Ames Hydroelectric Project
FERC No. 400

INVASIVE PLANTS AND VEGETATION MANAGEMENT

Public Service Company of Colorado

DECEMBER 2007
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<td>2</td>
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Acronym List

Federal/State Agencies

Advisory Council on Historic Preservation (ACHP)
Bureau of Land Management (BLM)
Colorado Department of Natural Resources (CDNR)
Colorado Water Conservation Board (CWCB)
Colorado Department of Natural and Economic Resources, Division of Environmental Management (CDEM)
Colorado Department of Wildlife (CDOW)
Colorado Division of Water Quality (CDWQ)
Colorado Natural Heritage Program (CNHP)
Colorado State Forest Service (CSFS)
Colorado State Historic Preservation Officer (CSHPO)
Federal Energy Regulatory Commission (FERC)
National Park Service (NPS)
National Weather Service (NWS)
U.S. Department of Interior (DOI)
U.S. Environmental Protection Agency (USEPA)
U.S. Fish and Wildlife Service (USFWS)
U.S. Geological Survey (USGS)
U.S. Department of Agriculture (USDA)
U.S. Forest Service (USFS)

Other Entities

Electra Sporting Club (ESC)
Public Service Company of Colorado (PSCo)

Documents

401 Water Quality Certificate (401 WQC)
American Disabilities Act Accessible Guidelines (ADAAG)
Colorado State Water Quality Standard (COWQS)
Draft Environmental Assessment (DEA)
Environmental Assessment (EA)
Environmental Impact Statement (EIS)
Forest Service Outdoor Recreation Accessibility Guidelines (FSORAG)
Memorandum of Agreement (MOA)
National Wetland Inventory (NWI)
Notice of Intent (NOI)
Notice of Proposed Rulemaking (NOPR)
Preliminary Draft Environmental Assessment (PDEA)
Programmatic Agreement (PA)
Scoping Document (SD)
Shoreline Management Plan (SMP)
Laws/Regulations

Americans with Disabilities Act (ADA)
Clean Water Act (CWA)
Code of Federal Regulations (CFR)
Electric Consumers Protection Act (ECPA)
Endangered Species Act (ESA)
Federal Power Act (FPA)
Fish and Wildlife Coordination Act (FWCA)
National Environmental Policy Act (NEPA)
National Historic Preservation Act (NHPA)

Terminology

Cubic feet per second (cfs)
Degrees Celsius (C)
Degrees Fahrenheit (F)
Dissolved oxygen (DO)
Feet (ft)
Gallons per day (gpd)
Geographic Information Systems (GIS)
Gigawatt Hour (GWh)
Global Positioning System (GPS)
Grams (g)
Horsepower (hp)
International Symbol of Accessibility (IAS)
Kilogram (kg)
Kilowatt (kW)
Kilowatt-hour (kWh)
Mean Sea Level (msl)
Megawatt (MW)
Megawatt-hours (MWh)
Micrograms per liter (μg/L)
Milligrams per liter (mg/L)
Millimeter (mm)
Million gallons per day (mgd)
National Geodetic Vertical Datum (NGVD)
National Wetlands Inventory (NWI)
Non-governmental Organizations (NGOs)
Ounces (oz.)
Outdoor Recreation Access Route (ORAR)
Outstanding Remarkable Value (ORV)
Parts per billion (ppb)
Parts per million (ppm)
Pounds (lbs.)
Power Factor (p.f.)
Probable Maximum Flood (PMF)
Project Inflow Design Flood (IDF)
Rare, Threatened, and Endangered Species (RTE)
Ready for Environmental Analysis (REA)
Resource Work Groups (RWG)
Revolutions per Minute (rpm)
Rights-of-way (ROW)
Stakeholders (federal and state resource agencies, NGOs, and other interested parties)
Volts (V)
Wastewater treatment plant (WWTP)
1.0 Description of Issue

The Ames Water/Terrestrial Resource Work Group (RWG) identified the occurrence and distribution of invasive species in the immediate vicinity of the Ames Project as an issue to be addressed during relicensing studies. Invasive species can affect terrestrial, aquatic, recreational, and other resources by displacing native species, changing ecosystem processes, and undermining aesthetic values. In addition, the RWG identified a need for PSCo to implement an invasive species management plan as part of its ongoing vegetation management activities.

