Alaska Department of Transportation and Public Facilities

Integrated Vegetation Management Plan

Revised September 2020
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Pesticides Subject to Buffer Zones in Washington State

Front page photo credit: DOT&PF staff and John Morton, USFWS

Final Revision 2020
1.0 INTRODUCTION

The Alaska Department of Transportation and Public Facilities (DOT&PF) oversees 241 airports, 12 ferries serving 35 communities, 5634 miles of highway, and 776 public facilities occupied by 17 state and local agencies throughout the state of Alaska. This Integrated Vegetation Management Plan (IVMP) has been developed for use upon lands owned or leased by DOT&PF, which includes State-owned rights-of-way, airports, and state facilities occupied by other agencies.

The intent of this IVMP is to comply with Chapter 18, Section 90 of the Alaska Administrative Code (AAC) and complement DOT&PF’s Guidelines for Vegetation Control within Department Right-of-Way, or as amended. This IVMP will assist DOT&PF in its responsibility to manage the vegetation upon its lands to improve safety and control invasive plant species.

DOT&PF intends to continue using herbicides as a maintenance tool, along with non-chemical maintenance and vegetation control measures, following the required posting and notification requirements specified within 18 AAC 90.640. Through the use of the herbicides described within this IVMP, along with current and traditional non-chemical maintenance practices, it is the intent of DOT&PF to provide improved maintenance service and public safety in a more cost-effective manner.

All herbicide applications shall comply with local, state and federal herbicide regulations and any necessary permit requirements. All herbicide application covered within this IVMP will be performed by certified applicators and using state-approved herbicides in accordance with their labels. Apart from vegetation, no other pest categories are included in this IVMP.

**IPM Plan Effective Dates:**
- Original July 2013 – 2015
- Revision #1 April 2014 – 2016
- Revision #2 April 2016 – 2018
- Revision #3 April 2018 – 2020
- Revision #4 April 2020 – 2022

**Management Area Name/Location:**
Alaska Department of Transportation and Public Facilities (DOT&PF)

**General Site Description:**
DOT&PF owned or leased lands and facilities.
**Land Uses:** Public rights-of-way, airports, and other lands and facilities owned or leased by DOT&PF.

**Name of Person in Charge:** Jess Parks, Statewide Environmental Analyst, DOT&PF

**Certified Applicator Name(s):** Various

**Certification Numbers:** Various

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**2.0 DOT&PF STATEWIDE MAINTENANCE**

Jess Parks, Statewide Environmental Analyst has been identified as the Person in Charge for this IVMP. Alaska DOT&PF is divided into three regions: Central, Northern, and Southcoast (Figure 1, Page 15). Each region is further broken into maintenance districts that are each managed by a District Superintendent. Vegetation management is implemented regionally by the Regional M&O Director/Chief and District Superintendents.

Each region has the same vegetation management goals and objectives; however, vegetation management varies slightly throughout the state given each region’s climate, topography, vegetation communities, wildlife, and extent of DOT&PF facilities.

**3.0 DOT&PF VEGETATION MANAGEMENT GOALS AND OBJECTIVES**

The primary goal of vegetation management throughout DOT&PF lands is to improve public safety. The goals and objectives for vegetation management within this IVMP differ for those communities associated with DOT&PF road rights-of-way and those within DOT&PF airport facilities.

3.1 DOT&PF Road Right-of-Way Management

Effective vegetation management reduces the risk of functional or structural failure which may contribute to crashes, injury, or disruption to travel. Effective vegetation management will help limit physical obstruction or restricted visibility and can reduce the severity of run-off-road crashes.

DOT&PF objectives in vegetation management within its road system rights-of-way are in accordance with the *Guidelines for Vegetation Management, 1st Edition*, by the American Association of State Highway and Transportation Officials (AASHTO). These guidelines define
three roadside management zones (Zones 1, 2, and 3) from the edge of pavement to improve sight distances, maintain access, protect structures, and reduce wildlife strikes.

