Appendix E

Framework Noxious Weed Plan

Gateway West Transmission Line Project

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1.0 INTRODUCTION

1.1 Background

Rocky Mountain Power and Idaho Power Company (Companies) are proposing to construct and operate approximately 1,000 miles of new 230-kilovolt (kV), 345-kV and 500-kV alternating current electric transmission system, called the Gateway West Transmission Line Project (Project), consisting of 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. The proposed transmission line is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the Companies' larger service areas and to other interconnected systems. The Project includes ground-disturbing activities associated with the construction of above-ground, single-circuit transmission lines involving towers, access roads, multiuse areas, fly yards, and pulling sites as well as associated substations, communication sites, and electrical supply distribution lines. The Project crosses private land and public lands administered by the Bureau of Land Management (BLM), U.S. Forest Service (Forest Service), and the states of Idaho and Wyoming.

The format and content of this framework Noxious Weed Plan based on the principles and procedures outlined in the BLM Integrated Weed Management Manual 9015 (1992). This Plan includes a discussion on 1) the plan purpose and goals and objectives, 2) the noxious weed inventory, 3) management practices, 4) monitoring, and 5) the use of pesticides/herbicides. This document provides a template for the detailed Final Noxious Weed Plan to be developed by the Construction Contractor.

1.2 Purpose

The Wyoming Weed and Pest Council and the Idaho State Department of Agriculture (ISDA) have identified noxious weeds that occur within the states of Wyoming and Idaho. Some of these noxious weeds have the potential to occur on the Project right-of-way. This framework Noxious Weed Plan provides methods to control the potential occurrence/infestation of noxious weeds during and following construction of the Project. It is the responsibility of the Companies and/or the Construction Contractor(s), working with the Compliance Inspection Contractor (CIC) and BLM Project Manager, to ensure noxious weeds are identified and controlled during the construction of project facilities and all federal, state, county, and other local requirements are satisfied. The control of invasive species is addressed in Appendix D – Framework Reclamation Plan.

1.3 Goals and Objectives

The goal of this framework Noxious Weed Plan is to implement early detection, containment, and control of noxious weeds during Project construction. Information gathered during pre-construction surveys and provided by the BLM will be used to monitor and control the spread of noxious weeds that may pose a potential infestation threat during the construction and operation of the transmission line in areas on or adjacent to the Project. General preventive and treatment measures are described in Section 3.0 of this plan. Weed management environmental protection measures (EPMs)

are contained in Appendix Z of the Plan of Development (POD), currently being discussed with the Agencies. When these discussions are completed, finalized measures will be listed herein. An evaluation of the effectiveness of the prescribed control measures (Section 4.0) also will be implemented during the operational phase of the transmission line.

Noxious weed is a legal term meaning any plant officially designated by a federal, state, or local agency as injurious to public health, agriculture, recreation, wildlife, or property (Sheley and Petroff 1999). The more general term *invasive species* refers to species that are non-native to the ecosystem under consideration and whose introduction causes, or is likely to cause, economic or environmental harm or harm to human health (National Invasive Species Information Center 2011). Invasive plant species include those legally designated as noxious, as well as additional species that may be considered noxious in some areas but not others, and other species that are already widespread.

Soil disturbances, such as those caused by the construction of the Project, could result in the establishment of new populations and spread of existing populations of noxious and invasive weeds. This section of the framework describes the known status of noxious-weed species within the Project area, the regulatory agencies responsible for the control of noxious and invasive weeds, and steps the Companies will take in preventing the establishment and spread of noxious- and invasive-weed species that are the result of Project construction activities. In addition to providing updated information contained within this framework, the final Noxious Weed Plan will include information on locations of significant weed populations within the Project footprint and proposed treatment methods as applicable.

The focus of the Companies' noxious-weed control efforts will be to prevent the spread of new infestations resulting from the Companies' activities. The Companies are only responsible for the control of noxious weeds and invasive species that are a result of their construction-related, surface-disturbing activities. The Companies are not responsible for noxious weeds and invasive species that occur adjacent to Project areas or for controlling or eradicating a species that was present prior to the Project. For example, cheatgrass *(Bromus tectorum)* is widespread across large portions of the Project area. Eradication of these infestations is not the responsibility of the Companies and would not be attempted.

2.0 NOXIOUS WEED INVENTORY

The noxious weed inventory for the Project will include 1) the identification of weed species designated noxious by the States of Wyoming and Idaho and having the potential to occur within the area affected by the Project, and 2) the gathering of information to identify specific noxious weed populations in the Project area, including pre-construction surveys along the Project right-of-way.

