memorandum

DATE: July 8, 2003

REPLY TO ATTN OF: KEP-4

- SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285/SA-163-Grand Coulee-Hanford/Schultz)
 - то: Tom Murphy TFS/Bell-1 Natural Resource Specialist

Proposed Action: Grant and Douglas County noxious weed management along BPA rights-ofways, transmission structures and roads listed in Attachment 1, Checklist. Attachment 1 identifies the ROW, ROW width, and ROW length of the proposed action in Grant and Douglas County, Washington.

Location: The ROWs are located in Grant and Douglas County, Washington, Spokane Region.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposed Action: BPA proposes to clear noxious and/or unwanted lowgrowing vegetation in selected corridors of the ROWs in Grant and Douglas County, Washington. In a cooperative effort, BPA, through landowners and the Grant and Douglas County Weed Control Board, plan to eradicate noxious plants and other unwanted, low-growing vegetation within the ROW width including all structures and access roads. BPA's overall goal is to eradicate all noxious and unwanted vegetation through chemical treatment and reseeding. Selective and nonselective chemical treatment using spot, local and broadcast methods. All work will be executed in accordance with the National Electrical Safety Code and BPA standards.

<u>Analysis</u>: This project meets the standards and guidelines for the Transmission System Vegetation Management Program Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

The Planning steps are described in Attachment 1, Checklist.

- All activities will be carried out in accordance with Section 15, Noxious Weed Act Amendment, 1990, Farm Act.
- Selective and nonselective chemical treatment will remove noxious and unwanted vegetation. Reseeding will take place to minimize reoccurrence of noxious vegetation. Retreatment may be required on an annual basis.
- Water resources (streams, rivers, wetlands and well) will be protected with the mitigation measures shown in Attachments 1.
- T&E Species will be protected as per the mitigation measures shown in Attachment 1. Species identified for mitigation include bald eagles.

- Herbicides will be applied by licensed applicators following manufacturers' label instructions and BPA's management prescriptions.
- Re-seeding /re-planting regimes have been identified as per Attachment 1.
- Notification of property owners and land management agencies, listed in Attachment 1, will be coordinated through the Douglas and Grant County Weed Control Boards as per the stipulations contained in Attachment 1, Statement of Work, Noxious Weed Management, Douglas and Grant County, FY 2003.

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. T&E fish and wildlife are not affected with implementation of the attached mitigation measures.

<u>/s/ Michael A. Rosales</u> Michael A. Rosales Environmental Scientist – KEPR/Bell-1

CONCUR:<u>/s/ Thomas C. McKinney</u> Thomas C. McKinney NEPA Compliance Officer

DATE:07/08/2003

Attachment

cc: L. Croff – KEC-4 T. McKinney – KEC-4 C. Leiter – KEP-4 J. Meyer – KEP-4 M. Rosales – KEPR/Bell-1 P. Key – LC-7 J. Hilliard Creecy – T-DITT2 D. Hollen – TF/DOB-1 J. Lahti – TFS/Bell-1 S. Vickers – TFS/Bell-1 R. Zaldivar – TFSP/Grand Coulee Environmental File – KEC - 4 Official File – KEP-4 (EQ-14)

Vegetation Management Checklist (Grand Coulee – Hanford/Schultz)

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way Grand Coulee – Hanford/Schultz Noxious Weed Management

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 paths</u>.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Grand Coulee – Hanford No. 1	500-kV	150 ft.	0.40 miles 1/1 – 1/3
Grand Coulee – Schultz No. 1	500-kV	475 ft.	0.40 miles 1/1 – 1/3
Columbia – Grand Coulee No. 1	287-kV	250 ft.	0.4 miles 183/1 – 183/3

Right Of Way:

Transmission Structures – clearing around Access Road clearing - approximate miles Other Noxious weed Management

1.2 Describe the vegetation needing management.

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

Vegetation Types:

Noxious Weeds - Knapweed species, and county listed weeds

Other/Description – low brush and weeds around structures and roads

Weed density ranges for light to heavy.

■ In the following places the landowner may be provided herbicides for noxious weed control. Noxious weed board performs almost all of the work. If BPA does provide herbicides to landowners in the future, they will be provided with the appropriate environmental information.

Others as requested - Tordon 22K (Picloram), Trooper/Vanquish (Dicamba), 2,4-d. TELAR

Tordon is being considered since it is one of the most effective products know to control knapweeds and other broadleaf species. Care must be taken due to its persistence and ground and surface water issues.

