United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Safford Field Office
711 South 14th Avenue, Suite A
Safford, Arizona 85546-3335
www.blm.gov/az/

August 12, 2014

Memorandum

To: Case Files for Southwest Transmission Cooperative; Guthrie Peak Substation, Dos Condados Substation, and Morenci Substation

From: Scott C. Cooke
Field Manager

Subject: 2014 Pesticide Use Proposals (PUPs) and Determination of NEPA Adequacy (DNA)

As noted on the memo from the AZ BLM State Weed Coordinator dated July 17, 2014 there was some disagreement surrounding the adequacy of the NEPA associated with DOI-BLM-AZ-G010-2014-0010-DNA.

My reasoning for signing the DNA and associated PUPs are as follows:

Recognizing that writing a new EA would be the ideal situation, the DNA referenced two previous EA's, the Safford RMP, and the BLM's 2007 Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement. The vegetation treatment EIS analyzes the proposed herbicides and associated mitigation measures.

I also took into consideration an environmental report for the Hackberry Substation project from 2006, also a Southwest Transmission Cooperative project, which includes an herbicide application plan and mitigation measures for herbicide treatment. Associated are Pesticide Use Proposal (PUP) DOI-BLM-AZG010-13-001-P (which was approved by the Safford Field Office and Arizona State Office July 17, 2013) and EA#AZ-410-2006-0051. The proposed action involves an action that is essentially similar to one of the components previously analyzed within the above referenced EA and PUP. The Hackberry PUP specifies treatment of 4.08 acres, whereas the proposed total treatment area for all three sites is approximately 6 acres. All 6 acres have been previously disturbed and the vast majority is covered by gravel. Moreover, the herbicides are identical with the same application rates. All herbicides proposed are approved for use on BLM administered land.

I consulted with two different BLM NEPA experts and the relative risk associated with approving this action with a DNA and associated PUPs is very low and timeliness to meet SW Transmission Cooperative's needs for this year was also considered.

As noted on the 2014 PUPs themselves, Pesticide Use Proposals DOI-BLM-AZG010-14-001-P, DOI-BLM-AZG010-14-002-P, and DOI-BLM-AZG010-14-003-P have been approved by the Safford Field Office and the Arizona State Office.

Pesticide Use Proposal Disapproval from Arizona State Weeds Coordinator

To: Safford Field Office and Deputy State Director of Resources

From: Lisa Thornley

Date: 7/17/2014

Pesticide Use Proposal Number: DOI-BLM-AZG010-14-001-P, DOI-BLM-AZG010-14-002-P, DOI-BLM-AZG010-14-003-P

Three Pesticide Use Proposals (PUPs) were submitted to me with two Environmental Assessments (EAs) and a DNA linking the EAs.

One of the two EAs was 4 pages long, which was not adequate because the document did not analyze in discussion of the resources concerns, no specific herbicides purposed, no application methods, no risks associated, no impacts, and no mitigation measures, no conservation measures, and no Standard Operating Procedures.

The second EA was signed in 2006 before the Programmatic VEG EIS on BLM in 17 Western States (2007). This EA was not adequate because the document was out dated and did not reference the VEG EIS (2007), no specific herbicides purposed, no associated risks, no mitigation measures, no conservation measures, and no Standard Operating Procedures.

The DNA that linked the two EAs was not adequate because it did not have the same information that was in the two EA assessments. The DNA had different information than the two EAs. The DNA document stated the specific herbicides which none of the two EAs did, it had more specific information about how the herbicide was purposed to be applied which the EAs did not address.

In summary, I have consulted/reviewed the documents with Dr. Richard Lee the IPM Specialist for BLM and Gina Ramos the Weeds Program Lead for WO and have determined that the two EAs and DNA did not adequately assess the use of herbicides for Pesticide Use Proposal Numbers: DOI-BLM-AZG010-14-001-P, DOI-BLM-AZG010-14-002-P, and DOI-BLM-AZG010-14-003-P though the EA process. As a result, I have disapproved the signing of the three PUPs until the herbicides used are assessed through an EA adequately with the analyzing of the specific proposed herbicides, application methods, risks associated, mitigation measures, conservation measures, standard operating procedures, and referencing the VEG EIS on BLM in 17 Western States (2007), etc.

