Mason County PUD No. 1
Regular Board Meeting
March 28, 2023
1:00 p.m.

Join Zoom Meeting
https://us02web.zoom.us/j/85869053743

Meeting ID: 858 6905 3743
1 (253) 215-8782

1:00 p.m. Regular Board Meeting

1) **Public Comment-** *Members of the public wishing to comment may request permission to do so during the Public Comment portion of the agenda. Comments shall be limited to no more than 5 minutes per speaker. There will be no action or discussion of public comment items, although the board may defer to PUD management for any necessary response.*

2) **Consent Agenda**

Minutes: Regular Board Meeting March 14, 2023

Disbursements:

Accounts Payable Wire	$ 912,184.76
Check Nos. 123015-123051	$ 124,001.76
Check Nos. 123054-123055	$ 1,242.57
Check Nos. 123057-123097	$ 33,858.13
Payroll Wire	$ 84,435.06
Paper Payroll Check Nos. 123052,123053, 123056	$ 12,959.91
Grand Total	**$ 1,168,682.19**

3) **Business Agenda**
   a. February Financials
   b. Authorize GM to sign USFS Operating Agreements HOO468 & HOO469
   c. Approve 2023-2026 Labor Contract with IBEW Local 77

4) **Staff Reports**
   a. General Manager
   b. District Treasurer
   c. Water Resource Manager
   d. Legal Counsel

5) **Correspondence**
6) **Board Comments**
7) **Other Business/Public Comment**
8) **Executive Session** Closed Session for the purpose of discussing union negotiation proceedings pursuant to RCW 42.30.140(4)(a) and also 42.30.110(1)(i) for the purpose of discussion threatened or pending litigation.
9) **Adjournment**

2023 Calendar

March 30	WPAG	Virtual
March 30	WPUDA	Location TBA
April 12-14	WPUDA	Olympia
April 27	WPAG	Virtual
April-May (TBA)	WPUDA	Location TBA
May 3-5	PNW-AWWA Conference	Kennewick
May 11-12	Manager's Committee	Spokane (Davenport Historic)
May 10-11	Telecom Workshop	Spokane (Davenport Historic)
May 14-17	NWPPA Annual Conf.	Anchorage Alaska
May 25	WPAG	Beijing Rm, SeaTac Airport
June 11-14	AWWA National Conf.	Toronto, Canada
June 16-21	APPA National Conf.	Seattle
June TBA	Strategic Plan Comm.	WPUDA, Olympia
June 29	Water Committee	Olympia
June 29	WPAG	Virtual
July 12-14	WPUDA	Location TBA
July 20	WPAG	Virtual
August 31	WPAG	Beijing Rm, SeaTac Airport
Sept. 13-15	WPUDA	Location TBA
Sept. 27-29	Water Workshop	Leavenworth (Enzian Inn)
Sept. 28	WPAG	Virtual
October TBA	Admin/Finance/HR	Location TBA
October TBA	Energy NW PP Forum	Tri-Cities area
October 26	WPAG	London Rm, SeaTac Airport
November 15-17	WPUDA	Location TBA
November	PPC Annual Mtg.	Portland, OR
Nov/Dec (TBA)	WAPAG	Virtual
Nov. 29-Dec 1	WPUDA Annual Conf.	Location TBA

Mason County Public Utility District No. 1
Board of Commissioners Regular Board Meeting
March 14, 2023, Potlatch, Washington

Present:
Jack Janda, President
Ron Gold, Vice President
Mike Sheetz, Board Secretary - via Zoom
Kristin Masteller, General Manager
Katie Arnold, District Treasurer – Excused
Brandy Milroy, Water Resource Manager
Julie Gray, Executive Assistant
Rob Johnson, Legal Counsel

Visitors:
Dave McKenzie – WPUDA Board VP
Jane VanDyke – WPUDA Board Secretary
Liz Anderson – WPUDA Staff
Stefany Zelepuza – WPUDA Staff
Mike Oblizalo – Hood Canal Communications
Shane Douthitt - Customer

CALL TO ORDER: Jack called the Regular Board Meeting to order at 1:00 p.m.

PUBLIC COMMENT: None

APPROVAL OF CONSENT AGENDA:

Minutes: Regular Board Meeting February 28, 2023

Disbursements: Accounts Payable Check Register

Accounts Payable Wire	$ 330,237.87
Check Nos. 122951-122954	$ 62,856.40
Check Nos. 122956-123014	$ 143,322.68
A/P Sub Total	**$ 536,416.95**
Payroll Expense	
Payroll Wire	$ 82,428.46
Paper Payroll Check - 122955	$ 6,344.55
Grand Total	**$ 625,189.96**

Ron made a motion to approve the consent agenda as presented, Mike seconded the motion. Motion carried.

BUSINESS AGENDA:

Washington PUD's Association Visit – WPUDA presented a power point to the Board and staff showing what was available to the PUD as a member of the Washington PUD Association. They also commended the Board and Staff for being so involved with the monthly WPUDA meetings and committees.

January Financials – Kristin presented the January 2023 financials in Katies absence. She reported that Gross Revenue for the month of January 2023 was $1,443.677 and Gross Expenditures were $1,180,769 for the same month. She reported that as of January 31 the PUD has $847,013 in grant reimbursements outstanding for on-going projects.

Financial Metrics as Compared with Prior Year:	January 2023	January 2022
Total General Cash and Investments	$1,303,661	$1,078,041
Current Ratio (Current Assets/Current Liabilities)	1.96 to 1	2.10 to 1
Debt Service Coverage (O&M/ Debt Service)	3.69	5.19
Long-Term Debt to Net Plant	31%	36%
Total Debt to Equity Ratio (Total Liabilities/Total Equity)	44%	49%
Long Term Debt to Equity Ratio (Long Term Debt / Total Equity)	39%	44%
Times Interest Earned Ratio (Earnings before Interest & Taxes/Total Interest)	7.10	10.82

Discussion on Broadband Messaging – Kristin asked the board if they wanted to formally address the PUD's role and intentions in providing broadband services in Mason and Jefferson Counties and communicate those intentions to a neighboring utility. There was a misunderstanding about PUD 1's communications regarding the Hood Canal-101 Broadband CERB project in the quarterly newsletter and the Mason County Broadband Action Team (BAT) meeting regarding the PUD's fiber project and partnership with a private internet service provider. The commission discussed a letter to be sent clarifying the PUD's position and inviting future opportunities to partner on broadband/infrastructure projects and asked Kristin to send it. Jack reported that he attended the last BAT meeting and made the same comments at the meeting to the group.

Award Pole Replacement Project – Ron made a motion to award the Hood Canal-101 Phase 2 Pole Replacement project to Magnum Power in the amount of $733,731.25, tax included. Mike seconded the motion. Motion carried.

Award Lake Arrowhead Iron & Manganese Project – Ron made a motion to award the Lake Arrowhead Iron and Manganese Treatment Project to General Mechanical in the amount of $278,379.98, tax included. Mike seconded the motion. Motion carried.

Award Manzanita Substation Circuit Switcher – Following discussion on system specification standards and lead times on equipment, Ron accepted staff's recommendation and made a motion to award the Manzanita Substation Circuit Switcher Project bid to Gore Electric in the amount of $89,525.00 plus tax. Mike seconded the motion. Motion carried.

Award Manzanita Distribution Breaker – Following discussion on system specification standards and lead times on equipment, Ron accepted staff's recommendation and made a motion to award the Manzanita Substation Distribution Breaker bid to Wesco Electric in the amount of $126,328.00 plus tax. Mike seconded the motion. Motion carried.

Staff Reports –

General Manager – Kristin reported that she had attended the WPUDA meetings in Washington, D.C. She reported that Meguire Whitney had set up separate meetings for her with Senators Cantwell and Murray regarding the Jorstad Substation and Representative Kilmer regarding water storage. Kristin asked the Commissioners to reschedule the April 11th meeting and hold a special meeting on Monday, April 10th at 1:00 p.m. She also reported that she has a PUD group picture scheduled for Wednesday, April 12th at 7:45 a.m. She reported that she and the commissioners have been invited to the Jefferson County PUD 10-year anniversary celebration celebrating their electric authority. She also reported that she and Katie would be reaching out to FCS Group for a Cost of Service review for CETA compliance, which will be above what the PUD is paying to refresh the electric COSA. She also reported that Katie won the APPA Robert E. Roundtree Rising Star award and will be presented with a plaque during the APPA annual conference in Seattle in June. She reported that she had applied for a substation security grant in the amount of $193,000. She also reported that she and Mike Oblizalo from HCC will be attending a town hall meeting at the Brinnon Community Club on Wednesday, March 15th in the evening.

Water Resource Manager – Brandy reported that the Agate Beach Rescoped Phase 2 went out to bid on Friday March 3rd. The Pre-bid walk through is March 17th and bids will be due on Friday, March 31st with the bid opening at 4:30 p.m. She reported that the water techs will be starting the E. Westwood Way mainline replacement next week. The HOA has been notified. Hood Canal Communications will also be getting in the ditch. She reported that she and Mary are working on Consumer Confidence Reports and WUE's for 2022. She reported that the Shadowood Reservoir, Booster Stations and Treatment design has been submitted to DOH. She also reported that she is currently reviewing Lake Arrowhead Phase 2 mainline design and Ripplewood mainline design. She reported that the generators have been ordered for Harstene Retreat and Canyonwood Beach. They should be installed by mid-July 2023.

Legal Counsel – None.

Correspondence – Thank you note from the Lions Club for our gift bag for the Polar Plunge, and a newspaper article regarding the partnership with HCC for the broadband project.

Board Reports –

Mike – Mike reported that he attended the last PPC meeting.

Jack – None

Ron – Ron reported that he attended the Hood Canal Coordinating Council meetings last week.

PUBLIC COMMENT – None.

EXECUTIVE SESSION – None.

Adjournment: 2:31 p.m.

Jack Janda, President	**Ron Gold, Vice President**	**Mike Sheetz, Secretary**

Accounts Payable
Check Register

03/13/2023 To 03/23/2023

Bank Account: 4 - UMPQUA BANK - DISTRICT

Check / Tran	Date	Pmt Type	Vendor	Vendor Name	Reference	Amount	
804	03/15/2023	WIRE	BPA	COLUMBIA BANK	POWER USAGE	372,388.00	
806	03/14/2023	WIRE	2	LAND TITLE COMPANY OF MASON CO	BAY EAST WATER-PROPERTY PURCHASE	66,521.10	
809	03/16/2023	WIRE	IRS	WEST COAST BANK	FEDERAL TAX LIABILITY	35,002.94	
810	03/16/2023	WIRE	WASH 1	WA DEPT OF RETIREMENT SYS	STATE RETIREMENT - PLAN 2	18,413.22	
811	03/16/2023	WIRE	WASH 7	WA STATE TREAS-MS: PO-11	DEFERRED COMPENSATION	8,695.25	
812	03/16/2023	WIRE	HRA	HRA VEBA TRUST CONTRIBUTI	VEBA MEDICAL SAVINGS	3,222.52	
813	03/17/2023	WIRE	IRS	WEST COAST BANK	FEDERAL TAX LIABILITY	2,868.62	
814	03/20/2023	WIRE	WASH 3	WA DEPT OF REVENUE	MONTHLY EXCISE TAX	41,872.11	
815	03/20/2023	WIRE	BPA	COLUMBIA BANK	POWER USAGE	363,201.00	
3007	03/22/2023	DD	2M COMPANY	2M COMPANY INC	HOLIDAY BEACH WATER-REPLACEMENT PART	0.00	
123015	03/14/2023	CHK	2M COMPANY	2M COMPANY INC	HOLIDAY BEACH WATER PARTS	146.77	
123016	03/14/2023	CHK	AM CONSERVAT	AM CONSERVATION GROUP, INC	(200)WATER KITS	5,561.54	
123017	03/14/2023	CHK	BUILDERS	BUILDERS FIRSTSOURCE, INC	TUIGER LAKES WATER SUPPLIES	3,200.59	
123018	03/14/2023	CHK	CENTUR	CENTURYLINK	TELEPHONE CHARGES ACCT#206-Z05-0016 020	1,516.33	
123019	03/14/2023	CHK	CENTURYLINK	CENTURYLINK	LONG DISTANCE & OUTBOAND CHARGES(21)LINE	221.08	
123020	03/14/2023	CHK	DAY	DAY WIRELESS SYSTEMS	(2)RADIOS -(1)VEHICLE #44 & (1)SPARE	777.92	
123021	03/14/2023	CHK	DOH	DEPT. OF HEALTH	SANITARY SURVEY INSPECTION	918.00	
123022	03/14/2023	CHK	GMES LLC	GMES LLC	VEHICLE #60-AUUGER SLING	88.95	
123023	03/14/2023	CHK	GRAIN	GRAINGER	VEHICLE #80-BENCH VISHE	278.96	
123024	03/14/2023	CHK	GRAY	GRAY & OSBORNE, INC	SHADOWOOD WATER SYSTEM IMPROVEMENT	20,897.59	
123025	03/14/2023	CHK	HOOD CANAL	HOOD CANAL MARKET FRESH	TOOLS FOR VEHICLE #80	543.56	
123026	03/14/2023	CHK	J&I	J & I POWER EQUIPMENT INC	VEHICLE #81-WOODCUTTERS APRON	323.70	
123027	03/14/2023	CHK	LILLIWAUP FAL	LILLIWAUP FALLS GENERATING COMP	JANUARY POWER USAGE	29,095.78	
123028	03/14/2023	CHK	MARSH	MARSH MUNDORF PRATT & SUL	MONTHLY WPAG SERVICES	288.99	
123029	03/14/2023	CHK	SHEL 2	MASON COUNTY JOURNAL	LAKE ARROWHEAD WATER-AD	773.00	VOID
123030	03/14/2023	CHK	NISC	NISC	POSTAGE, ACH E-CHECKS, REMITPLUS, & EFT	22,747.48	

Accounts Payable
Check Register

03/13/2023 To 03/23/2023

Bank Account: 4 - UMPQUA BANK - DISTRICT

Check / Tran	Date	Pmt Type	Vendor	Vendor Name	Reference	Amount
123031	03/14/2023	CHK	NW RIVER PART	NORTHWEST RIVER PARTNERS	2023 DUESASSESSMENT-ADDITIONAL AMOUNT	1,700.00
123032	03/14/2023	CHK	PARSON	PARSONS DIESEL & STEAM	SERVICE VARIOUS VEHICLES	2,308.34
123033	03/14/2023	CHK	45	KALVIN J PROBST	VEHICLE #81 & #82-(2)SAW BOXES	1,193.50
123034	03/14/2023	CHK	JOHN 3	ROBERT W. JOHNSON	FEBRUARY RETAINER FEE	3,815.51
123035	03/14/2023	CHK	ROSE	ROSE, MIKE	REIMBURSE-DOT PHYSICAL	150.00
123036	03/14/2023	CHK	SCOTT MCLEND	SCOTT MCLENDON'S HARDWARE #2	VEHICLE #71-DIGITAL SLIDING T-BEVEL	52.24
123037	03/14/2023	CHK	SPIKES	SPIKES HYDRAULICS & EQUIP	EQUIPMENT-#106 MOWER PARTS	184.29
123038	03/14/2023	CHK	TOZIER	TOZIER BROS, INC	SHOP-NOZZLE & HOSE	76.73
123039	03/14/2023	CHK	46	KOBE VIND	REIMBURSE-DOT PHYSICAL	150.00
123040	03/14/2023	CHK	NAPA AUTO PA	WESTBAY NAPA AUTO PARTS	SHOP SUPPLIES	219.23
123041	03/14/2023	CHK	WHITEWOLF EN	WHITEWOLF ENGINEERING SERVICES	CANAL VIEW,LAKE ARROWHEAD,& ENGIN SUPPOR	19,775.00
123042	03/14/2023	CHK	2	ALL WEATHER	DUCTLESS HEATPUMP-KIRA PEDERSEN	800.00
123043	03/14/2023	CHK	2	ALL WHEATHER	DUCTLESS HEATPUMP REBATE-MARK THOMPSON	800.00
123044	03/14/2023	CHK	2	WILFORD BEARDEN	DUCTLESS HEAT PUMP REBATE	800.00
123045	03/14/2023	CHK	2	LAURA GORDON	DUCTLESS HEATPUMP REBATE	800.00
123046	03/14/2023	CHK	2	HAMA HAMA COMPANY	REFUND-60FT OF 4/0TRIPLEX WIRE NOT USED	167.08
123047	03/14/2023	CHK	2	PATRICIA LEWALLEN	DUCTLESS HEATPUMP REBATE	800.00
123048	03/14/2023	CHK	2	CHERYL MAGILL	DUCTLESS HEATPUMP AIR SOURCE REBATE	1,400.00
123049	03/14/2023	CHK	2	ROBERT R SAARELA	DUCTLESS HEATPUMP REBATE	800.00
123050	03/14/2023	CHK	2	IRA STEPHENS	REFUND-CUSTOMER PROVIDED THERE OWN WIRE	429.60
123051	03/15/2023	CHK	BROWNT	BROWN, TIM	CLOTHING ALLOWANCE	200.00
123054	03/16/2023	CHK	IBEW	IBEW LOCAL UNION #77	UNION DUES	992.57
123055	03/16/2023	CHK	PUDEMP	PUD #1 EMPLOYEE FUND	EMPLOYEE FUND	250.00
123057	03/17/2023	CHK	2	FRED G GUENTHER	Credit Balance Refund	675.00
123058	03/21/2023	CHK	ANIXTER	ANIXTER INC	ELECTRIC NON INVENTORY-FUSE LINKS	1,875.72
123059	03/21/2023	CHK	BUILDERS	BUILDERS FIRSTSOURCE, INC	TIGER LAKES WATER SUPPLIES	1,880.02

Accounts Payable
Check Register

03/13/2023 To 03/23/2023

Bank Account: 4 - UMPQUA BANK - DISTRICT

Check / Tran	Date	Pmt Type	Vendor	Vendor Name	Reference	Amount
123060	03/21/2023	CHK	CASCA1	CASCADE COLUMBIA DIST.CO.	HASA MULTICHLOR & SODIUM HYPOCHLORITE	1,089.38
123061	03/21/2023	CHK	DAY	DAY WIRELESS SYSTEMS	RECURRING CHARGES-TWO WAY RADIO 26 UNITS	525.18
123062	03/21/2023	CHK	DITCH WITCH	DITCH WITCH WEST	EQUIPMENT #109-PARTS	97.07
123063	03/21/2023	CHK	FICS	FASTENAL COMPANY	ELECTRIC NON INVENTORY PARTS	662.30
123064	03/21/2023	CHK	GENPAC	GENERAL PACIFIC INC	ELECTRIC NON INVENTORY-AUTO SPLICES	3,332.04
123065	03/21/2023	CHK	GMES LLC	GMES LLC	(2)GAFF GUARD	53.25
123066	03/21/2023	CHK	HOOD CANAL	HOOD CANAL MARKET FRESH	VEHICLE #77-STOCK SUPPLIES	59.09
123067	03/21/2023	CHK	SHEL 2	MASON COUNTY JOURNAL	AGATE BEACH WATER SYSTEM IMPROVEMENT-AD	743.00
123068	03/21/2023	CHK	NWPPA	NWPPA	E&O CONFERENCE & TRADE-MATT & MIKE R	1,450.00
123069	03/21/2023	CHK	SCOTT MCLEND	SCOTT MCLENDON'S HARDWARE #2	TIGER LAKES WATER SUPPLIES	39.87
123070	03/21/2023	CHK	STATE	STATE AUDITOR'S OFFICE	ENERGY COMPLIANCE ATTESTATION	709.50
123071	03/21/2023	CHK	DOE	WA STATE DEPT OF ECOLOGY	MASON POLE YARD	768.24
123072	03/21/2023	CHK	34	WASHINGTON ALARM, INC	UNDERPAID JANUARY'S INVOICE+PAST DUE FEE	23.00
123073	03/21/2023	CHK	NAPA AUTO PA	WESTBAY NAPA AUTO PARTS	VEHICLE #65-V-RIBBED BELT	107.79
123074	03/21/2023	CHK	2	SOUTH PUGET INTER TRIBAL PLANNIN	REFUND-GEORGE MILLER (70 N POTLATCH CT)	1,303.12
123075	03/21/2023	CHK	ARNOLD,KATIE	KATIE ARNOLD	TRAVEL PER DIEM & MILEGE-REIMBURSEMENT	327.38
123076	03/21/2023	CHK	41	LISA CATES	TRAVEL PER DIEM-NISC NW USER GROUP	80.00
123077	03/21/2023	CHK	HOOD CANAL	HOOD CANAL MARKET FRESH	DISTILLED WATER	6.57
123078	03/21/2023	CHK	PARSON	PARSONS DIESEL & STEAM	SERVICE VARIOUS VEHICLES	1,669.82
123079	03/21/2023	CHK	SPIKES	SPIKES HYDRAULICS & EQUIP	(4)CONNECTORS	58.75
123080	03/21/2023	CHK	STELLA-JONES	STELLA-JONES CORPORATION	(1) 45 POLE	1,426.78
123081	03/21/2023	CHK	NAPA AUTO PA	WESTBAY NAPA AUTO PARTS	CREDIT-#67 & #71	299.96
123082	03/21/2023	CHK	2	COOPER STUDIOS	HEADSHOT SESSION IN STUDIO - KATIE	163.20
123083	03/22/2023	CHK	AAR	APPLIED ARCHAEOLOGICAL RESEARC	MANZANITA SUBSTATION DEVELOPMENT PROJECT	7,580.00
123084	03/22/2023	CHK	BUILDERS	BUILDERS FIRSTSOURCE, INC	TIGER LAKES WATER SUPPLIES	869.81
123085	03/22/2023	CHK	FEI 1539	FERGUSON WATERWORKS #3011	WATER NON INVENTORY PARTS	225.87

