



# Memorandum

To: Oregon Department of Environmental Quality                      Date: September 5, 2025  
Donald Hanson, RG

From: Caitlin Bryan and Andrew Vidourek, RG                      Project No.: M1419.14.007

Re: Vegetation Plan Request for ECSI Site 537

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Maul Foster & Alongi, Inc. (MFA) has prepared this memorandum on behalf of Roseburg Forest Products (RFP) to request approval from the Oregon Department of Environmental Quality (DEQ) for the proposed vegetation plan (see attached Figure) for ECSI Site 537, tax lots 372W24-600 and 372W24-500, located northwest of the intersection of North Central Avenue and Rossanley Drive in Medford, Oregon (the Property).

Per the requirements of the Remedial Action Scope of Work described in the Order on Consent dated May 15, 2024, RFP is required to install landscaping around the perimeter of the Property to limit windblown transport of contaminated surface soils.

## Vegetation Plan

### Completed Landscaping

From February 19 to 21, 2025, the RFP Resources Department planted landscape vegetation along the west, south, and east Property boundaries. The location of planted landscape vegetation is shown with green shading on the Figure, and a representative photograph is shown in the attached Photo Log (Photo No. 9).

### Site Security

As an additional security measure, two infrared cameras were installed on the active portion of the RFP mill facility to overlook the Property. The cameras were installed by RFP personnel between March 10 and 14, 2025, and their locations are indicated on the attached Figure.

### Existing Property Features

Because infrared cameras have been installed, planting trees along the north Property boundary is not feasible, as they would obstruct the cameras' view. Therefore, RFP requests approval to use existing features on the Property as part of the vegetation plan. The following are located on the north portion of the Property:

- Pavement is present at two locations, at the northeast Property entrance, and the north central portion of the Property (yellow areas on the Figure and Photo No. 1, 4, and 5).

- A gravel access road parallels the north Property boundary. The road is routinely maintained (graveled and graded) for emergency and fire prevention purposes (blue area on the Figure and Photo No. 2 and 3).
- Vegetated berm on the north portion of the Property is covered with grass, shrubs, and small trees (orange area on the Figure and Photo No. 4, 6, 7, and 8).
- Grass near the north Property boundary is present and is routinely maintained/mowed (purple area on the Figure and Photo No. 8).

All these features reduce the potential for transportation of windblown surface soils and are therefore an acceptable alternative to planting new, landscape vegetation (e.g., trees).

### **Remaining Landscaping**

There are two areas remaining that will require landscaping located on the northeast and northwest portions of the north Property boundary (see red areas on the Figure). These areas will have trees planted similarly to the landscaping completed on the west, south, and east Property boundaries (see Photo No. 9). Due to the likelihood of trees planted in the summer months of dying, RFP plans to plant trees on these two portions of the Property in September 2025.

## **Summary**

RFP requests DEQ approval of this vegetation plan. If approved, RFP will include this memorandum as an attachment to the forthcoming construction summary report.

## **Attachments**

Limitations

Figure

Attachment—Photographs

## Limitations

The services undertaken in completing this memorandum were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This memorandum is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this memorandum apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this memorandum.

# Figure

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




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# Figure Vegetation Plan Request

Tax Lots 372W24-600  
and 372W24-500  
Medford, OR

### Legend

-  IR Camera
-  Landscape Vegetation
-  Grass / Mowed Area
-  Gravel Access Road
-  Landscape Vegetation to be Planted September, 2025
-  Paved Surface
-  Vegetated Berm
-  Property Boundary

**Note**  
IR = infrared.



**Data Sources**  
Aerial photograph (2024) obtained from the Oregon Statewide Imagery Program; property boundary obtained from Jackson County.

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# Attachment

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## Photographs



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# Photographs

Project Name: Roseburg Forest Products—Vegetation Plan Request

Project Number: M1419.14.007

Location: ECSI Site 537, tax lots 372W24-600 and 372W24-500, Medford, Oregon

Date: December 2024 through July 2025

## Photo No. 1.

### Description

Paved property entrance, facing west/southwest.



## Photo No. 2.

### Description

Vegetated berm and gravel access road from the paved property entrance shown in Photo No. 1, facing west.





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## Photo No. 3.

### Description

Graveled access road (continued from Photo No. 2) between the north property boundary and the vegetated berm, facing west/southwest.



## Photo No. 4.

### Description

Paved area between the north property boundary and the vegetated soil berm, west of the gravel access road shown in Photo No. 3. Photo facing south/southwest.





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## Photo No. 5.

### Description

Paved area between the north property boundary and the vegetated soil berm. Photo facing west.



## Photo No. 6.

### Description

South side of the vegetated berm, facing east/northeast.





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## Photo No. 7.

### Description

South side of the vegetated berm, facing west/northwest.



## Photo No. 8.

### Description

Grass area between the north property boundary and the vegetated berm (see purple area on the Figure). Photo facing east.





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## **Photo No. 9.**

### **Description**

Vegetation (trees) planted along the northeast property fence line in spring 2025. Remaining areas shown in red on the attached Figure to receive similar planting in September, 2025.

