

APPENDIX VII

RIGHT-OF-WAY VEGETATION MANAGEMENT

TVA must manage its rights-of-way and easements -to ensure emergency maintenance access; and routine access to structures, switches, conductors, and communications equipment. In addition, TVA must ensure National Electrical Safety Code electrical clearances between structures, tall-growing vegetation, and any other structures. Trees located off right-of-way trees that could fall or be cut into a transmission line are also very important.

These requirements are imperative to the maintenance of the transmission system and, in some cases underbuilt distribution lines. It is seldom understood by customers or the general public that electricity must continuously be produced and transmitted on an instant-to-instant basis to serve the demand placed on the system by continuously changing electrical load. When a switch is turned on, electricity must flow instantaneously. With increasingly complex and diverse electronic equipment controlled by computers, microchips, and other systems that respond to micro-second interruptions, any disturbance on transmission or distribution lines instantaneously affects the overall reliability of critical devices, especially production devices, security systems, process controls, medical devices, water purification and sewage treatment systems, fire and safety protection systems, communication and control systems, etc. These systems have little tolerance of even a few micro-seconds of interruption.

Each year, TVA must assess the conditions of the vegetation on and along its rights-of-way. This is accomplished by aerial inspections of each line, periodic walking inspections, information from aerial photographs, information from TVA field personnel, property owners and the general public. Information is developed regarding vegetation species present, the mix of species, the observed growth, the seasonal growing conditions and the density of the tall vegetation. TVA also evaluates the proximity, height, and growth rate of trees that may be adjacent to the right-of-way and that may be a danger to the line or structures. TVA Right-Of-Way Program Administrators develop a vegetation-reclearing plan that is specific to each line segment; it is based on terrain conditions, species mix, growth, and density. They evaluate accessibility, right-of-way, and adjacent sensitive areas, land use and development, and a series of additional parameters. To the maximum extent possible, line segments from substation busbar to substation busbar should be recleared in the same year so a line can be made as reliable as reasonably possible.

Complicating factors are the rich diversity of tall-growing and climbing vegetation species in the power service area. The long growing season with abundant rain greatly accelerates growth in the moderate to rich soils of the TVA power service area. In addition, many rapid growing species are accelerated growers when competing vegetation is removed or reduced. Diverse geographic features, slopes, and conditions along line easements create many sensitive environmental and public interest areas on or adjacent to rights-of-way.

For the above reasons, TVA uses an integrated vegetation management approach. In farming areas of right-of-way crops and pasture, TVA encourages property owner management of the right-of-way using low-growing crops year after year. In dissected terrain with rolling hills and interspersed woodlands traversed by the rights-of-way, TVA uses mechanical mowing to a large extent.

When slopes become hazardous to farm tractors and rotary mowers TVA may use a variety of herbicides specific to the species present with a variety of possible application techniques. When scattered small segments of tall-growing vegetation are present but accessibility along the right-of-way is difficult or the path to such segments is very long compared to the amount present, herbicides may be used.

In very steep terrain, in sensitive environmental areas, in extensive wetlands, at stream banks, and in sensitive property owner land use areas, hand clearing may be utilized. Hand clearing is recognized as one of the most hazardous occupations documented by the Occupational Health and Safety Administration. For that reason, TVA is actively looking at better control methods including use of low volume herbicide applications, occasional single tree injections, and tree growth regulators.

TVA does not encourage individual property owner tree reclearing activity because of the high hazard potential of hand clearing, possible interruptions of the line, and electrical safety considerations for untrained personnel that might do the work. Private property owners may reclear the right-of-way with trained reclearing professionals.

TVA's experience initially was completely with hand clearing. World War II manpower shortages forced TVA to look toward developments in herbicide research. An era of near exclusive use of herbicides existed. Then, because of the discovery of residue accumulations with many pesticides and price increases of herbicides, high volume applications lost favor, and TVA sought other modes of vegetation control. Farm equipment of greater power and efficiency allowed use of tractor-mounted rotary mowers. These mowers not only cut the tall saplings and seedlings on the right-of-way, they shatter the stump and the supporting near surface root crown. The tendency of resistant species is to resprout from the root crown and shattered stumps produce a multistem dense stand in the immediate area. Repeated use of the mowers on short cycle reclearing with many original stumps regrowing in the above manner create a single species thicket or monoculture. With the original large root system and multiple stems the resistant species can and usually do produce regrowth at the rate of 5-10 feet in a year. In years with high rainfall, the growth can reach 12-15 feet in a single year.