2.0 Study Plan

The objective of the Invasive Plant Species study was to document the composition and distribution of invasive plant species in parts of the Ames Project Boundary affected by Project operations, especially those areas subject to ground-disturbing activities. The study plan required PSCo to conduct invasive plant surveys on all Project lands and facilities potentially subject to vegetation management, consisting of the following areas: (1) Project facilities; (2) the Lake Fork penstock corridor; and (3) the Howards Fork penstock corridor. Lands directly adjacent to these areas were also included in survey efforts if plainly affected by Project operations. No surveys of Trout Lake were indicated in the study plan, excepting at Trout Lake Dam.

Plants defined as invasive were defined as all those listed as “A” or “B” noxious weeds in Colorado. Discrete invasive plant occurrences located during survey efforts were to be mapped using GPS or hand-sketched onto Project orthophotos and subsequently digitized for use in a GIS database. Large or diffuse populations were to be described more generally.

The study plan also required PSCo to prepare a vegetation management plan (VMP) designed to: (1) allow continued vegetation management as needed for Project operations; (2) effect the prevention, eradication, or containment (in order of preference) of invasive plants; and (3) ensure coordination of vegetation management efforts between Public Service Company of Colorado (PSCo) and adjacent land owners and land managers.

The study was conducted in accordance with the study plan. No variances from the study were required.

2.1 Field Methods and Data Collection

2.1.1 Methods

Invasive plant surveys were conducted from June 27 to 30, 2006 and August 15 to 16, 2006. Surveys were conducted on foot using the intuitive controlled survey method (Whiteaker et al. 1998). Under this methodology, the surveyor observes all major habitats and topographic features within the study area, focusing particular effort on areas of high potential to support the target species. Surveyors used Weber and Wittmann (2001) as a primary field reference; botanical nomenclature in this report follows it as well.
Invasive Plants and Vegetation Management

Surveys targeted A and B-listed species, but occurrences of C-listed weeds were noted as well (Table 2-1). Occurrences of invasive plants were located in the field using handheld GPS units. Location and other occurrence data (e.g., estimated number of plants) were collected in a spreadsheet and imported into ArcGIS for use in preparing a GIS database of invasive plant occurrences in the study area.

### Table 2-1  Invasive plant target species

<table>
<thead>
<tr>
<th>Name</th>
<th>Common name</th>
<th>CDA Listing Status</th>
<th>Acres reported in Project USGS quads</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acroptilon repens</td>
<td>Russian knapweed</td>
<td>B</td>
<td>0</td>
</tr>
<tr>
<td>Breea arvense</td>
<td>Canada thistle</td>
<td>B</td>
<td>0</td>
</tr>
<tr>
<td>Centaurea acanthoides</td>
<td>plumeless thistle</td>
<td>B</td>
<td>0</td>
</tr>
<tr>
<td>Carduus nutans</td>
<td>musk thistle</td>
<td>B</td>
<td>0</td>
</tr>
<tr>
<td>Centaurea biebersteini</td>
<td>spotted knapweed</td>
<td>A</td>
<td>0</td>
</tr>
<tr>
<td>Centaurea diffusa</td>
<td>diffuse knapweed</td>
<td>A</td>
<td>0</td>
</tr>
<tr>
<td>Cirsium vulgare</td>
<td>bull thistle</td>
<td>B</td>
<td>0</td>
</tr>
<tr>
<td>Cynoglossum officinale</td>
<td>Houndstongue</td>
<td>B</td>
<td>0</td>
</tr>
<tr>
<td>Hesperis matronalis</td>
<td>Dame’s rocket</td>
<td>B</td>
<td>0</td>
</tr>
<tr>
<td>Leucanthemum vulgare</td>
<td>oxeye daisy</td>
<td>B</td>
<td>5</td>
</tr>
<tr>
<td>Linaria vulgaris</td>
<td>yellow toadflax</td>
<td>B</td>
<td>0</td>
</tr>
</tbody>
</table>

1. Plants defined as invasive consist of those listed as A or B by Colorado or San Miguel County. Target species are those thought to be likely to occur, based on local and regional distribution patterns. All plants defined as invasive were mapped during survey efforts.


#### 2.1.2 Results

A total of five invasive plant species were documented in the study area, consisting of a total of 26 mapped occurrences, some including multiple species (Table 2-2). In addition, field bindweed (*Convolvulus arvensis*), a C-listed plant not defined as invasive under this study, was observed in multiple occurrences near the Ames powerhouse.