Accounts Payable
Check Register

03/13/2023 To 03/23/2023

Bank Account: 4 - UMPQUA BANK - DISTRICT

Check / Tran	Date	Pmt Type	Vendor	Vendor Name	Reference	Amount
123086	03/22/2023	CHK	GOLDSTREET	GOLDSTREET DESIGN AGENCY, INC.	2022 WATER QUALITY REPORT	1,243.41
123087	03/22/2023	CHK	MTN2COAST	MTN2COAST, LLC	TOTTEN ESTATES SURVEY	860.00
123088	03/22/2023	CHK	NICHOL	NICHOLSON DRILLING, INC.	HOLIDAY BEACH WATER PARTS	1,693.10
123089	03/22/2023	CHK	OGG, GARET	GARET OGG	CLOTHING ALLOWANCE	200.00
123090	03/22/2023	CHK	PITENY BOWES	PITNEY BOWES GLOBAL FINANCIAL SE	QTRLY MAILING MACHINE & SCALE-LEASE FEES	413.52
123091	03/22/2023	CHK	39	REESE SMELCER	CLOTHING ALLOWANCE	200.00
123092	03/22/2023	CHK	2	MICHAEL R BECKER	INACTIVE REFUND	244.23
123093	03/22/2023	CHK	2	MARI HEROLD	INACTIVE REFUND	75.00
123094	03/22/2023	CHK	2	IRIS KALLAY	INACTIVE REFUND	56.95
123095	03/22/2023	CHK	2	PAUL F MCCONNELL	INACTIVE REFUND	113.90
123096	03/22/2023	CHK	2	MARK SMITH	INACTIVE REFUND	165.00
123097	03/22/2023	CHK	2	WLC PROPERTY HOLIDAYS LLC	INACTIVE REFUND	491.31

Total Payments for Bank Account - 4 :	(89)	1,070,514.22
Total Voids for Bank Account - 4 :	(1)	773.00
Total for Bank Account - 4 :	(90)	1,071,287.22
Grand Total for Payments :	(89)	1,070,514.22
Grand Total for Voids :	(1)	773.00
Grand Total :	(90)	1,071,287.22

Accounts Payable
Check Register

PARAMETERS ENTERED:

Check Date:	03/13/2023 To 03/23/2023
Bank:	All
Vendor:	All
Check:	
Journal:	All
Format:	Summary
Extended Reference:	No
Sort By:	Check/Transaction
Voids:	Current
Payment Type:	All
Group By Payment Type:	No
Minimum Amount:	0.00
Authorization Listing:	No
Credit Card Charges:	No

03/21/2023 8:11:28 AM

GENERAL LEDGER
TRANSACTION DETAIL

MAR 2023 To MAR 2023

Date	Journal	Description	Actv	BU	Project	Mod	Jrnl Code	Reference	
Account: 0 131.2 CASH-GENERAL FUND (DISTRICT)						Department: 0			
03/16/23	73370	Check Print		0		PL	2	PAYROLL	84,435.06

PARAMETERS ENTERED:

Divsion: All
Accounts: 0 131.2
Department: All
Activity: All
Sort By: Div/Acct
Date Selection: Period
Period: MAR 2023 To MAR 2023
Module: PL
Journal Activity: All
Accounts With No Transactions: Yes
Extended Reference: No
Interface Detail: No
Group by Department: Yes

Payroll/Labor

Check Register

Pay Date: 03/16/2023 To 03/17/2023

Empl	Name	Pay Date	Dir Dep/Check	Net Pay	Type
135	TIMOTHY BROWN	03/16/2023	123052	6,511.70	CHK
150	GARET A OGG	03/16/2023	123053	669.12	CHK
180	LANCE VALLEY	03/17/2023	123056	5,779.09	CHK
				$ 12,959.91	

Grand Total:

PARAMETERS ENTERED:

Pay Date: 03/16/2023 To 03/17/2023
Check/Direct Deposit: All
Employee: 135, 150, 180
Journal: 0

Division: All
Format: Summary By Check
Sort By: Check/Direct Deposit

Karnold

PUD1 – Executive Summary – February 2023

This report summarizes information on the current financial status of Mason County PUD No. 1 for the month of February 2023:

- **Work in Progress:**
  - Grant Applications – Ongoing
  - 2022 Privilege Tax Return (Due 02/28/23)
  - 2022 Form 7 (Due 03/31/23)
  - 2022 Annual Report (Due 05/30/23)
  - 2019 / 2020 CETA Audit

- **Completed Projects:**
  - 2023 Budget
  - 2020 / 2021 Audit (Exit Conference January 2023)

- **Planned Key Milestones, Activities and / or Events:**
  - Long range financial and budgetary planning – ongoing.

Financial Highlights:

- Revenue – Gross Revenue was $1,301,575 for the month of February 2023.
- Expenditures –Gross expenditures were $1,081,185 for the month of February 2023.
- As of February 28th, the PUD has $566,489 in grant reimbursements outstanding for ongoing projects.

Financial Metrics as Compared with Prior Year:	February 2023	February 2022
Total General Cash and Investments	$1,255,504	$1,164,093
Current Ratio (Current Assets/Current Liabilities)	2.01 to 1	2.13 to 1
Debt Service Coverage (O&M/ Debt Service)	3.46	3.70
Long-Term Debt to Net Plant	31%	36%
Total Debt to Equity Ratio (Total Liabilities/Total Equity)	43%	50%
Long Term Debt to Equity Ratio (Long Term Debt / Total Equity)	37%	44%
Times Interest Earned Ratio (Earnings before Interest & Taxes/Total Interest)	7.02	6.91
Cash on Hand (Total Available Cash/Average Daily Costs)	47 Days (General) 141 Days (All Funds)	40 Days (General) 162 Days (All Funds)

Mason County PUD No 1

Budget Summary by Division For the Month Ended February 28, 2023

	Electric	Water	Sewer	Totals
Total Revenue	$ 1,071,520.09	$ 229,017.57	$ 1,037.23	$ 1,301,574.89
Budgeted	$ 976,996.00	$ 167,394.04	$ 989.90	$ 1,145,379.94
Difference (-/+)	$ 94,524.09	$ 61,623.53	$ 47.33	$ 156,194.95
% of Budget	110%	137%	105%	114%
Total Expenditures	$ 895,615.00	$ 185,491.35	$ 78.92	$ 1,081,185.27
Budgeted	$ 882,794.86	$ 190,476.65	$ 529.97	$ 1,073,801.48
Difference (-/+)	$ 12,820.14	$ (4,985.30)	$ (451.05)	$ 7,383.79
% of Budget	101%	97%	15%	101%
Net Operating Margins	$ 175,905.09	$ 43,526.22	$ 958.31	$ 220,389.62
Budgeted	$ 94,201.14	$ (23,082.61)	$ 459.93	$ 71,578.46
Difference (-/+)	$ 81,703.95	$ 66,608.83	$ 498.38	$ 148,811.16
% of Budget	187%	-189%	208%	308%

Mason County PUD No 1

Budget Summary by Division for the Two Months Ended February 28, 2023

	Electric	Water	Sewer	Totals
Total Revenue	$ 2,276,156.56	$ 437,667.30	$ 2,087.93	$ 2,715,911.79
2023 Budget	$ 10,712,903.00	$ 2,687,536.00	$ 11,878.00	$ 13,412,317.00
Difference (-/+)	$ (8,436,746.44)	$ (2,249,868.70)	$ (9,790.07)	$ (10,696,405.21)
% of Budget	21%	16%	18%	20%
Total Expenditures	$ 1,979,986.94	$ 393,688.64	$ 524.15	$ 2,374,199.73
2023 Budget	$ 10,173,191.93	$ 2,493,753.55	$ 9,360.00	$ 12,676,305.48
Difference (-/+)	$ (8,193,204.99)	$ (2,100,064.91)	$ (8,835.85)	$ (10,302,105.75)
% of Budget	19%	16%	6%	19%
Net Operating Margins	$ 296,169.62	$ 43,978.66	$ 1,563.78	$ 341,712.06
2023 Budget	$ 539,711.07	$ 193,782.45	$ 2,518.00	$ 736,011.52
Difference (-/+)	$ (243,541.45)	$ (149,803.79)	$ (954.22)	$ (394,299.46)
% of Budget	55%	23%	62%	46%

Cash Flow				
Beginning Cash (General Fund)	**71,824.92**	**89,776.32**	**4,195.20**	**165,796.44**
Net Operating Margin (Excluding Depreciation)	752,517.28	237,842.78	1,538.86	991,898.92
Cash Transferred to / from Special Funds	464,296.09	(55,299.16)	(233.93)	408,763.00
Change in Accounts Receivable	99,930.42	187,863.46	(1,329.85)	286,464.03
Change in Accounts Payable	(412,281.83)	12,718.97	24.92	(399,537.94)
Cash Expended on Utility Plant	(764,046.94)	(278,016.59)	0.00	(1,042,063.53)
Change in CWIP	(83,927.32)	(106,815.43)	0.00	(190,742.75)
Ending Cash (General Fund)	**128,312.62**	**88,070.35**	**4,195.20**	**220,578.17**

Mason County PUD No. 1

Cash & Investment Balances

As of February 28, 2023

Cash Balances		
Cash - General Funds	$	117,863.76
Cash - Restricted	*$*	*102,714.41*
Total Cash	$	220,578.17
Investment Balances (LGIP)		
Investments - Electric	$	686,903.76
Investments - Sewer	$	316,732.07
Investments - Water	$	31,289.64
Total Investments	$	1,034,925.47
Total Cash & Investments	$	1,255,503.64

***Does Not Include Designated Funds*

Operating Agreement

Authorization IDs HOO468 and HOO469

PUD No. 1 of Mason County
and
Olympic National Forest

Submitted:

KRISTIN MASTELLER
General Manager & Chief Administrative Officer
PUD No. 1 of Mason County

Approved:

KELLY D. LAWRENCE
Forest Supervisor
Olympic National Forest

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PURPOSE

Scope

This operating agreement governs vegetation management, inspection, and operation and maintenance of the powerline facilities and the holder's roads and trails authorized by the Forest Service under powerline facility permits, Authorization Identification Numbers HOO468 and HOO469 (the permits).

The permits authorize the specific acres, location, and improvements. This document specifies the methods that the holder plans to take to operate and maintain the powerlines, roads, and vegetation maintenance. The map and list of authorized improvements are found in the permits.

Definitions

Definitions in Attachment 1 apply to this operating agreement and are taken from Forest Service Handbook 2709.11, Chapter 80, Operating Plans and Agreements for Powerline Facilities signed February 10, 2022.

COMPLIANCE WITH FEDERAL LAW and APPLICABLE RELIABILITY and SAFETY STANDARDS

Federal Law

This operating agreement is executed under Title V of the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. 1761-1772. The Forest Service must comply withthe National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and National Historic Preservation Act (NHPA) to the extent applicable in connection with the permit and this operating agreement. Pursuant to section 6 the National Forest Management Act of 1976, as amended, 16 U.S.C. 1704(i), all authorized activities and projects conducted by the holder within the permit area shall be consistent with the applicable national forest land management plan and any other applicable land management plans.

Applicable Reliability and Safety Standards

The holder is subject to utility reliability standards issued by the Federal EnergyRegulatory Commission (FERC), the North American Electric Reliability Council (NERC), and, as applicable, the regional entity designated by NERC (e.g., the Western Electricity Coordination Council (WECC) and other standards, including the National Electrical Safety Code (NESC) and standards issued by the Occupational Safety and Health Administration (OSHA) and the American National Standards Institute (ANSI).

LAND MANAGEMENT PLANS, ENVIRONMENTAL COMPLIANCE and RESOURCE PROTECTION

Forest Land Management Plans

The Forest Service shall be responsible for determining whether activities conducted under the permit and this operating agreement are consistent with applicable land management plans.

The holder shall coordinate with the Forest Service in the preliminary design stage for the holder's proposed non-routine powerline facility maintenance, road construction and reconstruction, and fiber optic cable installation projects in the permit area regarding whether these projects are consistent with applicable land management plans.

Environmental Compliance

See Attachment 2, Activity Charts, for guidance on environmental compliance associated with various activity levels conducted by the holder under this operating agreement.

Best Management Practices

GENERAL BEST MANAGEMENT PRACTICES (BMPs)

The holder's powerline facility maintenance activities and projects in the permit area shall follow applicable Forest Service National Core BMPs, which are incorporated in the Forest Service's BMP Technical Guide. The Forest Service's BMP Technical Guide is posted at https://www.fs.usda.gov/naturalresources/watershed/pubs/FS_National_Core_BMPs_April2012.pdf . Not all BMPs apply to every activity. BMPs should be applied consistent with local conditions, resource values, and designated uses of water.

OLYMPIC NATIONAL FOREST BMPs

Attachment 3 details BMPs that are specific to Olympic National Forest. Topics include Invasive Non-Native Plant Species Prevention and Control; Herbicide Use; Roads; Aquatic Habitat, Soil Resource and Mechanical Vegetation Management, Pollution Control; and Threatened, Endangered, and Sensitive Species Conservation Measures.

PERMIT HOLDER BMPs

Attachment 4 details BMPs that are specific to Mason County PUD #1. Topics include Wildfire Mitigation; Vegetation Management; Specifications and Drawings for Transmission and Distribution Lines; Spill Prevention, Control, and Countermeasures; System Planning Guide for Construction Work Plans; and Wood Pole Inspection and Maintenance.

EMPLOYEE AND CONTRACTOR EDUCATION

All contractors working on electrical facilities must undergo a prequalification process, which is vetted by PUD staff and then approved by the PUD board of commissioners.

The PUD also has a roster of consultants who specialize in an array of disciplines required to conduct PUD business in compliance with state and federal regulations, including: cultural resources professionals that the PUD employs for ground disturbance projects and projects where grant funding requires review and any subsequent IDP; certified arborists for danger tree removal and vegetation management; civil, electrical, environmental and geotechnical engineering firms for all facets of PUD projects. Consultants and contractors are prequalified based on their experience in best management practices in their areas of expertise, as well as following RUS specifications for electrical system construction and design.

Invasive Species

In planning activities in the permit area and in conducting supporting environmental analysis, the holder and the Forest Service shall strive to address the need to minimize the introduction and spread of invasive species as outlined in Attachment 3, Best Management Practices.

Pesticide Application

The holder shall comply with the pesticide application provision in the permit.

COORDINATION

Responsible Parties

The authorized officer for the Forest Service and the holder's designated principal contact or the programmatic contacts are responsible for implementation of this operating agreement.

Types of Activities and Projects

The holder shall coordinate with the Forest Service regarding activities and projects planned or proposed by the holder under this operating agreement as set forth in the permit and this operating agreement and using the following activity descriptions of Classes A, B, C, and D as a guide.

Attachment 2 contains a table that lists specific activities by Class.

CLASS A ACTIVITIES

Class A includes routine activities that are deemed by qualified Forest Service specialists to involve minimal or no ground disturbance or impacts on vegetation inside and outside the linear right-of-way for the powerline facilities and that do not require additional environmental analysis or consultation for listed endangered or threatened species and cultural and historic resources.

Examples include but are not limited to mapping and inspections of poles, conductors, and other structures where large equipment, helicopters, or drones would be involved. Class A activities may be restricted during certain times or under certain conditions to prevent adverse environmental, cultural, or species or habitat impacts.

A telephone call or email from the owner or operator to the authorized officer is sufficient prior notice for Class A activities.

Class A activities approved under an operating plan or agreement must be acknowledged (not approved) by the authorized officer by telephone call or email within 24 hours of receipt of prior notice. The owner or operator may proceed with Class A activities upon authorized officer acknowledgment or if the authorized officer does not acknowledge receipt of prior notice within 24 hours.

CLASS B ACTIVITIES

Class B includes routine activities that are deemed by qualified Forest Service specialists to involve minimal ground disturbance and impacts on NFS lands inside and outside the linear right-of-way for the powerline facilities and that do not require additional environmental analysis or consultation for listed endangered or threatened species and cultural and historic resources.

Examples include but are not limited to routine vegetation management, routine powerline facility maintenance included pole and conductor replacement, routine maintenance of access roads and trails and NFS roads and NFS trails, and routine repair or replacement of fiber optic cable.

An email or letter regarding a single project or an email transmitting an annual schedule of work is sufficient prior notice for Class B activities. Prior notice must be made a minimum of 30 days before work is to begin.

The owner or operator may satisfy prior notice for Class B activities conducted under an approved operating plan or agreement by submitting a single project notice or an annual schedule of work that identifies the activities planned for a calendar year. If deemed practical by the authorized officer, the

owner or operator may be allowed to submit an annual schedule that covers up to 5 years of Class B activities.

Prior written acknowledgment from the authorized officer by email or letter is required, except for routine vegetation management where all three of the following conditions are met:

- The owner or operator has submitted an email or letter requesting approval of a single routine vegetation management project or an annual schedule of work for routine vegetation management to the authorized officer in accordance with the specified timeframe in the approved operating agreement; and
- The proposed routine vegetation management is in accordance with the approved operating agreement; and
- The authorized officer has failed to respond to the email or letter in accordance with the specified timeframe in the approved operating agreement.

CLASS C ACTIVITIES

Class C activities involve new, changed, or additional uses or areas under 36 CFR 251.61. Due to their complexity, impacts, and scope, Class C activities will typically require additional environmental analysis and consultation for listed endangered or threatened species and cultural and historic resources.

Examples include but are not limited to new construction, rerouting of powerline facilities, and refurbishment or replacement of powerline facility components such as conductors, ground wires, and fiber optic cable; non-routine powerline facility maintenance; hazard tree felling or pruning that extends beyond the linear right-of-way for a powerline facility; road and trail construction and reconstruction; non-routine road and trail use and maintenance, such as installation of drainage features, fences, gates, or signs; and installation of fiber optic cable on powerline facilities.

Submission of an application (form FS-299) is required for prior notice of Class C activities. Prior notice must be made a minimum of 180 days before work is to begin.

Per 36 CFR 251.61, Class C activities require prior written approval in a signed letter from the authorized officer. The timeframe for approval will vary based on the complexity of the additional environmental analysis and consultation for listed endangered or threatened species and cultural and historic resources required for Class C activities. A separate special use authorization is not required. However, if Class C activities are approved, the existing powerline facility authorization must be amended to reflect the approved activities.

