

RISK ASSESSMENT FOR NOXIOUS & INVASIVE WEEDS

1. Project Name: Spring Valley Wind, LLC, Wind Generating Facility

2. NEPA No: DOI-BLM-NV-L020-2010-007-EA

3. Date Risk Assessment was completed: July 7, 2010

4. Describe steps taken to complete Risk Assessment:

Prior to conducting this noxious/invasive weed risk assessment, SWCA Environmental Consultants (SWCA) obtained the Ely District noxious weed inventory data from Bonnie Million of the Bureau of Land Management (BLM) Ely District Office (Figure 1). Additionally, SWCA biologists made casual observations of invasive weed species during other biological surveys within the project area. Noxious weed field surveys were not completed for this assessment.

5. Project Description:

Spring Valley Wind, LLC, is proposing the development of a 150-megawatt (MW) wind generating facility (WGF) along with associated roads, rights-of-way, and ancillary facilities within Spring Valley, which is located approximately 40 km (25 miles) southeast of Ely, Nevada. The project area is 7,820 acres and the WGF would be built entirely on BLM-managed lands. Of the total project area only 91 acres would be permanently removed from development of project facilities, while an additional 590 acres would be temporarily disturbed for the purpose of temporary laydown areas. These temporary laydown areas would be reclaimed following completion of the WGF.

Development of this project is motivated by growing electrical power needs within the State of Nevada and will help to satisfy the State of Nevada goal of achieving not less than 20% of electrical energy generation from renewable resources by 2015 (NRS 704.7821). Development of the WGF will include placement of up to 75 wind turbines, which have an anticipated life span of 30 years.

6. Project Location:

The project is located in White Pine County, Nevada, within Sections 25 and 36, Township 15 North, Range 66 East; Sections 30–32, Township 15 North, Range 67 East; Sections 1 and 12, Township 14 North, Range 66 East; and Sections 5, 6, and 7–9, Township 14 North, Range 67 East, found on the South Bastion Spring, Yellowwood Dry Lake, Hogum, and Cave Mountain Nevada, U.S. Geological Survey quadrangles. The project area is generally bounded on the west side by Nevada State Highway 893 and on the south and east sides by U.S. Highway 650

7. Risk Assessment:

The risk assessment is evaluated by two categorical factors. Factor 1 is determined by the current condition of noxious and invasive weed populations within and adjacent to the project site, including access roads. Factor 2 is independent from factor 1 and is determined by evaluating the consequences of noxious and invasive weed establishment within the project site.

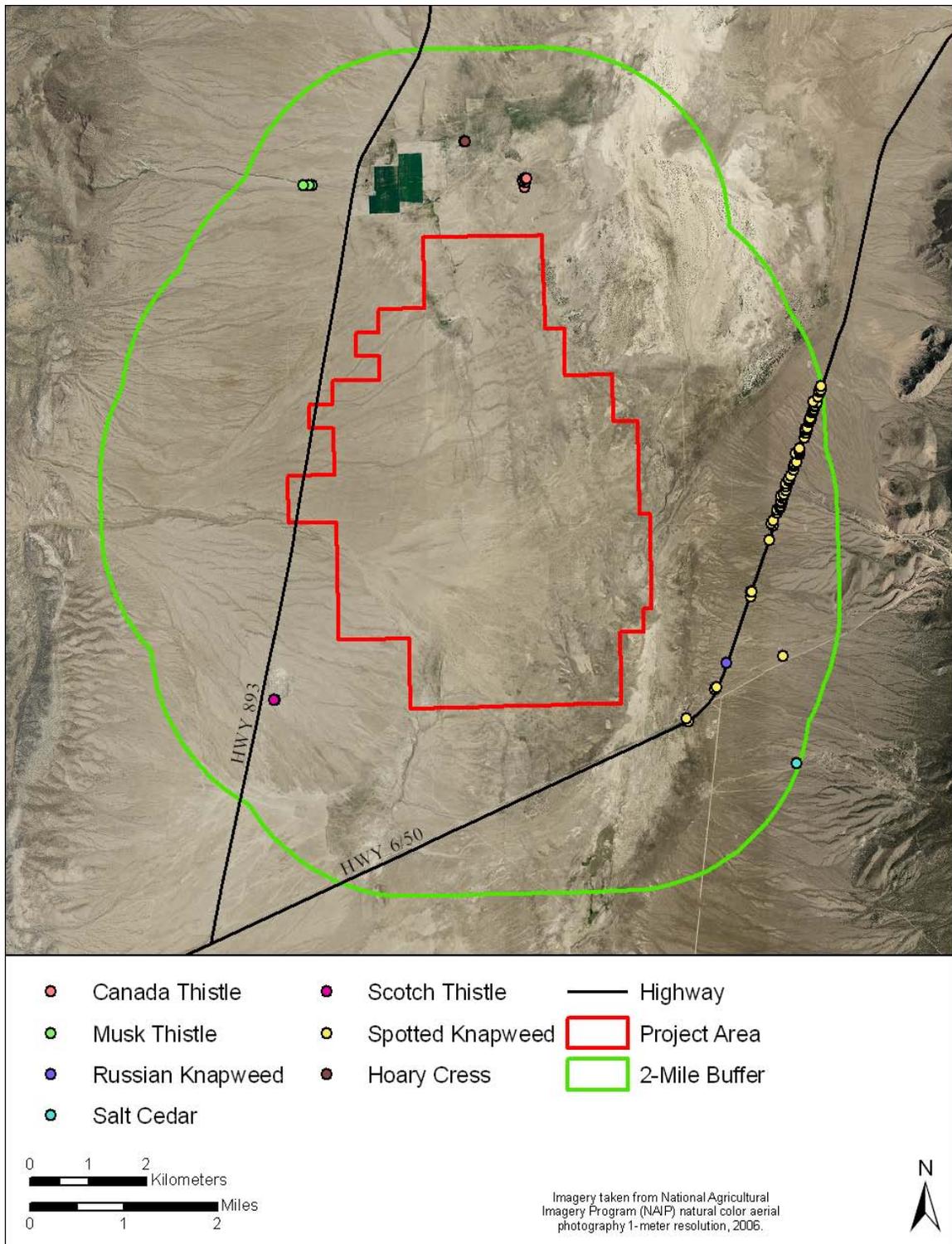


Figure 1. Recorded weed locations within 1 mile of the project area.

