Control Number: 32455

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TEXAS PARKS & WILDLIFE

September 8, 2006

Mr. Brian Almon, P.E.
Electric Division
Public Utility Commission of Texas
P.O. Box 13326
Austin, TX 78711-3326

RE: TPWD Review of the Environmental Assessment for the Proposed TXU Electric Delivery Company West Levee – Norwood 345-kV Transmission Line, Docket No. 32455 (Dallas County)

Dear Mr. Almon:

On August 2, 2006, TXU Electric Delivery Company (TXU) provided the Texas Parks and Wildlife Department (TPWD) a copy of the Environmental Assessment and Routing Study (EA) for the above referenced project. The EA was attached to the application requesting certification, filed at the PUCT on March 10, 2006. The project area contains an urban landscape bisected by the Trinity River floodway and its associated drainage ways. The project involves installation of approximately 6.5 miles of 345 kV transmission line within typically a 100-ft. wide right-of-way (ROW) to connect the two existing switching stations referenced above.

TPWD staff provides the following recommendations to strengthen the avoidance and minimization actions of the proposed project on fish and wildlife resources and to clarify the data provided.

Selection of Preferred Route

Although the EA evaluated and presented the impacts for each of 35 alternative routes, the EA did not indicate a preferred alternative. TPWD accessed the Application to Amend a Certificate of Convenience and Necessity (CCN) listed on the PUCT Interchange to identify on page 12 that TXU compared and ranked the routes and then selected Route 23 as its Preferred Route. Based on TPWD review of the information provided, there is no discussion of why Route 23 was selected by TXU.

Recommendation. The comparison and ranking of the routes leading to selection of a preferred route should be provided to TPWD for review and comment.

Transmission Line Design

Variations of transmission line design were presented in the EA dependent on terrain and whether other lines would be under built on the same pole.

> Recommendation. Pole placement, pole heights, and under building with additional lines specific to the Preferred Route should be presented.

Stream Crossings

The EA indicates that 1 stream will be crossed by the Preferred Alternative. Figure 3-2 shows the Preferred Route crossing the Trinity River. Figure 3-2 indicates that the Preferred Route will cross three other obvious drainage ways that are included in the 100-yr floodplain along Segment M_2, M_1, and at the intersection of M_1 and U. The EA named streams in addition to the Trinity River that are included in the study area, though those streams are not labeled on the figures.

> Recommendation. The EA should clearly show the location of the streams included in the study area and clearly indicate whether the drainage ways on Figure 3-2 are streams or not. If they are streams, then the number of streams crossed by the alternatives should be revised.

Figure 3-2 of the EA indicates that the Preferred Route crosses streams and drainage ways in a perpendicular manner, which is a preferred configuration by TPWD when crossing streams is unavoidable. The EA indicates that streams will be spanned.

> Recommendation. Streambank vegetation should be preserved where possible. In riparian areas, necessary vegetation removal should be conducted by hand to minimize soil disturbance. Construction equipment should utilize nearby roads to cross streams.

Riparian Habitat and Bottomland Forests, Including Forested Wetlands

Table 8-1 in the EA shows the Preferred Route would not cross any emergent wetlands and would cross 100 ft. of bottomland forest including forested wetlands. The EA did not differentiate between jurisdictional and non-jurisdictional forested wetlands crossed by the Preferred Route. The EA states that the clearing of the entire ROW in bottomland forests areas would be negligible because only 100 ft. of bottomland forest would be crossed.

In general, riparian areas provide nesting habitat for birds, soil stabilization for enhanced water quality, and food, cover, and travel corridors for wildlife. Riparian/bottomland communities provide complex ecosystem functions regarding soil and watershed management. Within urban landscapes, forest habitat offer important refuge for urban wildlife and adds to the aesthetic quality of the environment. Riparian habitat is suffering from loss to development within every ecoregion of the state and is identified by TPWD as priority habitat types for conservation across the state.

Recommendation. Loss of habitat within an urban landscape should be avoided or minimized, in particular, riparian buffers along streams and bottomland forests. When crossing riparian/bottomland habitat is unavoidable, TXU should attempt to span as much habitat as possible.