Lisa Thornley

Arizona State Weeds Coordinator

VII. INTEGRATED WEED MANAGEMENT: (Describe other aspects of the IWM program that are being used in addition to this chemical application in the project area).

When necessary and practical, hand removal and mechanical methods, e.g. weed eaters, mowing etc. are combined with herbicide applications to achieve the maximum level of control in an integrated vegetation management (weed control) program.

VII. SIGNATURES:

1. Pesticide Use Proposal's Originator: William A. Wells III Date: 2/6/14
   a. Company: Southwest Transmission Cooperative, Inc.

2. Certified Pesticide Applicator: Jonathon Gibson Date: 2-5-14
   a. Printed Name: Jonathon Gibson
   b. Address: Complete Landscape 2471 N Flowing Wells Tucson, Arizona
   c. License Number: 020202
   d. d. Certifying Organization: ADA / Office of Pest Management

3. Field Office Weed and Pest
   Weed Coordinator: Alan Cotton Date: 2 May 2014

4. Field Office Manager: Scott Cooke Date: 5/2/14

5. BLM State Weed and Pest
   Coordinator: DISAPPROVE - NOT SIGNING Date: _____

6. Deputy State Director: Julie A. Decker Date: 7/25/14
   - o Concur or Approved
   - o Not Concur or Disapproved
   - o Concur or Approved With Modifications

     - o Any changes (modifications) to this proposal by the state pesticide Coordinator will be listed below or in an attached memo to the manager requesting approval from the Deputy State Director.

UNITED STATE DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

PESTICIDE USE PROPOSAL

STATE: Arizona

COUNTY: Graham

DURATION OF PROPOSAL: Three Years

LOCATION: SWTC Dos Condados Station

T7S, R27E, Sec 31, SE4SW4

DATE: February 6, 2014

PROPOSAL NUMBER: DOI-BLM-AZG010-14-003-P

EA REFERENCE NUMBER: AZ-410-2006-0051; AZ-G010-2009-0053, G010-2014-0010

DR NUMBERS: AZ-410-2006-0051; AZ-G010-2009-0053 G010-2014-0010

ORIGINATOR – NAME: William H. Wells III, Land Services Administrator

ORIGINATOR – COMPANY: Southwest Transmission Cooperative, Inc.

ORIGINATOR – CONTACT INFORMATION:

Benson, Arizona 85602
P.O. Box 2195
520-586-5323
wwells@ssw.coop

I. APPLICATION INFORMATION – Including mixtures and adjuvants):

1. TRADE NAME(S):
   a) Diuron 4L Herbicide
   b) Polaris Herbicide
   c) LI 700 Penetrant/ Drift Control Agent
   d) Turf Trax Blue Colorant

2. COMMON NAME(S):
   a) Diuron
   b) Imazapyr
   c) LI 700
   d) Marker Dye (Colorant)

3. EPA REGISTRATION NUMBER(S):
   a) 34704-854
   b) 228-534
   c) CA Reg. No. 34704-50035
   d) N/A - Exempt

4. MANUFACTURER(S):
   a) Loveland Products, Inc.
   b) Nufarm Americas Inc.
   c) Loveland Products, Inc.
   d) Loveland Products, Inc.

5. METHOD OF APPLICATION: Boom applications with truck mounted spray equipment, small motorized spray equipment (e.g. Gator, ATV or Cart type) hand applications with hoses and spray wands attached to truck mounted tank for applications in restricted areas within the substation site.

6. MAXIMUM RATE OF APPLICATION – AS STATED IN THE Programmatic Veg. EIS: Diuron 20.0 pounds a.i / acre/year; Imazapyr 1.5 pounds a.e./acre/year.

