



ROW Paths for Pollinators

Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators was proclaimed by the President in a memorandum issued on June 20, 2014. IVM Partners, a 501-C-3 non-profit corporation, offers the following recommendations to meet strategy goals of;

1. *Increasing and improving pollinator habitat*
2. *Developing public-private partnerships*
3. *Expanding and coordinating public education programs*

1. Increasing and improving pollinator habitat

- Integrated Vegetation Management (IVM) should be recommended as the proven best practice of first establishing land management objectives, defining action thresholds, inspecting and evaluating the sites, communicating, choosing and implementing the best method(s), evaluating and documenting the results, and repeating the process. Methods include hand or mechanical cutting, herbicides or growth regulators, biological controls and cultural practices. The best practice is to choose the right tool at the right time to achieve management objectives with minimal input, or cost to safety, economics or the environment.
- Utility rights-of-way (ROW) traverse all ecosystem types as they provide electric, oil and natural gas to the public on approximately 12 million acres of land. FERC regulations have prompted electric utilities to reclaim ROW and many now practice routine mechanical cutting; FERC and DOT regulate natural gas and oil utilities which routinely mow their ROW on a 1-3 year cycle. They should be considered as pollinator and wildlife connectors and greenways if managed using IVM. Note: Maryland Public Service Commission now requires IVM as a condition for licensing new electric transmission line ROW within the state.
 - Electric transmission ROW can be managed as two distinct plant communities; grass and herbaceous plants within the wire zone (under and 20-feet outside conductors), and a shrub/scrub border zone from the wire zone to the ROW edge (Note: A shrub/scrub border zone could provide ladder fuels and not be a best practice in fire-prone areas). This zone division provides native prairie communities and shrub communities to optimize pollinator and bird habitat. Shrub/scrub communities can also be managed in ravine and riparian areas. Herbicide treated trees produce dead stems used by native bees for nesting, while ground nesters utilize bare soil between prairie clump grasses.
 - Natural gas and oil ROW can be managed as two distinct plant communities; low growing grass and herbaceous plants within the pipe zone (10-15 feet wide centered over the actual pipe routes) and a shrub border zone between and outside pipe routes. This zone division provides ready access for pipe leak

inspections and maintenance while optimizing habitat for pollinators and other wildlife. FERC regulations only allow a 10-foot wide path to be cut over the pipe routes in riparian areas and the cutting of plants exceeding 15-feet in height in the pipe border zones. These practices allow non-native invasive plants to proliferate along our nation's waterways easily dispersing seeds. IVM use of water-approved herbicides would manage riparian areas to native forbs and shrubs and improve pollinator and bird habitat while stemming the spread of non-native invasive plants.

- Urban-suburban grass height ordinances require utilities to routinely mow ROW to prevent "weeds" from exceeding 12 inches in height. If mowing is stopped and replaced with selective herbicide treatment of the tall growing trees and invasive plants, these areas would reestablish as native prairie habitat providing increased pollinator and bird habitat. These "natural areas" could then be used by inner city schools as nature areas for educating children on our natural resources and provide enjoyment of birds, butterflies and bees.
- Departments of Transportation routinely mow roadsides and medians to provide sight distance and safety for motorists. The necessary distance off the road surface is determined by the type and speed of the highway and terrain, but usually is necessary only past the swale or to the fence. Much unnecessary acreage is routinely mowed past these safety needs due to past practice, where it could be stopped and replaced with selective herbicide treatments to remove tall trees and invasive plants and reestablish native prairie.
- Security fencing around military installations and federal and private office complexes can be considered similar to ROW in that a designated corridor is maintained for sight distance and security. Mowing could be stopped or reduced in these areas by practicing selective IVM methods to manage for native prairie.
- Open areas that are routinely mowed, such as office complexes, landfills, parks and wildlife refuges, can be managed as native prairie by adopting IVM methods.