CLASS D ACTIVITIES

Class D activities include emergency vegetation management and emergency powerline facility maintenance. Class D activities do not require additional environmental analysis and consultation for listed endangered or threatened species and cultural and historic resources.

Examples include but are not limited to unplanned felling or pruning of hazard trees to prevent imminent contact with a powerline facility and immediate repair or replacement of powerline facility components that is necessary to restore electrical service. Ensure approved operating plans and agreements require that owners and operators take measures necessary to protect natural resources

during emergency operations. Routine vegetation management and powerline facility maintenance should be planned and approved to mitigate Class D activities.

Prior notice is not required for Class D activities but is suggested to the extent practicable to allow for any necessary Forest Service actions, such as notification of the State Historic Preservation Office.

Prior acknowledgment or approval from the authorized officer is not required for Class D activities. Appropriate prior notice and response are required before conducting other classes of activities in the vicinity of the owner's or operator's emergency response.

The owner or operator must notify the authorized officer by email of the location and type of Class D activities as soon as practicable, but no later than 24 hours after completion of the activities. Within 30 days of completing Class D activities, the owner or operator must submit to the authorized officer a written report detailing at a minimum the location, type, and scope of the activities conducted, the reason they were conducted, the methods used to conduct them, and the resulting benefits. The owner or operator may be required to conduct consultation under the ESA and NHPA following Class D activities to determine impacts on listed threatened or endangered species or their habitat and cultural and historic resources (FSM 2670). The Forest Service may charge cost recovery fees for any costs incurred by the Agency in connection with consultation required after Class D activities.

Meeting Regarding Activities and Projects

The holder and the Forest Service shall plan to meet annually regarding activities and projects planned or proposed by the holder or the Forest Service within the permit area. The holder and the Forest Service may agree to shorter intervals based upon resources and planned or proposed activities or projects. Either party may request, organize, and schedule additional meetings. Discussion topics may include but are not limited to holder issues such as:

- Clarify what activity level an activity fits for USFS notification and approval.
- Annual vegetation, road and powerline maintenance planned
- Use of National Forest System roads and trails
- Operations during fire season
- Unauthorized use
- Long term planning for powerline expansion

At least 30 days prior to a scheduled meeting, the holder and the Forest Service shall provide each other with a description of and schedule for planned activities and proposed projects to be addressed at the meeting. A proposed Annual Utility Meeting Checklist is included as Attachment 7.

Notice of Forest Service Activities

The Forest Service shall give advance notice to and coordinate with the holder regarding activities and projects planned or proposed by the Forest Service within the permit area that may impact operation or maintenance of or access to the powerline facilities, such as but not limited to:

- Timber sales
- Major road maintenance
- Access restrictions and Closure Orders

- Land sales or exchanges
- Prescribed fire
- Forest Plan amendments

When preparing a package for a timber sale near the holder's powerline facilities on National Forest System lands, the Forest Service shall include the following language in the associated National Environmental Policy Act document, timber sale prospectus, and timber sale contract:

> No sale operations are allowed within XXX feet of [holder's] powerline facility right-of-way without XX days prior written notice to the [holder] and review of and compliance with [holder's] safety plan for the powerline facilities. Written notice should be given to [name, address, email address, and telephone number].

Notice of Holder Activities

The holder shall provide prior notice to the authorized officer of the holder's activities in accordance with applicable law and applicable prior notification, coordination, and acknowledgment or approval requirements in 36 CFR 251.61(a), the permit, and this operating agreement, using Attachment 2, Activity Charts as a guide.

Project Managers and USFS Point of Contact

The holder shall designate a project manager for each project to represent the holder in all matters pertaining to that project. The holder shall ensure that contractors and vendors projects have a copy of the permit and this operating agreement, including attachments, before commencement of project work.

The Forest Service shall designate a point of contact for each project to represent the Forest Service in all matters pertaining to that project. The Forest Service may conduct onsite monitoring and inspection of projects to ensure compliance with the permit, this operating agreement, and Forest Service requirements such as environmental mitigation.

The holder or its contractor and the Forest Service may participate in the final walk-through for projects when they are complete. The holder shall give the Forest Service prior notice of completion of projects to facilitate Forest Service participation in final walk-throughs. The holder and the Forest Service shall agree on how much notice is required for each project.

The holder is responsible for contractors' and vendors' compliance with the terms and conditions of the permit and this operating agreement in performing work on projects. The holder shall notify the Forest Service immediately of any damage to NFS lands or resources in connection with project work performed by contractors and vendors.

POWERLINE AND RELATED FACILITIES

Objectives and Standards

The holder's maintenance objectives for the powerline facilities are to provide for cost-effective, safe, and reliable operation while minimizing impacts on the environment. All powerline facility maintenance activities and projects shall meet all applicable safety and industrial standards, including FERC, NERC, NESC, OSHA, and WECC standards.

Inspections

The PUD meets all OSHA, WECC and NESC standards. The PUD does not own generation or transmission facilities and is not subject to FERC or NERC standards. The PUD does annual visual inspections from PUD vehicles by qualified journey level line workers. The PUD also contracts with aerial line inspectors where necessary, but in rare instances. Previous aerial inspection has been via helicopter from Olympic Air in Shelton, Washington, with qualified PUD personnel during significant outage events. Drone inspections are also an option, although the PUD has not employed them.

The PUD also has pole inspection and testing, pole attachment inspections, and infrared inspections of critical equipment on the system.

Routine Maintenance Operations

Typical maintenance involves access by PUD pickups, line trucks, or dump trucks, and the clearing of vegetation around the power lines and poles, or the replacement of broken or damaged poles and lines. The poles under this permit are Class 2, 50' Douglas Fir poles.

Best Management Practices related to Powerline Facility Work

See Attachment 4, Best Management Practices.

ROADS, TRAILS, AND WINTER ACCESS

Use and Maintenance of National Forest System (NFS) Roads and Trails

USE OF NFS ROADS

The Forest Service uses a Motorized Vehicle Use Map (MVUM) to convey information on road use. The MVUM shows roads and trails open to motorized vehicles, and what type of motorized vehicles the public can use on each one. Roads and trails not shown on the map are closed to motor vehicle use. Olympic National Forest's MVUM can be found at the following link: Olympic National Forest - Maps & Publications (usda.gov)

Any road maintenance work on NFS roads, other than cutting out fallen trees, requires a Road Use Permit.

ROAD USE PERMITS

Road use permits authorize the use of NFS roads, NFS road segments, and associated transportation facilities of purposes of commercial hauling or as an exception to traffic rules and use restrictions. Road use permits may authorize use of a road that is otherwise closed to access non-federal property; road use that is otherwise restricted by road use order or a regulation; or motor vehicle use on NFS roads that are not designated for that use on a motor vehicle use map.

Overload road use permits or overweight bridge use permits may be required when loads exceed State law, Forest limits established by order, or posted weight limits.

Application for a road use permit should be made using form FS-7700-40.

Analysis through the NEPA process is required when:

- Public motorized traffic will be restricted during use by the holder.
- Use is on a road where motorized traffic is not designated.
- Use is on a trail which will be converted to a road under the road use permit.
- Snow removal will be authorized.
- The road is to be constructed to a higher standard.
- Whenever the authorized use is in conflict with the Motor Vehicle Use Map designation (type of vehicle or time of use).

CLEARING ROADS AND TRAILS
When cutting out trees that have fallen across NFS roads or trails, the trees should be cut out to the full clearing width of the road or trail. Cut logs should be placed in a stable position and not in a drainage feature such as a ditch or culvert intake. If emergency response does not afford time to meet this standard at the time of initial clearing, crews should follow up within 7 days to meet the standard.

GATED NFS ROADS AND TRAILS
The PUD uses horseshoe locks to jointly access gates without the need for sharing codes or keys. The PUD also has a contact with local FS office to obtain access to gates as necessary for utility activities.

Maintenance of Holder-Developed Roads and Trails

INVENTORY
Not applicable.

STANDARDS AND INSPECTIONS
Not applicable.

GATES
Not applicable.

BRIDGES
Not applicable.

Winter Access Procedures

All areas that need to be accessed for the purposes of this permit and operating agreement can be accessed via the county roads. The PUD coordinates with the respective counties to ensure plowing and access of roads during winter months.

Traffic Control

The PUD follows WSDOT's Traffic Control Plan procedures for traffic control on county and state roadways, including alternating lanes of traffic.

Roads and Trails Best Management Practices

See Attachment 3, Best Management Practices.

VEGETATION MANAGEMENT

Permit Requirements Take Precedence

Vegetation management requirements outlined in the permit take precedence over language in the operating agreement.

Vegetation Management Objectives

The parties' maintenance objectives for vegetation management under this operating agreement are to:

- Maintain reliability, address public safety, and eliminate the risk of vegetation-caused outages.
- Prevent the introduction and spread of invasive plant species.
- Maintain and enhance vegetation conditions to improve habitat for fish, wildlife, and plant species and water and soil resources.
- Encourage low growing, native vegetation.

Types of Vegetation Management and Activities

The PUD has adopted a Vegetation Management Policy, approved February 2022. Pages 1-6 of this policy are included in Attachment 4, Best Management Practices, and the entire policy is incorporated by reference.

This section lists the activities in the Activity Chart and provides details regarding the methods and BMPs used to address those activities.

INSPECTIONS

The PUD conducts annual inspections of the power lines every spring. During storm and outage events, the PUD conducts more frequent inspections to ensure that there aren't any damaged poles or equipment threatening the power lines and that trees or other vegetation are not interfering or threatening the power lines.

VEGETATION MAINTENANCE STANDARDS

The PUD and its contractors use ANSI A300 specifications for live line vegetation management. ANSI specifications are voluntary industry consensus standards developed by TCIA and written by a committee called the Accredited Standards Committee (ASC) A300, whose mission is to develop consensus performance standards based on current research and sound practice for writing specifications to manage trees, shrubs, and other woody plants. These specifications are the generally accepted best management practices for utilities and arborists.
https://www.tcia.org/TCIA/Build_Your_Business/A300_Standards/A300_Standards.aspx

CANOPY PRUNING

The PUD and its contractors use ANSI A300 specifications for live line vegetation management. Pruning equipment includes chainsaws and pole saws. Canopy pruning creates a 10' clearance above the power lines.

GROUND VEGETATION

The PUD and its contractors use ANSI A300 specifications for vegetation management. Fast growing, deciduous vegetation like Alder and Maple is sometimes cut at ground level by hand with saws. If ground vegetation is trimmed from a bucket, it is cut 6' below the lowest line. There is no

discrimination between species; all must be removed from the clearance zone of the wires.

PESTICIDE USE RELATED TO CONTROLLING GROUND VEGETATION
The PUD does not employ pesticides in its Vegetation Management program.

SLASH MANAGEMENT
The PUD and its Vegetation Management contractors chip and remove slash.

INVASIVE SPECIES PREVENTION AND TREATMENT

Prevention
The PUD agrees to clean all chainsaws, chippers, mowers and weed whackers of debris that may contain invasive plant propagules prior to being brought on to Forest Service lands for use. If operating in an area infested with invasive plants, the PUD will clean all equipment before moving between sites or leaving the project area. For cleaning equipment on ONF land, the permittee and ONF shall agree on methods of cleaning, locations of the cleaning, and control of off-site impacts, if any.

Inspection
The PUD agrees to adhere to the ONF BMP for receiving notification of weeds and treatment plans. The schedule will be provided 90 days prior to work.

Treatment
The PUD does not employ pesticides in its Vegetation Management program. The PUD will work with the Forest Service to determine the most effective and appropriate methods to treat invasive species within the permit area.

Best Management Practices Related to Invasive Species
See Attachment 3, BMPs.

HAZARD TREES

Inspection and Inventory
The PUD employs contractors with certified arborists on staff to assist with the identification, marking, and removal of hazard trees. The entire system is evaluated annually to identify danger trees.
Inventory individual tree data as follows: Our VM contractors employ certified arborists that can provide the criterion for the list below upon request to the PUD and USFS. The PUD can map this data on ArcGIS and publish it to an online layer.

- How tree is marked as hazard tree
- DBH, (diameter at breast height)
- What makes it a hazard tree
- Estimate of merchantable timber
- If it was imminent and was already removed
- If not imminent, when removal is planned
- Will it be topped or removed at the stump
- Location mapped

Review and Approval by Forest Service

Unless the situation presents an imminent emergency as defined in the Vegetation Management section of Attachment 1, all trees must be marked or otherwise designated for cutting by a Forest Officer before cutting occurs.

Treatment of Hazard Trees
The PUD and its contractors follow ANSI A300 standards for determining if trees are topped or removed at the stump.

Timber marked for cutting, unless otherwise agreed, must be cut into standard log lengths or other products as specified by the Forest Service. Standard dimensions for a minimum log are 16 feet in length, 6 inches DIB (diameter inside bark) on the small end, and minimum DBH (diameter breast height) of 9 inches.

Special Conditions for Auth ID HOO469
The powerline authorized by Auth ID HOO469 is located on easements acquired by the USA. Under the easement terms, the **grantor retained rights to the timber** growing on the easement premises. The current landowner of record on the south side of FSR 2510 (Duckabush Road) is Kathryn Schaefer and Glenn Hackney, 3903 Duckabush Road, Brinnon, WA 98320. Payment for and disposal of timber must be coordinated with the landowner.

Payment for and Disposal of Timber for Auth ID HOO468
When trees need to be felled, they must be evaluated for their merchantable value and appropriate payment made to the Forest Service. This is the case even when a hazard tree has been deemed an imminent threat and has already been taken down or topped. It is also the case when the tree is simply left on the ground.

After receiving notification from PUD that hazard tree removal is proposed, the permit administrator will work with the USFS timber sale staff to determine how the timber will be disposed of, which will depend on the volume, value, and location of the trees. This determination should be made after the trees are identified and before they are taken down. In some cases, the trees may be left on the ground, while other times the trees may need to be decked at an approved location so they can be easily accessed for sale.

INTEGRATED VEGETATION MANAGEMENT (IVM)

The goal for IVM powerline facility vegetation management is to convert vegetation in the linear right-of-way for the powerline facilities to low-growing plant communities that are non-invasive and that keep tall- growing vegetation out.

The PUD trims on a 7-10 year cycle. Low growing plants are not impacted as long as they are not co-located with tall, fast growing deciduous vegetation, which is cut as close to ground level as the chainsaws can safely manage. The PUD does not utilize mowing equipment. Most low growing plant communities are not impacted.

BEST MANAGEMENT PRACTICES

See the Vegetation Management Policy included in Attachment 4.

EMERGENCY MAINTENANCE

General

Emergency powerline facility maintenance and emergency vegetation management involve unexpected work or activities conducted in response to situations created by events such as windstorms, snowstorms, fires, floods, vandalism, or other events that interrupt or pose an imminent threat to the transmission of electricity in the permit area or road conditions that block access needed to respond to emergency events in the permit area. These situations represent potential threats to life, public safety, or property. Emergency powerline facility maintenance and emergency vegetation management shall be accomplished in an expedient manner to restore or maintain service to the communities served by the powerline facilities in the permit area, including homes, hospitals, and emergency services.

Emergency powerline facility maintenance may include clearing blocked culverts, repairing roads, replacement of downed poles or transmission towers, or repairing segments of a powerline facility. Emergency vegetation management shall be conducted in accordance with the permit.

Notice of Emergency Maintenance

The holder shall notify the Forest Service by telephone or email of the location and the type and scope of any emergency powerline facility maintenance or the quantity of emergency vegetation management as soon as possible but no later than 24 hours after initiating the response. The holder shall submit a written report within 30 days of completion of the response.

Resource Protection

The holder shall take all measures necessary to protect natural resources during emergency powerline facility maintenance and emergency vegetation management to the extent feasible. If emergency powerline facility maintenance or emergency vegetation management jeopardizes threatened or endangered species or their critical habitat, cultural resources, or human remains or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act, the holder shall comply with the permit and with applicable environmental laws and regulations that apply in the event of an emergency in the permit area.

FIRE PREVENTION AND CONTROL

Fire Prevention and Suppression Plan

In conducting activities and projects in the permit area, the holder's employees, contractors, and vendors shall adhere to the Wildfire Mitigation plan included in Attachment 4, Best Management Practices.

PUD personnel are not trained to fight fires beyond a shovel and fire extinguisher. Fire extinguisher training is an annual training in the PUD's safety program. All employees and contractors are responsible for following IFPL protocols and actions listed in the PUD's Plan.

Fire Prevention Measures

The holder shall take all measures necessary in operating and maintaining the powerline facilities to prevent fires from starting and spreading, including but not limited to the following:

FIRE EQUIPMENT

The holder shall ensure that all vehicles operating in the permit area carry a serviceable shovel and a fire extinguisher with at least a 5-B:C rating from the Underwriters Laboratories.

SAFETY PROCEDURES AND FIRE PREVENTION MEASURES
The holder shall ensure that its employees, contractors, and vendors working in the permit area have training on the safety procedures and fire prevention measures in the fire prevention and suppression plan for the permit area. The holder shall ensure that its employees, contractors, and vendors follow the safety procedures in the fire prevention and suppression plan and take all measures necessary, consistent with that plan, to prevent fires from starting and spreading.

INDUSTRIAL FIRE PRECAUTION LEVEL (IFPL)
IFPL levels and corresponding restrictions and prohibitions are shown below:

IFPL Level	Industrial Fire Precaution Levels Definition
Level One **I**	**Closed Season** - Fire precaution requirements are in effect. A Fire Watch/Security is required at this and all higher levels unless otherwise waived.
Level Two **II**	**Partial Hootowl** - The following may operate only between the hours of 8 p.m. and 1 p.m. local time: power saws except at loading sites; cable yarding; blasting; welding or cutting of metal.
Level Three **III**	**Partial Shutdown** - the following are prohibited except as indicated: **cable yarding** - except that gravity operated logging systems employing nonmotorized carriages may operate between 8 p.m. and 1 p.m. when all blocks and moving lines are suspended 10 feet above the ground except the line between the carriage and the chokers. **power saws** - except power saws may be used at loading sites and on tractor/skidder operations between the hours of 8 p.m. and 1 p.m. local time. **In addition**, the following are permitted to operate between the hours of 8 p.m. and 1 p.m. local time: Tractor, skidder, feller-buncher, forwarder, or shovel logging operations where tractors, skidders, or other equipment with a blade capable of constructing fireline are immediately available to quickly reach and effectively attack a fire start; mechanized loading or hauling of any product or material; blasting; welding or cutting of metal any other spark emitting operation not specifically mentioned.
Level Four **IV**	**General Shutdown - All Operations**

IPFL STATUS CHECKS AND WAIVERS

The holder's employees, contractors, and vendors shall check the IFPL daily during the fire season (usually June through October depending upon fire indicators) before conducting any activities or projects in the permit area. The holder's employees, contractors, and vendors working in the permit area shall comply with the restrictions and prohibitions under the applicable IFPL, unless a waiver of the applicable IFPL granting permission to use otherwise prohibited equipment or engage in otherwise prohibited activities is obtained in writing from the Forest Service. Any IFPL waiver shall be attached as an appendix to this operating agreement. The Forest Service may require the holder's employees, contractors, and vendors to take additional resource protection measures in conducting activities and projects in the permit area to be consistent with the applicable IFPL. These measures shall be listed in the fire waiver.

FIRE SAFETY INSPECTIONS

The Forest Service may make periodic inspections to ensure the holder's employee, contractor, and vendor compliance with fire safety requirements. Failure to comply with these requirements shall result in a temporary shutdown of all activities or projects conducted by the holder's employees, contractors, and vendors in the permit area until full compliance is achieved.

COMMUNICATION

The PUD's radio system enables field crewmen to alert the main office in the event of an emergency if cell phones are not in service. Otherwise, all field crewmen are able to call 911 in the event of a fire, or work with the main office to call 911 and report the fire.

FIELD CREW PREPAREDNESS

The PUD's personnel and contractors are trained in live power line work and/or live line vegetation management. The PUD's personnel are able to disrupt the power to safely secure the area so fire personnel can extinguish the fire. All journeymen linemen and "hot" apprentices are able to disrupt power and deenergize power lines. The crew foreman is responsible for ensuring standards are met. They will review the final operating permits for specifics once they are approved to ensure education and compliance.

