

**VEGETATION MANAGEMENT PLAN  
5-YEAR ROLLING ACTION PLAN  
CALENDAR YEAR 2023**

North Umpqua Hydroelectric Project  
FERC Project No. 1927

**AUTHORIZATIONS**

<b>Final Approved:</b>	PacifiCorp	<u>01/27/23</u> (date)	<u><i>[Signature]</i></u> (signature)
	USDA – FS	<u>01/27/23</u> (date)	<u><i>Pamela J Sicking</i></u> (signature)
	USDI – BLM	<u>01/27/23</u> (date)	<u><i>Michael J Korn</i></u> (signature)

**ATTACHMENTS**

1. Annual VMP Meeting Notes
2. 2022 ROW Completion and Compliance Review Report

## 5-Year Rolling Action Plan

Program/Activities	Action Lead	Prior Year	Current Year	Out Year #1	Out Year #2	Out Year #3
		CY 2022	CY 2023	CY 2024	CY 2025	CY 2026
<b>VMP Section 2.2: Rolling 5-year Vegetation Management Action Plan</b>						
Prepare RAP report for Annual RCC Meeting	PacifiCorp	X	X	X	X	X
<b>VMP Section 3.1: Transmission Line Row Vegetation Maintenance</b>						
Inspect T-line ROWs for vegetation management needs.	PacifiCorp	X	X	X	X	X
Notify agencies of annual aerial inspection schedule for T-line ROWs.	PacifiCorp	X	X	X	X	X
Prepare annual T-line inspection report (NTP requests) specifying annual vegetation management needs. Submit report to USDA-FS and USDI-BLM for approval.	PacifiCorp	X	X	X	X	X
Review and approve annual T-line inspection report (NTP requests) and specify terms and conditions required for resource protection (issue NTPs).	USDA-FS/USDI-BLM	X	X	X	X	X
Incorporate annual ROW completion and compliance report into upcoming RAP.	PacifiCorp	X	X	X	X	X
Coordinate planned annual vegetation management along T-line ROWs with USDA-FS and USDI-BLM: 1) Hazard tree removal 2) Vegetation clearing 3) Slash and debris removal	PacifiCorp	X	X	X	X	X
Comply with USDA-FS and USDI-BLM terms and conditions when managing vegetation along T-line ROWs.	PacifiCorp	X	X	X	X	X
Inspect as required completed vegetation management actions along T-line ROWs.	PacifiCorp/ USDA-FS/USDI-BLM	X	X	X	X	X

Program/Activities	Action Lead	Prior Year	Current Year	Out Year #1	Out Year #2	Out Year #3
		CY 2022	CY 2023	CY 2024	CY 2025	CY 2026
<b>VMP Section 3.2: Distribution Lines (Coordinated outside of hydro project)</b>						
<b>VMP Section 3.3: Other Project Facilities</b>						
Plan ongoing vegetation management in accordance with spatial and temporal constraints for protecting special status resources.	PacifiCorp	X	X	X	X	X
Adhere to measures defined on VMP pages 27-28 for fire prevention and control, etc. This also relates to VMP Sections 3.1 and 3.2.	PacifiCorp	X	X	X	X	X
During RAP meetings, coordinate with the USDA-FS planned annual vegetation management at PacifiCorp facilities: 1) Hazard tree removal 2) Vegetation clearing 3) Slash and debris removal 4) Noxious weed treatment	PacifiCorp	X	X	X	X	X
Pass large woody debris at Soda Springs and Slide Creek dams as required.	PacifiCorp	X	X	X	X	X
Transport large woody debris removed from reservoirs to an approved burn site and request required burn permits from the USDA-FS.	PacifiCorp	X	X	X	X	X
Report at the annual RAP about the removal of large woody debris from impoundments.	PacifiCorp	X	X	X	X	X
In consultation with USDA-FS, identify and target the removal of invasive horticultural species from PacifiCorp facilities. Revisit issue every 5 years (updated in 2018).	PacifiCorp/ USDA- FS		X			
In consultation with USDA-FS, develop an information packet about invasive horticultural species to be avoided in landscaping. Distribute package to PacifiCorp staff and incorporate in residency agreement. Revisit issue every 5 years (last updated in 2018).	PacifiCorp/ USDA- FS		X			