These created, dense, monoculture stands can become nearly impenetrable for even large tractors. Such stands have low diversity, little wildlife food, or nesting potential, and become a property owner concern. They tend to spread off the right-of-way into more desirable species areas. Increasingly, TVA is receiving complaints about the shatter sapling debris density. The potential exists for insect invasion or fungus infection resulting from the easy invasion of damaged specimens or debris. Once started, such infestations or invasions can spread into valuable timber of the same or related species off the right-of-way.

Therefore, TVA has been working with universities (such as Mississippi State University, University of Tennessee, Purdue University and others) chemical companies, other utilities, U. S. Department of Transportation, U.S. Fish and Wildlife Service, and U.S. Forest Service personnel to explore other means of dealing with problem vegetation. The results have been strong recommendations to use species specific, low-volume, herbicide applications in more situations. Research, demonstrations, and other right-of-way programs show a definite improvement of rights-of-way treated with selective low-volume applications of new herbicides using a variety of application techniques and timing.

The above named universities strongly recommend low-volume herbicide applications since their research demonstrates much wider plant diversity after such applications. They report better ground erosion protection, and more wildlife food plants and cover plants develop. In most situations there is increased development of wild flowering plants and shrubs. In conjunction with herbicides, the diversity and density of low-growing plants provide control of tall growing species through competition.

Wildlife managers are specifically requesting the use of herbicides in place of rotary mowing in order to avoid damage to nesting and tunneling wildlife. This method retains ground cover year around with a better mix of food species and associated high protein insect populations for birds in the right seasons. Most also report less damage to soils (even when compared with rubber tired equipment).

Property owners interested in tree production are requesting use of low-volume applications rather than hand or mechanical clearing because of the insect and fungus problems in damaged vegetation and debris left on rights-of-way. The insect and fungus invasions, such as, pine tip moth, oak leaf blight, sycamore and dogwood blight, etc., are becoming widespread across the nation.

Some property owners have special interests. In those cases, TVA attempts to work with them to either have them sign agreements in which they maintain the right-of-way in right-of-way crops or pasture or they do the actual right-of-way maintenance. Some may choose to use low-growing trees or fruit trees, sod, vegetable crops, or other low vegetation types.

TVA discusses with property owners the potential to sign an agreement to manage their land for wildlife under the auspices of "Project Habitat" a joint TVA, American Cyanamid, and wildlife organization. The property owner maintains the right-of-way in wildlife food and cover with emphasis on quail, turkey, deer, or related forms. A variation used in or adjacent to developing suburban areas is to sign agreements with the developer and residents to plant and maintain wildflowers on the right-of-way.

TVA places strong emphasis on developing rights-of-way in the above manner. When the property owners do not agree to these opportunities, TVA must maintain the right-of-way in the most environmentally acceptable, cost, and vegetation-effective and efficient manner possible.

Approved Herbicides for Usage on TVA Rights-of-Way

<u>Trade Name</u>	<u>Active Ingredients</u>	<u>Label Signal Word</u>
Accord	Glyphosate/Liquid	Caution
Arsenal	Imazapyr/Liquid/Granule	Caution
Escort	Metsulfuron Methyl/dry flowable	Caution
Garlon	Triclopyr/Liquid	Caution
Garlon 3A	Triclopyr/Liquid	Danger
Diuron	Diuron/Flowable powder	Caution
Spike 40P	Tebuthiuron/Pellet	Caution
Spike 80W	Tebuthiuron/Wettable powder	Caution
Transline	Clopyralid/Liquid	Caution
Pathfinder II	Triclopyr/RTU	Caution
Krenite UT	Fosamine Ammonium	Warning
Vanquish	Diglycolamine	Caution

Approved Herbicides for Bare Ground Areas

<u>Trade Name</u>	<u>Active Ingredients</u>	<u>Label Signal Word</u>
Chopper	Imazapyr/RTU	Caution
Topsite	Diuron/Imazapyr	Caution
Roundup	Glyphosate/Liquid	Caution
SpraKil SK-26	Tebuthiuron and Diuron	Caution
Sahara	Diuron/Imazapyr	Caution
Roundup Pro	Glyphosate	Caution
Endurance	Prodiamine	Caution
Predict	Norflurazon	Caution

Tree growth regulators (TGRs) are being considered for use on tall trees that have special circumstances where they must be trimmed on a regular cycle:

Approved TGRs for Use on TVA Property

<u>Trade Name</u>	<u>Active Ingredients</u>	<u>Label Signal Word</u>
TGR	Flurprimidol	Caution
Profile 2SC	TGR-paclobotrazol	Caution

The herbicide, Pathway, is being considered for use following initial clearing. Test plots have been established to determine the effectiveness of Pathway. Pathway is a mix of Picloram and 2,4-D and carries a "Warning" signal word.