7. MAXIMUM RATE OF APPLICATION – AS STATED ON THE LABEL:
   a. Formulated Product – Diuron 4L and Polaris are "liquid" flowable herbicide formulations
   b. Pounds of Active Ingredient or Acid Equivalent

Diuron:	Do not apply more than 12 quarts of product per acre per year -3 pounds per acre ai.
Polaris:	Do not apply more than 6 pints of product per acre per year- 1.5 pounds a.i.
LI 700:	Do not apply more than 8 pints of product per 100 gallons of total volume per year.
Turf Trax:	Do not apply more than 24 ounces per 100 gallons of water.

8. INTENDED RATE OF APPLICATION:
   a. Formulated Product – Diuron 4L and Polaris are "liquid" flowable herbicide formulations
   b. Pounds of Active Ingredient or Acid Equivalent at 100 gallons per acre total volume.

Diuron:	Formulated Product:	6 Quarts per acre per year (1.5 ounces per gallon water)
Polaris:	Formulated Product:	50 ounces per acre per year (0.4 ounces per gallon water)
LI700:	Formulated Product:	1.25 pints per acre per year (0.1 - 0.2 ounces per gallon water)
Turf Trax:	Formulated Product:	1.25 pints per acre per year (.156 ounces per gallon water)

9. APPLICATION DATE(S): The anticipated window for annual pre-emergent herbicide applications is November to March. However to obtain optimal control it may be necessary to extend this window into April depending on seasonal conditions. The follow-up pre-or post-emergent herbicide applications will be in June – October window as necessary.

II. PEST [List specific pest(s) and reason(s) for the proposed application of the pesticide]: The target pests are weeds including grasses, herbaceous broadleaves, small brush, and trees. The specific reason we need to eradicate the identified pests is to keep the ground clear of vegetation inside the fenced area of the electric substation for safety reasons. Listed below are some common species and Arizona listed noxious weeds:
Knapweed (*Acroptilon repens*), *Cenchrus* spp. (sandburs), *Centaurea* spp. (starthistle), *Portulaca* spp. (purslane), creosote (Larrea *tridentata*) and various annuals.

III. MAJOR DESIRED PLANT SPECIES

The Dos Condados substation is located in the Arizona Upland Subdivision, Sonoran Desert Scrub Biotic Community. The dominant species that define the natural plant community surrounding this site is creosote, white bursage and mesquite. The desired result of the herbicide applications is to keep the ground (crushed rock surface) free of vegetation within the fenced limits of the electric substation site and the 3-4' wide crushed rock apron that extends beyond the substation perimeter clears for safety reasons. The objective is to manage this site for bare ground.

IV. APPLICATION SITE DESCRIPTION:

1. ESTIMATED NUMBER OF ACRES: 3.80 acres
2. GENERAL DESCRIPTION (Describe land type or use, size, stage of growth of target species, soil characteristics, and any additional information that may be important in describing the area to be treated.)

The land use is for an Electric Substation with the area to be treated being approximately 3.80 acres. This includes the crushed rock surface within the fenced limits of the electric substation site and the 3-4' wide crushed rock apron that extends beyond the substation perimeter fence. Herbicides will be applied either pre-emergence to prevent the germination of susceptible weed seedlings, or post-emergence to eradicate grasses, herbaceous broadleaves and small brush and trees in the target area. The stage and growth of the target pest species is not applicable to the management of this site for bare ground control. The site has an overall gradual slope on compacted soil types. Note that the herbicides are applied to the 4"deep rock surface and not the soils directly.

V. SENSITIVE ASPECTS AND PRECAUTIONS: (Describe sensitive areas [e.g., marsh, endangered, threatened, candidate and sensitive species habitat] and distance to treatment site. List measures taken to avoid impact to sensitive areas).

There are currently no marshes, wetlands, riparian areas or endangered, threatened, candidate and sensitive species habitat in proximity to the Dos Condados substation site. The following precautions will be taken; herbicides will be applied on the crushed rock surface within the fenced limits of the electric substation site and the 3-4' wide crushed rock apron that extends beyond the substation perimeter fence. No herbicide applications will be performed during unfavorable wind and weather conditions.