Program/Activities	Action Lead	Prior Year	Current Year	Out Year #1	Out Year #2	Out Year #3
		CY 2022	CY 2023	CY 2024	CY 2025	CY 2026
Maintain the horticultural invasive species removal program by removing invasive species and ensuring that all residents are familiar with the invasive horticultural species information booklet.	PacifiCorp	X	X	X	X	X
<b>VMP Section 4.2: Noxious Weed Inventory</b>						
Inventory terrestrial noxious weeds and sample aquatic noxious weeds every 3 years.	PacifiCorp			X		
Update and maintain noxious weed database every 3 years.	PacifiCorp	X			X	
Integrate most recent weed inventory data with USDA-FS and USDI-BLM data to develop a combined GIS database for tracking noxious weed populations and treatments	PacifiCorp/ USDA- FS/ USDA-BLM	X			X	
Conduct QA/QC of noxious weed GIS maps and databases.	PacifiCorp/ USDA-FS/ USDI-BLM	X			X	
<b>VMP Section 4.3: Noxious Weed Prevention and Monitoring</b>						
To reduce noxious weeds within the FERC Project Boundary, implement Best Management Practices (BMPs) described in the September 2005 USDA-FS Weed EIS ROD and consistent with PacifiCorp's Environmental Management System (EMS).	PacifiCorp	X	X	X	X	X
Develop a noxious weed awareness program for PacifiCorp staff and contractors: 1) Photo-identification booklet with plant descriptions 2) Weed reporting procedure Training needs will be reevaluated every 3 years.	PacifiCorp			X		
Develop a noxious weed awareness program for PacifiCorp staff and contractors: 3) Annual training materials and meeting schedule	PacifiCorp/ USDA-FS	X	X	X	X	X

Program/Activities	Action Lead	Prior Year	Current Year	Out Year #1	Out Year #2	Out Year #3
		CY 2022	CY 2023	CY 2024	CY 2025	CY 2026
Train PacifiCorp Hydro and T&D staff and contractors to recognize and document ODA-designated noxious weeds potentially encountered while working within the FERC Project Boundary. Conduct training in coordination with the USDA-FS, USDI-BLM, and ODA when feasible.	PacifiCorp	X	X	X	X	X
Treat noxious weed infestations before conducting maintenance activities in infested areas or perform work prior to seed set or after seed dispersal.	PacifiCorp	X	X	X	X	X
Implement and monitor a Standard Operating Procedure for equipment and vehicle cleaning.	PacifiCorp	X	X	X	X	X
Through the RAP and RCP processes, annually meet with the USDA-FS and USDI-BLM and review upcoming vegetation maintenance, erosion control, and construction projects relative to known noxious weed infestations.	PacifiCorp	X	X	X	X	X
Through the RCP process, minimize ground disturbance at construction sites, and revegetate sites disturbed by O&M and construction actions >100 sf, as appropriate.	PacifiCorp	X	X	X	X	X
Following project completion, summarize and report weed treatments, revegetation measures, and monitoring schedule implemented (not required for emergencies or hazard tree removals).	PacifiCorp	X	X	X	X	X
Monitor the effectiveness of weed prevention measures at vegetation maintenance, erosion control, and construction sites. Report the findings at annual RAP meetings. Refer to the RCP process for projects that might include monitoring.	USDA-FS/ USDI-BLM	X	X	X	X	X

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		CY 2022	CY 2023	CY 2024	CY 2025	CY 2026
<b>VMP Section 4.4: Noxious Weed Control and Monitoring</b>						
Develop and maintain treatment plans and schedules for high-priority noxious weed populations.	PacifiCorp/ USDA- FS/USDI- BLM	X	X	X	X	X
Develop and maintain a GIS database to track annual noxious weed treatments.	PacifiCorp/ USDA- FS	X	X	X	X	X
Update noxious weed plans and schedules annually until treatments and monitoring are discontinued.	PacifiCorp/ USDA- FS	X	X	X	X	X
Monitor effectiveness of noxious weed treatments at priority infestations for 3 yrs. following eradication.	PacifiCorp/ USDA - FS	X	X	X	X	X
Continue noxious weed treatments, experimenting with more difficult infestations, and report progress at next annual RAP meeting.	USDA- FS/USDI- BLM	X	X	X	X	X
At annual RAP meetings, report weed prevention and control actions conducted under a PacifiCorp-USDA-FS or -USDI-BLM Financial Plan.	USDA- FS/USDI- BLM	X	X	X	X	X
Review ongoing noxious weed treatments and effectiveness monitoring at annual RAP meetings.	PacifiCorp	X	X	X	X	X
<b>VMP Section 5.0: Revegetation</b>						
Discuss overall vegetation management topics at the annual RAP meetings to ensure continued coordination.	PacifiCorp/ USDA-FS/ UDSI-BLM	X	X	X	X	X
Identify upcoming needs for seed and plant materials, appropriate sources, and collection methods. Needs might require 2+ years of advance notice to ensure sufficient availability.	PacifiCorp/ USDA- FS	X	X	X	X	X
Continue to evaluate potential sites to be revegetated. Sites may include knapweed infestations that have been treated and compacted forebay areas.	PacifiCorp/ USDA- FS	X	X	X	X	X
Annually inspect 20% of revegetation sites and report on effectiveness at annual RAP meeting.	PacifiCorp	X	X	X	X	X