Recommendation. If removal of riparian/bottomland forest is necessary, successful restoration of riparian vegetation should be conducted by planting appropriate native grasses, forbs, and low-growing shrubs and trees. In addition to any regulatory mitigation required as a result of impacts to jurisdictional wetlands and waters of the U.S., TPWD advises non-regulatory mitigation for loss of non-jurisdictional riparian habitat and bottomland forest on an acre-to-acre basis and large mature trees at a one-to-one ratio. TPWD requests an opportunity to review and comment on any proposed mitigation plan.

Recommendation. The following information regarding the bottomland forests to be disturbed by the Preferred Route should be indicated in the EA to assess the quality of the habitat being impacted and to aid in determining the level of mitigation that should occur:

- Location of the bottomland forest and riparian habitat to be impacted
- Number and species of trees to be removed
- Range and average height per tree species to be removed
- Range and average diameter-at-breast height (dbh) per tree species to be removed
- Percent canopy cover of bottomland forest and riparian habitat to be removed

Landscaping

The EA indicated that very little mechanical clearing of the ROW would be required because of the urban landscape, though there was no indication of how the ROW would be treated following ground disturbance during construction

within vegetated portions of the ROW. The EA did not indicate whether any portion of the Preferred Route would require establishment of permanent vegetation nor did it indicate the type of permanent vegetation that would be established.

> Recommendation. The areas requiring establishment of permanent vegetation and the type of permanent vegetation that would be established should be provided.

> Recommendation. Where feasible, ROW areas should be landscaped using native grasses, forbs, and low-growing shrub species as on the attached list. Native species should be chosen as appropriate to the soil type and hydrology of the immediate area. Because the study area is urban, native landscapes would be aesthetically pleasing to the community while also reducing maintenance and watering costs.

Parks

The EA indicates that 3,848 ft of parks or recreational areas would be crossed by the Preferred Route. TPWD interprets that as saying the Trinity River Corridor (TRC) would be crossed. The TRC includes areas proposed for recreational use within the Trinity River Corridor Project and Crow Lake Park.

> Recommendation. The name of the park or recreational area, the entity that manages and operates the park, and the length of line crossing the park should be clearly identified and defined for each park crossed by the Preferred Route. Additionally, the anticipated disruption or impact to the land use within the park or recreational area should be defined. For example, if the line would cross a trail, would the use as a trail be altered?

> Recommendation. TXU should coordinate with the Grants-In-Aid Branch of TPWD (512) 912-7124 to determine whether or not any portions of the parks were funded with Local Park Grant funds or other state or federal funding. This is necessary to prevent conversion of grant assisted lands to other than public outdoor recreation use - as prohibited by Section 6(f) of the Land and Water Conservation Act.

Migratory Birds

Migratory birds and their nests and eggs are protected under the Migratory Bird Treaty Act. Construction of the Preferred Route would involve removal of bottomland forest that may support nesting birds.

> Recommendation. By scheduling vegetation clearing activities outside of the peak nesting period impacts to migratory birds can be avoided. If clearing work will be conducted during the nesting season, trees should be surveyed for active nests prior to clearing, and work activities should cease in the immediate area until active nests are abandoned. Since raptors nest in late winter and early spring, construction activities should be excluded from within 100 meters around any occupied raptor nest during the period of February 1- July 15. Contact the U.S. Fish and Wildlife Service Southwest Regional Office (Region 2) at (505) 248-6879 for further information.

Birds typically establish flight corridors along and within river and creek drainages. Therefore, there is increased potential for bird collisions with the proposed lines over the Trinity River and its associated creek drainages and wetland areas.

> Recommendation. TPWD strongly recommends installing line markers on the transmission lines where they cross the Trinity River Corridor, drainage ways, and wetlands.

Rare, Threatened and Endangered Species

The EA indicates that there is no known habitat of endangered or threatened species within the project area. Portions of the Trinity River Corridor within the project area could be used as stopover habitat for migratory birds including rare species known to occur in Dallas County. Therefore, there is potential for rare species to occur within the project area, though only occasionally or rarely.