2.1 State Listed Noxious Weeds

Table E-1 contains a list of the noxious-weed species known or expected to occur within the Project area based on their recorded presence in the counties where the Project is located. The BLM and Forest Service use the most current Idaho and Wyoming state noxious-weed lists for managing weeds on federal lands. The final Noxious Weed Plan

will include the most current noxious-weed species lists produced by the two states just prior to construction.

The State of Wyoming has designated 25 plant species as noxious (Wyoming Weed and Pest Council 2012) and the ISDA has designated 64 plant species as noxious. Idaho's noxious weeds are divided into three categories (ISDA 2011):

- Statewide Early Detection and Rapid Response (EDRR) List: If weeds on this list are identified, they will be reported to ISDA within 10 days, and eradicated in the same growing season as identified.
- Statewide Control List: This list contains species that are known to exist throughout the state. When identified, a control plan will be developed by the county, with active control methods to be employed in no more than 5 years.
- Statewide Containment List: Weed list: This list contains species that are known to exist throughout the state. Weed control efforts may be directed at reducing or eliminating new or expanding populations, while known populations may be managed by any approved weed control methodology, as determined by the county.

Table E- 1. Invasive and Noxious Plant Species Potentially Present in the Gateway West Project Analysis Area

Common Name	Scientific Name	Invasive Exotic Species?[1]	Listed as Noxious[2]			Segments in Which Known or Likely to Occur[2,3]	
			State of Wyoming (Designated)	Wyoming Counties (Declared)	State of Idaho[4]	Wyoming	Idaho
Species on Wyoming or Idaho Noxious Weed List							
Black henbane	*Hyoscyamus niger*	Yes	--	Albany, Converse, Lincoln, Natrona, Sweetwater	Control	All	All
Buffalobur	*Solanum rostratum*	Yes	--	Converse, Natrona	Control	All	8, 9
Canada thistle	*Cirsium arvense*	Yes	X		Containment	All	All
Common burdock	*Arctium minus*	Yes	X	--	--	, 1W, 2, 4	All
Common St. Johnswort	*Hypericum perforatum*	Yes	X	--	--	4	8
Common Tansy	*Tanacetum vulgare*	Yes	X	--	--	All	5, 7
Dalmatian toadflax	*Linaria dalmatica*	Yes	X	--	Containment	All	All
Diffuse knapweed	*Centaurea diffusa*	Yes	X	--	Containment	All	All
Dyer's woad	*Isatis tinctoria*	Yes	X	--	Control	All	All
Eurasian watermilfoil	*Myriophyllum spicatum*	Yes	--	--	Control	--	8
Field bindweed	*Convolvulus arvensis*	Yes	X	--	Containment	All	All
Hairy whitetop, Hoary cress	*Cardaria pubescens*	Yes	X	--	--	All	All
Houndstongue	*Cynoglossum officinale*	Yes	X	--	Containment	, 1W, 2, 4	4, 5, 7
Johnsongrass	*Sorghum halepense*	Yes	--	--	Control	--	5. 7, 8
Jointed goatgrass	*Aegilops cylindrica*	Yes	--	Converse	Containment	, 1W	All
Leafy spurge	*Euphorbia esula*	Yes	X	--	Containment	All	All
Matgrass	*Nardus stricta*	Yes	--	--	Control	--	5
Musk thistle	*Carduus nutans*	Yes	X	--	Control	All	All
Orange hawkweed	*Hieracium aurantiacum*	Yes	--	Converse	Control	--	5, 7, 8
Oxeye daisy	*Chrysanthemum leucanthemum*	Yes	X	--	Containment	, 1W, 2, 4	4, 7
Perennial pepperweed	*Lepidium lapathifolium*	Yes	X	--	Containment	All	All
Perennial sowthistle	*Sonchus arvensis*	Yes	X	--	Control	All	All

Table E-1: Invasive and Noxious Plant Species Potentially Present in the Gateway West Project Analysis Area (continued)