Approved and Suggested seeds	*Native	Reason for seeding
Mixes can be developed form the following seed species. Based on site and adaptation.	N-Native I=Introduced	Re-seeding and Fertilization after noxious weed treatments has been shown to be effective in preventing the re-establishment of noxious weeds and which reduces the need for future herbicide applications
Name Sheep fescue (Festuca ovina) N Smooth Brome I Canada bluegrass (Poa compressa) N Big Bluegrass N Intermediate Wheatgrass I Bluebunch Wheatgrass N Pubesent Wheatgrass N Sand dropseed N Needlegrass N Crested Wheatgrass I Perennial Ryegrass I Sickle-keeled lupine N And/or Lupinus bicolor N clovers I Alfalfa I		

Suggested Seed mixture to reduce and prevent noxious weeds.

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.

Only target, selected noxious weed species will be treated. Desirable, low-growing vegetation will not be disturbed.

1.4 Describe overall management scheme/schedule.

See Handbook - Overall Management Scheme/Schedule.

Initial entry – BPA in Cooperation with Grant and Douglas Counties Noxious weed Control Boards will provide resources to assist landowners in controlling noxious weeds on the listed lines. The Weed board will be consulting on application rates, adjuvants, and application timing for this project. Herbicide will be ground applied by a licensed applicator, and will be applied only to private property.

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 Landowners/Managers/Uses</u> for a checkbox list.

Agricultural

Residential

- 🗹 Rural
- Agricultural
- \blacksquare Grazing lands
- Industrial Forest lands
- Urban
- BLM
- Other Federal lands
- Tribal Reservation Yakima Tribe on Hanford
- State/City/County Lands
- 2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., doorhanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.

See Handbook — Methods for Notification and Requesting Information for requirements.

The Local weed board works closely with local landowners and Agency's when controlling weeds.

2.3 List the specific land owner/landuse 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>, <u>BLM –managed lands</u>, <u>Other</u> <u>federal lands</u>, <u>State/ Local Lands</u>.

Most of the acres are either dry cropland or rangeland.

Agricultural

Prevent the spread of noxious weeds by cleaning seeds from equipment before entering cropland.

If using herbicides on grazing lands, comply with grazing restrictions as required per herbicide label.

If using herbicides near crops for consumption, comply with pesticide-free buffer zones, if any, as per label instructions.

For rights-of-way adjacent to agricultural fields, observe appropriate buffer zones necessary to ensure that no drift will affect crops.

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.

The following landowners have responsibility for vegetation maintenance.

No agreements or permits

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.

Limited use on Private land

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.

N/A

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	pan	Water body T&E? Method Herbicide		Application	Buffer		
То	From					Technique	
1/2	1/3	Grand Coulee – Schultz (seasonal pond)		Manual Biological Herbicide mechanical	2,4-d dicamba, clopyralid,chlo rsulfuron,mets ulfuron, picloram	localized	150 feet.

All applications for this project will be spot, localized, ground/broadcast. No aerial applications will occur on this project.

T&E FISH STREAMS

State and/or Private lands within 122 m (400 ft.) of a listed stream. Available: manual, mechanical, spot and localized herbicide, broadcast treatments, and biological treatments. No mechanical within 100 feet of streams except for tower sites and access roads.

Manual: Hand tools and chainsaws

Mechanical: None within 100 feet of stream. Except for Access Roads and Tower sites

Herbicide: From 0 to 100 feet away from water, use only Non-toxic formulations to moderately toxic (to aquatic species) formulations of glyphosate (such as Rodeo[®]), dicamba (Trooper/Vanquish), Telar, Escort, clopyralid, picloram, and 2-4-d using wick and spot-foliar treatments (localized) and ground broadcast treatments with handgun only. Highly Toxic and very

Highly toxic (to fish) herbicides will not be used within 100 feet of a T&E Stream. Use appropriate buffers as described in the buffer table.

From 100 to 400 feet away from water use appropriate buffers as described in the buffer table.

OTHER STREAMS: Land 100 ft of a stream, water and wetlands. Available: all manual, spot and localized herbicide, and biological treatments. No mechanical treatments within 50 feet of streams or wetlands.