> Recommendation. To minimize potential impacts to rare species, line markers over the Trinity River Corridor, drainage ways, and wetlands are recommended.

Future Correspondence

Through restructuring, TPWD no longer has a Resource Protection Division and projects should no longer be addressed to Dr. Larry D. McKinney. All future projects should be addressed to Ms. Kathy Boydston, TPWD Wildlife Division, Wildlife Habitat Assessment Program, 4200 Smith School Road, Austin, TX 78744.

TPWD advises review and implementation of these recommendations. If you have any questions, please contact me at (903) 675-4447.

Sincerely,

Karen B. Hardin

Karen B. Hardin
Wildlife Habitat Assessment Program
Wildlife Division

kbh:11941

Attachment

cc: Robert Holt – TXUED, Project Manager, Rates and Regulatory

TEXAS PARKS AND WILDLIFE

Texas Plant Information Database

Dallas County

190 -- Plant(s) are recommended for your site requirements.

Common Name	Scientific Name	Erosion Index	Wildlife Index
BLACKBERRIES-DEWBERRIES	RUBUS SPP.	EXCELLENT	EXCELLENT
PARTRIDGE PEA (PRAIRIE SENNA)	CHAMAECRISTA FASCICULATA	EXCELLENT	GOOD
MAXIMILLIAN SUNFLOWER	HELIANTHUS MAXIMILIANI	EXCELLENT	GOOD
VINE-MESQUITE	PANICUM OBTUSUM	EXCELLENT	GOOD
YELLOW INDIANGRASS	SORGHASTRUM NUTANS	EXCELLENT	EXCELLENT
PRAIRIE CORDGRASS	SPARTINA PECTINATA	EXCELLENT	EXCELLENT
PEPPERVINE	AMPELOPSIS ARBOREA	EXCELLENT	EXCELLENT
AMERICAN ELDERBERRY	SAMBUCUS CANADENSIS	EXCELLENT	GOOD
SWITCHGRASS	PANICUM VIRGATUM	EXCELLENT	EXCELLENT
ILLINOIS BUNDLE FLOWER (PRAIRIE MIMOSA)	DESMANTHUS ILLINOENSIS	EXCELLENT	EXCELLENT
CHICKASAW PLUM	PRUNUS ANGUSTIFOLIA	EXCELLENT	EXCELLENT
SWAMP SMARTWEED	POLYGONUM HYDROPIPEROIDES	EXCELLENT	GOOD
BIG BLUESTEM	ANDROPOGON GERARDII	EXCELLENT	GOOD
SIDEOATS GRAMA	BOUTELOUA CURTIPENDULA	EXCELLENT	GOOD
COMMON REED	PHRAGMITES AUSTRALIS	EXCELLENT	GOOD
COTTONWOOD	POPULUS DELTOIDES	EXCELLENT	GOOD
COMMON CURLYMESQUITE	HILARIA BERLANGERI	EXCELLENT	GOOD
COFFEE BEAN	SESBANIA MACROCARPA	EXCELLENT	EXCELLENT
FRAGRANT SUMAC	RHUS AROMATICA	EXCELLENT	EXCELLENT
HARDSTEM BULRUSH	SCIRPUS ACUTUS	EXCELLENT	EXCELLENT
EASTERN RED CEDAR	JUNIPERUS VIRGINIANA	EXCELLENT	GOOD
CAT GREENBRIAR	SMILAX GLAUCA	EXCELLENT	GOOD
VIRGINIA CREEPER	PARTHENOCISSUS QUINQUEFOLIA	EXCELLENT	GOOD
BROOMSEDGE BLUESTEM	ANDROPOGON VIRGINICUS	EXCELLENT	GOOD
SOFTSTEM BULRUSH	SCIRPUS TABERNAEMONTANI (S. VALIDUS)	EXCELLENT	GOOD
WINGED ELM	ULMUS ALATA	EXCELLENT	GOOD
DELTA ARROWHEAD	SAGITTARIA PLATYPHYLLA	EXCELLENT	GOOD
WATER SMARTWEED	POLYGONUM AMPHIBIUM	EXCELLENT	EXCELLENT
PENNSYLVANIA SMARTWEED	POLYGONUM PENSYLVANICUM	EXCELLENT	EXCELLENT
STOUT SMARTWEED	POLYGONUM DENSIFLORUM	EXCELLENT	EXCELLENT
LAUREL CHERRY (CAROLINA LAUREL-CHERRY)	PRUNUS CAROLINIANA	EXCELLENT	EXCELLENT
CORALBERRY	SYMPHORICARPOS ORBICULATUS	EXCELLENT	EXCELLENT
YAUPON	ILEX VOMITORIA	EXCELLENT	EXCELLENT