### Table 2-2  Invasive plants documented in the study area

<table>
<thead>
<tr>
<th>Name</th>
<th>Common name</th>
<th>CDA Listing Status</th>
<th>Number of Mapped Occurrences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breea arvense</td>
<td>Canada thistle</td>
<td>B</td>
<td>7</td>
</tr>
<tr>
<td>Carduus nutans</td>
<td>musk thistle</td>
<td>B</td>
<td>1</td>
</tr>
<tr>
<td>Hesperis matronalis</td>
<td>Dame’s rocket</td>
<td>B</td>
<td>1</td>
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<td>Leucanthemum vulgare</td>
<td>oxeye daisy</td>
<td>B</td>
<td>7</td>
</tr>
<tr>
<td>Linaria vulgaris</td>
<td>yellow toadflax</td>
<td>B</td>
<td>10</td>
</tr>
</tbody>
</table>

1. Plants defined as invasive consist of those listed as A or B by Colorado or San Miguel County.

Invasive plants were most frequently concentrated along roadsides. Unroaded sections of the study area (e.g., portions of the buried Lake Fork penstock) and rarely used roads supported few invasive plants as defined by this study. Few invasive plants were observed in areas other than roadsides; invasives do not appear to be spreading into forested lands or other less-disturbed habitats.
Distributions of individual invasive plant species are presented in Figures 2-1 and 2-2 (figures are located at the end of this report) and described below.

**Canada thistle (Breea arvense [=Cirsium arvense]) (CDA Class B)** - Seven occurrences of Canada thistle were mapped in the study area, one of which also included other invasive species. These occurrences ranged in size from fewer than 50 stems of Canada thistle to more than 500, but were most often found as groups of fewer than 100 stems (much of this likely represents vegetative growth rather than individual plants).

Most plants observed were of subspecies incana, and appeared to favor upland soils rather than the wetland-upland transitions typical of subspecies arvense. The largest concentration of Canada thistle was mapped on highly disturbed soils at the junction of the Lake Fork penstock and a non-Project distribution line, in an area with substantial vehicle use.

**Dame’s rocket (Hesperis matronalis) (CDA Class B)** - Once occurrence of dame’s rocket was mapped in the study area, growing in conjunction with Canada thistle and oxeye daisy (*Leucanthemum vulgare*). The occurrence included fewer than 100 stems growing on disturbed soils near old mining activity along the Lake Fork penstock.

**Musk thistle (Carduus nutans) (CDA Class B)** - One occurrence of musk thistle were mapped in the study area, growing in conjunction with Canada thistle and yellow toadflax. The occurrence included fewer than 100 stems growing on disturbed soils along an old railroad grade followed by the Lake Fork penstock.

**Oxeye daisy (Leucanthemum vulgare [=Chrysanthemum leucanthemum]) (CDA Class B)** - Seven occurrences of oxeye daisy were mapped in the study area, two of which also included other invasives. Oxeye daisy occurrences ranged in size from fewer than ten to more than 500 stems, but were most often found in groups of fewer than 100 stems. The largest concentration of oxeye daisy was mapped in an open field traversed by the buried Lake Fork penstock. Oxeye daisy was found in disturbed habitats throughout the study area, but does not appear to be invading less-disturbed habitats such as forests or wetlands.

**Yellow toadflax (Linaria vulgaris) (CDA Class B)** - Ten occurrences of yellow toadflax were mapped in the study area, one growing in conjunction with oxeye daisy. Occurrences ranged in size from fewer than 25 to more than 250 stems. The largest concentrations of yellow toadflax were mapped on the Howards Fork penstock access road, in an area adjacent to commercial development and subject to substantial vehicle use.

In addition to the plants described above, the study area supports a number of other non-native plant species. The most frequent among these are orchardgrass (*Dactylis glomerata*) and dandelion (*Taraxacum officionale*), each of which very common along roads and in developed or otherwise disturbed areas. In addition, both were occasionally found in otherwise undisturbed habitats, such as forests or riparian areas. Other non-natives common in the study area include, white and red clover (*Trifolium repens* and *T. pretense*), yellow salsify (*Tragopogon dubius*), Kentucky bluegrass (*Poa pratensis*), yellow sweetclover (*Melilotus officinalis*).
2.1.3 Analysis of Project Effects

Operation of the Ames Project requires the diversion of water from the Lake Fork and Howards Fork of the San Miguel River, water storage in Trout Lake, use of publicly accessible access roads, and infrequent vegetation management activities as required to maintain Project rights-of-way in a partially cleared state. Of these, the use of access roads, vegetation management, and fuels management each have a potentially discernable effect on invasive plant distributions in the Ames Project vicinity.