Manual: Hand tools and chainsaws

•

Mechanical: None, within 50 feet of streams or wetlands. Only on Access Roads and Tower sites

Herbicide: Only Non-toxic formulations and slightly toxic (to aquatic species) formulations of glyphosate (such as Rodeo[®]), dicamba (Trooper/Vanquish), Telar, Escort, clopyralid, picloram, and 2-4-d may be prescribed for wick, and spot-foliar treatments (localized). Ground Broadcast treatments can be completed with the appropriate buffers on noxious weeds, access roads and tower sites.

HERBICIDE		Ground water Advisory	Surface Water Advisory	Highest Aquatic Toxicity Invertebrates/Vert ebrates	Spot treat	Localized	Broadcast	Aerial
		<u> </u>		coracos				1 tor fur
Transline				Practically Non				
Clopyralid		Х		Toxic	25 ft	35 ft	100 ft	250 ft
2,4-d Dimethyl				Practically Non				
amine Salt		Х				35 ft		250 ft
Glypro/Accord Glyphosate				Practically Non Toxic	Up to edge	Up to edge	35 ft	100 ft
2,4-d Dodecyl/amin e salt	х			Slightly toxic	25 ft	35 ft	100 ft	250 ft
Tordon 22K picloram	х		Х	Moderately Toxic	25 ft	35 ft	100 ft	250 ft
Vanquish								
dicamba		Х	Х	Slightly Toxic Practically Non	25 ft	35 ft	100 ft	250 ft
Escort				Toxic Practically Non	Up to edge	Up to edge	35 ft	100 ft
Telar				•	Up to edge	Up to edge	35 ft	100 ft
Garlon 3A					Up to edge	Up to edge	35 ft	100 ft
Garlon 4*				Highly Toxic	35 ft	100 ft	400 ft	400 ft

BPA BUFFER Herbicide

Buffers:

None Known

- Non-toxic and slightly toxic formulations of Glyphosate, Escort, Telar, and Garlon 3A may be used to the waters edge when using spot and localized treatments.
- Garlon 4* may be used may be used when more than 35 feet from streams and seasonally dry wetlands. When not within a T & E Fish stream
- The buffers for dicamba, 2,4-d, clopyralid, and Picloram are 25 feet for spot treatment and 35 feet for localized treatments, 100 feet for ground broadcast, and 250 for aerial applications.
- Ground Broadcast treatment buffers will be 35 feet for approved formulations of Glyphosate, Escort, Telar, and Garlon 3A.
- **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.

Well/irrigation/or spring	Herbicide	Buffer
When present	Low toxicity, Garlon 3A, Glyphosate,Escort <u>Clopyr</u> <u>alid,Garlon 4</u>	50 ft

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.

Except for the potential for Bald Eagles to be present within the project area, no other No T&E plant or animal species are present. If Eagles are observed within the project area, the following mitigation measures will be followed:

Bald **Wintering bald eagles:** No work within 100 meters (328 feet) of any known wintering bald eagle roosts from Nov. 1 through March 15 unless clearance surveys are done daily to determine that no bald eagles are present within 100 meters of activities.

If roosting trees are to be removed, you will need to do formal consultation with USFWS.

Nesting bald eagles: No work within 0.25 miles if out of line-of-sight of nesting tree, or 0.5 miles if in line-of-sight of nesting tree from January 1 to August 31, unless clearance surveys show that there is no nesting occurring. May be able to cut sooner if consult with USFWS and can show that young have fledged.

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.

Control and Management of Noxious weeds will improve habitats

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

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

See Handbook – <u>Cultural Resources</u> for requirements.

No Ground disturbing activities planned

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.

Describe sensitivity	Method/mitigation measures
Throughout project area.	Do not use ground (soil)-disturbing mechanical equipment to clear on slopes over 20%.
	Avoid using granular or total vegetation management (non-selective) herbicides on slopes over 10%.
	Do not use herbicides that have surface water advisories.
	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.

N/A

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: Hand tools and chainsaws

Mechanical: None, within 50 feet of streams or wetlands. Only on Access Roads and Tower sites

Herbicide: glyphosate, dicamba (Trooper/Vanquish), Telar, Escort, clopyralid, picloram, and 2-4d may be prescribed for wick, and spot-foliar treatments (localized). Broadcast treatment can be completed using ground broadcast methods or aerial application with the appropriate buffers.

APPLICATION METHOD DESCRIPTIONS

Spot Herbicide Application

A spot application treats individual plant(s) with the least amount of chemicals possible. The methods include, but are not limited, to the following:

S Wick and carpet roller applications. The herbicide is wiped on the plant(s) (noxious weeds) using hand held or equipment mounted rope wicks, sponges, fiber covered wipers, or carpet wiper designs. This application devise uses saturated ropes, wick or sponges that are used to apply the herbicide selectively on the plant. This method is effective where drift or sensitive water sources are a concern.

