

**ATTACHMENT C - CONSERVATIONS MEASURES FOUND WITHIN THE “FINAL BIOLOGICAL OPINION FOR THE ANIMAS LA PLATA PROJECT”, US FISH AND WILDLIFE SERVICE, JUNE 19, 2000 (ATTACHMENT G-PART 2, VOLUME 2, 2000 FSEIS ALP)**

Conservation Measures

Conservation measures are actions that the action agency agrees to implement to further the recovery of the species under review. The beneficial effects of conservation measures were taken into consideration for determining both jeopardy and incidental take analyses and all hydrology analyses considered in this biological opinion assume implementation of these conservation measures, including the reoperation of Navajo Dam. Reclamation agrees that failure to implement the conservation measures will be grounds for reinitiation of consultation.

1. Under this conservation measure, Reclamation is committing to operate Navajo Reservoir to mimic the natural hydrograph of the San Juan River to benefit endangered fishes and their critical habitat. Mimicry of the natural hydrograph will be achieved by following the San Juan River flow recommendations (Holden 1999, see Tables 2 and 3) and subject to completion of the Navajo Operations EIS and execution of a Record of Decision. The flow recommendations provide recommended reservoir operating rules that were developed in cooperation with Reclamation (see Tables 4 and 5, and Figure 1). Reclamation is in the process of preparing an EIS addressing the operation of Navajo Reservoir to meet the flow recommendations. After completion of the Navajo Reservoir EIS, if Reclamation determines that the existing or future revised flow recommendation cannot be met, reinitiation of section 7 consultation will be required on the Animas-La Plata Project<sup>1</sup> (see reinitiation notice). The San Juan River Basin Recovery Implementation Program uses an adaptive management process that involves annual monitoring and continued research, so the flow recommendations may be refined in response to new information. The Service will periodically review operation of Navajo Dam to determine if the flow recommendations are being met.

The Service anticipates that flows provided through the implementation of the existing or future revised flow recommendations and other recovery actions (such as, but not limited to, fish passage, nonnative fish control, habitat restoration as described in the San Juan River Recovery Implementation Program’s Long Range Plan) will provide a positive population response for Colorado pikeminnow and razorback sucker. The Service is currently developing recovery goals for the Colorado pikeminnow and razorback sucker. Information from the recovery goals will be used to determine a positive population response. If a population meets or exceeds the recovery goals for the San Juan River, it will be considered to exhibit a positive population response. However, prior to meeting recovery goals, criteria for determining a positive population response

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<sup>1</sup>Numerous section 7 consultations in the San Juan River Basin rely on the operation of Navajo Dam to remove jeopardy; therefore, this requirement would apply to many section 7 consultations.

must be established. Therefore, before construction of Ridges Basin Reservoir or within one year of the date of this biological opinion (whichever comes first), Reclamation will develop criteria to determine a positive population response for concurrence by the Service. Reclamation will consult with the Biology Committee of the San Juan River Recovery Implementation Program in developing the criteria.

A monitoring plan is being developed by the Program and will be used to track the status and trends of endangered fishes. The monitoring plan will determine the relative annual reproductive success of Colorado pikeminnow and razorback sucker, determine size-structure of adult and juvenile fishes, track changes in abiotic parameters (water quality, channel morphology, and habitat) and provide detailed analyses of data collected to help determine progress toward recovery in 2003 and every 5 years thereafter. Information from the San Juan River Monitoring Program will be used to determine population responses. If the flow recommendations or other recovery actions do not result in a positive population response for both species within the time frames established in the criteria and as determined by the Service, reinitiation of section 7 consultation will be required<sup>6</sup> (see reinitiation notice).

2. Conservation measure number one and many other projects in the San Juan River Basin rely on the hydrology modeling that was done for the San Juan flow recommendations (Holden, 1999) and for the Animas-La Plata Project. RiverWare was selected as the model to simulate flows in the San Juan River and to model the effects of water development in the basin. Modification of the model to simulate the effects of the Animas-La Plata Project was an extension of the RiverWare model. The San Juan River Recovery Implementation Program recently designated the responsibility of maintaining and updating the model to Reclamation. Reclamation is now the “keeper” of the model. As such, Reclamation will be responsible for maintaining the model and its data, within the guidelines provided by the Recovery Program’s committees.