VI. NONTARGET VEGETATION: (Describe impacts to non-target vegetation in the project area).

SWTC needs to keep the site as vegetation free as possible since it is being managed for bare ground control. Herbicides will be handled, mixed and applied in accordance with the manufacturer's label instructions. Careful attention will be given to wind and weather conditions. Application rates and methods, and that the herbicide applications will not extend more than a distance of 3-4' beyond the site perimeter fence. The SWTC believes it will avoid impacts to the non-target vegetation in the area beyond the treatment site boundaries.

VII. INTEGRATED WEED MANAGEMENT: (Describe other aspects of the IWM program that are being used in addition to this chemical application in the project area).

When necessary and practical, hand removal and mechanical methods, e.g. weed eaters, mowing etc. are combined with herbicide applications to achieve the maximum level of control in an integrated vegetation management (weed control) program.

VII. SIGNATURES:

1. Pesticide Use Proposal's Originator: _____ Date:_____

2. Certified Pesticide Applicator:_____ Date:_____
   License Number: _____
   Certifying Organization: _____

3. Field Office Pesticide/Noxious
   Weed Coordinator: _____ Date: _____

4. Field Office Manager: _____ Date:_____

5. BLM State Pesticide
   Coordinator: _____ Date:_____

6. Deputy State Director: _____ Date:_____
   - O Concur or Approved
   - O Not Concur or Disapproved
   - O Concur or Approved With Modifications
     - o Any changes (modifications) to this proposal by the state pesticide Coordinator will be listed below or in an attached memo to the manager requesting approval from the Deputy State Director

UNITED STATE DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

PESTICIDE USE PROPOSAL

STATE: Arizona

COUNTY: Graham

DURATION OF PROPOSAL: Three Years

LOCATION: SWTC Guthrie Peak

Communication Site (AZA-9331)
T6S, R30E, Sec 30, NE4NW4

DATE: February 4, 2014

PROPOSAL NUMBER: DOI-BLM-AZG010-14-001-P

EA REFERENCE NUMBER: AZ-410-2006-0051, G010-2009-0053, G010-2014-0010

DR NUMBER: AZ-410-2006-0051, AZ-410-2009- 053 G010-2014-0010

ORIGINATOR – NAME: William H. Wells III, Land Services Administrator

ORIGINATOR – COMPANY: Southwest Transmission Cooperative, Inc.

ORIGINATOR – CONTACT INFORMATION:

Benson, Arizona 85602
P.O. Box 2195
520-586-5323
wwells@ssw.coop

I. APPLICATION INFORMATION – Including mixtures and adjuvants):

1. TRADE NAME(S):
   a) Diuron 4L Herbicide
   b) Polaris Herbicide
   c) LI 700 Penetrant/ Drift Control Agent
   d) Turf Trax Blue Colorant

2. COMMON NAME(S):
   a) Diuron
   b) Imazapyr
   c) LI 700
   d) Marker Dye (Colorant)

3. EPA REGISTRATION NUMBER(S):
   a) 34704-854
   b) 228-534
   c) CA Reg. No. 34704-50035
   d) N/A - Exempt

4. MANUFACTURER(S):
   a) Loveland Products, Inc.
   b) Nufarm Americas Inc.
   c) Loveland Products, Inc.
   d) Loveland Products, Inc.

5. METHOD OF APPLICATION: Hand applications with hoses and spray wands attached to truck mounted tank, backpack sprayer, or small motorized spay equipment (e.g. Gator, ATV or Cart type) with hose and spray wand attached to ATV mounted tank.

6. MAXIMUM RATE OF APPLICATION – AS STATED IN THE Programmatic Veg. EIS: Diuron 20.0 pounds a.i / acre/year; Imazapyr 1.5 pounds a.e./acre/year.