The three roadside management zones, which were originally developed by the National Roadside Vegetation Management Association and are in the AASHTO Guidelines for Vegetation Management, 1st Edition are illustrated in Photograph 1 and can generally be described as follows:

3.1.1 Zone 1 (Vegetation Free Zone)

A 1- to 3-foot gravel or paved shoulder adjacent to the road system to provide maintenance and operational access to guardrail, improve drainage, reduce fire potential, increase sight distance, and prevent destruction of pavement from vegetation.

3.1.2 Zone 2 (Recovery or Operational Zone)

Provides a stable, low-growing vegetative community to accommodate suitable space for drivers to regain control of errant vehicles, maintain sight distance, provide clearance for signage, maintain roadside drainage capacity, eliminate hazard vegetation, prevent erosion and road stabilization, and accommodate utilities.
3.1.3 Zone 3 (Natural Zone)
Maintained for a natural, self-sustaining vegetative community appropriate for the adjoining land uses. Maintenance, if any, is determined by safety concerns (snow storage, shade trees, sight distance, etc.).

3.2 DOT&PF Airport Facilities
Airports certified by the Federal Aviation Administration (FAA) are typically permanently staffed by three to four dedicated DOT&PF staff. Uncertified airports are typically in rural communities, do not have dedicated staff, and may or may not have regular maintenance agreements with the local communities. These rural, uncertified airports are also located in areas where services are scarce. As a result, the regular maintenance measures that are achievable between certified and uncertified airports differ greatly although their objectives are similar.

3.2.1 FAA Certified Airports
Many FAA certified airports have wildlife management plans developed for each airport based on their location and wildlife presence. Within some of these wildlife management plans, vegetation management is included to minimize hazard wildlife from becoming a safety concern. Additionally, vegetation management at these airports includes routinely clearing the landing approaches, lights, signage, fence lines, and where vegetation is breaking through pavement.

3.2.2 Non-Certified Airports
Although non-certified airports have the same vegetation management objectives as certified airports, they generally do not have wildlife management plans. Vegetation management is performed when funding is possible.

4.0 VEGETATION HAZARDS
DOT&PF maintenance personnel face a variety of hazards from unmanaged vegetation throughout its system. Many of the hazards are common throughout the state, along the right-of-way as well as airports. This IVMP has been developed to allow DOT&PF to better manage these hazards.

4.1 DOT&PF Right-of-Way Vegetation Hazards
Vegetation maintenance hazards common throughout the state’s right-of-way include vegetation that harms/damages guardrail and fence lines, impairs sight lines and visibility of signage, and attracts wildlife closer to the road system. Noxious and invasive weeds are also increasingly present throughout the right-of-way, although the specific species of these weeds vary by region.
Of particular concern to DOT&PF is the difficulty controlling vegetation from damaging guardrails and fence lines. Non-chemical vegetation control cannot keep up with the rapid growth of willow (*Salix spp.*), cottonwoods (*Populus spp.*), birch (*Betula spp.*), and alder (*Alnus spp.*) saplings that grow up through guardrails. As a result, sand and other material accumulate on the upslope edge of the roadway and reduce the ability for proper drainage. This, in turn, can lead to pavement and slope failure. Similarly, vegetation growing up through chain link fence damages these fences and reduces their ability to separate vehicles from wildlife.

### 4.2 DOT&PF Airport Vegetation Hazards

Common vegetation hazards at DOT&PF airports includes vegetation that damages perimeter fencing, obstructs landing lights, damages paved and unpaved runways, and creates habitat suitable for undesirable wildlife.

Noxious and invasive weeds occur at airports and necessitate an integrated vegetation management approach.

### 5.0 VEGETATION MONITORING AND ACTION THRESHOLDS

DOT&PF maintenance personnel perform vegetation monitoring as part of their current maintenance observation schedule. The frequency and regularity of maintenance observations differs for DOT&PF right-of-way, airports, and facilities based on resources and access.

#### 5.1 Right-of-Way Vegetation Monitoring and Action Thresholds

At a minimum, DOT&PF maintenance personnel perform visual inspection of its entire roadway system on a monthly basis. Maintenance personnel, as part of their asset monitoring system, identify areas of concern so that maintenance activities are prioritized. The presence of hazard vegetation and noxious and invasive weeds are part of this identification process.