The model is also one of the tools being used in preparation of the Navajo Operation EIS. A Modeling Group, consisting of people trained and experienced in hydrology, has been established to help on the operation EIS and includes the Corps of Engineers, New Mexico Interstate Stream Commission, San Juan Water Commission, Bureau of Indian Affairs, City of Farmington, Jicarilla Apache Tribe, the Navajo Nation, Southwestern Water Conservation District, Fish and Wildlife Service, and the Colorado Water Conservation Board. Many of the same people serve on the Recovery Program committees. This group of hydrologists provides the expertise and appropriate forum to continually peer review the model and its results from many perspectives.

In order to insure the accuracy of the model, Reclamation will take actions necessary to have an independent review of the model conducted. Reclamation will coordinate the review with the Service and seek the Service’s concurrence with the model results. The review and the coordination will be completed within one year of the date of this biological opinion.

3. A Memorandum of Understanding and Supplemental Agreement to protect the releases for endangered fishes made from the Navajo Reservoir to and through the endangered fish habitat of the San Juan River to Lake Powell was signed in October 1991. This MOU remains in effect.

4. The Durango Pumping Plant will be operated in a manner that insures that its operations do not interfere with meeting the target flows recommended for the San Juan River. Pumping would be decreased or stopped during certain periods in order to meet the recommended target flows. If there have been no endangered fish releases from Navajo Dam for two consecutive years and the planned release for the current year is the minimum release specified in the flow recommendation report, the Durango pumping plant would be turned off during June, allowing an additional 280 cfs to help meet flow recommendations for endangered fish in the San Juan River. After satisfying all downstream senior water rights demands and downstream Animas-La Plata Project water demands, pumping will be further limited to allow the following bypass flows in the Animas River at the pumping Plant intake; October through November - 160 cfs, December through March - 125 cfs, and April through September - 225 cfs.
5. Reclamation will implement all actions necessary to prevent escapement of nonnative fishes from Ridges Basin Reservoir in any water leaving the reservoir. Reclamation will consider the escapement of eggs and larvae in the design of an escapement devise or method. Reclamation will monitor any water leaving Ridges Basin Reservoir to determine if escapement of nonnative fishes is occurring. If escapement is occurring, Reclamation will develop and implement a plan to stop escapement. The plan will be approved by the Service prior to implementation.
6. Reclamation will develop and implement a monitoring program for potential adverse bioaccumulation of trace elements in bald eagle food items in Ridges Basin Reservoir. If the monitoring program identifies a problem with trace elements, Reclamation will develop and implement an action plan to minimize impacts to bald eagles.
7. Reclamation will incorporate bypass flows into ALP project operations to promote natural recruitment of cottonwood trees along the Animas River. These flows are compatible with the San Juan River flow recommendations for endangered fishes. This should avoid impacts to future bald eagle habitat.
8. All electrical transmission lines associated with the project will be designed to avoid injury to raptors, including bald eagles.

**ATTACHMENT D: “ACTIONS TO MINIMIZE ADVERSE EFFECTS AND PRACTICABLE STEPS TO MINIMIZE POTENTIAL ADVERSE IMPACTS (SUBPART H)”, SECTION 404(b) (1) EVALUATION, CLEAN WATER ACT COMPLIANCE (ATTACHMENT B, VOLUME 2 2000 FSEIS ALP PROJECT)**

**7.0 ACTIONS TO MINIMIZE ADVERSE EFFECTS AND PRACTICABLE STEPS TO MINIMIZE POTENTIAL ADVERSE IMPACTS (SUBPART H)**

This section provides and discusses appropriate and practicable steps to minimize potential adverse impacts of the discharge of fill material on the aquatic ecosystem.

**7.1 Actions Concerning the Location of the Discharge (230.70)**

Under all alternatives, impact avoidance and minimization procedures are available during the construction of pipeline crossings of wetlands and riparian habitats occurring along intermittent and perennial drainages, or construction or enlargement of dams. The following avoidance/minimization measures would be applied on a routine basis:

- The actual location of pipeline or canal siphon trench installation would be adjusted as necessary to avoid wetland and stands of riparian vegetation. Trenches would be sited away from wetland/riparian areas to the maximum extent feasible within the defined right-of-way corridor at each crossing.
- Water conveyance pipelines can feasibly be installed through directional drilling techniques, thereby avoiding impacts to possible wetland/riparian habitat altogether. Wherever significant stands of wetland or riparian vegetation occur along a drainage crossing, directional drilling approaches would be considered if trench relocation could not avoid the impact.
- Where trench installation could not completely avoid wetland or riparian habitats and/or where directional drilling would not be feasible, the construction zone would be kept to a minimum. Trenching work would avoid sidecasting of excavated soils into wetland/riparian vegetation, and heavy equipment movement would be routed around vegetated areas where feasible.