Localized Herbicide Application

"Localized" herbicide application is the treatment of individual or small groupings of plants. This application method is normally used only in areas of low-to-medium target-plant density.

The application methods for this application group include, but are not limited to, the following:

- **Low-volume foliar treatment.** Herbicides are applied with the use of a backpack sprayer, all terrain vehicle (ATV), or tractor with a spray gun. Herbicide is applied to the foliage of individual or clumps of plants during the growing season, just enough to wet them lightly. A relatively high percentage of herbicide is used mixed with water. Thickening agents are added where necessary to control drift. Dyes may also be added to see easily what areas have been treated.
- **S** Localized granular application. Granular or pellet forms of herbicide are hand-applied to the soil surface beneath the driplines of an individual plant, or as close to a tree trunk or stem base as possible. Herbicide is applied when there is enough moisture to dissolve and carry the herbicide to the root zone—but not so much water that it washes the granules off-site.

Broadcast Ground Herbicide Application

Broadcast herbicide applications treat an area, rather than individual plants. Broadcast applications are used to treat rights-of-way that are thickly vegetated (heavy stem density), access roads, and noxious weeds, The application methods for this group include, but are not limited to, the following:

- S **High-volume foliar treatments.** Herbicides are applied by truck, ATV, or tractor with a spray gun, broadcast nozzle, or boom. A hydraulic sprayer mounted on a rubber-tired tractor or truck or tracked-type tractor is used to spray foliage and stems of target vegetation with a mixture of water and a low percentage of herbicide. The herbicide mixture is pumped through hoses to a hand-held nozzle. A worker activates the nozzle and directs the spray to the target vegetation. Boom application methods involve a fixed nozzle or set of nozzles that spray a set width as the tractor passes over an area.
- S **Broadcast granular treatment.** Granular forms of herbicide are spread by hand, belly grinder, truck or tractor. The herbicide is spread over a relatively large area, such as in an electric yard, or around tower legs.

VEGETATION

The following mitigation measures would be observed to reduce impacts on vegetation:

As much as practical, be careful not to disturb low-growing plants. When possible, use only selective vegetation control methods (such as spot herbicide applications) that have little potential to harm non-target vegetation.

Use only those biological control agents (insects) that have been tested to ensure they are host-specific.

When possible, wash vehicles that have been in weed-infested areas (removing as much weed seed as possible) before entering areas of no known infestations.

Consider, if appropriate, reseeding after noxious weed treatments.

Where cost-effective and to the extent practicable, use regionally native plants for landscaping.

Use seeds, seedlings, or plants that are consistent with management objectives and adapted to climatic conditions, soils, landscape position, and the site itself.

Use native seed/plants if the species meet the objectives of the re-vegetation project, if the costs are reasonable, and if the seeds/plants are readily available in the quantity and quality needed to perform the project.

If native seed mixes are not reasonably priced or available in needed quantities, consider a seed mix with some percentage of native seeds.

Use high-purity seed; take actions to prevent purchase of seed contaminated with noxious weeds.

Apply mitigation measures (such as timing restrictions, or specific method use) resulting from T&E determinations or consultations.

Follow herbicide product label directions for appropriate uses, restrictions etc.

Use herbicide-thickening agents (as appropriate), label instructions, and weather restrictions to reduce the drift hazard to non-target plants.

Do not apply pellet herbicides within three times (3X) the crown width (or dripline) of an off-right-of-way tree.

In the rare case of an herbicide spill, follow all herbicide spill requirements, including containment and clean-up procedures.

Visit rights-of-way after treatments to determine whether target vegetation was controlled and whether non-target plants were affected.

SOILS

The following mitigation measures would be observed to reduce impacts on soils:

Do not use ground-disturbing mechanical equipment to clear on slopes over 20%.

Use mechanical clearing or heavy equipment when the ground is sufficiently dry to sustain the equipment and excessive rutting will not occur.

Re-seed or re-plant seedlings on slopes with potential erosion problems and/or take other erosion control measures as necessary.

WATER RESOURCES

The following mitigation measures would be applied for water resources.

In riparian areas, use selective control methods and take care not to affect non-target vegetation.

In riparian areas, leave vegetation intact, where possible.

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.

Follow herbicide product label directions for appropriate uses, restrictions etc.

