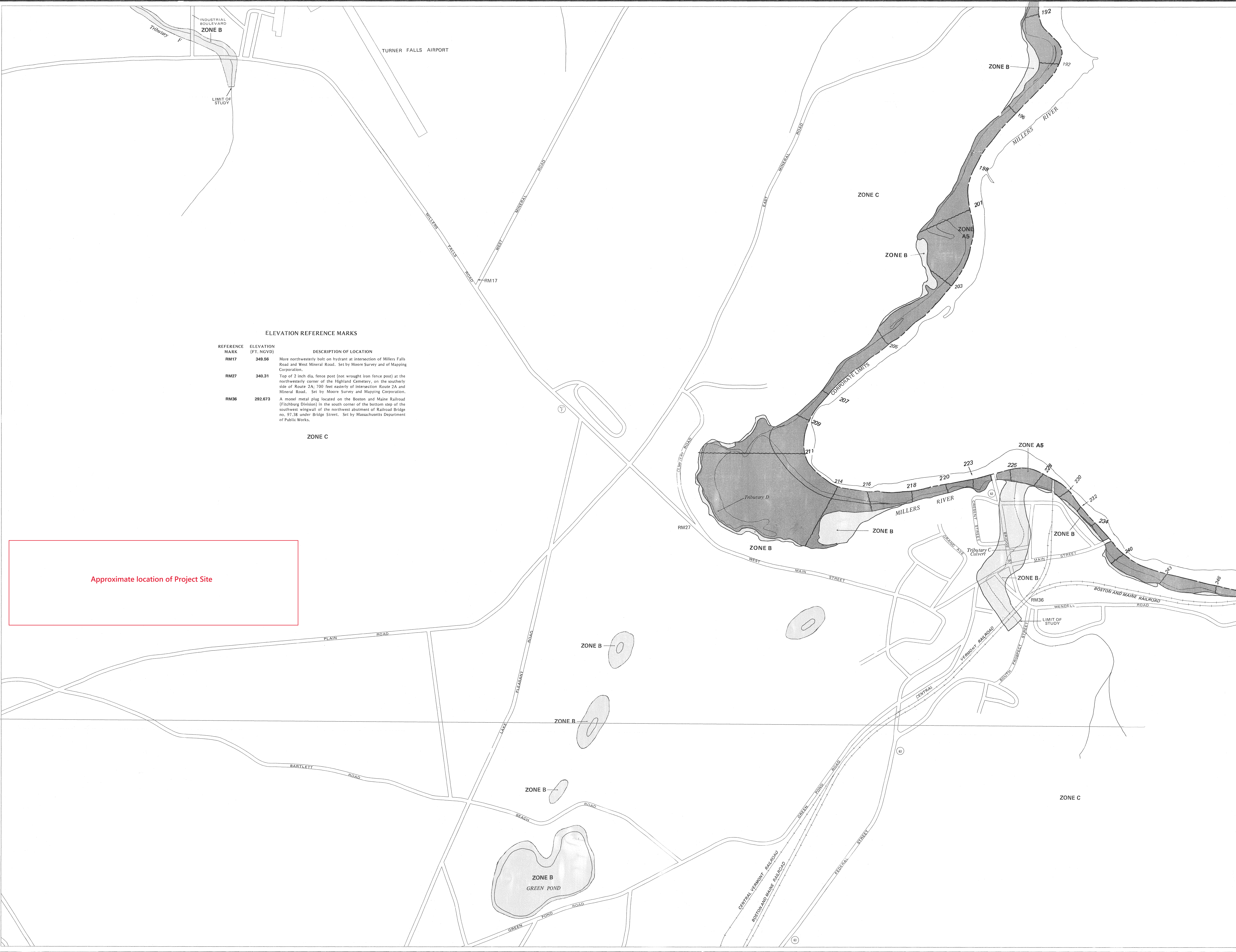
- Structures
- Montague Habitat Management Area
- NHESP Priority Habitats of Rare Species
- NHESP Estimated Habitats of Rare Wildlife
- NHESP Certified Vernal Pools
- NHESP Potential Vernal Pools



EVERSOURCE

Site Aerial with NHESP Data Overlay
Eversource Rare Species
Habitat Management Project
Montague, MA

March 2022



Approximate location of Project Site

ELEVATION REFERENCE MARKS		
REFERENCE MARK	ELEVATION (FT. NGVD)	DESCRIPTION OF LOCATION
RM17	348.66	More northwesterly bolt on hydrant at intersection of Millers Falls Road and West Mineral Road. Set by Moore Survey and of Mapping Corporation.
RM27	340.31	Top of 2 inch dia. fence post (not wrought iron fence post) at the northwesterly corner of the Highland Cemetery, on the southerly side of Route 2A; 700 feet easterly of intersection Route 2A and Mineral Road. Set by Moore Survey and Mapping Corporation.
RM36	292.673	A monel metal plug located on the Boston and Maine Railroad (Fitchburg Division) in the south corner of the bottom step of the southwest wingwall of the northwest abutment of Railroad Bridge no. 97.38 under Bridge Street. Set by Massachusetts Department of Public Works.