2. *Developing public-private partnerships*

- Most electric and natural gas/oil utilities operate their facilities on ROW easements and not fee-owned land. Where ROW cross federally managed lands, especially US Forest Service and Bureau of Land Management, an Environmental Assessment (EA) is required to change from routine mechanical cutting to IVM and the use of herbicides. This is demanded even when the agency has approved EAs for herbicide use on other utility ROW within their jurisdiction, or for control of non-native invasive plants or silviculture. This requirement most often results in the

status quo being maintained rather than endure the costs and time necessary to complete a new EA. A simple solution is to amend an existing EA to allow the proposed utility to use herbicides so long as they have developed and committed to an IVM Plan using best practices.

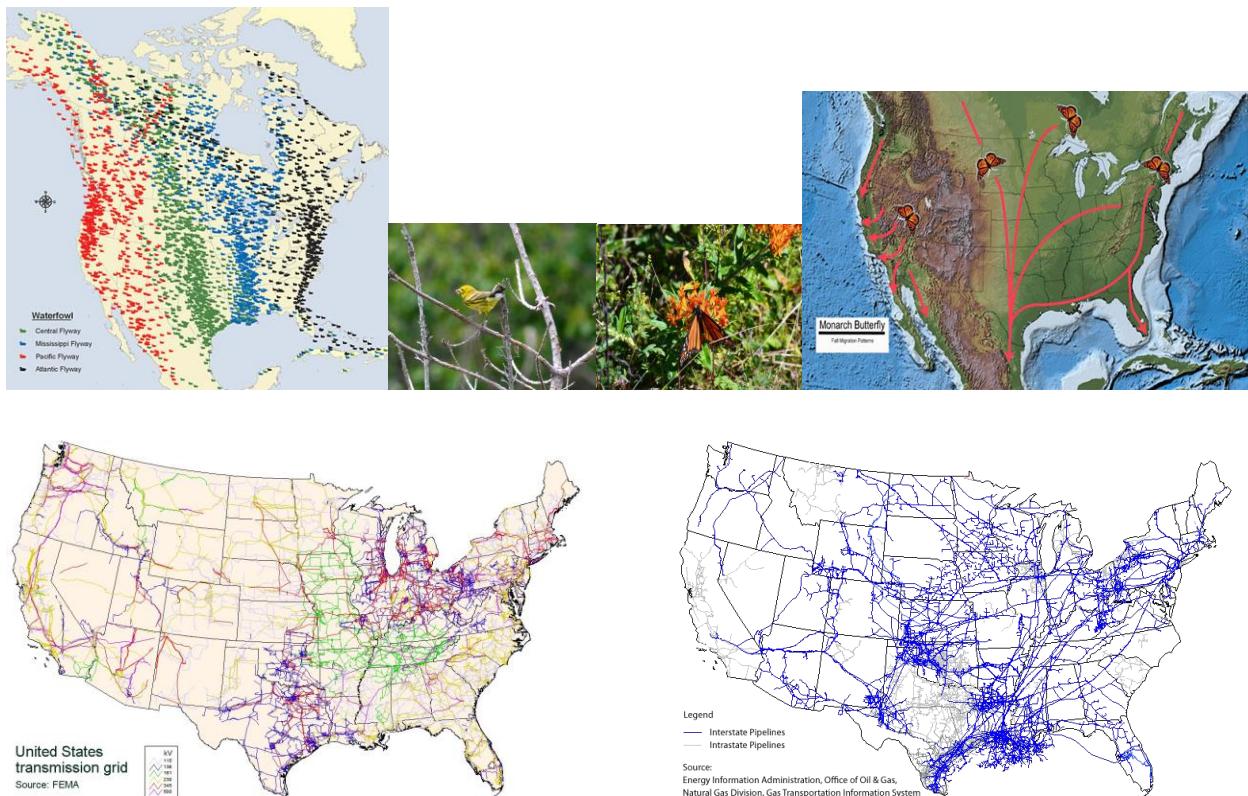
- Many state Departments of Transportation require fee permits for vegetation maintenance practices of utilities for every highway crossing of their ROW. Some DOTs have restrictions on herbicide use within riparian areas or if applied using broadcast techniques. While there may be legitimate reasons for these restrictions under some circumstances, a properly administered IVM program partnership between utilities and DOTs could improve safety, aesthetics and pollinator habitat while working jointly to reduce the spread of invasive plants.
- IVM Partners has developed partnerships with US Fish & Wildlife Service, Army Corps of Engineers, US Geological Survey, New Jersey Institute of Technology, Rutgers University, Chesapeake Bay Foundation, Chesapeake Wildlife Heritage, The Navajo Nation, The Wildlife Habitat Council, The Pollinator Partnership, Progressive Solutions and the EPA. As a 501-C-3 non-profit corporation, we are in a unique position to provide the expertise and liaison between the public agencies, utilities, other land managers, contract applicators and conservationists to leverage grant dollars with matching funds to achieve the necessary public –private partnerships for implementing the Pollinator Strategy.