Common Name	Scientific Name	Invasive exotic species?[1]	Listed as Noxious[2]			Segments in Which Known or Likely to Occur[2,3]	
			State of Wyoming (Designated)	Wyoming Counties (Declared)	State of Idaho[4]	Wyoming	Idaho
Meadow hawkweed, yellow hawkweed	*Hieracium pretense, H. caespitosum*	Yes	--	--	Control	--	7
Plumeless thistle	*Carduus acanthoides*	Yes	X	--	Control	, 1W	--
Poison hemlock	*Conium maculatum*	Yes	--	--	Containment	, 1W, 2, 3	All
Puncture vine	*Tribulus terrestris*	Yes	--	Natrona	Containment	, 1W, 2	All
Purple loosestrife	*Lythrum salicaria*	Yes	X	--	Containment	--	All
Quackgrass	*Agropyron repens*	Yes	X	--	--	All	All
Rush skeletonweed	*Chondrilla juncea*	Yes	--	Converse	Containment	--	5, 7, 8, 9, 10
Russian knapweed	*Acroptilon repens*	Yes	X	--	Control	All	All
Russian olive	*Elaeagnus angustifolia*	Yes	X	--	--	, 1W	All
Salt cedar, tamarisk	*Tamarix spp.*	Yes	X	--	Containment	All	All
Scotch broom	*Cytisus scoparius*	Yes	--	Converse	Control	--	5, 9
Scotch thistle	*Onopordum acanthium*	Yes	X	--	Containment	, 1W, 4	All
Skeletonleaf bursage	*Artemisia tomentosa*	Yes	X	--	Control	All	5, 7, 8, 10
Spotted knapweed	*Centaurea maculosa*	Yes	X	--	Containment	All	All
Silverleaf nightshade	*Solanum Elaeagnifolium*	Yes	--	--	Control	--	8, 10
Syrian beancaper	*Zygophyllum zabago*	Yes	--	Converse	EDRR	--	5
Tansy ragwort	*Senecio jacobaea*	Yes	--	Converse	Containment	--	5
Vipers blugloss	*Echium vulgare*	Yes	--	--	Control	--	8
Whitetop, hoary cress	*Cardaria draba*	Yes	X	--	Containment	, 1W, 2, 4	All
Yellow starthistle	*Centaurea solstitialis*	Yes	--	--	Containment	--	All
Yellow toadflax	*Linaria vulgaris*	Yes	X	--	Containment	, 1W, 2, 4	All
Absinth wormwood	*Artemisia absinthium*	Yes	--	Converse	--	, 1W	8
Baby's breath	*Gypsophila paniculata*	Yes	--	Converse	--	--	--
Bull thistle	*Cirsium vulgare*	Yes	--	Converse, Lincoln	--	All	All
Bur buttercup	*Ranunculus testiculatus*	Yes	--	Converse	--	All	All

Table E-1: Invasive and Noxious Plant Species Potentially Present in the Gateway West Project Analysis Area (continued)

Common Name	Scientific Name	Invasive exotic species?[1]	Listed as Noxious[2]			Segments in Which Known or Likely to Occur[2,3]	
			State of Wyoming (Designated)	Wyoming Counties (Declared)	State of Idaho[4]	Wyoming	Idaho
Other Species							
Cheatgrass/downy brome	*Bromus tectorum*	Yes	--	Albany, Natrona	--	All	All
Chicory	*Cichorium intybus*	Yes	--	Converse	--	, 1W	All
Common cocklebur	*Xanthium strumarium*	Yes	--	Converse	--	All	All
Common crupina	*Crupina vulgaris*	Yes	--	Converse	--	--	--
Common mullein	*Verbascum thapsus*	Yes	--	Converse	--	All	All
Common sunflower	*Helianthus annuus*	Native	--	Converse	--	, 1W	--
Curlycup gumweed	*Grindelia squarrosa*	Native	--	Natrona	--	1W	--
Curly dock	*Rumex crispus*	Yes	--	Converse	--	All	All
Dames rocket	*Hersperis matronalis*	Yes		Converse	--	, 1W, 2, 4	4, 5, 7, 9
Foxtail barley	*Hordium jubatum*	Native	--	Sweetwater	--	3, 4	--
Geyer larkspur	*Delphinium geyeri*	Native	--	Albany, Carbon	--	, 1W, 2, 3	--
Goatsrue	*Galega officinalis*	Yes	--	Converse	--	--	--
Gorse	*Ulex europaeus*	Yes	--	Converse	--	--	--
Halogeton	*Halogeton glomeratus*	Yes	--	Carbon, Converse, Natrona,	--	All	5, 7, 8, 9
Iberian starthistle	*Centaurea iberica*	Yes	--	Converse	--	, 1W	--
Italian thistle	*Carduus pycnocephalus*	Yes	--	Converse	--	--	--
Japanese brome	*Bromus japonicus*	Yes	--	--	--	All	All
Lady's bedstraw	*Galium verum*	Yes	--	Converse	--	2, 3, 4	7
Meadow knapweed	*Centaurea nigrescens*	Yes	--	Converse	--	--	--
Medusahead	*Taeniatherum caput-medusae*	Yes	--	Converse	--	--	8
Mountain thermopsis	*Thermopsis montana*	Native	--	Sweetwater	--	3, 4	--
Musk mustard, blue mustard	*Chorispora tenella*	Yes	--	Converse	--	All	All
Plains pricklypear	*Opuntia polyacantha*	Native	--	Carbon	--	, 1W, 2, 3	--
Redstem filaree	*Erodium cicutarium*	Yes	--	--	--		All
Russian thistle	*Salsola iberica*	Yes	--	--	--	All	All