KEY TO MAP

500-Year Flood Boundary

100-Year Flood Boundary

Zone Designations* With Date of Identification e.s., 12/2/74

100-Year Flood Boundary

500-Year Flood Boundary

Base Flood Elevation Line With Elevation In Feet**

Base Flood Elevation in Feet Where Uniform Within Zone**

Elevation Reference Mark

River Mile

**Referenced to the National Geodetic Vertical Datum of 1929

ZONE B

ZONE A1 DATE

ZONE A5 DATE

ZONE B

513

(EL 987)

RM7x

M1.5

*EXPLANATION OF ZONE DESIGNATIONS

ZONE	EXPLANATION
A	Areas of 100-year flood; base flood elevations and flood hazard factors not determined.
A0	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; average depth of inundation are shown, but no flood hazard factors are determined.
AH	Areas of 100-year shallow flooding where depths are between one (1) and three (3) feet; base flood elevations are shown, but no flood hazard factors are determined.
A1-A30	Areas of 100-year flood; base flood elevations and flood hazard factors determined.
A99	Areas of 100-year flood to be protected by flood protection system under construction; base flood elevations and flood hazard factors not determined.
B	Areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than one (1) foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood. (Medium shading)
C	Areas of minimal flooding. (No shading)
D	Areas of undetermined, but possible, flood hazards.
V	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors not determined.
V1-V30	Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined.

NOTES TO USER

Certain areas not in the special flood hazard areas (zones A and V) may be protected by flood control structures.

This map is for flood insurance purposes only; it does not necessarily show all areas subject to flooding in the community or all planimetric features outside special flood hazard areas.

For adjoining map panels, see separately printed Index To Map Panels.

INITIAL IDENTIFICATION:

MARCH 22, 1974

FLOOD HAZARD BOUNDARY MAP REVISIONS:

NOVEMBER 9, 1976

FLOOD INSURANCE RATE MAP EFFECTIVE:

AUGUST 15, 1979

FLOOD INSURANCE RATE MAP REVISIONS:

2/12/82: CHANGE ZONE DESIGNATION
INCREASE SPECIAL FLOOD HAZARD AREA
DECREASE SPECIAL FLOOD HAZARD AREA
DECREASE BASE FLOOD ELEVATION
INCREASE BASE FLOOD ELEVATION

Refer to the FLOOD INSURANCE RATE MAP EFFECTIVE date shown on this map to determine when actuarial rates apply to structures in the zones where elevations or depths have been established.

To determine if flood insurance is available in this community, contact your insurance agent, or call the National Flood Insurance Program, at (800) 638-6620.

APPROXIMATE SCALE

400 0 400 FEET

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

TOWN OF

MONTAGUE,

MASSACHUSETTS

FRANKLIN COUNTY

PANEL 4 OF 11

(SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER

250122 0004 C

MAP REVISED:

FEBRUARY 12, 1982

federal emergency management agency

federal insurance administration

Attachment A

Request for Determination of Applicability

Project Narrative

- › Introduction
- › Site Description
- › Wetland Resource Areas
- › Work Description
- › Regulatory Compliance
- › Summary

RDA Project Narrative for Habitat Management

This Request for Determination of Applicability (RDA) is being filed pursuant to the Massachusetts Wetlands Protection Act (M.G.L. Chapter 131, Section 40; WPA) and its implementing regulations (310 CMR 10.00).

Introduction

The Applicant, NSTAR Electric d/b/a Eversource Energy (Eversource), is proposing to manage habitat for state-listed plants located within their existing electric transmission right-of-way (ROW) in the vicinity of Plains Road (the Project Site). The intent of this work is to improve habitat for state-listed plants through removal of invasive plant species, at the direction of the Natural Heritage and Endangered Species Program of the Massachusetts Division of Fisheries and Wildlife (DFW). Several invasive plants¹ that are competing with or threatening encroachment of state-listed plants have been identified within non-jurisdictional uplands, buffer zones, and wetland resource areas at the Project Site. Eversource is seeking approval from the Montague Conservation Commission to manage invasive species within jurisdictional wetland areas including Bank associated with three intermittent streams, Bordering Vegetated Wetlands (BVW), and 100-foot Buffer Zone to Bank and BVW.