3. *Expanding and coordinating public education programs*

- The electric industry has relied on the Gamelands 33 research in Pennsylvania for education of IVM benefits to wildlife. While these 60+ years of documentation is invaluable, it fails to show the benefits of IVM on other ecosystems across the country. IVM Partners has established photo point and botanical documentation on various ecosystems over the last 10 years and shared best management practice knowledge through numerous conference presentations. IVM case study results are shared on the web under www.ivmpartners.org and a video produced by Virginia Tech University discussing IVM for utilities and highways is posted on www.vegmgmt.com
- IVM Partners seeks to establish IVM case study sites on utility ROW ecosystems corresponding to the migratory routes of birds and Monarch butterflies and use the research results in training conferences and for educational field workshops. IVM Case Study sites are presently established in Maryland, Tennessee, Arkansas, New Mexico and Arizona, with data shared from past studies in New Jersey, Delaware and Michigan. Three sites on Baltimore Gas & Electric ROW in Maryland are also being documented for bird and pollinator use by US Fish & Wildlife Service, USGS, New Jersey Institute of Technology and Rutgers University.
- IVM Partners is looking for additional utility partners to establish case studies in Massachusetts, Florida, California, Oregon and one of the Great Plains and Great Lakes states. USGS and USF&WS and the university system could coordinate bird and pollinator documentation at these same sites with assistance from the Pollinator Partnership.

- Similar IVM case studies are proposed for documenting best practices on highway ROW, landfills, parks, military bases, and communities. Untilled land on agricultural sites, such as drainage ditches and roadsides, could likewise be managed under IVM best practices. These fallow lands, coupled with similar management of utility ROW, could bring more native pollinators into close proximity of our field crops. These studies would demonstrate how IVM can improve pollinator habitat simply by adopting best practices without the need for expensive landscaping.
- Additional benefits of IVM best practices include reduced erosion and sedimentation of waterways, reduced spread of non-native invasive plants, improved habitat for threatened and endangered species, reduced carbon footprint from maintenance practices, improved habitat for game species, improved landowner satisfaction and reduced complaints, streamlining of the NEPA process for environmental assessments, and reduced costs to utilities, highways, agencies and ultimately the public.
- IVM Partners offers to assist and coordinate IVM Conferences and Field Workshops across the various disciplines to maintain open dialogue between utilities, industry, public agencies, conservationists, universities and the public to improve public education on IVM and its impacts to pollinator habitat and other natural resource concerns.



Integrated Vegetation Management Partners, Inc. is organized and operated exclusively for charitable, scientific, literary, and educational purposes within the meaning of Section 501 (c)(3) of the Internal Revenue Code of 1986. Such purposes shall be to develop, educate professionals and the public with respect to, and apply best vegetation management and conservation practices and related activities.