ADDITIONAL FIRE PREPAREDNESS

The PUD has employed enhanced vegetation management, including danger tree removal. The PUD also has started an overhead copper wire replacement plan safer wire and strategic undergrounding of power lines.

FIRE PREVENTION RELATED TO POWERLINE INFRASTRUCTURE

The PUD has employed enhanced vegetation management, including danger tree removal. The PUD also has started an overhead copper wire replacement plan safer wire and strategic undergrounding of power lines.

PUBLIC SAFETY POWER SHUTOFFS

The PUD does not fall under Bonneville Power Administration's scope of PSPS. The PUD's Wildfire Mitigation Plan identifies "Operational Procedures and Emergency Response" to include the possibility of PSPS in extenuating circumstances and in coordination with BPA, Mason County

or Jefferson County Departments of Emergency Management, and other pertinent agencies on a case-by-case basis.

MISCELLANEOUS PROVISIONS

Principal Contacts and Communication Protocol

The individuals listed below are authorized to act in their respective areas for matters relating to this operating agreement. The holder and the Forest Service shall update each other as soon as possible on any changes to these principal contacts. The principal contacts for each party shall contact and work with their counterparts to address any issues or concerns that arise in connection with this operating agreement and to otherwise facilitate its implementation.

The Forest Service Permit Administrator will be the primary contact for all activities and coordination of approvals by the Authorized Officer (Forest Supervisor). An annual phone call between the Permit Administrator and the holder representative should occur during November each year to update contact information and share any plans that may affect operations in the coming year. The Permit Administrator will be the contact in emergency maintenance situations during Forest Service office hours. When emergencies arise after hours or on weekends, the holder Representative will notify the Permit Administrator within 24 hours of implementing emergency response.

Olympic National Forest
Annabelle Pfeffer
Permit Administrator
Olympic National Forest
1835 Black Lake Blvd SW
Olympia, WA 98512
Office Phone: 360-956-2294
Cell Phone: 360-552-5862
Email: annabelle.pfeffer@usda.gov

PUD#1 of Mason County
Kristin Masteller
General Manager
Mason PUD 1
21971 N. Hwy 101
Shelton, WA 98584
(360) 877-5249
(360) 490-4895
Email: kristinm@mason-pud1.org

Olympic National Forest
Kelly D. Lawrence
Forest Supervisor
Olympic National Forest
1835 Black Lake Blvd SW
Olympia, WA 98512
Office Phone: 360-956-2301
Email: kelly.lawrence2@usda.gov

PUD #1 of Mason County
James Reyes
Engineering Manager
Mason PUD 1
21971 N. Hwy 101
Shelton, WA 98584
Office Phone: 360-877-5249
Email: jamesr@mason-pud1.org

Olympic National Forest
Puget Sound Incident Command Center (PSICC)
Phone: 425-783-6150
After hours or weekend emergency contact number

PUD #1 of Mason County
Kristin Masteller
Phone: (360) 790-1552 or (360) 490-4895

Modifications

At any time, the holder may submit a proposed modification to this operating agreement for review and approval by the authorized officer.

The authorized officer shall consider and respond to the proposed modification, to the maximum extent practicable, within 120 days from the date it was received by the authorized officer, with the understanding that such factors as the number of proposed operating plans and agreements and proposed modifications to approved operating plans and agreements under review by the authorized officer and the number of powerline facilities covered under a single operating plan or agreement may affect the practicability of approving a proposed modification within 120 days from the date of receipt.

Modifications to this operating agreement proposed by the holder must be submitted in writing and, if approved by the authorized officer, must be signed and dated by the authorized officer and the holder.

Review and Expiration

Every 10 years from the approval date of this operating agreement, the holder shall review and, as necessary, update this operating agreement to be consistent with changed conditions and submit it to the authorized officer for review and approval.

Upon expiration of the permit, this operating agreement shall expire, and the holder shall prepare a new proposed operating agreement, either solely or in consultation with the authorized office, and submit it to the authorized officer for review and approval.

Use of Operating Plans and Agreements

All new and existing powerline facilities on NFS lands must have an approved operating plan or agreement that complies with section 512 of FLPMA, the Forest Service's implementing regulations, and directive FSH 2709.11 Chapter 80, except for new and existing powerline facilities on NFS lands authorized under a FERC license containing conditions on powerline facility maintenance and vegetation management that meet those requirements.

An **operating plan**, rather than an operating agreement, must be used for powerline facilities that:

1. Are subject to NERC reliability standards (200 kilovolts or more); and

2. Sold more than 1,000,000 megawatt hours of electricity during each of the 3 calendar years during the period of March 23, 2015, to March 23, 2018.

Activities conducted under an approved operating plan are subject to strict liability up to the limit specified in 36 CFR 251.56(h)(2), as amended, per occurrence (sec. 89, para. 1).

An **operating agreement** may be utilized for powerline facilities that:

1. Are not subject to NERC reliability standards (200 kilovolts or more); and/or

2. Sold less than 1,000,000 megawatt hours of electricity during each of the 3 calendar years during the period of March 23, 2015, to March 23, 2018.

Activities conducted under an approved operating agreement are subject to strict liability up to $500,000 per occurrence until March 23, 2028, at which time they are subject to strict liability up to the limit specified in 36 CFR 251.56(d)(2), as amended, per occurrence (sec. 89, para. 2).

Aircraft Operation – Manned and Unmanned

The PUD contracts with aerial line inspectors where necessary, but in rare instances. Previous aerial inspection has been via helicopter from Olympic Air in Shelton, Washington, with qualified PUD personnel during significant outage events. Drone inspections are also an option, although the PUD has not employed them.

Generally, airspace is controlled by the Federal Aviation Administration (FAA), not the Forest Service. However, flight operations that are connected to activities on the ground such as infrastructure (pole/tower sets), sling loads, or vegetation work (helisaw/helicopter logging) do require advance notice and approval from the Authorized Officer. Landing sites also need specific authorization unless identified in the permit or easement.

The following are required for Unmanned Aircraft System (UAS or drones) use during utility operations:

1. Provide advance notification and obtain approval from the Authorized Officer (see Activity Chart).
2. Conduct all missions in accordance with FAA Regulations Part 107. https://www.faa.gov/uas/commercial_operators/.

3. Adhere to guidance found on page 16 of Forest Service Standards for UAS Operations at https://www.fs.usda.gov/sites/default/files/2020-07/Forest%20Service%20Standards%20for%20UAS%20Operations%2007012020.pdf

Superior Clauses

If there is any conflict between the terms of this operating agreement and the terms of the permit, the terms of the permit shall control.

ATTACHMENTS

1. Definitions from USFS FSH 2709.11, Chapter 80
2. Activity Charts
3. Best Management Practices – Olympic National Forest
4. Best Management Practices - Mason County PUD
5. NHPA Section 106 direction
6. Project Notification Checklist
7. Annual Utility Meeting Checklist
8. Documentation of Operating Agreement Status

Attachment 1. Definitions from US Forest Service Handbook 2709.11, Chapter 80

Access Road or Trail. For purposes of this directive, a road or trail constructed, operated, and maintained by an owner or operator that is necessary to access a powerline facility or its linear right-of-way.

Bulk Power System. A system consisting of powerline facilities and control systems necessary for operating an interconnected electric energy transmission network or any part of it, other than facilities used in the local distribution of electric energy, and electric energy from generation facilities needed to maintain transmission reliability.

Conductor. Cable or wire that transmits electricity.

Edison Electric Institute (EEI). The association that represents all investor-owned electric companies in the United States.

Electric Reliability Organization. An independent, self-regulating entity created by the Energy Policy Act of 2005 that has been certified by the Federal Energy Regulatory Commission (FERC) to enforce reliability standards for the bulk power system.

FERC License. An authorization issued by FERC for a non-Federal hydropower project and its primary powerline facility, which may include Forest Service conditions for powerline facility maintenance and vegetation management per section 4(e) of the Federal Power Act.

Fiber Optic Cable. An all-dielectric, self-supporting, non-conducting cable consisting of a central core surrounded by buffer tubes containing optical fibers and covered with a protective polyethylene jacket; an optical ground wire; or an overhead ground wire with optical fibers integrated into the design of the cable to provide communications capability as well as lightning protection.

Flashover. An electric discharge over or around the surface of an insulated conductor that may result in fire through the ignition of surrounding objects.

Hazard Tree. For purposes of vegetation management for a powerline facility, any tree, brush, shrub, other plant, or part thereof, hereinafter "vegetation" (whether located on NFS lands inside or outside the linear right-of-way for the powerline facility), that has been designated, prior to failure, by a certified or licensed arborist, qualified vegetation management specialist, or forester under the supervision of the owner or operator to be:

1. Dead; likely to die or fail before the next routine vegetation management cycle; or in a position that, under geographical or atmospheric conditions, could cause the vegetation to fall, sway, or grow into the powerline facility before the next routine vegetation management cycle; and

2. Likely to cause substantial damage to the powerline facility; disrupt powerline facility service; come within 10 feet of the powerline facility; or come within the minimum vegetation clearance distance as determined in accordance with applicable reliability and

safety standards and as identified in the special use authorization for the powerline facility and the associated approved operating plan or agreement.

Integrated Vegetation Management. The practice of promoting desirable, stable, low-growing plants that will resist invasion by tall-growing tree species through the use of appropriate, environmentally sound, and cost-effective methods, including a combination of chemical, biological, cultural, mechanical, and manual treatments.

Linear Right-of-Way. An authorized right-of-way for a linear facility, such as a road, trail, pipeline, powerline facility, fence, water transmission facility, or fiber optic cable, whose linear boundary is delineated by its legal description.

Master Powerline Facility Authorization. A permit or an easement that covers more than one powerline facility to streamline authorization of an owner's or operator's powerline facilities and administration of the associated powerline facility permits or easements, including consolidation of the number of powerline facility permits and easements and their expiration dates, points of contact, and operating plans or agreements.

Maximum Operating Sag. The theoretical position of a conductor when operating at 100 degrees Celsius, which must be accounted for when determining minimum vegetation clearance distance.

Minimum Vegetation Clearance Distance (MVCD). The calculated distance (stated in feet or meters) that is used to prevent flashover between conductors and vegetation for various altitudes and operating voltages. The MVCD is measured from a conductor's maximum operating sag to vegetation on NFS lands within the linear right-of-way for a powerline facility and on NFS lands adjacent to either side of the linear right-of-way for a powerline facility for purposes of felling or pruning hazard trees, which the owner or operator uses to determine whether vegetation poses a system reliability hazard to the powerline facility.

North American Electric Reliability Corporation (NERC). The Electric Reliability Organization certified by FERC for the purposes of developing and enforcing reliability standards for the bulk power system in North America.

North American Electrical Power Grid (the Electrical Grid). The interconnection of hundreds of thousands of miles of high-voltage powerline facilities and millions of miles of low-voltage powerline facilities with distribution transformers that connect thousands of power plants to hundreds of millions of electricity customers across North America.

Operating Plan or Agreement for a Powerline Facility (Operating Plan or Agreement). A plan or agreement prepared by the owner or operator of a powerline facility, approved by the authorized officer, and incorporated by reference into the corresponding special use authorization that provides for long-term, cost-effective, efficient, and timely inspection, operation, maintenance, and vegetation management of the powerline facility on NFS lands within the linear right-of-way for the powerline facility and on NFS lands adjacent to either side of the linear right-of-way to fell or prune hazard trees and to construct, reconstruct, and maintain access roads and trails, to enhance electric reliability, promote public safety, and avoid fire hazards.

Owner or Operator. For purposes of a powerline facility, the owner or operator of the powerline facility or a contractor or other agent engaged by the owner or operator of the powerline facility.

Powerline Facility. One or more electric distribution or transmission lines authorized by a special use authorization, and all appurtenances to those lines supporting conductors of one or more electric circuits of any voltage for the transmission of electric energy, overhead ground wires, and communications equipment that is owned by the owner or operator; that solely supports operation and maintenance of the electric distribution or transmission lines; and that is not leased to other parties for communications uses that serve other purposes.

Powerline Facility Maintenance.

1. Emergency Maintenance. Immediate repair or replacement of any component of a powerline facility that is necessary to prevent imminent loss, or to redress the loss, of electrical service due to equipment failure in accordance with applicable reliability and safety standards and as identified in an approved operating plan or agreement.

2. Non-Routine Maintenance. Realigning, upgrading, rebuilding, or replacing an entire powerline facility or any segment of it, including reconductoring, as identified in an approved operating plan or agreement.

3. Routine Maintenance. Repair or replacement of any component of a powerline facility due to ordinary wear and tear, such as repair of broken strands of conductors and overhead ground wire; replacement of hardware (such as insulator assembly) and accessories; maintenance of counterpoise, vibration dampers, and grading rings; scheduled replacement of decayed and deteriorated wood poles; and aerial or ground patrols to perform observations, conduct inspections, correct problems, and document conditions to provide for operation in accordance with applicable reliability and safety standards and as identified in an approved operating plan or agreement.

Reliability Standard. A requirement developed and enforced by NERC to provide for reliable planning and operation of the bulk power system in North America, including operation of existing bulk power system facilities and the design of planned additions or modifications to those facilities to the extent necessary to provide for reliable operation of the bulk power system, but not including any requirement to enlarge bulk power facilities or to construct new transmission or generation capacity.

Tort. A civil wrong, other than breach of contract, for which a remedy may be obtained, usually in the form of damages, which typically falls into one of the following four categories:

1. An intentional act resulting in harm;

2. An act involving unlawful conduct causing unintentional harm;

3. An unintentional act involving an unreasonable risk of harm; or

4. An act resulting in accidental harm for which, because of the hazards involved, the law imposes strict or absolute liability despite the absence of fault.

Vegetation Management.

1. Emergency Vegetation Management. Unplanned pruning or felling of vegetation on NFS lands within the linear right-of-way for a powerline facility and unplanned pruning or felling of hazard trees on NFS lands adjacent to either side of the linear right-of-way that have contacted or present an imminent danger of contacting the powerline facility to avoid the disruption of electric service or to eliminate an immediate fire or safety hazard.

2. Non-Emergency (Routine) Vegetation Management. Planned actions as described in an operating plan or agreement periodically taken to fell or prune vegetation on NFS lands within the linear right-of-way for a powerline facility and on NFS lands adjacent to either side of the linear right-of-way to fell or prune hazard trees to ensure normal powerline facility operations and to prevent wildfire in accordance with applicable reliability and safety standards and as identified in an approved operating plan or agreement.

Attachment 2. Activity Charts

CHART 1. ACTIVITY CLASS DESCRIPTIONS, NOTICE, AND APPROVAL

Class	Description	Prior Notice	Prior Acknowledgement or Approval	Subsequent Notice
A	Routine activities involving minimal or no ground disturbance and no impacts to vegetation and do not require additional analysis or consultation. Examples: inspections, ground and aerial patrols, and mapping.	Telephone call or email	Acknowledgment from AO by telephone or email	N/A
B	Routine activities involving minimal ground disturbance and impacts to vegetation and do not require additional analysis or consultation. Examples: routine vegetation management, routine powerline facility maintenance, routine maintenance of roads and trails, and routine repair or replacement of fiber optic cable.	Minimum 30-day notice. Recommended use of Notification Checklist or provide at annual meeting.	Prior written acknowledgment from the authorized officer by email or letter is required with some exceptions.	N/A
C	New, changed, or additional uses or areas. Due to their complexity and scope, these activities will typically require additional analysis and consultation. Examples: new construction and rerouting of powerline facilities; non-routine powerline facility maintenance; major hazard tree removal that extends beyond the linear right-of-way; road and trail construction and reconstruction; non-routine road and trail use and maintenance, e.g., involving installation of drainage features, fences, gates, or signs; and installation of fiber optic cable on powerline facilities.	Minimum 180-day notice. Submission of an application (form FS-299) is required.	NEPA decision to approve. The existing powerline permit must be amended, or a new authorization issued to authorize the approved activities.	N/A
D	Emergency vegetation management and emergency powerline facility maintenance that do not require additional analysis and consultation. Examples: unplanned pruning or removal or hazard trees to prevent imminent contact with a powerline facility and immediate repair or replacement of powerline facility components that is necessary to restore electrical service.	N/A	N/A	Within 24 hours of initiating activity telephone or email AO. Within 30 days submit a detailed written report to AO.

CHART 2. SPECIFIC ACTIVITIES BY CLASS

Activities	Class A Activity	Class B Activity	Class C Activity	Class D Activity	Comments
INSPECTIONS					
Ground inspections	X				
Cultural surveys			X		ARPA permit needed
Other resource surveys	X				
UAS inspections with landings within the ROW		X			See USFS UAS guide.
UAS inspections with landings outside the ROW			X		See USFS UAS guide.
Manned aircraft inspections with no landings on NFS lands					No authorization or notification required.
Manned aircraft inspections with landings on NFS lands		X	X		Level of approval dependent on if landing zones were authorized at permit issuance. Always consult with forest aviation lead
ABOVE-GROUND LINE POWERLINES					
Maintenance and replacement of equipment on poles or towers	X				
Repair of downed powerline or fiber optic line				X	
Single pole replacement with like pole		X			
Replacement of several poles in one area		X			
Tower replacement		X	X		Depending on scope of project.
Emergency repairs within ROW				X	Typically storm response
Construction of new overhead powerline			X		
Relocation of overhead powerline			X		
UNDERGROUND POWERLINES					
Maintenance of line through vault boxes	X				

Activities	Class A Activity	Class B Activity	Class C Activity	Class D Activity	Comments
Replacement of aged buried line		X	X		Depends on if the line will simply be pulled through existing conduit or replacement line will be buried alongside new line
Construction of new buried powerline			X		
Relocation of buried powerline			X		
Overhead line converted to buried powerline			X		
VEGETATION MANAGEMENT					
Planned 5-7 year vegetation clearing cycle		X			
"Touch up" vegetation clearing between 5-7 year cycle		X			
Hazard tree removal within the ROW		X			
Hazard tree removal outside of the ROW			X		
Pesticide/herbicide application			X Pesticide Use Permit (PUP)		A PUP is required each year. Permit amendment not needed.
Pulling invasive plants		X			
Emergency vegetation work				X	Typically storm response
Slash management		X			Chipped on site and scattered or chipped and hauled.
ACCESS & ROUTE MAINTENANCE					
Routine maintenance of authorized access trails or roads that are not NFS routes including gates or traffic control devices		X			

Activities	Class A Activity	Class B Activity	Class C Activity	Class D Activity	Comments
Routine maintenance of authorized access trails or roads that are NFS routes including gates or traffic control devices.			Road Use Permit required		
Motorized travel outside of authorized access routes including unauthorized over snow routes		X	X		Depends on scale and location
Non-routine maintenance of non-USFS roads or trails.			X		For example, installing culverts or bridges
Emergency access route work				X	Typically storm response
Snowplowing of NFS roads		X	X	X	Depends on what is addressed in permit and operating plan. If nothing - then engineering would issue a road use permit unless responding to emergency.
Snowcat operations	X				If routes are outlined in operating plan
MISCELLANEOUS					
Other utilities installed onto power poles			X		When power utilities allow other entities to install lines on their facilities, the entity must submit proposal to USFS.
Routine substation maintenance	X				
Replace substation fencing		X			
Installation of power utility owned fiber			X		
Additional facilities added within substation footprint			X		

Attachment 3. Best Management Practices – Olympic National Forest

This section provides Olympic National Forest's Best Management Practices for the following areas:

- Invasive Non-Native Plant Species Prevention and Control
- Herbicide Use
- Roads
- Aquatic Habitat
- Soil Resource and Mechanical Vegetation Management
- Pollution Control
- Threatened, Endangered, and Sensitive Species Conservation Measures

INVASIVE NON-NATIVE PLANT SPECIES PREVENTION AND CONTROL

There may be infestations of invasive plants and noxious weeds in the distribution line corridor. The following criteria and mitigation measures are designed to prevent the spread of existing infestations in the vicinity of project activities, and to prevent the introduction and spread of new infestations.