LONG-LEAF PONDWEED	POTAMOGETON NODOSUS	EXCELLENT	GOOD
SOUTHERN WAX-MYRTLE	MYRICA CERIFERA	EXCELLENT	GOOD
DOTTED SMARTWEED	POLYGONUM PUNCTATUM	EXCELLENT	GOOD
BLACK CHERRY	PRUNUS SEROTINA	EXCELLENT	GOOD
TRUMPET HONEYSUCKLE	LONICERA SEMPERVIRENS	EXCELLENT	GOOD
LEAFY PONDWEED	POTAMOGETON FOLIOSUS	EXCELLENT	GOOD
GIANT CANE	ARUNDINARIA GIGANTEA	EXCELLENT	GOOD
LITTLE BLUESTEM	SCHIZACHYRIUM SCOPARIUM	EXCELLENT	GOOD
COYOTE WILLOW (SANDBAR WILLOW)	SALIX EXIGUA	EXCELLENT	GOOD
COMMON TRUMPET-CREEPER	CAMPSIS RADICANS	EXCELLENT	GOOD
SAND DROPSEED	SPOROBOLUS CRYPTANDRUS	EXCELLENT	GOOD
PURPLETOP	TRIDENS FLAUUS	EXCELLENT	GOOD
HUISACHE	ACACIA SMALLII	EXCELLENT	FAIR
BLACK WILLOW	SALIX NIGRA	EXCELLENT	FAIR
WESTERN INDIGO (SCARLET PEA)	INDIGOFERA MINIATA	EXCELLENT	FAIR
WATER OAK	QUERCUS NIGRA	EXCELLENT	EXCELLENT
WHITE OAK	QUERCUS ALBA	EXCELLENT	EXCELLENT
PECAN	CARYA ILLINOENSIS	EXCELLENT	EXCELLENT
DOWNY VIBURNUM (RUSTY BLACKHAW)	VIBURNUM RUFIDULUM	EXCELLENT	EXCELLENT
RIVERBANK GRAPE	VITIS RIPARIA	EXCELLENT	EXCELLENT
CROTON, SPP.	CROTON, SPP.	EXCELLENT	EXCELLENT
AMERICAN BEAUTYBERRY	CALLICARPA AMERICANA	EXCELLENT	EXCELLENT
TEXAS PERSIMMON	DIOSPYROS TEXANA	EXCELLENT	GOOD
MUSTANG GRAPE	VITIS MUSTANGENSIS	EXCELLENT	GOOD
FARKLEBERRY (TREE HUCKLEBERRY)	VACCINIUM ARBOREUM	EXCELLENT	GOOD
RED MULBERRY	MORUS RUBRA	EXCELLENT	GOOD