Use herbicide thickening agents (as appropriate), label instructions, and weather restrictions to reduce the drift hazard to water resources.

Ensure that there is no danger of granular herbicides being washed from the areas of application.

Notify inspector and the State of any amount of herbicide spill in or near water.

Always use siphon prevention devices/methods when filling herbicide tanks from domestic water supplies.

Consider climate, geology and soil types in selecting the herbicide with lowest relative risk of migrating to water resources.

Protect surface water and groundwater by observing all riparian buffer widths and herbicide-free zone.

Before herbicide application, thoroughly review the right-of-way to identify and mark, if necessary, the buffer requirements.

Monitor to determine whether desired results for water resources were achieved or whether follow-up mitigation measures are necessary (e.g., erosion control measures).

Herbicide/Adju- vant Ecological	Buffer Width from Habitat Source per Application Method (i.e., stream, wetland, or sensitive habitats)						
Toxicities and Characteristics	Spot	Localized	Broadcast ¹	Aerial ²	Mixing, Loading, Cleaning		
Practically Non- toxic to Slightly Toxic	Up to Edge ^{3,4}	Up to Edge ^{3,4}	10.7 m ^{3,4} (35 ft.)	30.5 m ⁴ (100 ft.)	30.5 m ⁵ (100 ft.)		
Moderately Toxic, or if Label Advisory for Ground/ Surface Water	7.6 m ^{3,4} (25 ft.)	10.7 m ^{3,4} (35 ft.)	30.5 m ^{3,4} (100 ft.)	76.2 m ⁴ (250 ft.)	76.2 m ⁵ (250 ft.)		
Highly Toxic to Very Highly Toxic	10.7 m ^{3,4} (35 ft.)	30.5 m ^{3,4} (100 ft.)	Noxious weed control only. Buffer as per local ordinance.	Noxious weed control only. Buffer as per local ordinance.	76.2 m ⁵ (250 ft.)		

Table VI-2: Buffer Widths to Minimize Impacts on Non-Target Resources

¹ Using ultra low volume (ULV) nozzles with orifice size and spray pressure set to produce droplets at a minimum of 150 microns, boom or nozzle heights at the lowest possible height, and cross-wind speed of less than 10 mph.³

 2 Using ULV nozzles with orifice size and spray pressure set to produce droplets at a minimum of 150 microns, minimizing air shear relative to nozzle angle and aircraft speed, boom length at 70% or less of wingspan/rotor, swath adjustment not to exceed 60 feet based on maximum cross-wind speed of less than 10 mph, minimum safety clearance application height, and herbicide tank mixture dynamic surface tension is less than 50 dynes/cm.³

³ Goodrich-Mahoney, J.W., Determination of the Effectiveness of Herbicide Buffer Zones in Protecting Water Quality, Electric Power Research Institute, Report No. TR-113160, September 1999

⁴ Calculated from: A Summary of Ground Application Studies, Spray Drift Task Force, 1997

⁵ BPA Best Management Practice

AQUATIC SPECIES

Apply all appropriate mitigation measures outlined in the **Water** section of this chapter.

Apply all appropriate T& E mitigation measures outlined in **Wildlife** section.

WILDLIFE SPECIES

The following mitigation measures would apply for wildlife species.

Apply mitigation measures (such as timing restrictions, or specific method use) resulting from determinations or consultations.

AGRICULTURE

The following mitigation measures would apply to agricultural areas.

Prevent the spread of noxious weeds by cleaning seeds from equipment before entering cropland.

If using herbicides on grazing lands, comply with grazing restrictions as required per herbicide label.

For rights-of-way adjacent to agricultural fields, observe appropriate buffer zones necessary to ensure that no drift will affect crops.

If using herbicides near crops for consumption, comply with herbicide-free buffer zones, if any, as per label instructions.

For rights-of-way near organic farms, observe appropriate buffer zones, or provide for the owner to maintain the right-of-way, by way of a vegetation management agreement.

If reseeding, determine whether any of the adjacent properties are being, or will in the immediate future be, used for growing grass seed, especially high-purity strains.

If reseeding near grass seed fields, consult with the area seed certification and registration authority to determine whether buffer zones are necessary, appropriate grass mixtures allowed, and appropriate modes of seeding used.

Other Federal Lands

Notify and cooperate with other federal agencies when scheduling site-specific right-of-way vegetation control activities on their lands.