Prior to beginning vegetation management or ground-disturbing activities, the permittee will survey for and treat existing invasive plant infestations of species within the project area that are listed as priority 1 or priority 2 on the most current version of the Olympic National Forest invasive plant list (the 2022 list can be found at the end of this document) and/or species on the County or State lists, which can be found at http://www.nwcb.wa.gov/nwcb_county.htm and http://www.nwcb.wa.gov/. These lists are updated annually, and the permit holder is responsible for confirming that they have the most up to date list. Surveys and treatments must be done by qualified personnel who have experience with weed identification and are licensed applicators. Contact FS Invasive Plant Program Coordinator for assistance if needed.

Whenever feasible, these treatments will be completed before vegetation control or ground disturbing activities begin using appropriate chemical, mechanical, or manual methods. Herbicide applications will follow the rules and guidelines outlined in the Olympic National Forests' weed EIS "Beyond Prevention: Site-Specific Invasive Plant Treatment Project" (2008) which can be found at http://permanent.access.gpo.gov/lps100981/1-FinalEIS.pdf . If timing or resources prevent treatment before vegetation control or ground disturbing activities begin, then infestations in the project area will be monitored and treated upon completion of the project in order to prevent the spread of invasive plants. Any treatments completed will be documented according to Forest Service protocols and documentation will be submitted to the Forest Botanist and the FS Invasive Plant Program Coordinator by the end of each fiscal year.

All species of non-native knotweed, including but not limited to bohemian, Japanese, Himalayan, and giant knotweed (*Polygonum x bohemicum, P. cuspidatum, P. polystachyum, P. sachalinense,* respectively) will not be mowed, cut, brushed or otherwise mechanically removed or damaged. All knotweed infestations will be treated with appropriate herbicides until eradicated.

Herbicide applications will follow the rules and guidelines outlined in the Olympic National Forest's weed EIS "Beyond Prevention: Site-Specific Invasive Plant Treatment Project" (2008) which can be found at http://permanent.access.gpo.gov/lps100981/1-FinalEIS.pdf. Treatments completed will be documented

according to Forest Service protocols and documentation will be submitted to the Forest Botanist and the FS Invasive Plant Program Coordinator by the end of each fiscal year.

Clean all off-road equipment of dirt/mud, seeds, and other plant parts before it is moved onto ONF land. Chainsaws, chippers, mowers and weed whackers will also be cleaned of debris that may contain invasive plant propagules prior to being brought on to Forest Service lands for use. If operating in an area infested with invasive plants, clean all equipment before moving between sites or leaving the project area. For cleaning equipment on ONF land, the permittee and ONF shall agree on methods of cleaning, locations of the cleaning, and control of off-site impacts, if any. 'Off-road equipment' includes all machinery other than log trucks, chip vans, pickup trucks or vehicles used to transport personnel on a daily basis.

ONF shall flag locations of high priority invasive plant infestations prior to work commencing and provide the permittee with a map of these locations. These areas shall be avoided during work and travel associated with the project unless otherwise directed by the Permit Administrator. If directed to work in infested area, the permittee shall be required to prevent spreading the infestation into un-infested areas by cleaning vehicles and equipment.

All material (e.g., soil, gravel, sand borrow, aggregate, etc.) transported onto National Forest System land or incorporated into the work shall be weed-free. The Permit Administrator may request written documentation of methods used to determine the weed-free status of any and all materials furnished by the permittee. The permittee-provided expertise and methods to establish weed-free status must be appropriate for species listed as priority 1 or priority 2 on the most current version of the Olympic National Forest invasive plant list (attached as Exhibit C) and/or species on the County or State lists, which can be found at http://www.nwcb.wa.gov/nwcb_county.htm and http://www.nwcb.wa.gov/.

An ONF weed specialist shall inspect proposed material sources to determine weed-free status. The permittee shall provide the Permit Administrator written notification of proposed material sources 14 days prior to use. If weed species are present in the proposed source, appropriate mitigation measures may allow conditional use of the source as required by the Permit Administrator, but if it is determined that materials from a specific source have a high likelihood of being contaminated with invasive plant propagules, use of a different source may be required.

Fill material generated from the project site containing or suspected to contain invasive plants shall be stockpiled within the project area and as close to the infested source area as possible. The material shall not be broadcast for disposal.

Mulch used on the project shall be weed-free. The Permit Administrator may request written documentation of methods used to determine the weed-free status of any and all materials furnished by MPUD. Contractor-provided expertise and methods to establish weed-free status must be appropriate for the weeds on the current Washington State noxious weed list (www.nwcb.wa.gov/weed_list/weed_list.htm). *(Refer to the North American Weed Free Forage Program standards, Regional EIS, Appendix O)*

Seed used in the project shall be weed-free and meet state and local noxious weed laws. Avoid using seed mixes containing non-native species. Consult FS Invasive Plant, Botany, or Native Plant staff for guidance.

Use seed mixes and plantings that consist of locally appropriate native species whenever possible. Locally sources and genetically appropriate native plant material of herbaceous and non-coniferous woody plants (seeds, live stakes, containerized plants, etc.) shall be used for all revegetation efforts connected with the proposed action. Non-native, non-persistent seed mixes may be used only as a last resort when native plant material is unavailable and resource damage would occur without its use. Contact FS Invasive Plant, Botany, or Native Plant staff for guidance.

Olympic National Forest 2022 Invasive Species List				
Code	**Scientific Name**	**Common Name**	**Treatment Priority**	**Documented on ONF**
AEPO	*Aegopodium podagraria*	Bishop's weed, goutweed	1	Y
ANSY	*Anthriscus sylvestris*	wild chervil	1	N
ANCA14	*Anthriscus caucalis*	bur chervil	1	N
ARMI2	*Arctium minus*	lesser burdock	1	Y
BOOF	*Borago officinalis*	common borage	1	Y
BRSY	*Brachypodium sylvaticum*	false brome	1	N
BRTE	*Bromus tectorum*	cheatgrass	1	Y
BUDA2	*Buddleja davidii*	butterfly bush	1	Y
CEDE5	*Centaurea debeauxii*	meadow knapweed	1	Y
CEDI3	*Centaurea diffusa*	diffuse knapweed	1	Y
CEJA	*Centaurea jacea*	brownray knapweed	1	Y
CESTM	*Centaurea stoebe* ssp. *micranthos*	spotted knapweed	1	Y
CLVU	*Clinopodium vulgare*	wild basil savory	1	Y
COMA2	*Conium maculatum*	poison hemlock	1	N
DALA11	*Daphne laureola*	spurge laurel	1	Y
DIFU2	*Dipsacus fullonum*	Fuller's teasel	1	Y
GELU	*Geranium lucidum*	shiny geranium	1	Y
GERO	*Geranium robertianum*	herb Robert, stinky Bob	1	Y
HEMA17	*Heracleum mantegazzianum*	giant hogweed	1	N
HEMA3	*Hesperis matronalis*	dames rocket	1	Y
HIAU	*Hieracium aurantiacum*	orange hawkweed	1	Y
HICA10	*Hieracium caespitosum*	meadow (yellow) hawkweed	1	Y
HISA4	*Hieracium sabaudum*	European hawkweed	1	Y
IMCA	*Impatiens capensis*	spotted jewelweed	1	Y
LAGA2	*Lamiastrum galeobdolon*	yellow archangel	1	Y
LIVU2	*Linaria vulgaris*	yellow toadflax, butter and eggs	1	Y
LYPU2	*Lysimachia punctata*	large yellow loosestrife	1	Y
LYVU	*Lysimachia vulgaris*	garden yellow loosestrife	1	N
MEPI	*Mentha × piperita*	peppermint	1	Y
ORVU	*Origanum vulgare*	oregano	1	Y
POCU6	*Polygonum cuspidatum*	Japanese knotweed	1	Y
POPO5	*Polygonum polystachyum*	Himalayan knotweed	1	N
POSA4	*Polygonum sachalinense*	giant knotweed	1	Y
POBO10	*Polygonum x bohemicum*	Bohemian knotweed	1	Y
PORE5	*Potentilla recta*	sulphur cinquefoil	1	Y
ROCA3	*Rosa canina*	dog rose	1	Y
SEJA	*Senecio jacobaea*	tansy ragwort	1	Y
SILAA3	*Silene latifolia ssp. alba*	bladder campion	1	Y
SOAU	*Sorbus aucuparia*	European mountain ash	1	Y
SYOF	*Symphytum officinale*	common comfrey	1	Y
TAVU	*Tanacetum vulgare*	common tansy	1	Y
TUFA	*Tussilago farfara*	European coltsfoot	1	N
VETH	*Verbascum thapsus*	common mullein	1	Y
VIMA	*Vinca major*	bigleaf periwinkle	1	Y
VIMI2	*Vinca minor*	common periwinkle	1	Y
CIAR4	*Cirsium arvense*	Canada thistle	2	Y
CIVU	*Cirsium vulgare*	Bull thistle	2	Y
COAR4	*Convolvulus arvensis*	field bindweed	2	?
CYSC4	*Cytisus scoparius*	Scotch broom	2	Y

DACA6	*Daucus carota*	Queen Anne's lace	2	Y
HEHE	*Hedera helix*	English ivy	2	Y
HYPE	*Hypericum perforatum*	common St. Johnswort	2	Y
ILAQ80	*Ilex aquifolium*	English holly	2	Y
LALA4	*Lathyrus latifolius*	everlasting peavine	2	Y
PHAR3	*Phalaris arundinacea*	reed canarygrass (including ribbon grass)	2	Y
PRLA5	*Prunus laurocerasus*	English laurel	2	Y
RUAR9	*Rubus armeniacus*	Himalayan blackberry	2	Y
RULA	*Rubus laciniatus*	cutleaf blackberry	2	Y

HERBICIDE USE

Herbicides may only be used to control specific species of invasive plants, as determined by the ONF, and only after coordination with and prior written approval from the Authorized Officer.

Herbicide use for control of aquatic plants is NOT permitted. Herbicide use for vegetation control (for example, to control woody brush, such as native alders or willows) is also NOT permitted under the terms of this permit.

A request for approval of planned uses of herbicides shall be submitted annually no later than March 15 and must include a Pesticide Use Proposal (PUP). Blank PUPs will be supplied by the ONF. It is highly recommended that the request be developed with input from ONF invasive plant staff to make the process as efficient as possible, as there are many standards that must be adhered to that are specific to the ONF, and more restrictive than what is described in the instructions for use found on herbicide labels.

The request must include species proposed for control, herbicides and adjuvants that would be used, application rate, application method, approximate size of the application area, location (road number and beginning and ending milepost, if a road edge application), approximate date of proposed applications, a description of the application site (for example "5 foot wide strip on both shoulders of paved road."), and if any of the applications being proposed will be within 15 feet of any seasonal or perennial stream, waterbody, or wetland. All herbicide applications must be documented according to Forest Service protocols, and documentation submitted to the ONF Invasive Plant program by September 15 every year. All herbicide applications must follow the applicable standards and guidelines in the ONF Weed EIS "Beyond Prevention: Site-Specific Invasive Plant Treatment Project" (2008), available upon request from the ONF.

ROADS

Road Reconstruction

Identify and locate waste areas before the start of operations. Deposit and stabilize excess and unsuitable materials only in designated sites. Establish designated areas for equipment staging.

Reconstruct existing roads to the degree necessary to provide adequate drainage and safety. Avoid disturbing stable road surfaces. Use suitable measures to avoid, to the extent practicable, or minimize direct discharges from road drainage structures to nearby waterbodies.

Install sediment and stormwater controls before initiating surface-disturbing activities, and when severe storms are expected, and prior to seasonal shutdown to the extent practicable

Sediment controls (including but not limited to sediment traps, straw or wood wattles, rock check dams, straw mulch, slash filter windrow, additions of coarse rock, and/or sediment fences) will be placed in areas where there is potential for sediments to reach the stream network. Key locations will include ditchlines, intermittent, and perennial stream crossings.

Any removal of accumulated sediment will be done when site conditions are dry and captured sediment will be relocated to a stable location away from streamcourse.

Roads that are located in potentially unstable areas and/or have potentially unstable sidecast fillslopes will have additional emphasis on road drainage and stabilization.

Unstable sidecast located along fillslopes that are within harvest units and near landings will be stabilized and/or hauled to a stable waste disposal area to the extent feasible.

Sidecasting of waste material along fill slopes and ditch lines is prohibited.

Road Operations and Maintenance

Road work will occur from June 1 through October 31 unless otherwise agreed.

As needed, shape road surfaces to drain as designed. Construct or reconstruct drainage structures as needed. Ensure that ditches and culverts are clean and functioning. Remove berms unless specifically designed for erosion control purposes.

Additional ditch relief culverts may be installed as needed to divert sediment-laden runoff away from stream channels.

Cutslope vegetation (specifically root system) will be maintained to reduce soil erosion, ditch plugging, recurrent road maintenance and impacts to water quality.

If maintenance of road surface or sediment controls cannot be performed adequately due to weather, haul will be discontinued until conditions improve and/or additional actions will be taken such as placement of additional coarse road surfacing and sediment controls (straw/wood wattles, sediment traps, straw mulch, rock check dams, slash filter windrow, and/or sediment fences) where sediment has the potential for delivery to streams.

Log haul on surfaced and un-surfaced roads will be allowed during freezing conditions, but will be suspended as roads begin to thaw

Organic debris from cleaning culverts, or other activities will be distributed away from other road drainage features including ditches.

Coordinate project work with Forest Service Special Use Administrator before and during development and implementation of activities on or adjacent to roads or areas under permits or other legal access agreements.

Stockpile and Waste

Select stockpile locations that are previously created openings (usually old rock quarries or barrow sites). Prevent weed infestation of stockpile through measures that may include but not limited to 1) a material barrier under the stockpile that is later removed 2) removing layer of topsoil before stockpiling (consult botanist for method).

Follow pit management plans for storing fill or other waste material, or contact botanist to coordinate waste pile locations.

Avoid placing waste fill material within the stream prism to avoid sedimentation to stream or spread of seed into waterways where it can travel downstream.

Temporary Roads

Practices related to road location and stormwater and erosion control should be applied to temporary roads.

Construct temporary roads between June 1 to October 31 unless otherwise identified.

Avoid construction and rehabilitation of temporary roads during times of excessively wet conditions and/or when soil has reached saturation.

Routinely inspect temporary roads to verify that erosion and stormwater controls are implemented, functioning, and appropriately maintained.

Temporary roads that are built but not used for haul prior to the onset of a winter season will require establishment and maintenance of erosion and sediment control measures. Measures may include cross-drains, seed/mulching, or waterbars to reduce risk of erosion and sedimentation.

Temporary roads will be decompacted as necessary per permit administrator instruction, to improve water infiltration and restore soil productivity. Available logging slash will be placed across the decompacted surface. Motorized access will be blocked.

Revegetate as appropriate with native plant species. Encourage spreading seed even over slash mats.

If abandoned culverts occur on temporary roads located on old, abandoned roadbeds not in INFRA remove abandoned culverts and restore drainage patterns as much as possible by stewardship or other funding. If needed, in low/wet areas (not wetlands with hydric plants) rock may be placed on temporary roads to stabilize the route with criteria explained in the contract. Rock would normally not be compacted/graded. If compaction/grading is necessary, consult a qualified engineer for possible specified road situation.

Winter units may require extra rock on temporary roads to be described in criteria.

If needed on steeper sections, erosion control measures may be applied.

If temporary road section exceeds 12 percent grade, contact qualified engineer for possible criteria or different location.

Construction of temporary roads within or directly adjacent to potentially unstable landforms will be assessed by a Forest Service soil scientist.

If temporary road construction involves cutting a suitable nest tree change location to avoid the tree or contact wildlife biologist.

Should temporary road fills be agreed upon within wet areas, they will be removed after use and stream bank profiles reestablished to restore hydrologic function.

Establish criteria for rehabilitation if needed. Revegetate as appropriate with native plant species. Encourage spreading seed even over slash mats.

Road Decommissioning

Remove drainage structures.

Recontour and stabilize cut slopes and fill material.

Reshape the channel and streambanks at crossing sites to pass expected flows without scouring or ponding, minimize potential for undercutting or slumping of streambanks, and maintain continuation of channel dimensions and longitudinal profile through the crossing site.

Restore floodplain function. For road decommissioning projects within riparian areas, re-contour the road prism to mimic natural floodplain contours and gradient to the greatest degree possible

Revegetate as appropriate with native plant species. Encourage spreading seed even over slash mats.

Dispose of slide and waste material on stable sites and outside of drainages and flood prone areas.

Place sediment barriers prior to any ground disturbing activities around sites where significant levels of fine sediment may enter the stream directly. Maintain barriers throughout all ground disturbing activities.

For road decommissioning projects within riparian areas, re-contour the road prism to mimic natural floodplain contours and gradient to the greatest degree possible

If a road is decommissioned, effective access controls shall be employed to reduce motorized use and unauthorized activities on that road such as dumping of trash and cutting of legacy trees and other important habitat features

Where feasible, based upon topography and landform stability, road decommissioning and closure locations should be set back from the junction by 50 feet to allow for safe pullout and parking for recreation.

Stream Crossing and Standing Water Crossing

Replacement culverts are installed at natural stream grade and designed for turbulence around the inlets and outlets.

Temporary culverts or bridges on stream crossings are those in place for a single summer season. They need only be designed, installed, and maintained to accommodate flows, sediment, and wood passage anticipated during that time.

Culverts and bridges in place longer than a single summer season are not considered temporary. They shall be designed, installed, and maintained to accommodate Q100 with consideration of sediment and wood passage.

Size replacement culverts to accommodate Q100 with consideration of sediment and bedload. Q100 is a 100-year flood event that has a 1 percent probability of occurring in any given year. The number is based on the expected 100-year flood flow rate in a given creek, river, or surface water system.

Use suitable measures to stabilize or harden the streambed and approaches, including the entire bankfull width and sufficient freeboard, where necessary to support the design vehicle traffic.

Although unlikely, if standing water crossings are necessary, provide for sufficient cross drainage to minimize changes to, and avoid restricting, natural surface and subsurface water flow of the wetland under the road to the extent practicable. Use suitable measures to increase soil-bearing capacity and reduce rutting from expected vehicle traffic.

Fish-bearing Stream Crossing

Project activities will follow all applicable provisions of the current version of the Memorandum of Understanding (MOU) between the Washington Department of Fish and Wildlife and USDA Forest Service, Pacific Northwest Region, regarding hydraulic projects conducted by USDA Forest Service. Follow all applicable general and project- specific provisions found in Appendix A of the MOU.

Tentative instream work period is July 15 to September 30, pending agreement with WDFW habitat biologist.

Any culvert with water flowing would need to be dewatered for replacement.

Non-fish-bearing Stream Crossings or Ditch Relief Culverts

Tentative instream work period is July 15 to September 30, pending agreement with WDFW habitat biologist. If a stream has no water flowing at the time of replacement, then dewatering is not necessary, and work could occur outside of the work window.

Any culvert with water flowing would need to be dewatered for replacement.

Changes in the work period should be discussed with the Fish biologist and Watershed specialists and then reviewed by the WDFW habitat biologist.

AQUATIC HABITAT

No cutting of vegetation and no equipment entry within a buffer zone measured as 100 feet from the outer edge of the streambank or to the top of the slope break, whichever distance is greater.

Utilize full log suspension in skyline yarding corridors.

Upon review by a watershed and fish specialist, the no-cut buffer width, equipment access, and suspension criteria may be waived or modified to accommodate logging system feasibility.

No gap openings or heavily thinned areas will be created adjacent to no-cut buffers along fish-bearing streams, unless reviewed by fish biologist.

Operation of ground-based skidding equipment will not occur within 30 feet of harvest unit boundaries where riparian no-cut buffers serve as harvest unit boundaries on the edge of a slope break.

Reconstruction or construction of temporary or system roads must be reviewed by botanist, fish and wildlife biologists, and watershed specialist if placement or removal of fill would encroach on a wetland. If this happens develop criteria for the temporary road.