BROADLEAF WOODOATS	CHASMANTHIUM LATIFOLIUM	EXCELLENT	GOOD
GREEN ASH (RED ASH)	FRAXINUS PENNSYLVANICA	EXCELLENT	GOOD
BLACK WALNUT	JUGLANS NIGRA	EXCELLENT	GOOD
GREEN SPRANGLETOP	LEPTOCHLOA DUBIA	EXCELLENT	GOOD
BOXELDER	ACER NEGUNDO	EXCELLENT	GOOD
HONEY MESQUITE	PROSOPIS GLANDULOSA VAR. GLANDULOSA	EXCELLENT	GOOD
BUFFALOGRASS	BUCHLOE DACTYLOIDES	EXCELLENT	GOOD
MARSHMILLET (GIANT CUTGRASS)	ZIZANIOPSIS MILIACEA	EXCELLENT	FAIR
BUR OAK	QUERCUS MACROCARPA	GOOD	EXCELLENT
SHUMARD OAK	QUERCUS SHUMARDII	GOOD	EXCELLENT
COMMON PERSIMMON	DIOSPYROS VIRGINIANA	GOOD	EXCELLENT
LOTEBUSH	ZIZYPHUS OBTUSIFOLIA	GOOD	GOOD
POSSUM-HAW (DECIDUOUS HOLLY)	ILEX DECIDUA	GOOD	GOOD
EASTERN GAMAGRASS	TRIPSACUM DACTYLOIDES	GOOD	GOOD
CAROLINA BUCKTHORN	RHAMNUS CAROLINIANA	GOOD	GOOD
OSAGE ORANGE (BOIS D'ARC)	MACLURA POMIFERA	GOOD	GOOD
SESSILELEAF TICKCLOVER	DESMODIUM SESSILIFOLIUM	GOOD	GOOD
SMOOTH SUMAC	RHUS GLABRA	GOOD	GOOD
FLOWERLEAF SUMAC	RHUS COPALLINA	GOOD	GOOD
COMMON HONEY LOCUST	GLEDITSIA TRIACANTHOS	GOOD	GOOD
BLUE WILD INDIGO	BAPTISIA AUSTRALIS	GOOD	GOOD
WOOLLY CROTON	CROTON CAPITATUS	GOOD	FAIR
CURLTOP SMARTWEED (WILLOW-WEED)	POLYGONUM LAPTHIFOLIUM	GOOD	FAIR
OKLAHOMA BLACKBERRY	RUBUS OKLAHOMUS	GOOD	EXCELLENT
SUGAR HACKBERRY (SUGARBERRY)	CELTIS LAEVIGATA	GOOD	GOOD
BLACKJACK OAK	QUERCUS MARILANDICA	GOOD	GOOD