Eversource respectfully requests that the Montague Conservation Commission find the proposed work will not remove, fill, dredge, or alter jurisdictional wetland areas, and issue a Negative Determination #2 for the Project.

Site Description

The Project Site is located within Eversource's ROW containing transmission line 312, within Montague Plains Management Area, near Plains Road (See Figure 1- *USGS Locus Map*). The Project Site is approximately 0.5 miles long and extends from Bartlett Road northeast to Eversource's transmission structure 36049 (Figure 2 – *Site Aerial Map*). The Project Site consists mainly of dry rocky, hillside habitats and scrub-shrub vegetation communities that are maintained under Eversource's Vegetation Management Plan, and topography varies from flat to gently sloping. Vegetation composition includes herbs, shrubs, and saplings, and although aspects vary, the site is open and canopy-free. The Project Site contains gravel access roads and numerous leveled work pad areas around the transmission structures. The Project Site

¹ Massachusetts Invasive Plant Advisory Group. 2005. The Evaluation of Non-Native Plant Species for Invasiveness in Massachusetts (with annotated list). Website https://www.massnrc.org/mipag/docs/MIPAG_FINDINGS_FINAL_042005.pdf/. Accessed January 2022.

also contains 2 wetland features. Each wetland resource area is described within the Wetland Resource Area section below.

According to the most recent edition of the Massachusetts Natural Heritage Atlas², the Project Site falls within Priority Habitat for Rare Species (PH 1778) and Estimated Habitats of Rare Wildlife (EH 1179). The Project Site is not mapped for any potential or certified vernal pools (Figure 3 – *Site Aerial Map with NHESP Data Overlay*). The Project Site is not located within an Area of Critical Environmental Concern (ACEC)³ and does not contain any areas designated as Outstanding Resource Waters⁴. The most recently issued Flood Insurance Rate Maps (FIRM) for the area, produced by the Federal Emergency Management Agency (FEMA), indicate that no portion of the Project Site is within mapped floodplain for the 100-year storm event (Figure 4 – *FEMA FIRMettes*).

Wetland Resource Areas

VHB wetland scientists delineated wetland resource areas in the vicinity of the Project Site on September 3, 2021, in accordance with methods developed by the Massachusetts Department of Environmental Protection (DEP)⁵ and the U.S. Army Corps of Engineers (USACE)⁶. The following sections describe the wetland resource areas on the Project Site and the associated buffer zones that are regulated under the WPA. *Attachment B - Project Plans* shows the location and extents of each regulated area and *Attachment C – Site Photographs* provides images.

Bank (310 CMR 10.54)

As defined at 310 CMR 10.54, a Bank is the portion of the land surface which normally abuts and confines a water body. It occurs between a water body and a vegetated bordering wetland and adjacent floodplain, or, in the absence of these, it occurs between a water body and an upland. The upper boundary of a Bank is the first observable break in the slope or the mean annual flood level, whichever is lower. The lower boundary of a Bank is the mean annual low flow level.

There are two intermittent streams on the Project Site. An intermittent stream located between structures 36052 and 36053 originates from an upgradient offsite BVW located to the north of the ROW. This drainage connects to two small BVWs and passes beneath the access road as it flows to the south. This shallow stream has a silty, mossy bottom and varies from 2 to 5 feet wide. Flow within the stream was approximately 1 inch deep at the time of the survey. The banks were delineated with blue flags labeled using G, H, J, and K flag series.

An intermittent stream originating from a forested wetland to the north of the ROW flows from north to south through the middle of the Project Site, between Structures 36051 and 36052. This stream has a silty and mucky bottom, varies from 3 to 12 feet-wide, and banks up

² NHESP 2021. *Massachusetts Natural Heritage Atlas*. 15th Edition.

³ DCR 2009. Areas of Critical Environmental Concern. MassGIS

⁴ Designated Outstanding Resource Waters of Massachusetts; MassDEP 1990.

⁵ DEP, 1995. *Delineating Bordering Vegetated Wetlands Under the Massachusetts Wetlands Protection Act*.