Hazard vegetation and noxious and invasive weeds are noted during these monthly maintenance inspections. Vegetation within the right-of-way is evaluated based on the goals of the AASHTO *Guidelines for Vegetation Management, 1st Edition.*
5.1.1 Zone 1 (Vegetation Free Zone)

This zone will be evaluated based on the presence of vegetation and managed so that it is practically free of vegetation. The extent of vegetation within Zone 1 shown in Photograph 3 would be considered above treatment threshold.

5.1.2 Zone 2 (Recovery or Operational Zone)

This zone will be evaluated based on the presence and type of vegetation obscuring signage, impairing guard rail and fence lines, presence of noxious and invasive weeds, and extent of tall shrub or tree vegetation throughout the zone.

Tall herbaceous or woody vegetation shall be controlled in this zone as these communities interfere with the goals of this zone and the safety of users. This zone will be managed for a low growing herbaceous vegetation community free of noxious or nuisance weeds. The extent of woody vegetation within Zone 2 within Photograph 3 would be considered above treatment threshold.

5.1.3 Zone 3 (Natural Zone)

This zone shall be evaluated based on the presence of noxious and invasive weeds, hazard trees, and shade trees. In general, vegetation management within Zone 3 shall be minimal. Trees identified as a danger to roadway users may be removed manually. Noxious and invasive weeds may be controlled through chemical or non-chemical methods.

Based on the observations made, maintenance personnel will identify the type and extent of action necessary to control vegetation, if any. This information will help prioritize scheduling of mechanical or chemical vegetation control.
5.2 Airport Vegetation Monitoring and Action Thresholds

As noted earlier, the presence of DOT&PF maintenance staff at FAA certified airports differs greatly from those of non-certified airports. Therefore, the regularity of monitoring at these airport types also differs, although the action thresholds for treatment are the same.

FAA certified airports are inspected on a weekly basis, at a minimum. Maintenance personnel at FAA certified airports use a checklist system to identify areas of concern to prioritize maintenance activities. Non-certified airports are often within rural environments and are difficult and/or costly to access. Therefore, monitoring of these non-certified airports vary based on their accessibility and on available resources. Those airports accessible by road occur monthly while remote airports that are infrequently used will be monitored once every three years.

As part of the vegetation monitoring, critical airport infrastructure such as runway, lights, and approaches are inspected to make sure that vegetation is not impairing the safety of the airport. This includes evaluating vegetation based on the airport’s wildlife management plan, if applicable. Vegetation is managed around runways, lights, and approaches when vegetation obscures the visibility of this critical infrastructure. A vegetation-free perimeter around lighting is to be maintained. Herbaceous or woody vegetation obstructing lights, as shown in Photograph 4, will be considered above the treatment threshold.

Additionally, fence lines will be evaluated to determine the extent of woody vegetation in and around the fence lines. Woody vegetation growing among fence lines, as shown in Photograph 5, will be considered above the treatment threshold. Low-growing herbaceous vegetation may be allowed along fence lines as long as it does not include noxious or nuisance species.
Using the observations from maintenance inspections, the type and extent of vegetation management will be prioritized based on safety.

**5.3 Noxious/Invasive Weed Monitoring and Action Thresholds**

Road systems are common corridors for the spread of noxious and invasive weeds. The DOT&PF road system is no different and is encumbered by numerous patches of noxious and invasive weeds. DOT&PF is committed to doing its part to control the spread of noxious and invasive weeds, although total elimination of these plant species is likely unrealistic.

As part of DOT&PF monitoring, noxious and invasive weeds will be identified and included in the prioritization of vegetation control management. Additionally, DOT&PF works cooperatively with adjacent land owners and state and federal agencies, such as the National Forest Service, National Park Service, Bureau of Land Management, Alaska Department of Agriculture, Alaska Department of Natural Resources, and others, to control the spread of noxious and invasive weeds. This includes authorizing these and other state or federal agencies to apply herbicides, in compliance with this IVMP. Noxious weeds, such as the Canada thistle (*Cirsium arvense*) rosettes, as shown in Photograph 6 along the Seward Highway in Anchorage for example, may be controlled by DOT&PF maintenance personnel or other federal or state agencies in compliance with this IVMP.