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Conduct revegetation required for large scale PM&E construction and O&M actions through the RCP review and approval process rather than the RAP process.	PacifiCorp	X	X	X	X	X

**SUMMARY OF RESULTS FROM THE PREVIOUS VMP CALENDAR YEAR ACTION PLAN**

**Non-routine Projects Completed Last Year**

- Helicopter-assisted topping of Priority 2 hazard trees from Jack Fire
- BLM EA for noxious weed treatment

**Projects Not Completed and Carried forward to the Current Year**

- Identification of cover-type conversion areas
- Removal of solarization fabric at Toketee Reservoir/Lower Clearwater Village
- Forest Service EIS for herbicide use

**Unanticipated Events**

- None

**CHANGES IN VMP RESPONSIBILITIES OF THE PARTIES: ASSUMPTIONS, RATIONALE, AND PERCENTAGES**

- None

**UPCOMING REVEGETATION PROJECTS REQUIRING COORDINATION AND/OR PLANT MATERIALS**

- Replanting of Fish Creek forebay dredge disposal areas
- Clearwater 2 forebay elk forage plot and spoils disposal area
- Toketee Dam Rehabilitation Project, including potential enhancement projects at the interface of North Umpqua River and Toketee Campground

**NORTH UMPQUA HYDROELECTRIC PROJECT  
VEGETATION MANAGEMENT PLAN**

**ANNUAL VEGETATION MEETING  
AND ROLLING ACTION PLAN UPDATE**

**MEETING NOTES AND ACTION ITEMS  
Microsoft Teams Meeting and Conference Call  
November 30, 2022**

**Attendees:** **BLM:** Golladay, Amy; Grinter, Justy  
**Pacific Power:** Albertelli, Steve; Hooley, Josh; Newell, Emily; Rutledge, Brandon  
**US Forest Service:** Andersen, David; Olson, Mitchel; Shepherd, Crystal; Sighting, Pam; Siebold, Ryan; Simmons, Adam; Sommer, Mark  
**Wright Tree Service:** Anderson, Aaron; Storns, Allen

**Meeting Summary (Action items identified in bold, italic font):**

1. The draft VMP RAP and ROW Completion and Compliance Review Report were distributed for review and use as the meeting agenda. The group reviewed last year's meeting notes and action items.
2. Josh provided a summary of the ROW Report. Pacific Power vegetation management focused on the Archie Creek fire-affected areas in 2022. This included helicopter-assisted topping and ground-based clean-up operations. The NTP for work submitted for approval in August was received yesterday. One urgent action to clear cottonwood growth under the lines west of Lemolo 2 powerplant (Line 55, Structures 1/2-4/2) will begin as soon as possible. The rest of the approved actions will occur as weather allows. Aerial inspections in 2023 will identify spot treatments. Full cycle maintenance inspections and treatments will occur in 2024.
3. The group discussed the balance between identifying hazard trees and applying for, waiting for, and receiving agency authorizations before performing vegetation management. The group discussed the definition of emergency and when Pacific Power may consider a vegetation management activity an emergency that cannot wait for authorization. Steve noted that the standing definition for emergency is "imminent threat to life and property." Pam affirmed that Forest Service acknowledges Pacific Power's responsibility to identify emergency actions in the field. Pam noted that the Forest Service is acquiring additional staff, devoting resources to action review and approval processes, and reminding staff that Federal Power Act projects, including the North Umpqua Hydroelectric Project (Project), should be a priority for Forest Service staff. Josh noted that the vegetation management crews attempt to exercise caution in defining an activity as an emergency and make every effort to at least provide a one-week desktop



review of environmental and cultural constraints before performing emergency activities. David noted that waivers during IFPL III and IV will only be provided for emergency actions; no other waivers will be granted during IFPL general shutdowns.