COMMON BUTTONBUSH	CEPHALANTHUS OCCIDENTALIS	GOOD	GOOD
CANADA WILDRYE	ELYMUS CANADENSIS	GOOD	GOOD
POST OAK	QUERCUS STELLATA	GOOD	GOOD
ROUGHLEAF DOGWOOD	CORNUS DRUMMONDII	GOOD	GOOD
BLACK OAK	QUERCUS VELUTINA	GOOD	GOOD
CHINKAPIN OAK	QUERCUS MUHLENBERGII	GOOD	GOOD
BRASIL	CONDALIA HOOKERI	GOOD	GOOD
INDIGOBUSH (FALSE INDIGO)	AMORPHA FRUTICOSA	GOOD	GOOD
SLENDER LESPEDEZA	LESPEDEZA VIRGINICA	GOOD	GOOD
HAIRY GRAMA	BOUTELOUA HIRSUTA	GOOD	GOOD
FROST GRAPE	VITIS CORDIFOLIA	GOOD	GOOD
WHITE ASH	FRAXINUS AMERICANA	GOOD	GOOD
AMERICAN ELM	ULMUS AMERICANA	GOOD	GOOD
BLACK HICKORY (TEXAS HICKORY)	CARYA TEXANA	GOOD	GOOD
SAND LOVEGRASS	ERAGROSTIS TRICHODES	GOOD	GOOD
SLIPPERY ELM	ULMUS RUBRA	GOOD	GOOD
HERCULES CLUB (PRICKLYASH)	ZANTHOXYLUM CLAVA-HERCULIS	GOOD	GOOD
CEDAR ELM	ULMUS CRASSIFOLIA	GOOD	FAIR
BROWNSEED PASPALUM	PASPALUM PLICATULUM	GOOD	FAIR
BLUE SAGE	SALVIA AZUREA	GOOD	FAIR
SWAMP PRIVET	FORESTIERA ACUMINATA	GOOD	EXCELLENT
ALABAMA SUPPLEJACK (RATTAN VINE)	BERCHEMIA SCANDENS	GOOD	GOOD
VIRGINIA WILDRYE	ELYMUS VIRGINICUS	GOOD	GOOD
YELLOW SWEETCLOVER	MELILOTUS OFFICINALIS	GOOD	GOOD
GUM BUMELIA (CHITTAMWOOD)	BUMELIA LANUGINOSA	GOOD	GOOD
PURPLE PRAIRIE CLOVER	DALEA PURPUREA	GOOD	GOOD
WATER HICKORY	CARYA AQUATICA	GOOD	GOOD
CAROLINA SNAILSEED	COCCULUS CAROLINUS	GOOD	GOOD
SEDGES	CAREX SPP.	GOOD	GOOD
GREEN HAWTHORN	CRATAEGUS VIRDIS	GOOD	GOOD
LITTLEHIP HAWTHORN	CRATAEGUS SPATHULATA	GOOD	GOOD
SAW GREENBRIAR	SMILAX BONA-NOX	GOOD	GOOD
FLORIDA PASPALUM	PASPALUM FLORIDANUM	GOOD	FAIR
REVERCHON HAWTHORN	CRATAEGUS REVERCHONI	GOOD	FAIR
FALSE MESQUITE	CALLIANDRA CONFERTA	GOOD	FAIR
BLACK-EYED SUSAN	RUDBECKIA HIRTA	GOOD	FAIR
MEXICAN PLUM	PRUNUS MEXICANA	GOOD	GOOD
MOCKERNUT HICKORY	CARYA ALBA	GOOD	GOOD
CATCLAW SENSITIVEBRIAR	SCHRANKIA NUTTALLI	GOOD	GOOD
SHAGBARK HICKORY	CARYA OVATA	GOOD	GOOD
BITTERNUT HICKORY	CARYA CORDIFORMIS	GOOD	FAIR
COMMON BEEBUSH (WHITEBRUSH)	ALOYSIA GRATISSIMA	GOOD	FAIR
COCKSPUR HAWTHORN	CRATAEGUS CRUSGALLI	GOOD	FAIR
DOWNY HAWTHORN	CRATAEGUS MOLLIS	GOOD	FAIR
TEXAS BLUEBONNET	LUPINUS TEXENSIS	GOOD	FAIR
AMERICAN SYCAMORE	PLATANUS OCCIDENTALIS	GOOD	FAIR
FERN ACACIA (PRAIRIE ACACIA)	ACACIA ANGUSTISSIMA	GOOD	FAIR
MEXICAN PRIMROSE	OENOTHERA SPECIOSA	GOOD	LOW
YELLOW NUTGRASS (CHUFA)	CYPERUS ESCULENTUS	GOOD	EXCELLENT
WHITE CLOVER	TRIFOLIUM REPENS	GOOD	GOOD
INLAND CEANOTHUS (REDROOT)	CEANOTHUS HERBACEUS	GOOD	GOOD
RED CLOVER	TRIFOLIUM PRATENSE	GOOD	FAIR
SILVER BLUESTEM	BOTHRIOCHLOA LAGUROIDES	GOOD	FAIR