The DOT&PF has developed a comprehensive 10 step process for cooperating agencies/organizations to follow should they desire to partner with the department and utilize this IVMP to control the spread of noxious and invasive weeds. This 10 step process can be found on the DOT&PF IVMP webpage; go to: [http://dot.alaska.gov/stwdmno/ivmp/index.shtml%20](http://dot.alaska.gov/stwdmno/ivmp/index.shtml%20) and follow the link “10 Steps to Success” on the right sidebar. Any cooperating agency/organization interested in partnering with the DOT&PF should first visit this website.

The presence of noxious and/or invasive weeds will be considered above the action threshold; however, control of these species will be prioritized along with the other vegetation management...
needs for each maintenance district. Where noxious and/or invasive weeds do not pose a safety hazard, their control by the department will be considered secondary.

6.0 VEGETATION CONTROL MEASURES

Non-chemical vegetation control, including both preventative and mechanical control, will continue to be an effective method of vegetation management performed by DOT&PF maintenance personnel.

6.1 Preventative Methods

Preventative vegetation control methods include the following activities:

- Road resurfacing
- Asphalt patching
- Establishment of low maintenance plantings, such as grasses, during road construction or rehabilitation
- Using native soils for backfill, where possible, from “weed free” sources during road construction

6.2 Mechanical Methods

DOT&PF uses a suite of mechanical methods to control vegetation within its roadway and airport system, such as:

- Mowing
- Brush cutting
- Hydro-axing
- Burning
- Best Management Practices (see below)

While mechanical methods are effective, these methods tend to be labor intensive, fuel intensive, and typically require heavy equipment which itself requires maintenance. Given how time consuming and expensive these measures can be, DOT&PF maintenance personnel have not been able to keep up with all of their vegetation maintenance activities, prompting the need for an integrated approach. In addition, mechanical controls can be ineffective against certain species of noxious and invasive weeds and can in fact, result in the spread of the unwanted weed. The DOT&PF collaborated with the University of Alaska Fairbanks, Cooperative Extension Service to develop Best Management Practices, Controlling the Spread of Invasive Plants During Road Maintenance (http://dot.alaska.gov/stwdmno/ivmp/documents/Best_Management_Practices.pdf). These best
management practices (BMPs) are used when planning maintenance activities and when in the field conducting maintenance projects. The BMPs in this booklet are designed to help road maintenance personnel prevent the spread of invasive plants and provide managers with a variety of control strategies.

6.3 Chemical Control

The use of herbicide application is expected to significantly improve DOT&PF’s ability to manage vegetation upon its road rights-of-way, airports, and facilities. While herbicides are expected to be an efficient and effective tool in managing vegetation, herbicide application must be done in an environmentally responsible manner.

In selecting herbicides suitable for DOT&PF use, consideration was given to habitat conditions in and adjacent to DOT&PF lands. The DOT&PF works closely with the Alaska Department of Natural Resources Alaska Plant Materials Center and the University of Alaska Fairbanks Cooperative Extension Service Agriculture Program to select herbicides that minimize potential risks to human health and the environment while providing an effective and efficient method for vegetation management and invasive species control.

A federal lawsuit in Washington State necessitated environmental reviews of some herbicides and their impact on federally listed salmon species under the Endangered Species Act (ESA). This environmental review resulted in a list of which herbicides that require a no-spray buffer zone around salmon-bearing streams (Appendix). This list is a resource used by DOT&PF during herbicide review and selection. Per Alaska Department of Environmental Conservation (DEC) requirements, this IVMP is reviewed every two years. During this process, the herbicide list is reviewed in collaboration with statewide experts to develop a comprehensive list that will control DOT&PF hazards such as woody vegetation while also choosing herbicides that are effective on noxious and invasive species (Table 1, below).

For herbicides used to control noxious and invasive species and other unwanted vegetation, the DOT&PF follows a process that ensures herbicides are used appropriately and only when necessary in combination with other effective control measures. The ultimate goal in any roadside treatment is to replace unwanted vegetation with appropriate native plants. In many cases herbicides are an effective tool for initial control of a problem. When combined with other control measures, herbicide use can be minimized or eliminated over time.