Sediment controls will be installed before initiating surface-disturbing activities to the extent practicable (including but not limited to sediment traps, straw or wood wattles, rock check dams, straw mulch, slash filter windrow, additions of coarse rock, and/or sediment fences). Sediment controls will be placed in areas where there is potential for sediments to reach the stream network. Key locations will include ditchlines, intermittent, and perennial stream crossings

Any removal of accumulated sediment will be done when site conditions are dry and captured sediment will be relocated to a stable location away from stream courses.

All screens, pump intakes, and hoses that will be in contact with a stream or waterbody must be disinfected prior to entering the National Forest lands to avoid introducing aquatic invasive species, unless otherwise agreed.

SOIL RESOURCE AND MECHANICAL VEGETATION MANAGEMENT

Ground based equipment will travel on operationally generated slash (limbs and tops) where possible. The slash mat will be thick and continuous as practicable. Yarding activities will be planned to make as few trips as possible.

If compaction occurs, skid trails will be decompacted (to a depth of 12 inches) as necessary to improve water infiltration and restore soil productivity. Available logging slash will be placed across the decompacted surface where needed.

Skid trail obliteration will not occur during times of excessively wet conditions and/or when soil has reached saturation.

Operation of ground-based equipment will be restricted to sustained slopes that are 35% or less.

Existing skid trails will be used wherever possible (unless the old skid trail is in a unsuitable location), care will be taken to assure any new skid trail construction will avoid wet areas and prevent sediment delivery to streams.

Operation of ground-based yarding and skidding equipment will generally be restricted to authorized skid trails. Equipment may be allowed to operate off designated skid trails occasionally to resolve operational issues. These instances would be intermittent and site specific and would require agreement by the Sale Administrator and will be limited to a single out and back pass by a single piece of equipment.

Avoid harvest on areas that have average sideslopes of greater than 75 percent unless they have been reviewed and approved by a Soil Scientist.

If excessive gouging or soil displacement on slopes resulting from cable/skyline yarding corridors or steep slope machines occurs, such areas will be treated to prevent rill and gully erosion and possible sediment delivery to steam courses. Erosion control treatment may include but is not limited to repositioning displaced soil to re- contour disturbed sites, creating small ditches or diversions to redirect surface water movement, installation of waterbars along slope contours, and scattering slash material to create flow disruption and surface soil stability.

Leading end of logs shall be suspended above ground during yarding to avoid detrimental soil gouging. If possible, full log suspension should be utilized to yard over steep water run in positions (inner gorges), and escarpment areas dominated by steep fillslopes.

Establish a no cut buffer 25 feet upslope from a major slope break that defines an escarpment, inner gorge, or potentially unstable area.

POLLUTION CONTROL

Equipment Refueling and Servicing

All machinery maintenance involving potential contaminants (fuel, oil, hydraulic fluid, etc.) shall occur at a site greater than 100 feet from water courses and riparian habitat. All project equipment will be equipped with hazardous spill prevention and containment equipment to minimize the effects of a fuel spill or hydraulic leak.

Plan for suitable equipment refueling and servicing sites during work activities.

Use suitable measures to avoid spilling fuels, lubricants, cleaners, and other chemicals during handling and transporting.

Ensure that hazardous spill kits are adequately stocked with necessary supplies and are maintained in accessible locations.

Clean up and dispose of spilled materials according to specified requirements in the appropriate guiding document.

Report spills and initiate suitable cleanup action in accordance with applicable state and federal laws, rules, and regulations.

Pesticide and Preservative-Treated Wood

Treated wood may not be used in a stream crossing structure that will be in or over water or permanently or seasonally flooded wetlands, except to maintain or repair an existing wood bridge. The following criteria below apply to the use of treated wood for maintenance or repair of existing wood bridges.

No part of the treated wood may be exposed to leaching by precipitation, overtopping waves, or submersion (e.g., no treated wood piles, and stringers or decking of a timber bridge can be made from treated wood only if they will be covered by a non-treated wood wearing surface that covers the entire roadway width), and all elements of the structure using the treated wood are designed to avoid or minimize impacts or abrasion that could create treated wood debris or dust.

Installation of treated wood:

- Treated wood shipped to the project area will be stored out of contact with standing water and wet soil and protected from precipitation.

- Each load and piece of treated wood will be visually inspected and rejected for use in or above aquatic environments if visible residue, bleeding of preservative, preservative-saturated sawdust, contaminated soil, or other matter is present.

- Prefabrication will be used whenever possible to minimize cutting, drilling and field preservative treatment.

- When field fabrication is necessary, all cutting, drilling, and field preservative treatment of exposed treated wood will be done above OHW to minimize discharge of sawdust, drill shavings, excess preservative and other debris.

- Tarps, plastic tubs or similar devices will be used to contain the bulk of any fabrication debris, and any excess field preservative will be removed from the treated wood by wiping and proper disposal.

Removal of treated wood:

- Evaluate all wood construction debris removed during a project, including pile, to ensure proper disposal of treated wood.

- Ensure that no treated wood debris falls into the water or, if debris does fall into the water, remove it immediately.

- After removal, place treated wood debris in an appropriate dry storage site until it can be removed from the project area.

- Do not leave any treated wood debris in the water or stacked on the streambank at or below OHW.

THREATENED, ENDANGERED, AND SENSITIVE SPECIES CONSERVATION MEASURES

The location of sites within the permit area needing special measures for protection of plants or animals listed as threatened or endangered under the Endangered Species Act (ESA) of 1973 or identified as sensitive or otherwise requiring special protection pursuant to consultation conducted under Section 7 of the ESA will be provided to the PUD if found during the term of this permit. If such sites are found, ONF will provide a map to be attached as an appendix to the special use permit.

Conservation Measures

The following conservation measures are to be incorporated into each project to avoid or minimize impacts to species. Application of these conservation measures to specific projects assists in the final determination of effect to each species or its habitat.

Timing of Nesting Seasons for Northern Spotted Owl and Marbled Murrelet

The early spotted owl nesting season for the northern spotted owl (when most young are in the nest) is considered to be from March 1 to July 15, the late spotted owl nesting season (when most young have

fledged) is from July 16 to September 30, and the entire marbled murrelet nesting season is from April 1 to September 23.

Definition of Suitable Nest Trees and Habitat for Northern Spotted Owl and Marbled Murrelet

A northern spotted owl suitable nest tree is defined as being located in suitable nesting, roosting or foraging habitat; is a conifer (alive or dead); is at least 18" dbh; and contains a nesting structure such as a broken top, cavity, nest of a large raptor, mistletoe broom, or branch platform large enough to support a spotted owl nest. Stands for nesting and roosting are generally characterized by moderate to high canopy closure (60 to over 80 percent), multilayered, multispecies canopies with large (20 to 30 inches dbh or greater) overstory trees, high diversity of different diameters of trees, high incidence of large live trees with various deformities (e.g., large cavities, broken tops, mistletoe infections, and other evidence of decadence), large snags and large accumulations of fallen trees and other woody debris on the ground.

A marbled murrelet suitable nest tree is defined as a live conifer at least 18" dbh that contains one or more platforms, defined as any horizontal tree structure such as a limb, and area where a limb branches, or a surface created by dwarf mistletoe (at least 4-inch diameter) located in the live crown of the tree 33 feet or more above the ground and is within 55 miles of marine waters. A suitable nest tree is located within or along the edges of old-growth, mature, or younger forested areas that provide both overstory (vertical) and adjacent (horizontal) canopy cover to platforms.

A buffering tree to a marbled murrelet nest tree is one that is at least half-site potential tree height of its capability that has a crown that interlocks with the crown of the potential nest tree. A forested stand that has at least 60 percent coniferous canopy cover with a minimum 40 percent of the dominant and co-dominant trees being Douglas-fir (*Pseudotsuga menziesii*), western hemlock (*Tsuga heterophylla*), western red cedar (*Thuja plicata*), or Sitka spruce (*Picea sitchensis*). There is some degree of cover to the potential nesting platform that is provided by adjacent trees.

Conservation Measures for Northern Spotted Owl, Marbled Murrelet, and their Designated Critical Habitats

1. No trees known to be active or historic nest trees for spotted owls or marbled murrelets shall be removed during any time of year, no matter how many years have passed since the tree was known to be a nest tree.

2. Trees to be removed in suitable habitat during the murrelet nesting season shall be inspected by an ONF wildlife biologist when feasible or, if necessary, a qualified, designated non-biologist to determine whether it is a suitable nest tree.

3. The number of suitable nest trees and other large trees removed shall be minimized. Trees shall be felled in a manner to minimize impacts to surrounding trees, and away from suitable habitat if it is possible and safe to do so. If the site does not meet the requirements for large woody debris, felled trees shall be left on site.

4. When feasible, projects shall: a) be designed to occur at times of the year and locations that reduce the potential for disturbance to spotted owls and murrelets; b) begin activities in the area farthest from suitable habitat when conducting activities during the nesting season that must occur within the adverse-effect threshold distances; and c) be adjusted to use topographic and vegetative buffers to minimize sound levels where it is necessary to conduct activities within the adverse-effect threshold distance of suitable habitat of either species during their nesting seasons.

5. During the early nesting season of the spotted owl and the entire nesting season of the marbled murrelet, helicopters shall maintain an altitude and distance greater than the defined disruption distance from suitable

habitat except when they are on direct approach or departure from landing zones and during emergencies. Forest Service will provide disruption distances.

6. To the extent feasible, number of overflights shall be minimized, and use of the same flight paths shall be maximized over suitable habitat during nesting seasons.

7. To the extent feasible, the smallest, quietest helicopters that can accomplish the task efficiently and safely shall be used.

8. There shall be no blasting within 0.25 mile of suitable habitat between March 1 and September 23. Effects of blasting shall be minimized following guidelines described in "Guidelines for Blasting**"** (Forest Service will provide).

9. An ONF wildlife biologist shall be notified immediately if a spotted owl or murrelet active nest or individual is found, and measures to minimize or eliminate disruption to normal behaviors will be applied.

Conservation Measures for Spotted Owls in Suitable Habitat

1. An ONF wildlife biologist or, if necessary, a qualified, designated non-biologist shall inspect each suitable spotted owl nest tree removed during the entire spotted owl nesting season (March 1 to September 30) for signs the tree is being used as a nest tree (e.g., spotted owls, pellets, "whitewash").

2. Trees will be directionally felled to minimize damage to adjacent trees.

3. Activities shall not result in removing or downgrading stands of nesting, roosting, or foraging spotted owl habitat.

4. Known occupied spotted owl nests shall not be exposed to noise and visual disturbance within the defined disruption distances during the early nesting season (Forest Service will provide disruption distances).

5. Since activities of this operating plan may affect spotted owls, marbled murrelets, and/or their designated critical habitats, this operating plan shall be in compliance with the ONF programmatic biological opinion, in order to meet requirements of Endangered Species Act consultation. A Project Consistency Evaluation Form will be completed to document this compliance. Actual adverse effects (disturbance and/or suitable nest tree removals) shall be tracked and recorded each year.

Conservation Measures for Marbled Murrelets

1. An ONF wildlife biologist or, if necessary, a qualified, designated non-biologist shall inspect each suitable murrelet nest tree removed during the entire murrelet nesting season (April 1 to September 23) for the presence of platforms.

2. Project activities that generate noise or visual disturbance throughout the nesting season of murrelets (April 1 to September 23) within disruption distances of unsurveyed but potentially occupied murrelet habitat shall begin at least 2 hours after sunrise and shall end at least 2 hours before sunset to lessen disturbance to murrelets flying to and from the nest. Forest Service will provide disruption distances.

3. Known occupied murrelet nest stands shall not be exposed to project activities during the entire nesting season within the disruption distances. Forest Service will provide disruption distances.

4. During all project activities any garbage including food waste shall be removed to prevent attracting corvids.

5. When feasible, removal of platforms, trees with platforms, and trees providing cover to platforms shall be avoided even if it is not known whether the stand is occupied by murrelets.

Conservation Measures for Bull Trout

1. Erosion prevention and control methods shall be used as necessary during and immediately after project implementation (and as long as necessary) to minimize the loss or displacement of soils and to prevent delivery of sediment into a waterbody. These measures may include, but are not limited to, operational techniques, straw bales, silt fencing, erosion control blankets, temporary sediment ponds, and/or immediate mulching of exposed areas. Disturbed ground with the potential to deliver sediment into waterbodies shall be revegetated or protected from surface erosion by seeding, mulching, or other methods prior to the fall rainy season. After project completion, disturbed streambanks and lakeshores shall be revegetated with site-appropriate vegetation to maintain soil stability and provide shade and future sources of large wood. Revegetation can be accomplished by planting or natural reproduction, depending on site conditions.

2. All machinery maintenance involving potential contaminants (fuel, oil, hydraulic fluid, etc.) shall occur at a site that is at least 100 feet from stream channels, water bodies, or wetlands.

3. The vegetated ditchline shall be maintained, where functional, to help control soil erosion. Grasses and other non-woody vegetation shall be retained in ditches to reduce water velocity and trap sediment. When ditches are cleaned, sediment traps shall be installed and maintained until vegetation is re-established to prevent delivery of sediment to stream channels.

4. Excess material (spoils) shall be disposed of so it does not enter stream channels or other water bodies.

5. Any trees greater than 12 inches dbh to be felled within reach of a stream (or lake) shall be felled toward the water and left in place if feasible.

6. To retain the largest pieces of downed wood possible in stream channels and floodplains, bucking of large trees during clearing activities in riparian areas shall be minimized.

Disruption and physical injury distance thresholds for Spotted Owls and Marbled Murrelets.

Distances are to occupied nest trees or unsurveyed nesting habitat and may be changed over time by U.S. Fish and Wildlife Service as new research is done.

Project Activity	Spotted Owl early nesting season disruption (injury) distance **(Mar 1–Jul 15)**	Spotted Owl late nesting season disruption (injury) distance **(Jul 16–Sep 30)**	Marbled Murrelet nesting season disruption (injury) distance **(April 1-Sep 23)**
Chainsaws (includes felling hazard/danger trees)	65 yards	NA	110 yards (potential for mortality if felled trees contain platforms)
Heavy equipment for road construction, road repairs, bridge construction, culvert replacements, etc.	65 yards	NA	110 yards
Pile-driving (steel H piles, pipe piles); rock crushing and screening equipment	120 yards (5 yards injury)	5 yards (injury)	120 yards (5 yards injury)
Blasting	0.25 mile (100 yards injury)	100 yards (injury)	0.25 mile (100 yards injury)
Helicopter: Chinook 47d	265 yards	100 yards (hovering only)	265 yards (100 yards injury/mortality)
Helicopter: Boeing Vertol 107, Sikorsky S-64 (SkyCrane)	150 yards	50 yards (hovering only)	150 yards (50 yards injury/ mortality
Helicopters: K-MAX, Bell 206 L4, Hughes 500	110 yards	50 yards (hovering only)	110 yards (50 yards injury/ mortality)
Small fixed-wing aircraft (Cessna 185, etc.)	110 yards	NA	110 yards
Tree climbing	25 yards	NA	110 yards
Burning (prescribed fires, pile burning)	0.25 mile	NA	0.25 mile

Attachment 4. Best Management Practices – Mason County PUD #1

The PUD uses RUS standards for construction and maintenance of PUD facilities. The following standards and specifications are incorporated into this operating agreement by reference:

Electric Transmission Specifications and Drawings 115 KV – 230 kV
https://www.rd.usda.gov/files/UEP_Bulletin_1728F-811.pdf

Specifications and Drawings for 12.47/7.2 kV Line Construction
https://www.rd.usda.gov/files/UEP_Bulletin_1728F-804.pdf

Design Guide for Oil Spill Prevention and Control at Substations
https://www.rd.usda.gov/files/UEP_Bulletin_1724E-302.pdf

Design Manual for High Voltage Transmission Lines
https://www.rd.usda.gov/files/UEP_Bulletin_1724E-200.pdf

System Planning Guide, Construction Work Plans
https://www.rd.usda.gov/files/UEP_Bulletin_1724D-101B.htm

Wood Pole Inspection and Maintenance
https://www.rd.usda.gov/files/UEP_Bulletin_1730B-121.pdf

The PUD has developed written policies on the topics of wildfire mitigation, vegetation management, and spill prevention and control, as follows:

Wildfire Mitigation Plan/Policy, approved February 2022. Pages 1-7 of this document are attached here, and the entire policy is incorporated by reference.

Vegetation Management Policy, approved February 2022. Pages 1-6 of this document are attached here, and the entire policy is incorporated by reference.

Spill Prevention, Control, and Countermeasures Plan, approved xxxxxxxxxxxxx, The entire policy is incorporated by reference.

WILDFIRE MITIGATION PLAN/POLICY

1. EXECUTIVE SUMMARY

It is the intent of Mason County PUD No. 1 (PUD or District) to set basic guidelines for reacting to climate change and the impact that drought and severe weather patterns are having on the vegetation in our environment. It is also our intent to enact safety precautions to help reduce the risk of fire through electrical contact. This policy addresses ways that the District can be proactive in its operations and respond to emergency situations with regard to wildfires.

2. WILDFIRE MITIGATION PLAN OBJECTIVES

2.1 PURPOSE

The Wildfire Mitigation Plan (WMP or Plan) details the actions that the District is currently performing to prevent and mitigate wildfire ignition in its service territory which pose a risk to our services and community. The Plan accesses the PUD's service territory, topography, weather, infrastructure, and grid configuration to identify areas most prone to wildfire risks. The Plan provides strategies to mitigate the threat of electrical equipment ignited wildfires owned by the PUD.

2.2 SERVICE TERRITORY ASSET OVERVIEW

The District owns and operates approximately 11 miles of transmission, 120 miles of overhead distribution, and 140 miles of underground distribution circuits, including four substations in Mason and Jefferson Counties. The service territory is heavily treed and generally has very rocky soil.

3. WILDFIRE RISK

3.1 THE DISTRICT'S FIRE ENVIRONMENT

Over the next several decades the effects of climate change are projected to increase in Washington State. Summers are projected to be drier and warmer, and extreme weather events may become more likely. These conditions exacerbate the risks of wildfire ignition and spread. Changing weather patterns can shift tree pests and disease as well, causing additional fire load in forests and in the adjacent wildland urban interface (WUI).

3.1.1 HISTORICAL WILDFIRE ACTIVITY IN SERVICE TERRITORY

Large fires have been relatively few compared to east of the Cascades. Per the Wildfire History Map (Attachment A), there have been a few larger wildfires near the PUD's service territory. The Haven Lake fire, reportedly started in August of 2014 was the closest to the District's territory. None of these fires were started by or caused damage to the PUD's infrastructure.

3.1.2 WILDLAND URBAN INTERFACE (WUI)

The WUI is the zone of transition between unoccupied land and human development. It is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels. Communities adjacent to and surrounded by wildland are at varying degrees of risk from wildfire.

The Washington State Department of Natural Resources (WDNR) has identified the WUI areas in District's service territory, per Attachment B.

3.2 PUD RISK ASSESSMENT

3.2.1 WILDFIRE IGNITION AND PROPAGATION

The PUD has identified risk drivers which could hypothetically result in a wildfire. In general, one or all of these risk drivers could potentially cause electrical energy to be released as heat. Resulting in a fire ignition as the heat reaches a combustible fuel. Such as, vegetation encountering a circuit or a spark landing in dry grass. Wildfire propagation results as a fire spreads to more fuels and becomes self-sustaining. The continued growth or exacerbation of the hypothetical fire is dependent on factors such as availability, type and dryness of the fuel; wind; and terrain.

3.2.1.1 Risk Drivers

These following are the most likely risk drivers associated with the PUD's infrastructure in relation to its unique geographical service territory.

3.2.1.1.1 Contact with Powerlines

Contact with powerlines by animals or vegetation.

3.2.1.1.2 Equipment Failure

Equipment failure of transformers, conductor, blown fuses.

3.2.1.1.2.1 Conductors

Small copper conductor has been identified as the largest equipment-caused risk factor. This is due to very low strength ratings and its susceptibility for brittleness.

3.2.1.1.3 Wire to Wire Contact

Wire to wire contact can occur by excessive winds and falling or excessive vegetation growth.

3.2.1.1.4 Downed Wire

Overhead wire can be brought down by trees or via poles brought down by impacts by cars.

3.2.1.1.5 Inadvertent damage

Inadvertent damage to PUD infrastructure by vandalism, or human error via contractor or PUD.