STATEMENT OF WORK NOXIOUS WEED MANAGEMENT

FY 2003

The Contractor will provide all labor, materials, herbicides, fuel, transportation, and bio-agents to implement noxious weed management activities under their jurisdiction.

Activities will be carried out in an "Integrated Pest Management" approach as outlined by the Section 15, Noxious Weed Act Amendment, of the 1990 Farm Bill.

- **1.** The amount of funding will not exceed \$5000. The local county weed board will determine control methods and sites to be controlled on Bonneville Power Administration (BPA) easements.
- **2.** The Control Measures approved for BPA rights-of-way can be a combination of the following measures:
 - A. <u>Educational Methods</u>, which create an awareness of undesirable plant species in BPA rightsof-way.
 - **B.** <u>Prevention Measures</u>, such as inventory, and measures, which prevent the spread of weeds.
 - C. <u>Competitive Plantings</u> to replace and/or prevent the establishment of undesirable plants.
 - **D.** <u>Cultural Control Methods</u> such as barriers and cultivation.
 - E. Chemical use of herbicides.
 - F. Biological release of agents, which feed on or destroy undesirable plants.
 - G. <u>Physical control</u> such as hand pulling or cutting of individual plants.
- **3.** All herbicide applications will be according to state and local laws. All applicators must be licensed in the state where applications are performed. The Bonneville Power Administration has completed a Vegetation Management Program Environmental Impact Statement. The Contractor will follow the enclosed mitigations when completing vegetation management projects
- **4.** Records of all control measures must be completed the day the control measures are performed. Records must be according to state law, and location must be identified by BPA line names and structure numbers. All records of control measures will be due by September 15, 2002.
- **5.** BPA will not fund control measures in areas, which do not have active noxious weed control programs being performed by landowners, except when required by easement acquisition documents.
- 6. Monitoring will be completed by the Contractor. Monitoring will consist of a field review of areas where BPA has financed control measures, preferably within one month of control actions. Documentation of monitoring will be a short written summary consisting of the identification of the location, species controlled, methods of control used, and a judgment of the effectiveness of control. The Monitoring area will be based on practical management units that have similar habitats, noxious weeds, control methods and/or management.
- 7. Partial payments will be allowed during the contract period, with 20% being retained until all requested records, monitoring data, landowner herbicide transaction forms, and final summaries are turned into the COTR (Contracting Officer's Technical Representative).
- **8.** If the Contractor provides herbicides to landowners, the Contractor will have the landowners fill out BPA form 6530.11e and show that they are appropriately licensed to apply that product. The landowner must be provided BPA's herbicide list and given the buffer zones that are part of BPA's requirements

Noxious Weed Management Contracts Spokane Region 2003

1. The Contractor will notify federal, state, or tribal entities in advance before applying herbicide on those lands.

Application on BLM lands is restricted to certain herbicides and conditions for the control of noxious weeds. use only those herbicides that are approved for both BLM use and Bonneville use.

2. Those herbicides presently approved for both Bonneville and BLM—Washington, eastern Oregon*, Idaho, and Montana Districts—are as follows:

Bromacil	Glyphosate+ 2,4-D	2,4-D	Picloram
Bromacil+	Hexazinone	Dicamba	Picloram+ 2,4-D
Diuron	Imazapyr	Dicamba + 2,4-D	Sulfomturon methyl
Chlorsulfuron	Mefluidide	Diuron	Tebuthiuron
Clopyralid	Metsulfuron methyl	Glyphosate	Triclopyr

Oregon and Washington continues under herbicide injunction except for control of noxious weeds. This herbicide list would then apply only for the use on noxious weeds.

3. Work will be planned and implemented according to the recently finished Environmental Impact Statement for the Control of Vegetation on Bonneville Power facilities. This analysis document can be accessed via the BPA's web Site located at:

http://www.efw.bpa.gov/cgi-bin/PSA/Introduction

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.

N/A

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3). See Handbook — <u>Reseeding/replanting</u> for requirements.

See previous

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

Soils and adaptation of introduced species are more competitive with noxious weeds. Efforts will be made to include native species into seed mixtures.

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

Seeding should be completed when there is enough moisture to allow for 2 months of growth. Seeding can be completed early and late fall, or late winter or early spring.

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.

Site will be inspected during treatment. In addition routine patrols by BPA ground and aerial patrols. And Weed board members

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

Routine patrols by BPA ground and aerial patrols. The Local Weed Board Patrols and inspects for weeds on a yearly basis.

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".

None

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

None