All herbicide applications will comply with the requirements of 18 AAC 90.640 and with this IVMP.
TABLE 1. POTENTIAL HERBICIDES TO BE USED BY DOT&PF

<table>
<thead>
<tr>
<th>Active Ingredients</th>
<th>Product Name</th>
<th>EPA Registration Number</th>
<th>Aquatic Approved</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Glyphosate</strong></td>
<td>EZ-JECT Diamondback Herbicide Shells</td>
<td>83220-1</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>RoundUp Custom for Aquatic and Terrestrial Use (formerly AquaMaster)</td>
<td>524-343</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>RoundUp Ready-to-Use Weed and Grass Killer III</td>
<td>71995-33</td>
<td>No</td>
</tr>
<tr>
<td><strong>Imazapyr</strong></td>
<td>Habitat</td>
<td>241-426-67690</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Triclopyr</strong></td>
<td>Garlon 4 Ultra**</td>
<td>62719-527</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Navitrol Landscape and Aquatic Herbicide</td>
<td>8959-56</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Aminopyralid</strong></td>
<td>Milestone**</td>
<td>62719-519</td>
<td>No*</td>
</tr>
<tr>
<td><strong>Clopyralid</strong></td>
<td>Transline</td>
<td>62719-259</td>
<td>No</td>
</tr>
<tr>
<td>2,4-D, Floroxpyr, Dicamba</td>
<td>Escalade 2</td>
<td>228-442</td>
<td>No</td>
</tr>
<tr>
<td><strong>Metsulfuron methyl</strong></td>
<td>Escort XP**</td>
<td>432-1549</td>
<td>No</td>
</tr>
<tr>
<td>Aminocyclopyrachlor, Metsulfuron methyl</td>
<td>Bayer Streamline**</td>
<td>432-1570</td>
<td>No*</td>
</tr>
<tr>
<td>2,4-D Ester</td>
<td>Shredder 2,4-D LV6**</td>
<td>1381-250</td>
<td>No</td>
</tr>
<tr>
<td>Chlorosulfuron</td>
<td>Telar XP**</td>
<td>432-1561</td>
<td>No*</td>
</tr>
</tbody>
</table>

* Though Milestone, Telar XP and Bayer Streamline are NOT labeled for application to natural or constructed bodies of water, it is permissible to use them to treat seasonally dry wetland such as floodplains, deltas, marshes, swamps, or bogs as well as transitional areas between upland and lowlands sites when no water is present. Per the label, Milestone and Bayer Streamline can be used to the water's edge; however, regional DOT&PF IVMP buffers may apply.

** Applications of Milestone, Garlon 4 Ultra, Escort XP, Bayer Streamline, Shredder 2,4-D LV6 and Telar XP can have non-target impacts to woody vegetation when applied to the root zone of trees; however, these applications are still permissible by the label. Ensure that such injury can be tolerated if the woody vegetation is desirable.

Additional information related to Table 1 is provided in the IVMP.

The following information provides a brief description of the various herbicide products listed in Table 1. Use of these products will be in accordance with their respective EPA-approved label. All products listed are registered with DEC for use within Alaska. Product selection is based on the application site and vegetation species being targeted. Tank mixing of products from Table 1 is allowed unless corresponding label language expressly prohibits such combinations. All
herbicide applications will be conducted by a person with a valid Category 9 Certified Pesticide Applicator’s license issued by DEC.

RoundUp Custom for Aquatic and Terrestrial Use and Roundup is a non-selective herbicide for most vegetation. Habitat is also a non-selective herbicide for most vegetation and may be used as an alternative to RoundUp Custom for Aquatic and Terrestrial Use. Garlon 4/ Ultra, Navitrol, Milestone, Transline, Escalade 2, Escort XP, Bayer Streamline, Shredder 2,4-D LV6, and Telar XP can be used to selectively target specific vegetation within terrestrial, and in the case of several products, aquatic environments. Based on the treatment site, these products may be used to manage woody vegetation and/or invasive weed species with applications in non-cropland areas including roadside rights-of-way and other areas under the jurisdiction of the DOT&PF.