⁶ USACE, 2012. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region, Version 2.0*.

to approximately 5 feet tall. Flow within the stream was approximately 12 inches deep at the time of the survey. The banks of the stream were delineated based on the first observable break in the slope with blue flags labeled using A, B, and C number series.

Bordering Vegetated Wetlands (310 CMR 10.55)

As defined at 310 CMR 10.55, BVW is an area which borders on a creek, river, stream, pond, or lake. The boundary of BVW is the line within which 50% or more of the vegetational community consists of wetland indicator plants and saturated or inundated conditions exist. BVWs throughout the Project Site were delineated based on vegetation, hydric soil indicators, and evidence of hydrology.

Two BVWs were identified and delineated within the Project Site, both are associated with the previously described intermittent stream drainages. A hillside seep, which is punctuated by intermittent stream drainages and interrupted by the access road, exists between structures 36052 and 36053. This seep was delineated with F and I numbered series of pink flags. This BVW contains hydrophytes such as pussy willow (*Salix discolor*), black elderberry (*Sambucus nigra*), red-osier dogwood (*Swida sericea*), common wrinkle-leaved goldenrod (*Solidago rugosa*), jewelweed (*Impatiens capensis*), common wooldsedge (*Scirpus cyperinus*), spotted Joe-Pye weed (*Eupatorium maculatum*), field horsetail (*Equisetum arvense*), Devil's beggar-ticks (*Bidens frondosa*), mad dog skullcap (*Scutellaria lateriflora*), white turtlehead (*Chelone glabra*), ostrich fern (*Matteuccia struthiopteris*), and pointed broom sedge (*Carex scoparia*). Indicators of wetland hydrology and hydric soil conditions according to USACE⁷ include Surface Water (A1), Drift Deposits (B3), Saturation Visible on Aerial Imagery (C9), and Redox Dark Surface (F6).

Another hillside seep is located between Structures 36051 and 36052 and was delineated with pink flags using D and E-series numbering. This BVW includes hydrophytes such as speckled alder (*Alnus incana*), pussy willow, spicebush (*Lindera benzoin*), common winterberry (*Ilex verticillata*), common wrinkle-leaved goldenrod, sensitive fern (*Onoclea sensibilis*), jewelweed, arrow-leaved tearthumb (*Persicaria sagittata*), fringed yellow-loosestrife (*Lysimachia ciliata*), white turtlehead, Allegheny monkey-flower (*Mimulus ringens*), fowl manna grass (*Glyceria striata*), white cut grass (*Leersia virginica*), and common water-primrose (*Ludwigia palustris*). Indicators of wetland hydrology and hydric soil conditions according to USACE⁷ include Surface Water (A1), Saturation (A3), Water-Stained Leaves (B9), Saturation Visible on Aerial Imagery (C9), and Redox Dark Surface (F6).

Land Under Water Bodies and Waterways (310 CMR 10.56)

As defined at 310 CMR 10.56, Land Under Water Bodies and Waterways (LUWW) is the land beneath any creek, river, stream, pond, or lake. The boundary of LUWW is the mean annual low water level.

LUWW exists within the two intermittent streams that flow across the ROW within the Project Site.

⁷ USACE, 2012. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region, Version 2.0.*

100-foot Buffer Zone

The WPA establishes a 100-foot Buffer Zone from the Banks of intermittent streams and the edges of BVW. On the Project Site these upland areas are comprised of a mix of raspberries (*Rubus allegheniensis* and *R. idaeus*), tall goldenrod (*Solidago altissima*), early goldenrod (*Solidago juncea*), summer grape (*Vitis aestivalis*), glossy false buckthorn (*Frangula alnus*), Asian bittersweet (*Celastrus orbiculatus*), multiflora rose (*Rosa multiflora*), Japanese barberry (*Berberis thunbergii*), American hazelnut (*Corylus americana*), white ash (*Fraxinus americana*), shagbark hickory (*Carya ovata*), American witch-hazel (*Hamamelis virginiana*), white snakeroot (*Ageratina altissima*), common cinquefoil (*Potentilla simplex*), eastern hay-scented fern (*Dennstaedtia punctilobula*), white wood-aster (*Symphotrichum divaricatus*), Morrow's honeysuckle (*Lonicera morrowii*), sugar maple (*Acer saccharum*), northern red oak (*Quercus rubra*), and eastern white oak (*Q. alba*).