**7.2 Actions Controlling the Material to be Discharged, the Material after Discharge, the Method of dispersion and Related Technology (230.71, 230.72, 230.73, and 230.64)**

Under all alternatives, a range of routine sedimentation/turbidity control measures and technology would be employed to control the material to be discharged and the method of dispersion to downstream areas. These would include the following:

- Limiting all work, except for major construction elements (i.e., Ridges Basin Dam and Reservoir, NNMP, Lemon Dam) to the drier seasons when flow does not occur in the majority of drainage crossings.
- Temporary cofferdams or berms would be used to contain fine materials and placement of fill material during periods of low water flows in the vicinity of intermittent drainages and creeks, and

rivers.

- Stockpiles of backfill materials would be placed above ordinary high water marks and protected by measures to prevent erosion of those materials into waters of the United States.
- Use of turbidity screens, filter materials and other technology as needed for all work in perennial drainages where surface water occurs. Silt screens or other appropriate methods would be used in and near intermittent drainage channels, creek beds, and river banks to confine suspended particulate matter and turbidity to small areas where settling or removal can be done.
- Use of directional drilling technology as described in Section 7.1 above.
- Construction equipment adapted for work in wetlands would be used to minimize the zone of construction-related disturbance to the minimum necessary. Trenching work would avoid sidecasting of excavated soils into wetland/riparian vegetation, and heavy equipment movement would be routed around vegetated areas where feasible.
- Road crossings of intermittent and perennial drainages would be culverted to allow both low and high flow passage, fluctuating water levels, and to maintain circulation and faunal movement.
- Routine sediment retention methods as part of all dewatering procedures would be used. To the maximum extent feasible, dewatering would be directed to upland areas where runoff to drainages could be avoided.
- During the reservoir filling process, turbid waters from shoreline slumping and other erosion would likely cause high turbidity levels. Discharges from the reservoir would not be allowed during periods of high turbidity, to the extent practicable under project water supply commitments.
- All work would be conducted in accordance with water quality restrictions contained in the required NPDES Permit.

Pipeline construction across the San Juan River would be accomplished by either trenching across the river (open-cut crossing, plowing-in, flume crossing, dam and pump crossing) or directionally drilling underneath the river. Excavation, pipeline installation, and backfilling across the river and banks, using standard BMPs would be completed as quickly as possible. In addition to BMPs, adherence to erosion control guidelines that incorporate sediment traps and other procedures would reduce the potential impact to endangered fish species. No significant impacts on the Colorado pikeminnow or razorback sucker are anticipated due to the construction of the NNMP.

Actions would also be taken to avoid and minimize any potential pollutants in discharge material. These actions include the following:

- Construction dewatering of groundwater from the Durango Pumping Plant site could discharge trace elements into the Animas River due to high trace element concentrations at the pumping plant site. Dilution effects in the Animas River are expected to greatly diminish these trace element concentrations (Section 3.3). However, if monitoring suggests that dilution effects would be insufficient to reduce trace element concentrations, then groundwater discharges would be treated prior to discharge. Furthermore, the pumping plant would be designed to prevent infiltration of groundwater during operation (see Section 7.3,

below).

- Uncapped oil/gas wells beneath reservoirs can be a source of water contamination by substances such as free and floating oils and emulsions, aromatic hydrocarbons, metals and various other chemicals toxic to humans and wildlife. Two abandoned wells are found within the Ridges Basin Reservoir site. Reclamation would avoid potential contamination from existing or abandoned oil/gas wells in reservoir basins by completing proper site clean-up procedures and well closures in accordance with EPA and states of Colorado and New Mexico standards.

### **Actions Affecting Plant and Animal Populations (230.75)**

Reclamation has prepared a general mitigation plan that would address the impacts to fish, wildlife, wetlands, and other natural resources. The mitigation plan has been developed by Reclamation using preliminary recommendations from the Service and other agencies. The Service has prepared a report on the project under the Fish and Wildlife Coordination Act (FWCA) and this report (Service 2000b) has been used to finalize mitigation plans in the FSEIS.