Table E-1: Invasive and Noxious Plant Species Potentially Present in the Gateway West Project Analysis Area (continued)

Common Name	Scientific Name	Invasive exotic species?[1]	Listed as Noxious[2]			Segments in Which Known or Likely to Occur[2,3]	
			State of Wyoming (Designated)	Wyoming Counties (Declared)	State of Idaho[4]	Wyoming	Idaho
Sandbur	*Cenchrus incertus*	Native	--	Converse	--	--	--
Scentless chamomile	*Tripleurospermum inodorum*	Yes	--	Converse	--	All	8, 9
Showy milkweed	*Asclepias speciosa*	Native	--	Converse	--	, 1W	--
Squarrose knapweed	*Centaurea virgata*	Yes	--	Converse	--	--	--
Sulfur cinquefoil	*Potentilla recta*	Yes	--	Converse	--	--	5, 7
Teasel	*Dipsacus fullonum*	Yes	--	Converse		--	All
Wild licorice	*Glycyrrhiza lepidota*	Native	--	Converse, Natrona	--	, 1W	--
Wild oats	*Avena fatua*	Yes	--	Lincoln	--	All	All
Wyeth's lupine	*Lupinus wyethii*	Native	--	Converse	--	, 1W	--

[1] Included in INVADERS database (University of Montana-Missoula 2009).
[2] Source for status: ISDA 2012; Wyoming Weed and Pest 2008. "—"= not listed.
[3] Distribution based on INVADERS database (University of Montana-Missoula 2009), PLANTS database (NRCS 2009), and ISDA (2008). Distribution of native species is only shown for Wyoming counties where listed as noxious.
[4] Idaho listing categories are explained in text.

3.0 NOXIOUS WEED MANAGEMENT

Regulatory agencies along the proposed transmission alignment, and specifically the BLM, have varying requirements for weed management. A pre-construction survey for noxious weeds will be conducted using the protocol established by the BLM's Integrated Weed Management Manual 9015 (BLM 1992) and as required by the US Forest Service (USFS),

The management of noxious weeds will be considered throughout all stages of the Project including:

- Educating all construction personnel regarding the identified problem areas and the importance of preventive measures and treatment methods.
- Specific preventive measures to prevent the spread of noxious weeds.
- Pre- and post-construction treatment methods to be applied to areas of noxious weed infestation.

Following is a description of the measures that may be required for noxious weed management as directed by the BLM or State Quarantine Officer. Applicable measures will be agreed upon prior to the onset of any ground-disturbing activities, and this Noxious Weed Plan will be modified accordingly.

3.1 Identification of Problem Areas and Education

Prior to the initiation of construction activities, all construction personnel will be instructed on the importance of controlling noxious weeds. As part of start-up activities, the Construction Contractor will provide information and training regarding noxious weed management. The importance of preventing the spread of noxious weeds in areas not infested and controlling the proliferation of weeds already present will be emphasized. Prior to construction, areas of concern previously identified during the Weed Survey will be flagged by the Construction Contractor and reviewed by the CIC. This flagging will alert construction personnel and prevent area access until noxious weed management control measures, as described below, have been implemented.

3.1.1 Weed Management Personnel Requirements

Weed management actions shall be carried out by a weed management specialist with the following qualifications:

- Training and experience in native plant taxonomy/identification;
- Training and experience in field ecology and plant community mapping;
- Training in weed management or Integrated Pest Management with an emphasis in weeds;
- Experience in coordination with agency and private landowners; and,
- Recent attendance at a BLM-approved noxious weed training course

3.2 Other Specific Stipulations and Methods

3.2.1 Preventive Measures

Preventive measures will be implemented to prevent the spread of noxious weeds during the construction activities, as well as during reclamation and rehabilitation efforts. Detailed information regarding reclamation, along with the control of noxious plant species, is contained in Appendix Z of the POD. Prevention and control methods may include mechanical, cultural, biological, or chemical measures to prevent and control noxious weeds associated with Project activities. The weed specialist working in conjunction with the BLM and CIC will identify areas where noxious weed control measures will be implemented.