Work Description

The proposed work includes herbicide treatment of invasive plant species by licensed herbicide applicators along Bank and within BVW and Buffer Zone. Herbicides will not be applied within areas of LUWW or in BVW areas where surface water is present; these sensitive areas are designated as no-spray zones. Treatment areas will be approached on foot. Backpack sprayers will be used to spot-treat target species including Asian bittersweet, glossy false buckthorn, Morrow's honeysuckle, Japanese barberry, and multiflora rose (see Table 1).

Table 1. Targeted Invasive Plants

Common Name	Species Name	Jurisdictional Area Prevalence
Asian bittersweet	<i>Celastrus orbiculatus</i>	Common
glossy false buckthorn	<i>Frangula alnus</i>	Uncommon
Morrow's honeysuckle	<i>Lonicera morrowii</i>	Common
Japanese barberry	<i>Berberis thunbergii</i>	Uncommon
multiflora rose	<i>Rosa multiflora</i>	Common

Where target and non-target species co-occur, desirable plants will be protected through a combination of shielding, herbicide application at low pressure (i.e., dribbled vs. sprayed), directional treatment away from desirable plants, or cut and dab application. Foliar herbicide application will not be used on invasives greater than 12 feet in height; basal herbicide application will be used in these cases.

Protective Measures

Extreme care will be taken to limit the use of herbicide during work within and near wetland resource areas and buffer zones through targeted application. Work will not be scheduled on days when precipitation or strong winds are forecasted. All work will be overseen by a qualified wetland scientist/botanist.

Regulatory Compliance

Any activity proposed or undertaken within an area specified in 310 CMR 10.02(1), which will remove, fill, dredge or alter that area, is subject to Regulation under M.G.L. c. 131, § 40 and requires the filing of a Notice of Intent. No jurisdictional wetland areas will be removed, filled, dredged or altered as a result of this project. The proposed work can be considered minor activity and therefore aligns with the intents of 10.02(2) (b)1 and 2, which allow minor activities to be permitted within 100-foot Buffer Zone. Proposed work within 100-foot Buffer Zone and BVW will utilize the best practical measures to avoid or minimize impacts to wetland resource areas through targeted treatment of invasive plant species by licensed applicators. As noted above, the establishment of no-spray zones will protect LUWW and BVWs that contain surface water. It is anticipated that removal of invasive plants will increase resource availability for native species, providing an overall net gain for wildlife habitat.