Use of Project access roads by PSCo and others likely supports the dispersal of invasive plants, as seeds are transported on vehicles or footwear. The Licensee’s activities consist of occasional road use by one to two vehicles and personnel, in support of ongoing maintenance and operations, and foot access to Project facilities. Project access roads used by PSCo are publicly accessible, and are frequently traversed by recreational, residential, and agency users. All roads are open to public vehicle use; because this use greatly exceeds that of PSCo, the degree of actual Project effects on the dispersal of invasive plants likely is negligible.

The Licensee conducts ongoing vegetation management within the Project Boundary as required for continued Project operations. In general, little management is required, and the bulk of the Project Boundary remains unmanaged in a given year. Nearly the entire length of the Lake Fork penstock is buried, requiring no active vegetation management, and the aboveground Howards Fork penstock does not require a substantial clearance zone. A typical management year includes the mechanical removal of fewer than ten trees and mechanical mowing of less than 0.5 acre of shrubs. No herbicides are used as part of Ames Project right-of-way or powerhouse maintenance. Although limited in scope, these efforts may result in small areas of ground disturbance, which could provide establishment sites for invasive species.

The Licensee has prepared a VMP with the following goals: (1) allow continued vegetation management as needed for Project operations; (2) effect the prevention, eradication, or containment (in order of preference) of invasive plants; and (3) ensure coordination of vegetation management efforts between PSCo and adjacent land owners and land managers. It is expected that the implementation of the Ames Project VMP will minimize the effects of the Project on invasive plant species. The Ames VMP appends this report.

2.1.4 Discussion and Conclusions

While much of the study area is free from invasive plant infestations, five species of invasive plants occur in the area, some of which are in close association with one or more Ames Project facilities or rights-of-way. Each of these is listed as Class B by the CDA; no A-listed species were documented. Invasive plants are concentrated along roads and in developed areas used by PSCo and the public.

Use of roads by PSCo, the public, and agency personnel could provide a vector for the dispersal of invasive plants into areas not currently infested, or areas of particular resource concern. Other factors play a role as well; for example, invasive plants may spread into the area addressed by the Ames VMP via wind or wildlife dispersal. In addition, PSCo’s ongoing vegetation management and limited fuels management activities may result in local ground disturbance that could provide
establishment sites for invasive plants. The Licensee’s VMP is expected to minimize its role in the dispersal and maintenance of invasive plants, and their effect on beneficial uses of the Ames Project vicinity.

2.1.5 References


APPENDICES
APPENDIX A

VEGETATION MANAGEMENT PLAN
APPENDIX A

VEGETATION MANAGEMENT PLAN

1.0 Introduction

This document presents the draft Vegetation Management Plan (the Plan or VMP) for the Ames Hydroelectric Project, FERC No. 400. The Ames Project is owned and operated by the Public Service Company of Colorado (PSCo or Licensee), which will be responsible for implementation of the Plan.

The Ames VMP addresses those lands subject to Project-related vegetation management, an area currently consisting of Project facilities as well as the Lake Fork penstock and Howards Fork penstock rights-of-way (ROW). At PSCo’s discretion, management may also occur outside these lands, in cooperation with other land managers or landowners. The Plan has the following goals: (1) allow continued vegetation management as needed for Project operations; (2) effect the prevention, eradication, or containment (in order of preference) of invasive plants; and (3) ensure coordination of vegetation management and invasive plant management efforts between PSCo and adjacent land owners and land managers. For the purposes of the Plan, invasive plants are defined as those plants listed under the Colorado Invasive plant Act §§35-5.5-101 - 119 C.R.S (2003). Listed plants are categorized as A-, B-, or C-rated plants according to their current level of infestation and threat, with A-rated being of highest concern.

The Plan involves five components: vegetation management; invasive plant prevention; surveys and monitoring; invasive plant management; and reporting. Tasks and activities in support of each are described below.