3.2.1.2 Wildfire Hazard Potential

All of the District's transmission and distributions systems all fall under very low or low wildfire hazard potential (WHP) zones. The WHP is an index that quantifies the relative potential for wildfire that may be difficult to control, used as a measure to help prioritize where fuel treatments may be needed. Treatments such as enhanced tree trimming and heightened inspection protocols. See Attachment C for maps of the distribution system's WHP and Attachment D for maps of the transmission system's WHP.

4. WILDFIRE PREVENTION AND MITIGATION PLAN ELEMENTS

The District's priority is to provide safe, reliable, and valued utility services. Many of the Plan's elements have been ongoing, but some are new. The PUD will leverage and expand on existing programs to deliver benefits for wildfire mitigation. The Plan's overall effectiveness will be evaluated and many elements new and existing will adapt over time to align with latest best practices.

4.1 ENHANCED SITUATIONAL AWARENESS

Enhanced situational awareness requires awareness of potential infrastructure shortfalls as well as continual fire-related weather monitoring.

4.1.1 ENHANCED INSPECTION TECHNOLOGY

Regular inspections as described in the District's Inspection & Maintenance Plan were designed to verify the condition of critical infrastructure, quickly assess potential hazards, and provide remedial action before critical assets can pose undue risk. In addition, the District conducts infrared (IR) thermography testing and un-manned (drone) inspections as described in the PUD's Inspection and Maintenance Plan. IR thermography testing helps to identify specific locations that are at-risk of failure. Locations that are not identifiable by the naked eye. While the intent of the un-manned aircraft (drone) inspections is to inspect facilities in the remote and rugged parts of the service territory that are difficult to reach by land.

4.1.2 FIRE WEATHER MONITORING

The District continually monitors, throughout the year weather for conditions that can pose a risk during wildfire season, such as drought. Additionally, during wildfire season, the PUD monitors real-time weather and wildfire predictive services for conditions, that may present additional wildfire risk the service territory.

- National Weather Service (NWS) Seattle: https://www.weather.gov/sew/
- United States Forest Service (USFS) & United States Department of Agriculture (USFS & USDA) – Burn Probability: https://wildfirerisk.org/explore/0/53/53045/
- Northwest Interagency Coordination Center (NWCC) Predictive Services – Fire Potential: https://gacc.nifc.gov/nwcc/predict/index.aspx
- InciWEB - Incident Information System: https://inciweb.nwcg.gov/
- Washington State Department of Natural Resources (DNR) Burn Risk Map: https://burnportal.dnr.wa.gov/
- ESRI - US Wildfire Map: https://www.esri.com/en-us/disaster-response/disasters/wildfires
- National Oceanic and Atmospheric Administration (NOAA) – Red flag warnings, Wind Speeds, Thunderstorms, etc.: https://digital.weather.gov/?zoom=6&lat=46.394&lon=-117.92332&layers=00BFFFTTFTT&region=0&element=0&mxmz=false

4.2 FAULT REDUCTION

The District currently employs multiple strategies to aid in the reduction of potential fire ignition. These include enhanced vegetation management practices, overhead copper wire replacement, and strategic undergrounding.

4.2.1 ENHANCED VEGETATION MANAGEMENT

The vegetation maintenance cycle can also be used to determine the risk of a vegetation related faults. The goal is to proactively maintain vegetation and update the maintenance cycles in critical areas as the plan progresses. Ensuring that vegetation does not contact electrical infrastructure minimizes the probability that District assets may be the origin or contributing factor in the ignition of a wildfire. The PUD created the vegetation management plan with wildfire prevention in mind, collaborating with the local authorities, local fire departments, and the U.S. Forest Service on an as-needed basis. The plan will be reviewed and updated on an as-needed basis or every three-years, depending on changing conditions.

4.2.2 OVERHEAD COPPER WIRE REPLACEMENT

The District has identified areas with existing overhead copper wire and has slotted them for replacement. This is an ongoing program where areas are identified and scheduled for replacement annually.

4.2.3 STRATEGIC UNDERGROUNDING

The PUD has identified multiple locations that would benefit from being converted to underground construction. These locations have been strategically prioritized. However, underground construction is very expensive, so it is not always possible to underground within our annual budget. The leadership team consistently seeks opportunities to leverage and acquire additional funds to build as much underground as possible while maintaining the PUD's affordable rates.

4.3 FAULT PROTECTION

Automatic reclosing is critical for fast and efficient restoration of service; however, in isolated cases, arcing events can ignite dry grass or vegetation during fire weather events.

4.3.1 RECLOSE BLOCKING

Reclose blocking entails configuring specific reclosers to operate in a fire protection mode rather than reliability mode. Reclose blocking prevents immediate restoration attempts and would require line crews to be dispatched to visually inspect and declare clear before re-energization. This action is impactful to the District's operating budget, due to the increased labor and outage response expenses, especially in overtime periods.

4.3.2 NON-EXPULSION FUSES

The District, like the majority of the utility industry, installs expulsion fuses for transformer and overhead line protection. When an expulsion fuse operates to isolate the section of line where the fault occurred it vents gas and molten metal to extinguish the arc created by the fault. However, the molten metal, has the potential to be an ignition source for a wildfire.

Non-expulsion fuses such as current-limiting fuses limit the amount of energy going into failed equipment and does not emit gas, sparks, or debris. This greatly reduces the potential for wildfire ignition. Current-limiting fuses are more costly than expulsion fuses but are a viable option in areas where vegetation management is difficult to maintain, exceptionally dry areas, and or areas found have higher wildfire potentials in the future.

4.4 OPERATIONAL PROCEDURES AND EMERGENCY RESPONSE

4.4.1 CONCEPT OF OPERATIONS

Operational practices encompass standard company procedures that relate to wildfires, including vegetation management, inspection, and maintenance, and in extreme cases and in coordination with Bonneville Power Administration, Mason County Emergency Management, and other public safety agencies.

4.4.1.1 Notification

Communication is critical in emergency situations. The PUD will communicate via phone and email to delegated points of contacts for each corresponding agency- i.e.: Mason County, Jefferson County, BPA, etc. and also use social media and local news media outlets to convey important information.

4.4.1.2 Response Priorities

In the event of a wildfire incident, the District's priorities are as follows:

- Safety of personnel and communities
- Stabilization of infrastructure
- Preservation of property

4.4.1.3 Situational Awareness

The PUD monitors monitoring weather-related information on a daily basis throughout the year, including weather information related to wildfire risk. When the risk falls within prescribed activation thresholds the operational focus will shift from reliability to fire prevention. Exact steps depend on the level of fire threat.

4.4.1.3.1 Activation Thresholds

Fire Danger Rating and Color Code	Description
Low (L) (Green)	Fuels do not ignite readily from small firebrands although a more intense heat source, such as lightning, may start fires in duff or punky wood. Fires in open cured grasslands may burn freely a few hours after rain, but woods fires spread slowly by creeping or smoldering, and burn in irregular fingers. There is little danger of spotting.
Moderate (M) (Blue)	Fires can start from most accidental causes, but with the exception of lightning fires in some areas, the number of starts is generally low. Fires in open cured grasslands will burn briskly and spread rapidly on windy days. Timber fires spread slowly to moderately fast. The average fire is of moderate intensity, although heavy concentrations of fuel, especially draped fuel, may burn hot. Short-distance spotting may occur, but is not persistent. Fires are not likely to become serious and control is relatively easy.
High (H) (Yellow)	All fine dead fuels ignite readily and fires start easily from most causes. Unattended brush and campfires are likely to escape. Fires spread rapidly and short-distance spotting is common. High-intensity burning may develop on slopes or in concentrations of fine fuels. Fires may become serious and their control difficult unless they are attacked successfully while small.
Very High (VH) (Orange)	Fires start easily from all causes and, immediately after ignition, spread rapidly and increase quickly in intensity. Spot fires are a constant danger. Fires burning in light fuels may quickly develop high intensity characteristics such as long-distance spotting and fire whirlwinds when they burn into heavier fuels.
Extreme (E) (Red)	Fires start quickly, spread furiously, and burn intensely. All fires are potentially serious. Development into high intensity burning will usually be faster and occur from smaller fires than in the very high fire danger class. Direct attack is rarely possible and may be dangerous except immediately after ignition. Fires that develop headway in heavy slash or in conifer stands may be unmanageable while the extreme burning condition lasts. Under these conditions the only effective and safe control action is on the flanks until the weather changes or the fuel supply lessens.

Fire-Danger Classes: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd646166.pdf

4.4.1.3.1.1 Fire Prevention Operational Actions

Fire Danger Rating and Operational Action	Low (L) (Green)	Moderate (M) (Blue)	High (H) (Yellow)	Very High (VH) (Orange)	Extreme (E) (Red)
Circuit Recloser Settings	Automatic Reclosing	Automatic Reclosing	Reclose Blocking	Reclose Blocking	Reclose Blocking
Patrol following circuit outage	No[1]	No[1]	Yes	Yes	Yes

[1] No patrol is required. Re-test allowed following check of fault indicators, SCADA, other system indicators, and reports from the field. If the re-test fails, a patrol is mandatory.

4.5 POLICY RESPONSIBILITY

The General Manager and/or their designee is responsible for the administration of this policy.

VEGETATION MANAGEMENT POLICY

I. OBJECTIVE

To maintain adequate vegetation clearance from Mason County Public Utility District No. 1 (PUD or District) electric infrastructure such as power lines and other electric utility equipment vital to the safe and reliable operation of the electric distribution and transmission systems. Properly maintaining vegetation minimizes the probability of contact with power lines and equipment thus reducing the likelihood of fire ignition and interruptions. Proactively maintaining vegetation will increase safety for PUD employees as well by providing adequate access for line operations.

II. APPLICABLE REGULATIONS

The PUD will seek required government permits or applicable authorization for vegetation and tree removal or trimming, including but not limited to, federal, state, municipal, and tribal laws, ordinances, rules, and regulations.

The PUD will use hand cutting, pruning, and mechanical cutting to maintain proper clearances in accordance with, but not limited to, the National Electrical Safety Code (NESC), Rural Utility Service (RUS), American National Standards Institute (ANSI), federal, state and local laws and regulations pursuant to the operation of electrical facilities. The PUD specifically requires that the ANSI A300 Tree Care Operations standard practices relating to quality tree care, pruning, and integrated vegetation management be followed where practical when planned maintenance is being performed in the vicinity of electric lines and equipment. Employees and contractors shall also adhere to ANSI Z133.1 Safety Standards.

III. VEGETATION MANAGEMENT

In general, vegetation management consists of three primary components, preventative vegetation management, corrective vegetation clearance, and emergency vegetation clearance. Preventative vegetation management generally includes planned activities in right-of-way (ROW) with PUD facilities and are performed on 3 to 7-year cycle depending on species and risk factors. The PUD will mail a notification for all planned vegetation management activities. (See Attachment A: "Customer Notification of Vegetation Management"). Corrective vegetation clearance consists of completing corrective and emergent vegetation orders to fix clearance discrepancies that the contractor or PUD discovers. If an order is designated as High Priority, the PUD must prioritize that work and make the correction immediately. Emergency vegetation clearance includes completing maintenance on an as-needed basis for any major disaster or emergency events. For example, if a storm results in fallen trees and branches, the PUD must mobilize as soon as possible to clear the vegetation.

ROW corridors will be managed to:

- (10) feet on either side of pole - single-phase vertical and secondary routes.
- (15) feet on either side of pole - single-phase horizontal and three-phase routes.
- (50) feet on either side of structure centerline for transmission line routes.

The PUD will strive to remove all trees, whether hazardous or not, growing beneath the District's power lines in a public or the PUD's ROW. All trees that can be reasonably removed from private ROW, with the landowners' permission, shall be removed. A special effort shall be made to remove all young trees in ROW while they are small and before they become a hazard to the power line. Brush and other vegetation will be removed during regular tree trimming procedures.
Trees endangering PUD owned lines may be cut down or pruned by the PUD to eliminate any immediate hazard. Trees less than 8" inches in diameter in rural, forested, and agricultural road right of way corridors will be removed with or without the consent of the property owner.

A "Hazardous Tree" is a tree that is dead, severely damaged, or may present reasonable risks to the PUD's lines and facilities. A Hazardous Tree may be in the PUD's ROW, a public ROW, or on private property. For the safety of the public and/or all involved, the PUD may opt to remove a landowner's Hazardous Tree or remove the line from service to allow the landowner to safely remove the Hazardous Tree. A Hazardous Tree shall be removed or pruned in accordance with this Policy to mitigate safety hazards.

Landowners shall provide the PUD access to all public ROW and District easements where maintenance and cutting or pruning of vegetation and trees may be needed, in the opinion of the PUD, to avoid danger to the public or interference with the operation and maintenance of its power lines or facilities. The PUD has no affirmative duty to remove trees outside the District's rights-of-way. With a written request from a landowner, the PUD may assist the landowner with the removal of a Hazardous Tree outside the ROW at no cost to the landowner, as long as the PUD has identified the tree as a Hazardous Tree.

The PUD is responsible for maintaining tree clearance only on power lines owned by the PUD. Responsibility for tree clearance on customer owned lines belongs to the customer. When the line belongs to the customer, hiring of a professional tree service is recommending ensuring customer safety and prevent damage to electric lines.

Removal of branches and other debris from vegetation and tree removal in or outside the ROW or easement is the sole responsibility of the landowner unless otherwise agreed upon in writing. Stumps shall be cut as close to ground level as possible. Complete removal of a stump is the responsibility of the landowner.

The PUD shall control vegetation and trees around its property, including the fenced boundaries and within a substation, to ensure the safety of its landowners, employees and public while maintaining the reliability and integrity of the PUD's facilities.
The PUD will educate the public on planting trees in and around the PUD's power lines. The PUD shall encourage customers to report trees that are potential hazards, in and outside the ROW, which may become a threat to public safety and/or the system's reliability.

IV. CUSTOMER PLANTING GUIDE

Customers should consider the mature canopy size of trees to be planted on their property. Trees shall be planted in accordance with Attachment B as to not interfere with distribution or transmission lines when fully grown. If a customer's tree is in violation of the required distance, the trees will likely be trimmed as part of the tree trimming cycle or be subject to removal.

Customers and contractors should contact 811 to locate underground utilities to avoid personal harm and damage to the lines and interruption of electrical service when planting or moving trees. Customers and contractors will be responsible for paying repair costs for lines that are damaged due to digging.

V. RESPONSIBILITY

The General Manager and/or their designee is responsible for the administration of this policy.

Date

October 20XX

Notice of Vegetation Management/Tree Trimming:

Mason County PUD No. 1 is committed to improving electric service in your area. Since trees are a major cause of power outages in Mason/Jefferson County, one of our 20XX projects is to make sure the trees along the power lines that comprise our circuits are not a concern. Our in-house/contracted tree trimming crews will be working in your area from August 20XX through December 31, 20XX.

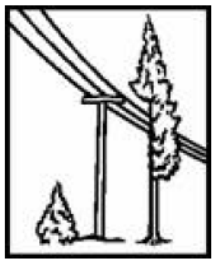
If PUD 1's primary electric lines cross your property, we will need to access our easement. After you receive this notification, be sure to unlock gates and move cars away from the overhead primary electric lines.

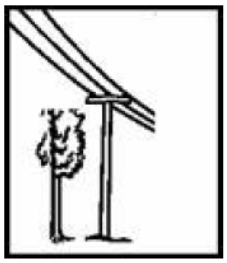
Although **no response is necessary**, if you have any questions, or wish to discuss removal or replacement of inappropriate trees adjacent to our primary lines, please call our superintendent.

Please note: These crews do not trim around the secondary electric line that runs from the pole to your home, (the twisted line going to your house meter).

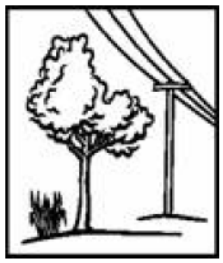
Thank you for helping us to maintain public safety and provide the reliable service you depend on.

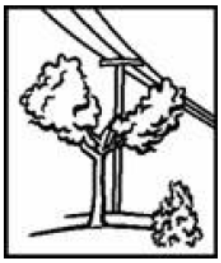
Necessary arboricultural methods change the appearance of trees near electric lines.





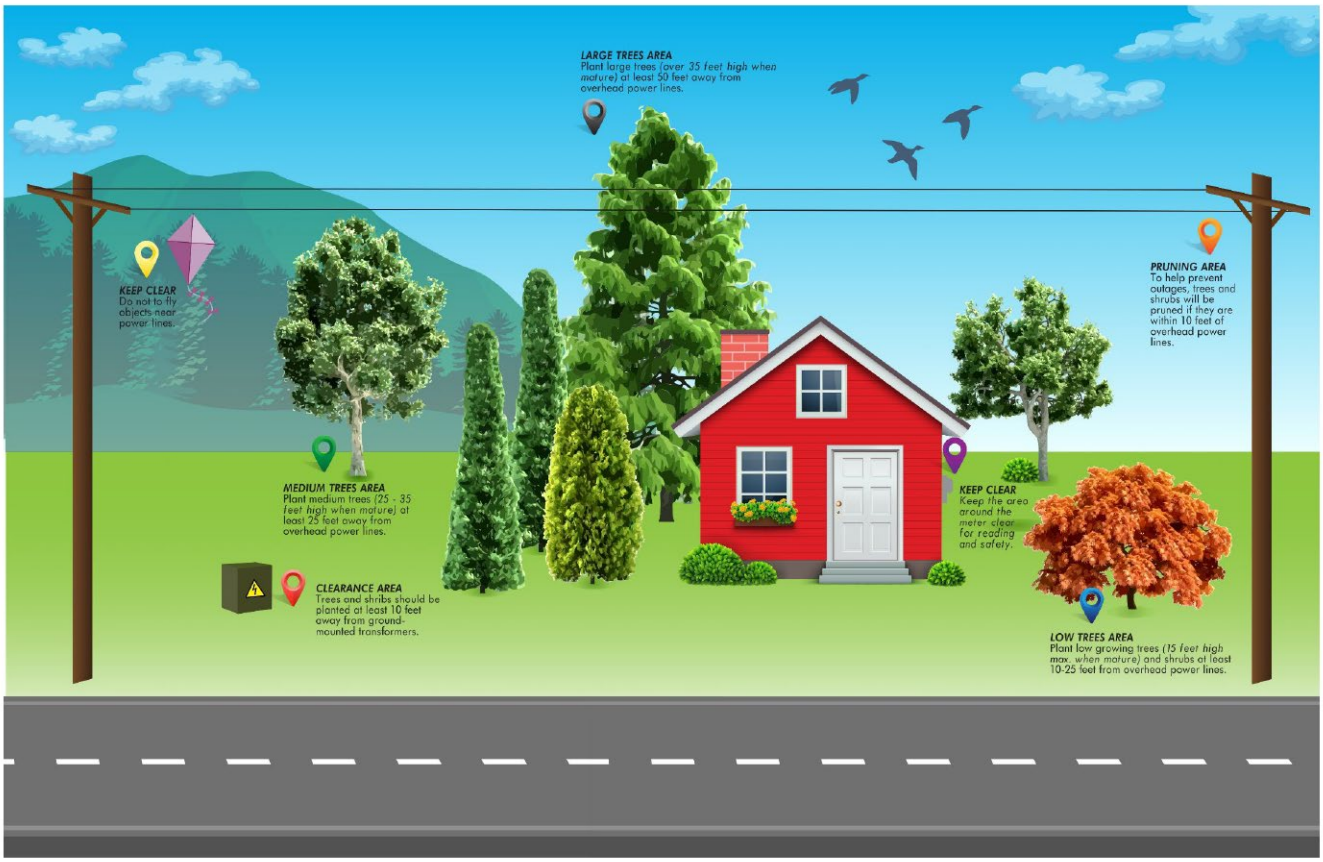
Evergreen trees must be side pruned, or topped to provide safety and reliability.





Deciduous trees must be side pruned, or "V" pruned to provide safety and reliability.

Attachment A - (This is printed on PUD letterhead with relevant contact District information.)



