

# **Energy Delivery Environmental Protection Procedures**

## ***Right-Of-Way Vegetation Management Guidelines***

### **1.0 Overview**

- A. The Tennessee Valley Authority (TVA) must manage the vegetation on 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 maintain adequate clearance, as specified by the National Electrical Safety Code, between conductors and tall growing vegetation and other objects. This requirement applies to vegetation within the right-of-way as well as to trees located off the right-of-way.
- B. Each year TVA assesses the conditions of the vegetation on and along its rights-of-way. This is accomplished by aerial inspections, periodic field inspections, aerial photography, and information from TVA personnel, property owners and the general public. Important information gathered during these assessments includes the coverage by various vegetation types, the mix of plant 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 adjacent to the right-of-way that may be a danger to the line or structures.
- C. TVA right-of-way specialists develop a vegetation re-clearing plan that is specific to each line segment and is based on terrain conditions, species mix, growth, and density.

### **2.0 Right-of-Way Management Methods**

- A. TVA uses an integrated vegetation management approach. In farming areas, TVA encourages property owner management of the right-of-way using low growing crops. In dissected terrain with rolling hills and interspersed woodlands, TVA may utilize mechanical mowing.
- B. TVA uses a variety of herbicides specific to the species present with a variety of possible application techniques. TVA utilizes control methods, including use of low volume herbicide applications, occasional single tree injections, and tree growth regulators (TGRs) to a large extent.
- C. 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 utilizes low volume herbicide applications in these areas when feasible.

- D. TVA does not encourage tree re-clearing by individual property owners 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 re-clear the right-of-way with trained re-clearing professionals.
- E. Mechanical mowers not only cut the tall saplings and seedlings on the right-of-way, they also shatter the stump and the supporting near surface root crown. The tendency of resistant species is to re-sprout from the root crown and shattered stumps can produce a multi-stem dense stand in the immediate area. Repeated use of mowers on short cycle re-clearing with many original stumps re-growing in the above manner can create a single species thicket or monoculture. With the original large root system and multiple stems, the resistant species can produce re-growth 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 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. Selective herbicide application may be used to control monoculture stands.
- F. TVA encourages property owners to sign an agreement to manage rights-of-way on their land for wildlife under the auspices of "Project Habitat," a joint project by TVA, BASF, and wildlife organizations, e.g., National Wild Turkey Federation, Quail Unlimited, and Buckmasters. The property owner maintains the right-of-way in wildlife food and cover with emphasis on quail, turkey, deer or other wildlife. 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.
- G. TVA places strong emphasis on managing 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-effective, and efficient manner possible.

### **3.0 Herbicide Program**

- A. TVA has worked with universities (such as Mississippi State University, University of Tennessee, Purdue University and others), chemical manufacturers, other utilities, U.S. Department of Transportation, U.S. Fish and Wildlife (USFWS), and U.S. Forest Service (USFS) personnel to explore options for vegetation control. 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. Table 1 below identifies herbicides currently used on TVA rights-of-way. Table 2 identifies pre-emergent herbicides currently being used on bare ground areas on TVA rights-of-way and in substations. Table 3 identifies TGRs that may be used on tall trees that have special circumstances that require trimming on a regular cycle, e.g., restrictions on complete removal. The rates of application utilized are those listed on the U.S. Environmental

Protection Agency (USEPA) approved label and consistent with utility standard practice throughout the Southeast.

Table 1 - Herbicides Currently Used on TVA Rights-of-Way

<b>Trade Name</b>	<b>Active Ingredient</b>	<b>Label Signal Word</b>
Accord/Accord XRT II	Glyphosate/Liquid	Caution
Arsenal	Imazapyr/Liquid/Granule	Caution
Chopper	Imazapyr/RTU	Caution
Clearstand	Imazapyr/Metsulfuron Methyl/Liquid	Caution
Escort	Metsulfuron Methyl/Dry Flowable	Caution
Garlon	Triclopyr/Liquid	Caution
Garlon 3A	Triclopyr/Liquid	Danger
Habitat	Imazapyr/Liquid	Caution
Krenite S	Fosamine Ammonium	Caution
Milestone VM	Aminopyralid/Liquid	Caution
Pathfinder II	Triclopyr/RTU	Caution
Rodeo	Glyphosate/Liquid	Caution
Roundup	Glyphosate/Liquid	Caution
Roundup Pro	Glyphosate	Caution
Streamline	Aminocyclopyrachlor/Metsulfuron Methyl/Liquid	Caution
Transline	Clopyralid/Liquid	Caution
Viewpoint	Imazapyr/Aminocyclopyrachlor/Metsulfuron Methyl/Liquid	Caution