2.0 Vegetation Management

The Ames VMP provides for on-going vegetation management within the Project Boundary as required for continued Project operations. In general, little management is required, and the bulk of the Project Boundary remains unmanaged in a given year. Nearly the entire length of the Lake Fork penstock is buried, requiring no active vegetation management, and the aboveground Howards Fork penstock does not require a substantial clearance zone. A typical management year includes the mechanical removal of fewer than ten trees and mechanical mowing of less than 0.5 acre of shrubs. No herbicides are used as part of Ames Project ROW or powerhouse maintenance.

No other vegetation management activities are planned as part of Project operations. However, the following vegetation management guidelines will be used by all PSCo personnel and contractors in any future vegetation management efforts:

- Conduct vegetation management, including fuels management, as required to ensure the continued safe operation of the Ames Project.
- Ensure coordination with adjacent land managers and existing vegetation management efforts, including fuels management projects. Document and report all planned and conducted vegetation management for a given year as detailed in Section 5.0.
- Mechanical or manual vegetation management methods are preferred. Herbicide use in the ROW is restricted to invasive plant management efforts.
Minimize tree removals. When tree removals are required for safety or fuels management reasons, inspect trees for nest holes or structures prior to falling. Schedule removals outside the nesting season if nests are present.

Minimize ground disturbance during all vegetation management.

Follow all invasive plant prevention guidelines as detailed in Section 3.0.

3.0 Invasive Plant Prevention, Surveys and Monitoring

3.1 Invasive Plant Prevention Guidelines

The following invasive plant prevention guidelines will be used by all PSCo personnel and contractors working within the Plan area. However, exceptions may occur in unusual or time-sensitive circumstances (e.g., emergency maintenance).

- Thoroughly clean all construction equipment before entering the Plan area, to reasonably ensure that seeds of invasive plants are not introduced. Vehicles that are solely used for the PSCo’s regular maintenance and operations activities do not require cleaning if they are not used off-road.

- Minimize ground disturbance during Project O&M. When ground disturbance is required, dispose of any resulting spoils on-site, grading to match local contours and reseeding with a mix of native species approved by the U.S. Forest Service (USFS). If fill is required for O&M activities, use fill collected on-site whenever possible, and reseed the disturbed area as described above.

- Use certified weed-free straw or rice straw for all construction, erosion control, or restoration needs.

- Restrict travel to established roads and trails when possible, and avoid entering areas with existing populations of invasive plants. If entering such areas is required, conduct work in weed-free areas first.

3.2 Invasive Plant Surveys and Monitoring

Surveys of the area addressed by the Ames VMP were conducted in 2006 and will be repeated following license issuance, and every fifth year thereafter. Surveys will be conducted at an appropriate intensity to ascertain the nature and distribution of all invasive plant occurrences. At each occurrence, surveyors will record species composition, location, and relative abundance, including GPS coordinates. Invasive plant occurrences documented during surveys will be evaluated using invasive plant management guidelines described below, and appropriate management efforts developed and implemented (see Section 4.3).

For most invasive plant occurrences, monitoring efforts will consist of the periodic survey, which will provide general information on invasive plant distributions and the efficacy of prevention and management efforts, and specific locations of invasive plant occurrences requiring additional monitoring. More intensive monitoring will be implemented in the event efforts are initiated to control high-priority species (currently, none are known from the area addressed by the Ames VMP). Monitoring intensity and methods for these individual management efforts will be detailed in the Project plan for each effort (see below), within the following guidelines:
4.0 Invasive plant Management

Under the Ames VMP, invasive plants will be managed according to the degree and kind of threat they pose. High-priority species (typically A- and B-listed species) will be designated for active management efforts aimed at eradication or control. Lower-priority species (typically C-listed or widespread B-listed species) will be addressed through prevention efforts or less intensive management aimed at containment. In prioritizing invasive species for management, emphasis will be placed on nexus to the Project, land ownership, the feasibility of successful control of a given species, and the threat posed to other resources. All management will be consistent with state and federal law, which will take precedence in the event any conflicts occur.

The following guidelines (Table A-1) will be used to define approaches to invasive plant management under the Plan:

<table>
<thead>
<tr>
<th>Current Status of Species</th>
<th>Typical CDA Listing</th>
<th>Plan Priority</th>
<th>Management Method and Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not present, potential to invade</td>
<td>A</td>
<td>High</td>
<td>Prevention and early detection: ongoing surveys, implementation of prevention guidelines.</td>
</tr>
<tr>
<td>Present, localized</td>
<td>B</td>
<td>Moderate</td>
<td>Eradication or control: herbicide treatment; mapping; monitoring.</td>
</tr>
<tr>
<td>Present, widespread</td>
<td>B and C</td>
<td>Moderate/Low</td>
<td>Containment: implementation of prevention guidelines; localized treatment near sensitive resources if warranted.</td>
</tr>
</tbody>
</table>

Any use of chemicals will be in compliance with USFS regulations.