4. Ryan asked about under clearance specs. Josh replied that the under-clearance requirement depends on the structure configuration and voltage of the span, but in general, vegetation is limited to no more than 10 to 15 feet in height from the ground. Ryan mentioned that he was considering the aesthetic context of the Scenic Byway corridor in his assessment of vegetation management actions.

***Josh will forward the vegetation management specs to Steve for distribution to the group. Steve will send the Project Aesthetics Management Plan to Ryan.***

Josh, Emily Brandon, Aaron, and Allen were excused from the meeting following the ROW vegetation management discussion.

5. Steve provided an update on the on-going horticultural invasive species removal program. The group reviewed the horticultural invasive species booklet provided to PacifiCorp residents. Justy noted that bamboo may be a good addition to the species list during the next revision.
6. The group discussed the noxious weed inventory and database management. The group agreed that current GIS and database software used by the respective organizations doesn't facilitate integration of data sets. BLM, Forest Service, and PacifiCorp are each moving toward use of ArcGIS Pro, ArcGIS Online, and Field Maps, and future weed inventory and treatment data may be better suited to sharing and collaboration.
7. The group discussed weed treatments. Steve explained the process for BLM and USFS to provide annual treatment proposals to PacifiCorp in the first quarter of each year based on the noxious weed inventory data and a treatment report at the end of the year. PacifiCorp's responsibility is the weeds within the FERC boundary. Steve reminded the group that the agencies are to provide treatment reports following PacifiCorp-funded weed treatments in any given year.

***Crystal will provide a weed treatment report for 2022 to Steve. Crystal and Justy will provide treatment proposals for 2023 to Steve by March 31, 2023.***

8. The group discussed NEPA documentation for herbicide treatment of weeds. Crystal is currently detailing as the Forest Botany Program Manager and is working on a skeleton draft of a new weed EIS. The Forest is utilizing disaster relief funds to prepare the draft and will pass on to a contractor for further development in 2023 with an estimated completion date of 2025. Justy reported that BLM's non-native, invasive species EA is complete. The EA includes a provision to write an annual treatment plan, which will have utility for the

treatment proposal to PacifiCorp each year. Twelve chemicals were approved for use under the EA, including triclopyr for woody species. Justy asked Steve whether PacifiCorp had any planned activities on BLM lands in 2023, and Steve replied that there were no PacifiCorp activities anticipated on BLM lands in 2023 with the exception of possible ROW vegetation management. The EA will include herbicide use. Justy hopes to complete the plan this year and hire new botany staff to help with weed treatments.

9. Justy noted that there is a new priority weed species observed at the Apple Creek trailhead: American pokeweed (*Phytolacca americana*). This species is spreading in Roseburg and areas east of Apple Creek.
10. The group discussed future revegetation projects and needs for plant materials. Fish Creek forebay dredging spoils disposal was identified as the nearest term need. Spoils may go under the adjacent transmission line ROW, to the Toketee airstrip, in new or existing elk forage plots, or other agency approved locations on the Fish Creek Desert. Steve identified Clearwater 2 pumped storage spoils disposal and a possible new elk forage plot as longer term (2-3 years out) revegetation material needs. The group also discussed Toketee Dam rehabilitation project. Pam reminded Crystal that the Toketee Dam project will result in a Toketee Campground closure, which would provide an opportunity to restore and revegetate the degraded riparian areas near the riverside campgrounds.

Steve noted that smaller O&M projects are revegetated with native seed provided by BLM and/or USFS. Funding for a few bags of seed per year can be provided at the same time as weed treatment funding. Crystal noted that Forest Service has began purchasing additional seed from outside contractors.