7. MAXIMUM RATE OF APPLICATION – AS STATED ON THE LABEL:
   a. Formulated Product – Diuron 4L and Polaris are "liquid" flowable herbicide formulations
   b. Pounds of Active Ingredient or Acid Equivalent
   Diuron: Do not apply more than 12 quarts of product per acre per year -12 pounds per acre ai.
   Polaris: Do not apply more than 6 pints of product per acre per year- 1.5 pounds ai.
   LI 700: Do not apply more than 8 pints of product per 100 gallons of total volume per year.
   Turf Trax: Do not apply more than 24 ounces per 100 gallons of water.

8. INTENDED RATE OF APPLICATION:
   a. Formulated Product – Diuron 4L and Polaris are "liquid" flowable herbicide formulations
   b. Pounds of Active Ingredient or Acid Equivalent at 100 gallons per acre total volume.

Diuron:	Formulated Product:	6 Quarts per acre per year (1.5 ounces per gallon water)
Polaris:	Formulated Product:	50 ounces per acre per year (0.4 ounces per gallon water)
LI700:	Formulated Product:	1.25 pints per acre per year (0.1 - 0.2 ounces per gallon water)
Turf Trax:	Formulated Product:	1.25 pints per acre per year (.156 ounces per gallon water)

9. APPLICATION DATE(S): The anticipated window for annual pre-emergent herbicide applications is November to March. However to obtain optimal control it may be necessary to extend this window into April depending on seasonal conditions. The follow-up pre-or post-emergent herbicide applications will be in June – October window as necessary.

II. PEST

[List specific pest(s) and reason(s) for the proposed application of the pesticide]: The target pests are weeds including grasses, herbaceous broadleaves, small brush, and trees.

III. MAJOR DESIRED PLANT SPECIES

The Guthrie Peak Communication site is located in the Chihuahuan Desert Scrub Biotic Community. The desired result of the herbicide applications is to keep the ground free of vegetation within the fenced limits of the communication site and 3-4' that extends beyond the perimeter for safety reasons. The objective is to manage this site for bare ground.

IV. APPLICATION SITE DESCRIPTION:

1. ESTIMATED NUMBER OF ACRES: 896 square feet
2. GENERAL DESCRIPTION (Describe land type or use, size, stage of growth of target species, soil characteristics, and any additional information that may be important in describing the area to be treated.)

The land use is for a communication site with the area to be treated being approximately 896 square feet.

This includes the compacted native soil within the fenced limits of the site and the 3-4 feet beyond the perimeter fence.
Herbicides will be applied either pre-emergence to prevent the germination of susceptible weed seedlings, or post-emergence to eradicate grasses, herbaceous broadleaves and small brush and trees in the target area. The site is sloped on compacted soil types.

V. SENSITIVE ASPECTS AND PRECAUTIONS: (Describe sensitive areas [e.g., marsh, endangered, threatened, candidate and sensitive species habitat] and distance to treatment site. List measures taken to avoid impact to sensitive areas).

There are currently no marshes, wetlands, riparian areas or endangered, threatened, candidate and sensitive species habitat in proximity to the Guthrie Communication Site. The following precautions will be taken; herbicides will be applied within the fenced limits of the communication site and 3-4' beyond the perimeter fence.

VI. NONTARGET VEGETATION: (Describe impacts to non-target vegetation in the project area).

SWTC needs to keep the site as vegetation free as possible since it is being managed for bare ground control. Herbicides will be handled, mixed and applied in accordance with the manufacturer's label instructions. Careful attention will be given to wind and weather conditions. Application rates and methods, and that the herbicide applications will not extend more than a distance of 3-4' beyond the site perimeter fence. The SWTC believes it will avoid impacts to the non-target vegetation in the area beyond the treatment site boundaries.

VII. INTEGRATED WEED MANAGEMENT: (Describe other aspects of the IWM program that are being used in addition to this chemical application in the project area).

When necessary and practical, hand removal and mechanical methods, e.g. weed eaters, mowing etc. are combined with herbicide applications to achieve the maximum level of control in an integrated vegetation management (weed control) program.