Table 2 - Pre-Emergent Herbicides Currently Used for Bare Ground Areas On TVA Rights-of-Way

<b>Trade Name</b>	<b>Active Ingredients</b>	<b>Label Signal Word</b>
Arsenal 5G	Imazapyr/Granule	Caution
Sahara	Diuron/Imazapyr	Caution
SpraKil SK-26	Tebuthiuron/Diuron/Granules	Caution
SpraKil S-5	Tebuthiuron/Granules	Caution
Topsite	Diuron/Imazapyr	Caution

Table 3 - Tree Growth Regulators (TGRs) Currently Used On TVA Rights-of-Way

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

- B. The herbicides listed in Table 1 and 2 and TGRs listed in Table 3 have been evaluated in extensive studies in support of registration applications and label requirements. Many have been reviewed in the USFS vegetation management environmental impact statements (EISs), and those evaluations are incorporated here by reference (USFS 1989a, 1989b, 2002a, and 2002b). Electronic copies can be accessed at <http://www.fs.fed.us/r8/planning/documents/vegmgmt/>. 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 prescribed measures, such as buffer zones, to protect threatened and endangered species.
- C. Low volume herbicide applications are recommended since research demonstrates much wider plant diversity after such applications. There is 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.
- D. Wildlife managers often request 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).
- E. Property owners interested in tree production often request the 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 the right-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.
- F. Best Management Practices (BMPs) governing application of herbicides are contained within *A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Transmission Construction and Maintenance Activities* (Muncy 2012) which is incorporated by reference. Herbicides can be liquid, granular, or powder and can be applied aerially or by ground equipment and may be selectively applied or broadcast, depending on the site requirements, species present, and condition of the vegetation. Water quality considerations include measures taken to keep herbicides from reaching streams whether by direct application or through runoff of or

flooding by surface water. “Applicators” must be trained, licensed, and follow manufacturers’ label instructions, USEPA guidelines, and respective state regulations and laws.

- G. When herbicides are used, their potential adverse impacts are considered in selecting the compound, formulation, and application method. Herbicides that are designated “Restricted Use” by USEPA require application by or under the supervision of applicators certified by the respective state control board. Aerial and ground applications are done either by TVA or by contractors in accordance with the following guidelines identified in the TVA BMP manual (Muncy 2012):
1. The sites to be treated are selected and application directed by the appropriate TVA official.
  2. A preflight walking or flying inspection is made within 72 hours prior to applying herbicides aerially. This inspection ensures that no land use changes have occurred, that sensitive areas are clearly identified to the pilot, and that buffer zones are maintained.
  3. Aerial application of liquid herbicides will normally not be made when surface wind speeds exceed 5 miles per hour, in areas of fog, or during periods of temperature inversion.
  4. Pellet application will normally not be made when the surface wind speeds exceed 10 miles per hour, or on frozen or water saturated soils.
  5. Liquid application is not performed when the temperature reaches 95 degrees Fahrenheit or above.
  6. Application during unstable, unpredictable, or changing weather patterns is avoided.
  7. Equipment and techniques are used that are designed to ensure maximum control of the spray swath with minimum drift.
  8. Herbicides are not applied to surface water or wetlands unless specifically labeled for aquatic use. Filter and buffer strips will conform at least to federal and state regulations and any label requirements. The use of aerial or broadcast application of herbicides is not allowed within a streamside management zone (SMZ) adjacent to perennial streams, ponds, and other water sources. Hand application of certain herbicides labeled for use within SMZs is used only selectively.
  9. Buffers and filter strips (200 feet minimum width) are maintained next to agricultural crops, gardens, farm animals, orchards, apiaries, horticultural crops, and other valuable vegetation.
  10. Herbicides are not applied in the following areas or times: (a) in city, state, and national parks or forests or other special areas without written permission and/or required permits (b) off the right-of-way and (c) during rainy periods or during the 48- hour interval prior to rainfall predicted with a 20 percent or greater probability by local forecasters, when soil active herbicides are used.
- H. TVA currently uses primarily low volume applications of foliar and basal applications, e.g., Accord (Glyphosate), Arsenal (Imazapyr), Clearstand (Imazapyr / Metsulfuron

Methyl), Milestone VM (Aminopyralid) and Streamline (Aminocyclopyrachlor / Metsulfuron Methyl).

#### 4.0 References

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