Reclamation proposes to mitigate ALP Project impacts through acquisition and enhancement of wildlife habitat; protection of portions of Ridges Basin to preserve wildlife wintering areas and movement corridors, and through provisions to develop sport fisheries to offset depletion impacts. Mitigation measures will be implemented concurrently with other project features so that they are operational at the time of reservoir filling. Land acquisition for vegetation and wildlife mitigation will be completed prior to award of the Ridges Basin Dam construction contract and enhancement will be completed concurrently with dam construction. Lands for wetland mitigation will be acquired prior to award of the Ridges Basin Dam construction contract and physical features of the wetland development will be at least 95 percent complete prior to starting reservoir filling.

Specific measures include:

- Acquisition and development of approximately 2,700 - 2,900 acres of appropriate land to mitigate deer, elk, and other terrestrial species habitat losses. Priority will be given to lands along the La Plata River drainage, the western area of Ridges Basin, or similar lands and drainages. Acquisition will be through willing sellers only. Once acquired, it is expected that these lands would be managed for wildlife purposes by the Southern Ute Indian Tribe, the CDOW, or by private land conservancies. The wildlife enhancements would be designed following acquisition of the land, enhancements would include fencing and signing of the property, weed control, planting and management of desirable vegetation, protection of soils and correction of erosion conditions, development of watering areas, and other plans. The lands would be managed for wildlife; human recreational use would be limited to activities that do not detract from this primary purpose.
- Compensation for the impact to 134 acres of wetlands. Reclamation has identified a substantial amount of acreage with wetland mitigation potential in the project area. See Attachment B-2 for a further discussion of these options. One option would involve the creation of 115 acres of wetlands at Ridges Basin.

- To protect migration corridors and remaining habitat around Ridges Basin, areas south of the reservoir will not be developed for recreation; winter closures for recreation use will be implemented in the entire right-of-way. A specific land management plan for the reservoir right of way and adjacent state lands will be developed in cooperation with the Service and CDOW prior to ALP Project construction. The purpose of this plan will be to protect migration corridors and protect habitat not directly impacted by the ALP Project.
- County Road 211 relocation along the Rafter J route as recommended by the Service to reduce wildlife impact, is the recommended plan but would require coordination with La Plata County.
- Relocated power lines would be designed raptor-proof. Pipeline relocation alternatives that impact golden eagle nests on Carbon Mountain would not be considered and specific construction specifications would be developed with the Service to protect these nests during actual construction.
- Trout fishery impacts would be minimized in several ways. Minimum bypass flows and ramping rates will be followed on the Animas River (see bullet item on ramping rates below). A trout stocking program will be initiated to offset loss of fish habitat.
- Reclamation will review and adopt established guidelines for screening diversion facilities to minimize fish entrainment and impingement at Ridges Basin Pumping Plant. Reclamation will also ensure that design specifications include Best Available Technology.
- Reclamation will operate the pumping plant in a manner to minimize the downstream stranding of trout and native fish in the Animas River. Changes in pumping rate will not exceed 100 cfs/hour upramp and 50 cfs/hour downramp when natural river flows are above 500 cfs. More detail on ramp rates is provided in Chapter 5 of the FSEIS (Section 5.4.6).
- Reclamation will either screen or implement other physical structures to prevent live fish from being released from Ridges Basin Reservoir. The reservoir outlet system will be designed and fitted with devices to eliminate survival of fish escaping the reservoir. Reclamation will monitor escapement from the reservoir and Basin Creek.
- Reclamation will fund the development of two fishing access points along the Animas River, providing for access roads, parking, and signage. Reclamation would also provide funding to acquire access and easements on a willing-seller basis to approximately 4 miles of the Animas River downstream from Durango, and develop rafting and kayaking put-ins.
- Reclamation will evaluate the advisability of extending the inlet conduit for water to enter the reservoir at a depth below the thermocline in Ridges Basin Reservoir. Final determination of the inlet conduit design will depend on the findings of this evaluation.
- Reclamation will continue to monitor native fish in the Animas River beginning in 2000 and will develop a firm recommendation for mitigation no later than 2005, at least two years prior to project pumping on the Animas River. (See Section 5.4.6 of the FSEIS for more information.)
- Future uses and development of project water will need to be considered under NEPA regulations. During this process, additional coordination under the FWCA will be carried out with the Service and other appropriate agencies to determine fish and wildlife impacts and mitigation needs.