VII. SIGNATURES:

1. Pesticide Use Proposal's Originator: _____ Date:_____

2. Certified Pesticide Applicator:_____ Date:_____
   License Number: _____
   Certifying Organization: _____

3. Field Office Pesticide/Noxious
   Weed Coordinator: _____ Date: _____

4. Field Office Manager: _____ Date:_____

5. BLM State Pesticide
   Coordinator: _____ Date:_____

6. Deputy State Director: _____ Date:_____
   - O Concur or Approved
   - O Not Concur or Disapproved
   - O Concur or Approved With Modifications
     - o Any changes (modifications) to this proposal by the state pesticide Coordinator will be listed below or in an attached memo to the manager requesting approval from the Deputy State Director

UNITED STATE DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

PESTICIDE USE PROPOSAL

STATE: Arizona

COUNTY: Graham

DURATION OF PROPOSAL: Three Years

LOCATION: SWTC Hackberry Station
T6S, R27E, Sec 29, SW4SW4

DATE: February 4, 2014

PROPOSAL NUMBER: DOI-BLM-AZG010-14-001-P

EA REFERENCE NUMBER: AZ-410-2009-0053

DR NUMBER: AZ-410-2009-0053

ORIGINATOR – NAME: William H. Wells III, Land Services Administrator

ORIGINATOR – COMPANY: Southwest Transmission Cooperative, Inc.

ORIGINATOR – CONTACT INFORMATION:

Benson, Arizona 85602
P.O. Box 2195
520-586-5323
wwells@ssw.coop

I. APPLICATION INFORMATION – Including mixtures and adjuvants):

1. TRADE NAME(S):
   a) Diuron 4L Herbicide
   b) Polaris Herbicide
   c) LI 700 Penetrant/ Drift Control Agent
   d) Turf Trax Blue Colorant

2. COMMON NAME(S):
   a) Diuron
   b) Imazapyr
   c) LI 700
   d) Marker Dye (Colorant)

3. EPA REGISTRATION NUMBER(S):
   a) 34704-854
   b) 228-534
   c) CA Reg. No. 34704-50035
   d) N/A - Exempt

4. MANUFACTURER(S):
   a) Loveland Products, Inc.
   b) Nufarm Americas Inc.
   c) Loveland Products, Inc.
   d) Loveland Products, Inc.

5. METHOD OF APPLICATION: Hand applications with hoses and spray wands attached to truck mounted tank, backpack sprayer, or small motorized spay equipment (e.g. Gator, ATV or Cart type) with hose and spray wand attached to ATV mounted tank.

6. MAXIMUM RATE OF APPLICATION – AS STATED ON THE LABEL:
   a. Formulated Product – Diuron 4L and Polaris are "liquid" flowable herbicide formulations
   b. Pounds of Active Ingredient or Acid Equivalent
   Diuron: Do not apply more than 12 quarts of product per acre per year -12 pounds per acre ai.
   Polaris: Do not apply more than 6 pints of product per acre per year- 1.5 pounds ai.
   LI 700: Do not apply more than 8 pints of product per 100 gallons of total volume per year.
   Turf Trax: Do not apply more than 24 ounces per 100 gallons of water.

8. INTENDED RATE OF APPLICATION:
   a. Formulated Product – Diuron 4L and Polaris are "liquid" flowable herbicide formulations
   b. Pounds of Active Ingredient or Acid Equivalent at 100 gallons per acre total volume.

Diuron:	Formulated Product:	6 Quarts per acre per year (1.5 ounces per gallon water)
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LI700:	Formulated Product:	1.25 pints per acre per year (0.1 - 0.2 ounces per gallon water)
Turf Trax:	Formulated Product:	1.25 pints per acre per year (.156 ounces per gallon water)

9. APPLICATION DATE(S): The anticipated window for annual pre-emergent herbicide applications is November to March. However to obtain optimal control it may be necessary to extend this window into April depending on seasonal conditions. The follow-up pre-or post-emergent herbicide applications will be in June – October window as necessary.