Attachment B -Vegetation planting guide. Disseminated to the public on an annual basis.

Attachment 5. NHPA Section 106 Direction

106 Review for Powerline

Operations & Maintenance Activities

on NFS Lands in WA and OR

(Excluding Bonneville Power Administration (BPA) Lines and FERC-authorized Lines[1])

Introduction

The purpose of this appendix is to describe the National Historic Preservation Act (NHPA) Section 106 review process the Forests and powerline companies will follow for powerline operations and maintenance activities. This document should be attached to every powerline Operation & Maintenance Plan reviewed and approved by the FS (Excluding Bonneville Power Administration (BPA) Lines and FERC-authorized Lines).

A. Regulatory Overview

National Historic Preservation Act

The Forest Service is mandated to comply with the NHPA[2] and its implementing regulations, 36 CFR 800. The NHPA requires the Forest Service as well as other federal agencies to consider the impact of their actions on historic properties and provide the Advisory Council on Historic Preservation (ACHP) with an opportunity to comment on projects before implementation. Because of Section 106, the Forest Service must assume responsibility for the consequences of its actions on historic properties (including approving powerline O & M activities) and be publicly accountable for its decisions.

Section 106 of NHPA

NHPA Section 106 is concerned with Federal undertakings. A Federal undertaking is a project, activity, or program either funded, permitted, licensed, or approved by the Forest Service. Undertakings may take place either on or off federally controlled property and include new and continuing projects and activities or programs funded in whole or in part and under the direct or indirect jurisdiction of the Forest Service. Section 106 requires the Forest Service to consider the effects of its undertakings on historic properties. In addition, the Forest Service is required to consult on the Section 106 process for each undertaking with State Historic Preservation Offices (SHPO), Tribal Historic Preservation Offices (THPO), and Indian Tribes. Powerline operation and maintenance activities may fall under the definition of an undertaking.

Statewide Programmatic Agreements & Applicability

[1] Routine O&M for powerlines associated with FERC licensed hydropower projects that are covered by a FS special use authorization would fall under this guidance, but those primary powerlines on NFS lands that are authorized by FERC (and not a SUA) would be subject only to the FERC license's HPMP requirements.
[2] 54 U.S.C. 306101.

The Pacific Northwest Region (Region 6) has an Oregon Programmatic Agreement (Oregon PA)[3] and a Washington Programmatic Agreement (Washington PA)[4] that may be applicable to some of the powerline O & M activities. These PAs describe how Section 106 process that can be applied to certain classes of undertakings, provided the criteria is met, as determined by the Forest Heritage Professional (FHP).

Operating and maintenance activities eligible for review under one of the PAs require less documentation and streamlined consultation with Tribes and the SHPOs. When extraordinary circumstances exist, complex issues warrant, or when the standard measures contained in the PA cannot or will not be implemented, the Forests shall revert to standard procedures as prescribed by 36 CFR 800.

Special Use Authorizations

Special Use Authorizations (SUAs) are issued by National Forests to powerline companies and allow for the operations and maintenance of the permitted corridor, powerlines, and related facilities on National Forest System (NFS) land. The Oregon PA and Washington PA address some of these activities, such as powerline O&M, that occur on NFS land that are subject to Section 106 review. Each authorized powerline company throughout the 17 Forests within Region 6 is required to submit an operating plan that includes procedures for vegetation management, facility inspection, and O & M activities required to operate and maintain safe and reliable electric and ancillary facilities. The powerline company's routine O & M activities may be considered undertakings subject to NHPA Section 106 review and may be covered by the PAs.

B. Definitions

Advisory Council of Historic Preservation (ACHP) means the entire Council, a Council member, or an employee designated to act for the Council.

Affected Tribes is any Indian Tribe that is affected by any agency undertaking).

Agency Official/Authorized Officer (Regional Forester, Forest Supervisor, Area Manager, or District Ranger) the Forest Service Line Officer responsible for legal compliance and land management decisions on a Forest.

Archeological Resources Protection Act (ARPA)- The Archaeological Resources Protection Act of 1979, is a federal law of the United States passed in 1979 and amended in 1988. It governs the excavation of archaeological sites on federal and Native American lands in the United States, and the removal and disposition of archaeological collections from those sites.

Area of Potential Effects (APE) [36 CFR§ 800.16 (d)] the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the

[3] The *2004 Programmatic Agreement Between the United States Department of Agriculture Pacific Northwest Region (Region 6), The Advisory Council on Historic Preservation, and the Oregon State Historical Preservation Officer Regarding Cultural Resources Management in the State of Oregon by the USDA Forest Service*

[4] *The Pacific Northwest Region (Region 6), The Advisory Council on Historic Preservation, and 2) the Washington Department of Archeology and Historic Preservation Regarding Cultural Resource Management of the National Historic Preservation Act for Undertakings on National Forest System Lands in the State of Washington* (Washington PA).

scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

Case by Case- Are those projects that need individual review on a case-by-case basis, and do not meet the criteria for the standard measures identified in the appendices in the OR or WA PAs.

Consultation [36 CFR§ 800.16 (f)] means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process.

Cultural Resources Professional- Is a professional consultant who meets the Secretary of the Interior Standards and Guidelines for Professional Qualification Standards (48 FR 44738-44739). Consultant responsibilities do not include formally approving Section 106 documents on behalf of the Forest, making official agency findings, signing consultation letters, or otherwise functioning as an agency official for the purposes of Section 106.

Effect [36 CFR§ 800.16 (i)] means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

Forest Heritage Professional (FHP) or **Heritage Staff** as defined by FSM 2360.91 and FSH 2309.12 (04.1) is a Forest Service staff or advisory position with education and expertise in archaeology, history, cultural resource management, or related disciplines. They provide professional recommendations and services to help land managers meet their Heritage Program responsibilities.

Historic Property- [36CFR 800.16 (l)] means any pre-contact or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, features, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian Tribe or native Hawaiian organization and that meet the National Register criteria per the definition in 36 CFR§ 800.16(1). Unevaluated cultural resources will be treated as eligible for the NRHP (FSH 2309.12 (30.33)).

Inventory (i.e., Project Inventory, Heritage Inventory, and Archaeological Survey) is a systematic, detailed examination of an area designed to gather information about the number, location, condition, and distribution of historic properties within an undertaking's APE. This examination should consider the full range of historic properties.

Limited Review- A review for undertakings that have limited potential to affect historic properties (Appendix A OR PA, Appendix B WA PA).

Memorandum of Agreement (MOA)- is a legally binding document that commits an agency both by statute and by federal regulation to carry out the undertaking in accordance with the terms of the agreement in satisfaction of its responsibilities under Section 106

National Register of Historic Places (NRHP)- is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966.

OR SHPO- Oregon State Historic Preservation Office

State Historic Preservation Officer (SHPO) 36CFR§800.16 (v) means the official appointed or representative designated pursuant to section 101(b)(1) of the act to administer the State historic

preservation program. For the State of Oregon- Oregon State Historic Preservation Office (OR SHPO) and for the State of Washington, the Washington State Department of Archaeology and Historic Preservation (WA DAHP) is the SHPO.

WA DAHP- Washington Department of Archeology and Historic Preservation (Washington SHPO)

Undertaking means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval per the definition in 36 CFR§ 800.16(y).

C. Roles & Responsibilities

a. Forest Heritage Professional

The Forest Heritage Professional (FHP) is responsible for Section 106 review of powerline O & M activities that are consistent with an approved operation plan. The FHP reviews the proposed annual schedule of work for O & M activities to determine whether it qualifies as an undertaking and whether it meets the criteria for a streamlined review process under a PA. The FHP also determines the Area of Potential Effects (APE) for the activities, reviews Archaeological Research Investigation (ARI) permits, identifies appropriate Section 106 review, and documents the final Section 106 findings. The FHP coordinates consultation with the Oregon SHPO and/or Washington DAHP, ACHP, affected Tribes and other parties on behalf of the Agency Official. The FHP can also be a point of contact for any cultural resource professional a powerline company hires to help assist with the Section 106 process.

b. Special Uses Permit Administrator (SUPA)

The SUPA is responsible for issuance and administration of Special Use Authorizations for powerline facilities on NFS land. The SUPA coordinates with the powerline company, resource specialists on the Forest and the Authorized Officer on any actions related to the authorization. The SUPA, in coordination with the FHP, also processes ARI permits, issued to cultural resources professionals hired by powerline companies to assist in completing NHPA Section 106 requirements for O & M activities when required.

c. Powerline Companies

The powerline company is responsible for submitting an annual schedule of work for O & M activities. The powerline company is also responsible for providing qualified cultural resources professionals hired to assist them with the NHPA Section 106 requirements for the activity, unless the local Forest Service office has determined their Heritage staff has the capacity to complete the Section 106 work under a Cost Recovery Agreement between the Forest Service and the powerline company.

d. Cultural Resources Professional

The cultural resource professional is provided or hired by the powerline company to assist them with NHPA Section 106 requirements associated with a powerline O & M activity. Cultural Resource Professionals in the appropriate area(s) of expertise, shall conduct all actions to the professional standards referenced in

36 CFR § 800.2(a)(1) and shall meet the Secretary of the Interior's Professional Qualification Standards. The cultural resource professional is responsible for applying for an ARI permit and complying with all stipulations of the permit. All field work, documentation and reporting shall meet the requirements of the local Forest Service office and the respective SHPO.

D. Archaeological Research Investigation (ARI) Permit

ARI permits are issued under one or more of the following Acts: Antiquities Act, ARPA, or the Organic Act. The powerline company's cultural resources professional shall secure from the local Forest Service office an ARI permit prior to conducting heritage resource investigations in support of powerline O&M activities on the Forest. Activities that require testing or data recovery or other invasive resource investigations will be issued under ARPA and require an additional 30-day consultation with affected tribes. Region 6 may issue an ARI permit for multiple Forests where the permit activity crosses Forest Service administrative unit boundaries. FSM 2360, Section 2367.13. ARI permit issuance is not subject to NHPA Section 106 and is not subject to the National Environmental Policy Act (NEPA).

E. Section 106 Review Procedures

The following procedures describe how NHPA Section 106 will be implemented for routine powerline company O & M activities identified in their approved operating plans.

1) **Submit Annual Schedule of Work to SUPA**- For Section 106 review purposes, the annual schedule of work for O & M activities should contain enough detail to distinguish between each separate activity and identify any areas of potential ground disturbance for each separate activity. The Powerline O & M Annual Project review form below indicates the type of information that will be needed by the FHP to conduct the Section 106 review. The SUPA will promptly forward the project information associated with the annual schedule of work to the FHP.

2) **Forest Initial Project Review**- The FHP will review the annual schedule of work to determine if the proposed activities qualify as an undertaking. If the activity is an undertaking, the FHP will determine the APE. The FHP will also determine if the activity qualifies for a streamlined Section 106 process under a PA Appendix. For O & M activities in which a PA Appendix applies, the FHP will determine whether inspection or monitoring is required for the project. For activities that do not qualify under a PA Appendix, the FHP will determine the level of inventory required for the project. The FHP will endeavor to respond to the SUPA with the findings from their initial review within 10 calendar days.

The following are activities (not inclusive) **may** qualify for a streamlined review process under the current OR and/or WA PAs provided the PA stipulations are met:

- Powerline corridor mowing to prevent encroachment by brush species and establishment of noxious weeds.

- Installation of power pole or tower replacement when placed in the same location of previously disturbed ground.
- Recurrent brushing (hand, machine, chipping) activities to control vegetation within clearing limits of power line corridors.
- Upgrading or adding new power lines to existing poles with no change in pole configuration or new ground disturbance

It should be noted; many of the powerline corridors within the region have not been previously surveyed. In general, activities that involve new ground disturbance in areas that have not had previous adequate archeological inventory or does not comply with Forest's established inventory design may require inventory, especially if the activity is located in an area considered to be high probability for the presence of cultural resources.

3) **Further Inventory**- If the FHP determines that an activity described in the annual schedule of work needs further inventory and the Forest Service is unable to complete the needed inventory through a cost recovery due to work load capacity, the powerline company will be required to provide a cultural resources professional to complete the inventory. The cultural resources professional will request an ARI Permit from the Forest where the activity will occur at least 60-days prior to proposed field work. The cultural resources professional will assist the powerline company with Section 106 compliance and will work with the FHP to ensure compliance with the Forest's established inventory design. The FHP will conduct tribal consultation prior to inventory to be conducted appropriate. The cultural resources professional will contact the FHP prior to the start of any inventory work to review Forest's established inventory design and review additional heritage files not available at OR SHPO or WA DAHP.

4) **Cultural Resources Professional Report Review by FHP**- The powerline company's cultural resources professional will submit electronically the inventory report and GIS shapefiles to the FHP, who will notify the SUPA when the information is received. The FHP will certify or request edits on the report's findings, determinations, and recommendations made by the cultural resources professional regarding the identification and management of historic properties. The Finding of Effects to historic properties will be determined in accordance with the procedures in the respective Oregon or Washington PA or most current versions.

   If the cultural resources professional's report meets the stipulations in the PA(or most current versions), the FHP will sign a PA approval form and email it to the powerline company, copying the SUPA and cultural resources professional indicating that the Section 106 process has been completed. Archaeological monitors may be required for some projects depending upon the findings as well as the implementation of site protection measures. For cultural resources professional reports that result in any determinations of eligibility and a finding of effect, the Forest will follow the process in their respective statewide PA. **Consultation with the affected Tribes, the SHPO and the ACHP is the responsibility of the agency and may take 60 days or more.**

5) **Adverse Effect**- If an Adverse Effect to historic properties is determined, the powerline company or cultural resources professional, in coordination with the Forest Service shall consult with the SHPO/THPO and other consulting parties, including Indian tribes, to develop and evaluate alternatives or modifications to the powerline O & M that could avoid, minimize or mitigate adverse effects on historic properties. If protection measures are identified to avoid or minimize impacts to historic properties, the powerline company will ensure that all employees and cultural resource professionals follow the protection measures for each site. If through protection measures historic properties cannot be avoided, a Memorandum of Agreement (MOA) will be developed (see www.achp.gov for more information).

6) **Resolution of Adverse Effects/Mitigations**- Through the MOA, mitigation measures that address the adverse effects will be developed in consultation between the tribes, appropriate SHPO, powerline company and Forest Service. Individual MOA stipulations need to be completed within one year of the execution of the MOA, unless there are unusual circumstances that would warrant a longer time period.

F. Inadvertent Discoveries, Emergency Undertakings, and Incident Management

With every undertaking there is a potential for discovering previously undocumented cultural resources, including human remains. Any discovery during implementation shall be treated in accordance with 36 CFR 800.13(b) and follow procedures in the local Forest Service office's Inadvertent Discovery Plan (IDP)s. The powerline company and their cultural resources professional are responsible for obtaining the IDP through the local Forest Service office prior to commencing with any O & M work.

For emergency undertakings associated with the O & M of the powerline, the process outlined in the 36 CFR 800.12 and 36 CFR Part 78 shall be followed. It is the responsibility of the powerline company to contact the affected Forest Service office and the FHP/Heritage staff to report the emergency.

If an incident occurs, that is not addressed in the section 106 plan, the powerline company will, at a minimum, provide the Forest with the following information:

1. Notification to the FHP/Heritage staff as soon as possible (typically within 48 hours of the incident).
2. A description of the incident.

A description of the heritage resources involved, if known.

POWERLINE O & M ANNUAL PROJECT PROPOSALS/ NHPA REVIEW

Instructions: Powerline company completes Sections A & B. Forest Service heritage staff completes Section C.

A. INFORMATION Forest:	District(s):
Date of Request:	Proposed Implementation Date:
B. PROJECT NAME & DESCRIPTION	
Project Name & Powerline Company Contact:	
Legal Description: (Township, Range, Section):	
Description of Project Location (Attach map, and send GIS Shapefiles):	
Project Need (What is the purpose and need for the project)? :	
Proposed Activities (Describe all operations and activities, including staging and laydown areas, equipment that will be used and construction activities. What is the end-result? How will it be accomplished? Are there timing limitations as to when the work can be completed?	
Project Manager/ Contact Information: Name & Title :_____ Email_____ Phone:_____	
C. PRELIMINARY REVIEW (COMPLETED BY FOREST SERVICE FHP)	
Does the project qualify for review under one or more of the Programmatic Agreement Appendices? Yes No	
If Yes, what Appendices apply to the project and is monitoring required?	
If No, what additional review is required (inventory, project monitoring, Tribal and SHPO consultation, etc.)	
If additional review is required how will the work be accomplished? ☐ Cost Recovery ☐ Cultural Resources Contractor Contact: _____	

Attachment 6. Project Notification Checklist

A. INFORMATION Forest:	District(s):
Date of Notification:	Proposed Implementation Date:
B. PROJECT NAME & DESCRIPTION	
Project Name & Forest Service Administrative Contact:	
Legal Description: (Township, Range, Section):	
Description of Project Location (Attach map, and send GIS Shapefiles available):	
Project Need (What is the purpose and need for the project)? :	
Proposed Activities (Describe all operations and activities)	
FS Project Manager/ Contact Information: Name & Title :_____ Email_____ Phone:_____	
C. PRELIMINARY REVIEW (COMPLETED BY UTILITY)	
Are there preliminary concerns regarding: • **Infrastructure security** • **Increases in vegetation management risk** • **Access**	
Is more information needed?	
Is a site visit needed?	
Does the project require utility specific design criteria or stipulations?	
Are there opportunities for collaborative work such as vegetation management, road maintenance, weeds treatments, etc.	

Attachment 7. Annual Utility Meeting Checklist

A. INFORMATION Forest(s):	Utility:
Date of Meeting:	Meeting Location:
Meeting Participant's:	
Follow up items from previous meeting/season?	
Description of Planned Utility Activity (Attach map, and Notification Checklist or SF 299 for each): • Vegetation management activities (including invasive species treatments) • Infrastructure maintenance activities • Construction activities (including line burials) • Road work/New access needs • Line/circuit abandonment • Other infrastructure work (communications sites, sub-stations, etc)	
Description of Planned Forest Service Activity (Attach maps and FS Notification Checklist): • Timber sales • Forest management (e.g., burning, thinning, brushing, spraying, and planting) • Travel management changes • Major road maintenance • Land sales, land adjustments, and mining operations • Changes in listing status for T&E species or special area management	
Common topics: • Public safety issues/Public use of permit area concerns • Permit re-issuance needs • Personnel changes/New contact information • Unauthorized use of NFS lands • Data sharing needs (GIS) • Collection agreements • Common issue collaboration (vegetation management, travel management, weeds treatment)	
Has the current operating agreement been reviewed by both parties? **Have proposed changes to the Operating Agreement or Appendices been identified?**	
Follow up items from this meeting:	

Attachment 8. Documentation of Operating Agreement Status

PUBLIC UTILITY DISTRICT NO. 1
OF MASON COUNTY
N. 21971 Hwy. 101
Shelton, Washington 98584

BOARD OF COMMISSIONERS
MIKE SHEETZ, Commissioner
JACK JANDA, Commissioner
RON GOLD, Commissioner

November 1, 2022

U.S. Forest Service
Olympic National Forest
Attn: Martha Krueger & Annabelle Pfeffer
martha.krueger@usda.gov
annabelle.pfeffer@usda.gov

Dear Martha & Annabelle,

Mason County PUD No. 1 falls under the criteria for an **Operating Agreement** under section 512 of FLPMA and directive FSH 2709.11, Chapter 80.

The PUD's powerline facilities are not subject to NERC reliability standards, and we have sold less than 1,000,000 megawatt hours of electricity during each of the three calendar years during the period of March 23, 2015, to March 23, 2018.

Activities conducted under an approved operating agreement are subject to strict liability up to $500,000 per occurrence until March 23, 2028, at which time they are subject to strict liability up to the limit specified in 36 CFR 251.56(d)(2), as amended, per occurrence (sec. 89, para. 2).

The PUD requests your concurrence of the Operating Agreement status and the strict liability limit of $500,000.

Please let me know if you have any questions.

Sincerely,

Kristin Masteller
General Manager

(360) 877-5249 (800) 544-4223 FAX (360) 877-9274
www.mason-pud1.org