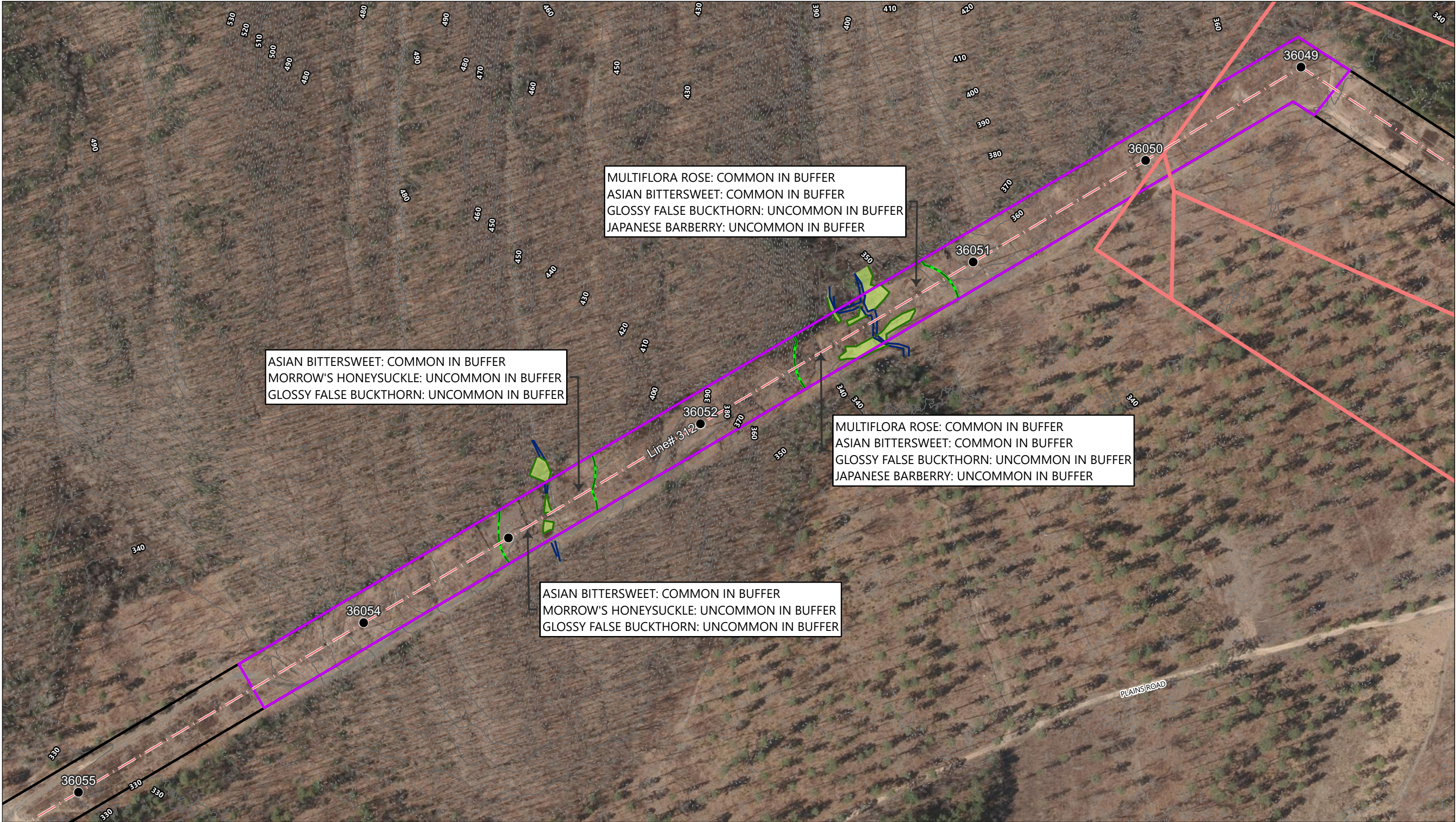
Summary

The Applicant is proposing targeted herbicide treatment of invasive plants within jurisdictional resource areas to benefit and protect state-listed plant species. Resource areas and 100-foot Buffer Zone will be protected by targeted spot treatment and implementation of no-spray zones within sensitive areas.

The Applicant respectfully requests that the Montague Conservation Commission find that the measures presented herein adequately protect the interests identified in the WPA and issue a Negative Determination of Applicability approving the work described herein.

Attachment B

Project Plans



INDEX MAP

● Existing Eversource Structures

--- Overhead Eversource Line

□ Approximate ROW Boundary

□ Eversource Owned Parcels

□ AMP Management Sites

100-ft BVW Buffer

— Delineated Wetland Edge

— Delineated Top of Bank

■ Wetland Resource Area

----- 2-ft Contours

— 10-ft Contours

012400

0100200

Feet

N

			EVERSOURCE ENERGY	
			Request for Determination Wetland Resources	
			MONTAGUE, MA	MAP SHEET 1 of 1
			Date: October, 2021	
NO.	DATE	REVISIONS		

Attachment C

Site Photographs


Photo 1.		<p>Description:</p> <p>Southerly view of the northern portion of the F/I-series BVW located between structures 36052 and 36053.</p> <p>September 3, 2021</p>
Photo 2.		<p>Description:</p> <p>Southerly view of the central portion of the F/I-series BVW located between structures 36052 and 36053.</p> <p>September 3, 2021</p>



Photo 3.	Description:
	<p>Northeasterly view of the G/H series intermittent stream and F/I-series BVW located between structures 36052 and 36053.</p> <p>September 3, 2021</p>
Photo 4.	Description:
	<p>Northerly view of the J/K series intermittent stream located along the southern edge of ROW between structures 36052 and 36053.</p> <p>September 3, 2021</p>

Photo 5.



Northeasterly view of the D/E series BVW containing the A/B/C series intermittent stream located between structures 36051 and 36052.

September 3, 2021

Photo 6.




Description:

Southwesterly view of the D/E series BVW located between structures 36051 and 36052.

September 3, 2021

Photo 7.	Description:
	<p>Southerly view of the A/B/C series intermittent stream located within the D/E series BVW between structures 36051 and 36052.</p> <p>September 3, 2021</p>
Photo 8.	Description:
	<p>Northerly view of the A/B/C series intermittent stream from the southern edge of ROW between structures 36051 and 36052.</p> <p>September 3, 2021</p>

Photo 9.	Description:
	<p data-bbox="1177 241 1542 409">Northerly view of the Asian bittersweet growing within the buffer zone west of the A/B/C series intermittent stream and D/E series BVW.</p> <p data-bbox="1177 451 1421 483">September 3, 2021</p>