3.2.2 Reclamation Actions

As specified in Appendix D of the POD, areas where weed control measures have been implemented and require post-construction reclamation actions (i.e., seeding) will follow the specific stipulations and methods presented as EPMs contained in Appendix Z of the POD.

3.3 Agency Requirements

Noxious weeds will be monitored and controlled during both construction and operation of the Project. Noxious weeds identified within the Project area will be reported to the applicable land-managing agency in whose jurisdiction the weeds occur. The appropriate weed control procedures, including target species, timing of control, and method of control, will be determined in consultation with the applicable land-managing agency. If herbicides are considered for use to control noxious weeds, the type of herbicide and methods of use would be approved by the applicable land-managing agency prior to their use. Monitoring surveys will be conducted following treatment of infected areas. These monitoring surveys are expected to occur in the fall (August–September) and would be conducted following the same methods as the pre-construction survey. Annual herbicide spraying would be planned and coordinated with the applicable agencies (based on the results of the prior years' survey data) to ensure spraying is conducted only where necessary, in areas approved for herbicide use, at the proper growing period, during favorable environmental conditions, and using only the appropriate and agency approved chemicals to control targeted species.

The Companies may be able to take advantage of any existing cooperative agreements between the land-managing agencies and the counties by providing the funds required for county personnel to implement the necessary weed control procedures. If not, the Companies will be responsible for providing the necessary personnel or hiring a Contractor to implement the weed control procedures with the qualifications as described in Section 3.1.

4.0 MONITORING

A weed management specialist, contracted by the Companies, will monitor the Project and any other areas of disturbance associated with the Project for a period not to exceed 5 years. Monitoring will be conducted annually in the fall, more specifically during the life cycle of the species identified during pre-construction inventories. This

monitoring may coincide with the reclamation monitoring identified and outlined in Appendix D of the POD. Growing seasons will vary from year to year, and consequently the length of monitoring will vary as well.

4.1 Reclamation Monitoring

During reclamation monitoring, the Companies, or the representative contractor(s) for the Companies, will initiate monitoring of previously identified affected/disturbed areas during the first spring following construction and proceed with monitoring during subsequent intervals.

Noxious weed monitoring will occur annually for up to 3 years following completion of each segment of the Project. In addition, noxious weed conditions will be included in the evaluations of revegetation success as described in Appendix D of the POD. The Companies will document their observations following the above noted field inspections and make these monitoring reports available to the local, state and federal agencies, as required.

Areas where the spread of a noxious weed infestation is noted, particularly in previously unaffected locations, will be further evaluated to determine if these areas require remedial action and additional treatment. The Companies will identify such areas to the agencies by state, county, and milepost (or nearest transmission structure number) and will record any additional noxious weed control treatments. A report summarizing right-of-way stability, revegetation progress, percent of cover, and weed infestation will be provided to the BLM as described in Appendix D of the POD.

4.2 Ongoing Monitoring

The Companies will consult with the agencies and counties should they have a concern pertaining to noxious weeds within their jurisdiction. The agencies may also contact the Companies to report on the presence of noxious weeds. The Companies will control weeds on a case-by-case basis, per previous agreements or contracts, the Companies will implement suitable and timely measures within the right-of-way to address the weed threat, as well as to suppress and help control new infestations that occur solely within the right-of-way, insofar as possible.

5.0 PESTICIDE APPLICATION, HANDLING, SPILLS, AND CLEANUP

5.1 Pesticide Application and Handling

The list of pesticides to be used (see Attachment A) will be reviewed and approved by the BLM and USFS, and pesticide application will be based on information gathered from the Weed Districts and agencies. Before application, all required permits from the local authorities will be obtained. Permits may contain additional terms and conditions that go beyond the scope of this management plan. Application of pesticides will follow the EPMs contained in Appendix Z of the POD.

5.2 Pesticide Spills and Cleanup

All reasonable precautions will be taken to avoid pesticide spills. EPMs describing pesticide spills and cleanup, worker safety, and spill reporting are presented in Appendix Z of the POD.

Additional information regarding the handling of hazardous materials may be found in Appendix P – Framework Hazardous Material Management Plan and Appendix G - Framework Spill Prevention, Containment and Countermeasures Plan.

6.0 LITERATURE CITED

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ATTACHMENT A
BLM-APPROVED PESTICIDES

BLM-APPROVED PESTICIDES

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