## **Water Quality Mitigation Actions**

- Reclamation will ensure that the Durango Pumping Plant is designed to minimize the disturbance of contaminated materials. Reclamation will also ensure that procedures are developed for radiological monitoring of excavated soils and groundwater encountered and that remedial procedures are planned in advance to counteract the potential for human exposure and prevention of contaminated groundwater release from the construction site.
- Reclamation will ensure that all federal and state requirements pertaining to the management and handling of hazardous materials and radioactive waste are followed and will include those requirements within construction contract language inclusive of construction safety and environmental compliance.
- Reclamation will require that pre-construction surveys are conducted for non-binding water end use facilities and conveyance system development and that hazardous material standards relating to construction are adhered to.
- Reclamation will develop and implement a monitoring program at Ridges Basin Reservoir to determine the extent of bioaccumulation of trace elements in fish and wildlife associated with the reservoir. (See Section 5.4.7 of the FSEIS for more information.)

In addition to the actions listed above, Reclamation would avoid potential contamination from existing or abandoned oil/gas wells in reservoir basins by completing proper site clean-up procedures and well closures in accordance with EPA and states of Colorado and New Mexico standards.

## **Special Status Species**

Reclamation will implement conservation recommendations outlined in the 2000 Biological Opinion (Service 2000a) with modifications, including the incorporation of bypass flows to reduce the possibility of impacts to cottonwood recruitment.

- Reclamation will, in conjunction with the Service, CDOW, New Mexico Department of Game and Fish (NMDGF), and the Colorado Ute Tribes, develop and implement a program to monitor compliance with water quality standards, and to determine potential water contamination effects and ways to address potential contaminant issues. (See Section 5.4.3 of the SEIS for more information.)
- Reclamation will ensure that contractors schedule construction of the Navajo Nation Municipal Pipeline to avoid construction during periods when the willow flycatcher is present near San Juan River Crossings if surveys determine that they are there.
- Reclamation will operate Navajo Reservoir and Durango Pumping Plant to mimic the natural hydrograph flows of the San Juan River for the benefit of the Colorado pikeminnow and razorback sucker.
- Reclamation will design and operate the Ridges Basin Reservoir outlet system to eliminate

survival of predatory or competitive fish from escaping the reservoir and release into the Animas River (See Section 5.4.6 of the FSEIS for more information).

#### **7.4 Actions Affecting Human Use (230.76)**

A range of actions is proposed to avoid or minimize impacts on human use. These include trout stocking and fishing access enhancement, elk and deer habitat enhancement, and improved access on the Animas River for recreation.

#### **7.5 Other Actions (230.77)**

- BMPs are proposed to manage runoff water quality in construction zones
- Water releases in the San Juan River, pursuant to the Biological Opinion RPA will protect endangered fish populations (Sections 7.3 and 9.5). Bypass flows in the Animas River will also accommodate fish and wildlife populations.

## **ATTACHMENT E - CONSERVATIONS MEASURES FOUND WITHIN THE “FINAL BIOLOGICAL ASSESSMENT FOR THE LA PLATA RIVER WETLAND/RIPARIAN MITIGATION AREA NON- NATIVE VEGETATION CONTROL FOR CY 2003, APRIL 2003**

Described below are the suggested Conservation Measures that will be employed for the vegetation control work in the wetlands/riparian area during the CY 2003 to avoid having adverse impacts to the list of federally protected and candidate species provided. Once agreed to by the Service, these conservation measures were incorporated in to the Proposed Action and firmly committed to.

### **Bald Eagle**

- Vehicular access will be minimized to the extent that the riparian area will only be accessed for necessary operation and maintenance activities during bald eagles winter use within the area. (November – March). Work within the mitigation area during this period will need to occur, however, care will be taken to minimize effects to perched eagles. Vehicle access within the riparian area outside of this period will also occur, however, use within the valley bottom will be minimized.
- No activity will take place during the early morning or late evening periods when eagles will possibly be on roost sites.
- Although no active bald eagle nests are known to occur within the mitigation area, evidence of nesting activities will be monitored. If any active nests are identified in the future, Reclamation will contact the Service to agree on possible minimization of adverse impacts.

### **Colorado Pikeminnow/Razorback Sucker**

- All toxic substances, in particular herbicides used to treat noxious weeds and other undesirable non-native vegetation will be appropriately applied according to the manufacturer’s label and will not be used in a careless manner that could lead to polluting the San Juan River occupied by the two listed endangered fish.