DOT&PF may use RoundUp Custom for Aquatic and Terrestrial Use, EZ-JECT Diamondback Herbicide Shells, Habitat, Milestone, Transline, Escalade 2, and Garlon 4/ Ultra, Escort XP, and Telar XP throughout its rights-of-way, FAA certified airports, accessible non-certified airports, and facilities in compliance with their EPA-approved labels. RoundUp Ready-to-Use Weed and Grass Killer III is only intended for use in terrestrial, upland uses at remote non-certified airports where access is difficult as it comes pre-mixed in ready-to-use handheld application devices. RoundUp Custom for Aquatic and Terrestrial Use, EZ-JECT Diamondback Herbicide Shells, Habitat, and Navitrol may be used to control vegetation within aquatic areas, if needed, only after an Alaska Pollution Discharge Elimination System Pesticide General Permit and a Pesticide Use Permit are obtained.

DOT&PF may apply RoundUp Custom for Aquatic and Terrestrial Use or Habitat herbicides using backpack sprayers, hand-held or hand-pump sprayers, truck-mounted sprayers, wet blade application, cut surface treatments, or injection depending upon the vegetation targeted and as directed by the EPA-approved labels. RoundUp Ready-to-Use Weed and Grass Killer III is purchased within pre-mixed 1.33 gallon containers, 1.25 gallon pre-mixed refills, or 24 ounce handheld spray bottles. RoundUp Ready-to-Use Weed and Grass Killer III will only be applied from these pre-mixed handheld containers following the instructions within the EPA-approved label.

<table>
<thead>
<tr>
<th>Location</th>
<th>When Herbicide May Be Used</th>
<th>Post Treatment Monitoring</th>
</tr>
</thead>
</table>
| Rights-of-way | **Zone 1**: When vegetation is present, including noxious/invasive weeds.  
**Zone 2**: When tall vegetation begins to obstruct sightlines, when woody vegetation is present, or if noxious and/or invasive weeds are present.  
**Zone 3**: When noxious and/or invasive weeds are present. | Between 30 and 60 days following herbicide application, the certified applicator will re-inspect each treated area to determine if the application achieved the target control level. The certified applicator will evaluate the effectiveness of the application. If application did not achieve the target control level, |
All cases: When woody vegetation is growing up through guard rail or within fence lines, the certified applicator will recommend modifications or additional controls.

FAA Certified Airports and Accessible Un-certified Airports
- When tall herbaceous vegetation or woody vegetation obstructs critical airport infrastructure, such as the runway, landing lights, or approaches.
- When vegetation is damaging pavement or gravel runways.
- When woody vegetation is growing up through fence lines.
- When noxious and/or invasive weeds are present.

Between 30 and 60 days following herbicide application, the certified applicator will re-inspect each treated area to determine if the application achieved the target control level. The certified applicator will evaluate the effectiveness of the application. If application did not achieve the target control level, the certified applicator will recommend modifications or additional controls.

Remote Un-certified Airports
- When tall herbaceous vegetation or woody vegetation obstructs critical airport infrastructure, such as the runway, landing lights, or approaches.
- When noxious and/or invasive weeds are present.

Following herbicide application, the certified applicator will assess the application areas prior to departing the airport to observe evidence of effective treatment.

Post-treatment monitoring will assess:
- Amount and rate of re-growth of the unwanted vegetation
- Evidence of off-target herbicide movement
- General effectiveness of the treatment

6.3.1 Notification

In accordance with 18 AAC 90.640(a)(2), DOT&PF will provide this IVMP to DEC to post on its website prior to IVMP implementation.

Prior to herbicide application, the following notification requirements will be met:
- Notification will be provided to DEC, as required under 18 AAC 90.640(a)(6), not later than 15 days before each proposed application, including multiple application projects, as defined within 18 AAC 90.640(d).
• Notify owners of any public drinking water system within 200 feet (by return receipt mail) at least 30 days prior to using pesticide for first time in a year.

• If applicable, ensure that all local notification requirements are met.