II. PEST [List specific pest(s) and reason(s) for the proposed application of the pesticide]: The target pests are weeds including grasses, herbaceous broadleaves, small brush, and trees. The specific reason we need to eradicate the identified pests is to keep the ground clear of vegetation inside the fenced area of the electric substation for safety reasons.

III. MAJOR DESIRED PLANT SPECIES

The Hackberry substation is located in the Arizona Upland Subdivision, Sonoran Desert Scrub Biotic Community. The dominant species that define the natural plant community surrounding this site is creosote, white bursage and mesquite. The desired result of the herbicide applications is to keep the ground (crushed rock surface) free of vegetation within the fenced limits of the electric substation site and the 3-4' wide crushed rock apron that extends beyond the substation perimeter clears for safety reasons. The objective is to manage this site for bare ground.

IV. APPLICATION SITE DESCRIPTION:

1. ESTIMATED NUMBER OF ACRES: 4.08 acres
2. GENERAL DESCRIPTION (Describe land type or use, size, stage of growth of target species, soil characteristics, and any additional information that may be important in describing the area to be treated.)

The land use is for an Electric Substation with the area to be treated being approximately 4.08 acres. This includes the crushed rock surface within the fenced limits of the electric substation site and the 3-4' wide crushed rock apron that extends beyond the substation perimeter fence. Herbicides will be applied either pre-emergence to prevent the germination of susceptible weed seedlings, or post-emergence to eradicate grasses, herbaceous broadleaves and small brush and trees in the target area. The stage and growth of the target pest species is not applicable to the management of this site for bare ground control. The site has an overall gradual slope on compacted soil types. Note that the herbicides are applied to the 4"deep rock surface and not the soils directly.

V. SENSITIVE ASPECTS AND PRECAUTIONS: (Describe sensitive areas [e.g., marsh, endangered, threatened, candidate and sensitive species habitat] and distance to treatment site. List measures taken to avoid impact to sensitive areas).

There are currently no marshes, wetlands, riparian areas or endangered, threatened, candidate and sensitive species habitat in proximity to the Hackberry substation site. The following precautions will be taken; herbicides will be applied on the crushed rock surface within the fenced limits of the electric substation site and the 3-4' wide crushed rock apron that extends beyond the substation perimeter fence. No herbicide applications will be performed during unfavorable wind and weather conditions. Mitigation measures: Reference: Environmental Report for the Proposed Hackberry Substation Project, Graham County, Arizona (2206), 4.7 Vegetation p.30.

VI. NONTARGET VEGETATION: (Describe impacts to non-target vegetation in the project area).

SWTC needs to keep the site as vegetation free as possible since it is being managed for bare ground control. Herbicides will be handled, mixed and applied in accordance with the manufacturer's label instructions. Careful attention will be given to wind and weather conditions. Application rates and methods, and that the herbicide applications will not extend more than a distance of 3-4' beyond the site perimeter fence. The SWTC believes it will avoid impacts to the non-target vegetation in the area beyond the treatment site boundaries.

VII. INTEGRATED WEED MANAGEMENT: (Describe other aspects of the IWM program that are being used in addition to this chemical application in the project area).

When necessary and practical, hand removal and mechanical methods, e.g. weed eaters, mowing etc. are combined with herbicide applications to achieve the maximum level of control in an integrated vegetation management (weed control) program.

VII. SIGNATURES:

1. Pesticide Use Proposal's Originator: _____ Date:_____

2. Certified Pesticide Applicator:_____ Date:_____
   License Number: _____
   Certifying Organization: _____

3. Field Office Pesticide/Noxious
   Weed Coordinator: _____ Date: _____

4. Field Office Manager: _____ Date:_____

5. BLM State Pesticide
   Coordinator: _____ Date:_____

6. Deputy State Director: _____ Date:_____
   - O Concur or Approved
   - O Not Concur or Disapproved
   - O Concur or Approved With Modifications
     - o Any changes (modifications) to this proposal by the state pesticide Coordinator will be listed below or in an attached memo to the manager requesting approval from the Deputy State Director