*Southern California Edison*
**WODUP A.13-10-020**

**DATA REQUEST SET A.13-10-020 WODUP ED-SCE-05**

**To:** ENERGY DIVISION
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**Question BIO-21:**

**BIO-21** Please provide a draft Integrated Weed Management Plan (IWMP) that describes SCE's proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project.
For the purpose of the IWMP, "weeds" should include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP should include the contents listed below. The IWMP should be implemented throughout project construction, operations and maintenance, and through the close of any soils, water, or vegetation-related post-construction rehabilitation, revegetation, restoration, and related monitoring. The IWMP should include the information defined in the following paragraphs.
*Background* . An assessment of the project's potential to cause spread of invasive nonnative weeds into new areas, or to introduce new nonnative invasive weeds into the project ROW. This section should list known and potential nonnative and invasive weeds occurring on the ROW and in the project region prior to construction activities, and identify threat rankings and potential consequences of project-related occurrence or spread for each species. Please include a map showing locations of all weeds detected in the ROW to date. The map should be updated at least once a year. It also should identify project sites where weed introduction or spread may be particularly likely or important. This section should identify control goals for each species (e.g., eradication, suppression, or containment).

***Prevention*** . Specify methods to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. For example, the ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. Vehicles may be inspected and cleaned at entry points to any portion of the ROW. Portable vehicle wash stations or commercial wash stations should be used to minimize likelihood of introducing weed seeds onto the ROW. Erosion control materials (e.g., hay bales) should be certified free of weed seed before they are brought onto the site. The IWMP should prohibit on-site storage or disposal of mulch or green waste that may contain weed material.

***Monitoring*** . Please include the proposed methods to survey for weeds during construction and operation. This section should include a monitoring schedule to ensure timely detection and immediate control of weed infestations, to prevent further spread. Surveying and monitoring for weed infestations will occur at least two times per year, to coincide with the early detection period for early season and late season weeds. It also should include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control

staff. The map of weed locations (above) should be updated at least once a year. The monitoring section should also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.

***Control*** . Please describe the proposed manual and chemical weed control methods to be employed during construction and operation. The IWMP should only include weed control measures with a demonstrated record of success for target weeds, based on the best available information. The plan should describe proposed methods for promptly scheduling and implementing control activity when any weed infestation is located, to ensure effective and timely weed control. Weed infestations must be controlled or eradicated as soon as possible upon discovery, and before they go to seed, to prevent further expansion of weed occurrences. All proposed weed control methods should minimize the extent of any native vegetation or ground disturbance, limit ingress and egress to defined routes, and avoid damage from herbicide use or other control methods to any environmentally sensitive areas identified within or adjacent to the ROW.

Manual control should specify well timed removal of weeds or their seed heads with hand tools; seed heads and plants must be disposed of in accordance with guidelines from the Riverside or San Bernardino County Agricultural Commissioners, if such guidelines are available.

The chemical control section must include specific and detailed plans for any herbicide use. It should indicate where herbicides will be used, which herbicides will be used, and specify techniques to be used to avoid drift or residual toxicity to native vegetation or special-status plants, consistent with BLM's Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States (2007) and National Invasive Species Management Plan (NISC 2008). Herbicides having residual toxicity, such as pre-emergents, should not be used in natural areas or within channels (engineered or not) where they could run off into downstream areas. Only state and BLM-approved herbicides may be used, and all herbicide applicators will be required to possess a qualified herbicide applicator license from the state. All herbicide applications will follow U.S. Environmental Protection Agency label instructions and be performed in accordance with federal, state, and local laws and regulations.

***Reporting schedule and contents***. This section of the IWMP should describe SCE's proposed reporting to the CPUC and BLM, including reporting schedule, and contents of each report.

**Response to Question BIO-21:**

SCE is currently preparing the information as requested per the data request and intends to submit such information in August 2014.