• Two consecutive public notices for planned herbicide applications will be published in a newspaper of general circulation in the affected area, no later than 30 days before the date of scheduled single or multiple application projects as required by 18 AAC 90.640(b). This notice will include:
  — The location of the application
  — The complete name and EPA registration number of the herbicide(s)
  — The target pests
  — The method of application
  — The approximate number of applications to be made
  — How the public can receive more information about the proposed application

6.3.2 Record Keeping and Reporting

All records of herbicide application will be kept for a minimum of two years after each use by the DOT&PF Person in Charge in accordance with 18 AAC 90.640(a)(7). These records will be available to DEC at their request.

Records must include:
• Details about the application specified in 18 AAC 90.415(2);
• Copies of notifications/posting made to the public;
• Copies of notifications made to DEC; and
• Copies of notifications made to drinking water systems.

For each herbicide applied to more than 20 acres in a calendar year, DOT&PF will publish on its website a report containing the following, in accordance with 18 AAC 90.640(a)(8):
• Complete herbicide product name and EPA registration number,
• Quantity of mixed herbicide applied, and
• Location of each application.

Certified applicators working under this IVMP, must comply with all Record Keeping and Reporting requirements as required by DEC and DOT&PF.
APPENDIX

PESTICIDES SUBJECT TO BUFFER ZONES IN WASHINGTON STATE
Click on the waterbody name for a specific ESU in the following table to view a detailed map in Adobe Acrobat PDF Format. The maps, produced by NOAA Fisheries, show the ESU geographic boundaries. WSDA has developed county-specific maps to identify salmon-bearing streams within the ESUs and provided a list of exceptions to the buffers required by the final ruling in Washington Toxics Coalition, et al., v. EPA. The effects determination analysis and supporting documentation for each active ingredient may be viewed at [epa.gov/oppfead1/endanger/effects/](http://epa.gov/oppfead1/endanger/effects/).

### PESTICIDES SUBJECT TO BUFFER ZONES IN WASHINGTON STATE

**Pesticide/ESA Effects Determinations Listed by Evolutionary Significant Unit (ESU)**

<table>
<thead>
<tr>
<th>Chemical</th>
<th>Product Name</th>
<th>Columbia River</th>
<th>Upper Columbia River</th>
<th>Lower Columbia River</th>
<th>Middle Columbia River</th>
<th>Lower Snake River</th>
<th>Upper Snake River</th>
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<tbody>
<tr>
<td>1, 3-dichloropropene</td>
<td>Inline, Telone, Tri-Cal, Tri-Form</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>2, 4-D</td>
<td>Atrine 4, Curtail</td>
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<td>acephate</td>
<td>Orthene</td>
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1. An Evolutionarily Significant Unit or "ESU" is a distinctive group of Pacific salmon or steelhead.
2. "No effect" determination based on crop use of 2, 4-D. When used to control aquatic weeds, 2, 4-D "may effect" all ESUs.
3. Only high application rate crops with use during the winter or late winter seasons (peaches, filberts and walnuts) exceed levels of concern. Diuron use on other crops will have no effect on listed salmon and steelhead.
4. There is believed to be a large amount of diuron use on rights-of-way and other non-crop sites in Washington. The "may effect" determination is based on the high label application rates, the potential direct and indirect effects of diuron at high rates, and the uncertainty of exposure.
**PESTICIDES SUBJECT TO BUFFER ZONES IN WASHINGTON STATE**

**Pesticide/ESA Effects Determinations Listed by Evolutionary Significant Unit (ESU)**

Click on the waterbody name for a specific ESU in the following table to view a detailed map in Adobe Acrobat PDF Format. The maps, produced by NOAA Fisheries, show the ESU geographic boundaries. WSDA has developed county-specific maps to identify salmon-bearing streams within the ESUs and provided a list of exceptions to the buffers required by the final ruling in Washington Toxics Coalition, et al., v. EPA. The effects determination analysis and supporting documentation for each active ingredient may be viewed at [epa.gov/oppfead1/endanger/effects/](http://epa.gov/oppfead1/endanger/effects/).

### Active Ingredient Information

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<sup>5</sup> Home owner uses make up a large portion of the non-crop malathion use. However, few states track home owner use data and many labels do not specify numeric application rates and/or intervals. The "may effect" determination for non-crop use is based on concern from home owner use.

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