WESTERN YARROW	ACHILLEA MILLEFOLIUM	GOOD	FAIR
RICE CUTGRASS	LEERSIA ORYZOIDES	GOOD	FAIR
ENGELMANN DAISY	ENGELMANNIA PINNATIFIDA	GOOD	FAIR
TEXAS SIGNALGRASS (TEXAS MILLET)	BRACHIARIA TEXANA	GOOD	FAIR
HEATH ASTER	ASTER ERICOIDES	GOOD	FAIR
PLAINS COREOPSIS (GOLDEN TICKSEED)	COREOPSIS TINCTORIA	GOOD	FAIR
HEARTLEAF AMPELOPSIS	AMPELOPSIS CORDATA	FAIR	GOOD
COMMON RAGWEED	AMBROSIA ARTEMISIIFOLIA	FAIR	GOOD
EASTERN REDBUD	CERCIS CANADENSIS	FAIR	FAIR
SLICK SEED WILDBEAN	STROPHOSTYLES LEIOSPERMA	FAIR	FAIR
REDROOT PIGWEED	AMARANTHUS RETROFLEXUS	FAIR	FAIR
UPRIGHT PRAIRIE CONEFLOWER (MEXICAN HAT)	RATIBIDA COLUMINFERA	FAIR	FAIR
INDIAN BLANKET	GAILLARDIA PULCHELLA	FAIR	FAIR
BEAKED PANICUM	PANICUM ANCEPS	FAIR	FAIR
FALL PANICUM	PANICUM DICHOTOMIFLORUM	FAIR	FAIR
COBAEA PENSTEMON (FOXGLOVE)	PENSTEMON COBAEA	FAIR	FAIR
LEAVENWORTH ERYNGIUM	ERYNGIUM LEAVENWORTHII	FAIR	FAIR
WESTERN RAGWEED	AMBROSIA CUMANENSIS	FAIR	GOOD
PRAIRIE SUNFLOWER	HELIANTHUS PETIOLARIS	FAIR	GOOD
TRAILING WILDBEAN	STROPHOSTYLES HELVOLA	FAIR	FAIR
SLIMLEAF SCURFPEA (WILD ALFALFA)	PSORALIDIUM TENUIFLORA	FAIR	FAIR
TEXAS SOPHORA (EVE'S NECKLACE)	SOPHORA AFFINIS	FAIR	FAIR
NARROWLEAF WOODOATS	CHASMANTHIUM SESSILIFLORUM	FAIR	LOW
BEEBALM (WILD BERGAMOT)	MONARDA FISTULOSA	FAIR	LOW
PROSTRATE KNOTWEED	POLYGONUM AVICULARE	FAIR	FAIR
POKEBERRY (POKEWEED)	PHYTOLACCA AMERICANA	FAIR	FAIR
BARNYARD GRASS	ECHINOCHLOA CRUSGALLI VAR. CRUSGALLI	FAIR	GOOD
COMPASSPLANT	SILPHIUM LACINIATUM	FAIR	FAIR
PURPLE CONEFLOWER	ECHINACEA PALLIDA	FAIR	FAIR
CHOLLA	OPUNTIA (MULTIPLE SPECIES)	FAIR	FAIR
PRICKLYPEAR	OPUNTIA SPP.	FAIR	FAIR
LOW RUELLIA (HAIRY WILD-PETUNIA)	RUELLIA HUMILIS	FAIR	FAIR
BLACK DALEA	DALEA FRUTESCENS	FAIR	LOW
COMMON LANTANA	LANTANA HORRIDA	FAIR	LOW
AUTUMN SAGE	SALVIA GREGGII	FAIR	LOW
ROUGH BUTTOMWEED (POOR-JOE)	DIODIA TERES	FAIR	FAIR
BUTTON SNAKEROOT (RATTLESNAKE MASTER)	ERYNGIUM YUCCIFOLIUM	FAIR	FAIR
SPIKERUSH	ELEOCHARIS SPP.	FAIR	LOW
WESTERN SOAPBERRY	SAPINDUS SAPONARIA VAR. DRUMMONDII	FAIR	LOW
BEARDED SPRANGLETOP	LEPTOCHLOA FASCICULARIS	LOW	FAIR
FLATSLEDGE	CYPERUS SPP.	LOW	FAIR
BEAKRUSH	RHYNCHOSPORA SPP.	LOW	LOW
SUMMER GRAPE	VITIS AESTIVALIS	LOW	FAIR
COMMON POOLMAT	ZANNICHELLIA PALUSTRIS	LOW	FAIR
LANCELEAF GAILLARDIA	GAILLARDIA AESTIVALIS	LOW	LOW
DUCKWEEDS	FAMILY LEMNACEAE	LOW	FAIR
KIDNEYWOOD	EYSENHARDTIA TEXANA	LOW	LOW
DWARF PALMETTO	SABAL MINOR	LOW	LOW
WALTER'S MILLET	ECHINOCHLOA WALTERI	LOW	LOW
BEGGAR'S TICKS	BIDENS LAEVIS	LOW	LOW

SOUTHERN NAIAD	NAJAS GUADALUPENSIS	LOW	LOW
MEXICAN BUCKEYE (MONILLA)	UNGNADIA SPECIOSA	LOW	LOW