Factor 1 is determined to be Moderate (4–7) because of the current infestations of noxious and invasive plants species within and adjacent to the project area. These species and their general occurrence location are summarized below in Table 1. Analysis of noxious weed inventory data was limited to a 1-mile buffer around the project area.

Table 1. Noxious Plant Species within the Project Area and 1-mile Buffer

Scientific Name	Common Name	Rank	Present in Project Area
<i>Acroptilon repens</i>	Russian knapweed	Category B	
<i>Bromus tectorum</i>	Cheatgrass	Invasive	X
<i>Carduus nutans</i>	Musk thistle	Category B	
<i>Centaurea stoebe ssp. micranthos</i>	Spotted knapweed	Category A	
<i>Cirsium arvense</i>	Canada thistle	Category C	
<i>Cirsium vulgare</i>	Bull thistle	Invasive	
<i>Halogeton glomeratus</i>	Halogeton	Invasive	X
<i>Salsola tragus</i>	Russian thistle	Invasive	X

Factor 2 is determined to be High (9) because of the amount of acres being permanent and temporarily disturbed presents a high potential to spread existing weed populations, especially invasive species such as cheatgrass and halogeton. Also, the use of heavy equipment to construct and maintain the infrastructure for the project could transport weeds from other areas and introduce new weed species to the project area and surrounding landscape. An increase in cheatgrass could increase the fire frequency in native plant communities.

Risk Rating

The risk ratings for the project sites are determined by multiplying factors 1 and 2. The subsequent value determines the course of action required to mitigate noxious and invasive weeds resulting from project implementation.

8. Determination

The risk rating for this project is High. This level of risk rating indicates that preventative measures for noxious and invasive weeds are necessary. Preventative measures for this project are discussed below in the following section.

9. Preventative Measures

For this project, the risk rating is High. This indicates that the project must be modified to reduce the risk level through preventive management measures. These preventive management measures include:

1. Prior to entering public lands, the contractor, operator, or permit holder will provide information and training regarding noxious weed management and identification to all personnel who will be affiliated with the implementation and maintenance phases of the project. The importance of preventing the spread of weeds to uninfested areas and importance of controlling existing populations of

weeds will be explained. It is also recommended that an annual refresher of this training be provided to affiliated personnel.

2. Prior to construction, a site-specific weed survey will occur. Monitoring will be conducted during and five years after reclamation reports will be provided to the BLM Ely District Office. If the presence and/or spread of noxious weeds is noted, appropriated weed control procedures will be determined in consultation with Ely District Office personnel and will be in compliance with the appropriate BLM Handbook sections and applicable laws and regulations. All weed control efforts on BLM-administered lands will be in compliance with BLM Handbook H-9011, H-9011-1 Chemical Pest Control, H-9014 Use of Biological Control Agents of Pests on Public Lands, and H-9015 Integrated Pest Management. Submission of pesticide use proposals and pesticide application records will be required.
3. To eliminate the transport of vehicle-borne weed seeds, roots, or rhizomes, all vehicles and heavy equipment used for the completion, maintenance, inspection, or monitoring of ground-disturbing activities or for authorized off-road driving will be free of soil and debris capable of transporting weed propagules. All such vehicles and equipment will be cleaned with power or high pressure equipment prior to entering or leaving the work site or project area. Cleaning efforts will concentrate on tracks, feet, tires, and the undercarriage. Special emphasis will be applied to axels, frames, cross members, motor mounts, on and underneath steps, running boards, and front bumper/brush guard assemblies. Vehicle cabs will be swept out and refuse will be disposed of in waste receptacles. Cleaning sites will be recorded using global positioning system (GPS) units or other mutually acceptable equipment and provided to the District Weed Coordinator or designated contact person.
4. To eliminate the introduction of noxious weed seeds, roots, or rhizomes, all interim and final seed mixes, hay, straw, hay/straw, or other organic products used for reclamation or stabilization activities, feed, bedding will be certified free of plant species listed on the Nevada noxious weed list or specifically identified by the BLM Ely District Office.
5. Removal and disturbance of vegetation would be kept to a minimum through construction site management (e.g., using previously disturbed areas and existing easements, limiting equipment/materials storage and staging area sites, etc.)
6. Reclamation would normally be accomplished with native seeds only. These would be representative of the indigenous species present in the adjacent habitat. Rationale for potential seeding with selected nonnative species would be documented. Possible exceptions would include use of non-native species for a temporary cover crop to out-compete weeds. Where large acreages are burned by fires and seeding is required for erosion control, all native species could be cost prohibitive and/or unavailable. In all cases, seed mixes would be approved by the BLM Authorized Officer prior to planting.
7. At the end of the project five consecutive years of monitoring are required with no establishments or spread of noxious weeds allowed on the site at the time of

reclamation release. Any noxious weeds that become established or spread will be controlled by the proponent.

Reviewed by: /s/Mindy Seal
Mindy Seal
Natural Resource Specialist

7/8/2010
Date