***Crystal will provide a list of Forest Service-approved, seed supply contractors for use by PacifiCorp. Pam will investigate whether funding for seed designated for the Archie Creek fire-affected area has been depleted.***

11. The group discussed novel weed treatment methods. Crystal noted that the previously identified opportunity to use Canada thistle blister rust was abandoned due to the blister rust being classified as an herbicide, which is currently not authorized. Crystal reported that the Forest mowed and followed up with weed-eating to treat perennial pea-vine in the Toketee Reservoir area. These sequential methods were used a total of four times to apparent success. Justy noted that the scotch broom within the Archie Creek fire-affected area had germinated but was yet to bloom; BLM will target this species and area in 2023.
12. The group approved the RAP for digital signature following receipt of the final meeting notes after the group review period.

**2023 ROW Vegetation Management  
Completion and Compliance Review Report  
North Umpqua Hydroelectric Project (FERC 1927)**

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**Introduction**

This report documents actions performed or funded during 2022 by Pacific Power to support compliance with the North Umpqua Hydroelectric Project Vegetation Management Plan (VMP, 2004) within transmission line rights of way (ROWs). This completion and compliance review report represents Step 6 of the document, ‘Standard Operating Procedure; Coordination, Agency Approval, and Documentation: Annual Vegetation Management within Transmission and Distribution Line Rights-of-Way’ (SOP).

Vegetation management within ROWs during 2022 consisted primarily of removal of fire-affected hazard trees resulting from the Jack Fire (ca. 2021). The goal for 2022 VMP vegetation management actions within T&D ROWs was to bring transmission and distribution lines into compliance with specifications described in pertinent Occupational Safety and Health Administration Standards and Sections 3.1 and 3.2 of the VMP and to complete all past transmission work that was previously submitted and approved. For 2022 there were no outstanding requests needing to be addressed from 2021.

**Vegetation Management Plan Implementation**

**Aerial Inspection**

Aerial inspections are conducted via helicopter to efficiently survey the extensive, and often remote, transmission line network. Several aerial inspections were conducted in 2022 to survey post-fire conditions, inspect before forecasted weather events, and to conduct annual inspections. Aerial inspections were conducted on May 26, 2022; August 10, 2022; August 17, 2022; and September 29, 2022. In addition, Pacific Power implemented helicopter-assisted tree-topping operations to address the wide-spread, fire-damaged, hazard trees within the Jack Creek fire footprint.

**Ground Inspections**

The most recent ground inspections were completed as of July 27, 2022.

**Notice to Proceed Requests**

Actions within the FERC boundary on USFS and BLM lands require GIS data, associated descriptions for each action, and approval through the Notice to Proceed (NTP) process. All hazard trees must be measured, identified, and marked for reporting pursuant to the USFWS-issued Biological Opinion. Coordination for actions within the FERC boundary is accomplished by Pacific Power staff (Steve Albertelli) in consultation with USFS (Pam Sichtung) and BLM (Amy Golladay). The USFS and BLM points-of-contact are then responsible for coordinating internal staff approvals (e.g., archaeology, botany, et al.) and communicating the final approval and any required mitigations back to Pacific Power staff.

Actions outside of the FERC boundary require maps and descriptions and are approved through ROW agreements and/or Special Use Permits with USFS and BLM. Coordination for actions outside of the FERC boundary are accomplished by Pacific Power ROW staff (Scott Mease) and/or Wright Tree Service (Jesse Rodriguez) in consultation with USFS ROW staff (Mitch Olson) or BLM ROW staff (Amy Golladay).

Pacific Power submitted an NTP request to Forest Service on April 8, 2022, for mitigation of hazard trees related to the Jack Creek Fire on Lines 39 and 46; the NTP was received on June 29, 2022 (turn-around of 11 weeks). Pacific Power submitted an NTP request to Forest Service on August 25, 2022, for routine

maintenance addressing hazard trees, and pruning locations on Lines 39, 42, 46, 51, 53, and 57; the NTP was received on November 29, 2022 (turn-around time of 14 weeks).

**Vegetation Management Action Summary for 2022**

No work was initiated on BLM lands in 2022. Within the Forest service boundaries, the Jack Creek fire restoration project was completed as of October 13, 2022, and no other work has been started at this time.

**Vegetation Management Actions within T&D ROWs Proposed for 2023**

In 2023 Pacific Power will complete all of the work within the most recent NTP in the early spring of 2023. Additional work will be on an as needed basis along the hydro lines, specifically TL 39 and 46. Aerial patrols will be scheduled for the fall of 2023, and as hazard trees are identified, there will be more tree removal requests in 2023.