These herbicides have been evaluated in extensive studies at universities in support of registration applications and label requirements. Most have been reviewed in the U.S. Forest Service (USFS) Vegetation Management Environmental Impact Statements (EIS) ,and those evaluations are incorporated here by reference. The result of these reviews has been a consistent finding of limited environmental impact beyond that of control of the target vegetation. All the listed herbicides have been found to be of low environmental toxicity when applied by trained applicators following the label and registration procedures, including buffer zones for listed threatened or endangered species.

Those not addressed in the USFS EIS or their supporting research have been peer reviewed university research, addressed in United States Environmental Protection Agency (EPA) literature reviews, or are discussed in documents on file at EPA and U.S. Fish and Wildlife Service libraries. On the basis of this literature and TVA's reviews, the approved list above has been compiled and is reviewed again each year as new information is published.

The rates of application utilized are those listed on the EPA-approved label and consistent with the revised application rates of the USFS Vegetation Management EIS Record of Decision. They are as follows:

Typical application rates (pound/acre) of active ingredient:

Application Method:	<u>Aerial Liquid</u>	<u>Aerial Granule</u>	<u>Mechanical Liquid</u>	<u>Mechanical Granule</u>	<u>Manual Hand</u>	<u>Manual Foliar</u>
<u>Herbicide</u>						
2,4-D amine	2.0		2.5			2.0
2,4-D ester	2.5		4.0			2.0
2,4-DP	3.0		4.0			1.0
Dicamba			2.0			2.0
Krenite	6.0		7.8			
Glyphosate	1.5		1.5			1.0
Hexazinone	4.0	4.0	4.0	4.0	4.0	4.0
Imazapyr	0.75		0.75			0.75
Fuel oil	0.5		2.0			1.5
Limonene	0.9		0.9			0.9
Picloram	0.5		0.7			0.4
Sulfomet	0.13		0.17			0.06
Tebuthiuron	1.0	1.0	1.0	1.0		4.0
Triclopyr amine	4.0		4.0			4.0
Triclopyr ester	4.0		4.0			4.0

TVA currently uses primarily low volume applications of foliar and basal applications of Accord (Glyphosate) and Accord (Glyphosate)-Arsenal (Imazapyr) tank mixes. Glyphosate is one of the most widely used herbicidal active ingredients in the world, and has been continuously the subject of numerous exhaustive studies and scrutiny to determine its potential impacts on humans, animals, and the environment.

Accord is labeled for vegetation management in forestry and utility rights-of-way applications. It has a full aquatics label and can be applied to emergent weeds in all bodies of fresh and brackish water. There is no restriction on the use of treated water for irrigation, recreation, or domestic purposes.

Accord is applied to the foliage of actively growing plants. The active ingredient is absorbed through the leaves and rapidly moves throughout the plant. Glyphosate prevents the plant from producing amino acids that are unique to plants and which are building blocks of plant proteins. The plant, unable to make proteins, stops growing and dies.

The favorable environmental fate characteristic of Accord herbicide and its major metabolite (breakdown product) aminomethylphosphonic acid (AMPA) is well known. Continuing research is underway with more than 400 studies conducted to date in the laboratory and under field use conditions. These studies show rapid breakdown, little soil or plant debris retention, and little vertical movement into soil below the surface.

Glyphosate is naturally degraded by microbes in soil and water under both aerobic (with oxygen) and anaerobic (without oxygen) conditions. AMPA is further degraded in soil and sediments to phosphorus, nitrogen, hydrogen, and carbon dioxide. Glyphosate binds rapidly and completely to a wide range of soils and sediment when introduced into the environment. This essentially eliminates movement in the soil. The average half-life of glyphosate in soils is less than 45 days. Half-life for the dissipation of glyphosate in environmental waters ranges from 1.5 to 14 days.

Glyphosate is nontoxic to birds, mammals, and bees and has been shown not to bioaccumulate since it acts in plants through an enzyme system that does not exist in animals or humans.

Arsenal (imazapyr) has been similarly tested, and it is found to have low leaching potential in soils. When available on or in the soil, it is broken down rapidly by soil microbes to naturally occurring compounds. When not available, Imazapyr is bound tightly to soil colloids and is unavailable for movement. The half-life in soil is 25 to 65 days.

Extensive chronic and acute toxicity studies have made Arsenal an EPA-classified herbicide as practically nontoxic to humans, mammals, birds, fish, aquatic invertebrates, and insects. The chronic studies demonstrate that Imazapyr is non-teratogenic, non-mutagenic, and not a carcinogen.

The mode of action suppresses amino acids of the plant via an enzyme system containing acetohydroxy acid synthase. This enzyme system does not exist in other forms of life including humans and animals.