4.1 Existing Invasive Plant Occurrences

Surveys conducted in 2006 documented a total of five A- and B-listed invasive plant species in the area addressed by the Ames VMP. These consisted of a total of 26 mapped occurrences, some including multiple species (Table A-2). In addition, field bindweed (*Convolvulus arvensis*), a C-listed plant, was observed in multiple small occurrences near the Ames powerhouse.

<table>
<thead>
<tr>
<th>Name</th>
<th>Common name</th>
<th>CDA Listing Status</th>
<th>Number of Mapped Occurrences</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Breea arvense</em></td>
<td>Canada thistle</td>
<td>B</td>
<td>7</td>
</tr>
<tr>
<td><em>Carduus nutans</em></td>
<td>musk thistle</td>
<td>B</td>
<td>1</td>
</tr>
<tr>
<td><em>Hesperis matronalis</em></td>
<td>Dame’s rocket</td>
<td>B</td>
<td>1</td>
</tr>
<tr>
<td><em>Leucanthemum vulgare</em></td>
<td>oxeye daisy</td>
<td>B</td>
<td>7</td>
</tr>
<tr>
<td><em>Linaria vulgaris</em></td>
<td>yellow toadflax</td>
<td>B</td>
<td>10</td>
</tr>
</tbody>
</table>

Plants defined as invasive consist of those listed as A or B by Colorado or San Miguel County.

Invasive plants were most frequently concentrated along roadsides. Unroaded sections of the study area (e.g., portions of the buried Lake Fork penstock) and rarely used roads supported few invasive plants as defined by this study. Few invasive plants were observed in areas other than roadsides; invasives do not appear to be spreading into forested lands or other less-disturbed habitats.
A summary of current invasive plant occurrences at Ames project facilities is provided below.

- **Ames Powerhouse** - Small patches of field bindweed and yellow toadflax occur in mowed areas around the powerhouse. Oxeye daisy occurs in the vicinity, outside the Project Boundary. Lands are managed by PSCo.

- **Trout Lake Dam** - Yellow toadflax, Canada thistle, and oxeye daisy occur on dam and adjacent disturbed areas; oxeye daisy continues along access road to the north. Lands are managed by PSCo; adjacent lands are private.

- **Lake Fork Penstock** - Oxeye daisy, Canada thistle, and yellow toadflax periodically occur on roadsides or disturbed sites within the right-of-way. Dame’s rocket is found as a single occurrence near old mining activity, and musk thistle is found as a single occurrence on an old railroad grade north of Pathfinder gravel pit. Most of the penstock is buried, and unaffected by Project operations; lands are in diverse ownership, including private and NFS. Sections of the penstock right-of-way north of Pathfinder gravel pit are do not see substantial public use.

- **Howards Fork Dam and Penstock** - Yellow toadflax occurs at Howards Fork dam and around the adjacent backwater area. Oxeye daisy and yellow toadflax periodically occur on the roadside adjacent to Howards Fork penstock, becoming more frequent with proximity to commercial development and the highway. Lands are managed by PSCo; adjacent lands are private.

### 4.2 Management Efforts

Following license issuance for the Ames Project, PSCo will initiate individual invasive plant management efforts for high-priority species or occurrences, as directed by the weed management guidelines listed above. Management efforts will be limited to those lands for which PSCo has direct management responsibility. For each of these efforts, PSCo will prepare an individual invasive plant management Project Plan detailing the following:

- Current conditions;
- Objective of the Project;
- Proposed treatment and monitoring methods; and
- Schedule.

Individual project plans will be distributed to interested relicensing participants for review and comment, and will be carried out in consultation with appropriate resource agencies.

### 5.0 Reporting

By March 30 of a given year, PSCo will provide interested relicensing participants and appropriate resource agencies with an annual report of Ames VMP activities, including the following:

- Vegetation management efforts completed and anticipated in the following year;
- Documentation of invasive plant survey, monitoring, and management efforts and results; and
- Documentation of newly observed invasive plant species or occurrences, with invasive plant management Project plans for the following year, if management is warranted.
6.0 References