### **Southwestern Willow Flycatcher**

#### **General Commitments**

- Reclamation will conduct willow flycatcher surveys within the mitigation area in 2003. Appropriate Service protocols for surveying for willow flycatchers will be followed.
- Reclamation will ensure that all work complies with the following applicable laws including the [Federal Insecticide, Fungicide, and Rodenticide Act \(FIFRA\)](#), Federal Noxious Weed Act, National Environmental Policy Act (NEPA), Clean Water Act and delegated state and local authority, laws and associated regulations, as well as the Chemical Labels and Material Safety Data Sheet information associated with any chemical applications.
- All of the areas identified in Table 8 as suitable habitat will be avoided during

willow flycatcher's breeding season (May through August) except for conducting willow flycatcher surveys. More specifically, a 100 foot buffer will be honored throughout this designated period and if a willow flycatcher is identified in a portion of the riparian habitat, a 250 foot buffer area will be identified to protect the occupied habitat. The 250 foot buffer was a recommendation made to Ecosphere by Jim Sedgewick (personal communication, Jim Sedgewick, USGS, 2002).

- No areas identified as being potentially "suitable habitats" for southwestern willow flycatchers will be damaged by motorized vehicles. Also, the area within the designated 100 foot buffers will be avoided in most situations from May through August unless there is no other way to access other portions of the river. Typically, the use of vehicles will avoid impacting riparian areas; however, there may be situations where it can not be avoided entirely.
- If willow flycatchers are found during the last survey season, the presumed "nesting area" will be avoided by maintaining a buffer through the nesting period as described above. This buffer will be honored through the presumed nesting season and to include a period of time when young birds had fledged (September 15).

#### **Herbaceous Weed Control**

- All herbaceous weed spraying occurring between May and August 15 between the two designated buffers (100 ft. to 250 ft.) will be limited to broad leaf herbicide only. Noxious weeds occurring outside of the 250 foot buffer could be treated with wide spectrum herbicides.
- During the southwestern willow flycatcher's breeding season, motorized vehicle use within the valley bottom will be limited to only necessary access for weed spraying purposes. Further, existing "two track" roads will be used whenever possible and buffers around identified potential suitable habitat areas will be abided by as described above.
- All noxious weed treatments applied to herbaceous species during the flycatcher's breeding season will be applied in a manner not to adversely impact potential willow flycatcher nesting habitats. Appropriate herbicides will be applied using backpack sprayers and/or ATV mounted sprayers in a manner to minimize adverse effects to native vegetation. Further, river crossings by any motor vehicle will be restricted to designated areas on the river that will minimize adverse affects to riparian vegetation.

#### **Non-Native Woody Vegetation Removal**

- Reclamation will avoid mechanical removal of undesirable non-native woody plants within the mitigation area during the flycatcher's breeding season if willow flycatchers were found during the breeding period. If nesting flycatchers are identified within the mitigation area, work will not be initiated until mid-September. If no nesting flycatchers are identified based on survey results, work will be initiated after the final survey period.
- During the course of the non-native woody vegetation removal, which will be a multiple year effort, no more than 25% of the existing riparian (measured by

percent cover) vegetation will be removed from identified suitable habitat during any calendar year.

- Within the northern parcel (Tract 3) the percentage of non-native woody vegetation is well below 20% occurrence allowing for all to be removed this calendar year. The southern portion (tract 2) has one suitable patch that is dominated by tamarisk. Within this patch, no more than 25% of the non-native vegetation will be removed this year.
- In order to minimize adverse effects to willows during non-native vegetation removal, large non-native trees especially Russian olives may need to be limbed prior to having them felled to minimize the effects of crushing desirable vegetation, in particular willows. In some cases, large trees will need to be removed from the riparian area to avoid having felled trees crushing native vegetation; however, they will be left in place after felling if the tree wasn't significantly impacting desirable vegetation.

#### **Herbaceous and Non-Native Woody Vegetation Control**

- Prior to initiating weed control work, a meeting will be held with all of the personnel involved with weed work this year to discuss environmental safeguards, work protocols, etc. Also, a biological monitor will work with the contractor in the field when work was initiated to assure all commitments are understood and then routinely monitor the work for the period of the contract.
- Reclamation will ensure that at least one supervisor engaged in activities to reduce the occurrence of non-native vegetation will have, at a minimum, a commercial applicator's license for the State of Colorado to dispense herbicides in industrial-right-of-ways, rangeland settings and in wetlands areas. Personnel performing non-native vegetation removal activities must be knowledgeable of southwestern Colorado weed species and native plants so as to be able to distinguish between them in the field.
- Once a final Statement of Work (SOW) is completed that identifies specifically what, how and when the non-native vegetation treatments and revegetation work will be conducted, it will be forwarded on to the Service for their review. The SOW will include; a chemical list, planting designs, seed mix, and overall revegetation plan.